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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

Case No.: 2017-OFC-00006

OFFICE OF FEDERAL CONTRACT
COMPLIANCE PROGRAMS, UNITED
STATES DEPARTMENT OF LABOR

DECLARATION OF JILL AREHART

Plaintiff,

V.

ORACLE AMERICA, INC.

Defendant.
I, Jill Arehart, state and declare as follows.

1. I am providing this declaration pursuant to a request from the U.S. Department of Labor, Office of the Solicitor.

2. I identify as a White woman and I worked for Oracle America, Inc. at the Redwood Shores facilities from approximately 1999 to 2000, and again from approximately March of 2006 to September of 2017. I have personal knowledge of the matters stated herein and, if necessary, I could and would testify to the facts stated below.

3. I have two master’s degrees, both are from San Francisco State University. One is a Master’s of Arts in English, and the other is a Master of Fine Arts in Filmmaking. I obtained a Bachelor’s degree from the University of California Santa Cruz in Sociology. I also have a multiple subject teaching credential from the University of California Santa Cruz.

4. Prior to joining Oracle in 2006, I had approximately ten years of experience in the technology industry. I had also worked as an editor for six years prior to working in the technology industry. In the job I had prior to working at Oracle for the second time, I held the title of Senior Technical Writer where I was responsible for researching a business analytics product and writing the documentation set for the product. The documentation set typically includes the user manual, the system administrator manual, installation and upgrade manual, and trouble-shooting manual.

5. From 1999 to 2000, I was employed at Oracle as a technical writer. I left Oracle in 2000 because I was unhappy with my pay and the tech industry was booming at the time and I thought I could make more money elsewhere. I did make more money in the tech industry after I left Oracle.

Declaration of Jill Arehart
6. I came to Oracle for the second time through Oracle’s acquisition of Siebel Systems in 2006. I began as a Principal Technical Writer, an IC 4 position, in Product Development. I held that position until approximately 2014, when I took a position as a Principal Multimedia Specialist, which was also an IC4 position. The Principal Multimedia Specialist position was in Product Development. I held the Principal Multimedia Specialist position until I was laid off in around September of 2017.

7. As a Principal Technical Writer, I was responsible for products within the Business Intelligence Suite. The Business Intelligence Suite was an umbrella product, with many smaller products under it. I primarily worked on Business Intelligence Applications and the Data Warehouse Administration Console.

8. While a Principal Technical Writer, I was often told by my manager Kaye Mc Ardell that I was a rock star. She would also tell me that I was highly valuable to the team and my work was exceptional. I believe that Kaye’s title was Technical Writer Manager. She was my direct manager for at least eight years.

9. Kaye and I spoke about my pay two to three times a year while I worked under her. I was the person to raise the topic of my pay because I felt that I was underpaid for the job I was doing. Kaye normally responded that while she would like to give me a raise, there was no money in the budget. She also told me on more than one occasion that she had raised this request with her superiors, but was unable to get me a raise.

10. I left technical writing because Oracle was starting a new team to both promote Cloud products and provide user-assistance through multimedia formats. There are many different products under the Cloud umbrella. Also, the development teams frequently created new Cloud products. This new team that I was transferred to was referred to as the User Assistance Multimedia Group. I was the first person to be hired onto this team. My title on this team was Principal Multimedia Specialist. As a Principal Multimedia Specialist,
I was responsible for creating the content of promotional and instructional videos for Cloud
Services. I was primarily responsible for creating this content for Oracle’s Cloud products.

11. In order to create the multimedia content for the development teams, I would
meet with the development team, learn the product, create the script, do the filming and/or
animation, and then edit the video, and then do post-production work on the video. Post-
production work includes things like color enhancement, audio corrections, etc. There was
no change in my pay when I transferred into the multimedia position, even though I was
working with a lot more products than I was as a technical writer.

12. Shortly after I transferred onto the Multimedia team, the then manager Lauren
Cohn told me in her office that I was underpaid. We were the only two people in her office
at the time. I may have been the one who brought up the topic of my pay in this
conversation. I told her that I thought my pay was too low. Lauren responded: I know what
you are making and we have got to do something about that. Lauren and I talked about
raising my pay more than once after this initial conversation, but she was never able to get
me a raise.

13. Deirdre Matisshak was my manager on the Multimedia team. There were
about three people in the United States that did video. There were two individuals in
Mexico. Eventually they also hired some graphic designers as well as a user-experience
designer. In total, I would estimate that Deirdre managed somewhere between 7 and 9
Multimedia employees, including me, and also managed additional employees in other
groups. Deirdre also told me that she thought my work was very good. She told me that I
was very valuable to the team. Deirdre did not have a multimedia background so she often
relied on me for guidance.

14. In 2017 just before I was laid-off, while I was a Principal Multimedia
Specialist, I heard that one of my White male colleagues, PJ Tamayo, made significantly
more money than me – about $30,000 more. I found this frustrating because he and I had the same title. He also worked on the same Multimedia team as me. He was hired only a few months after me into the Multimedia team. PJ Tamayo was hired from outside Oracle into the Multimedia team. He was also responsible for creating the same type of multimedia content that I was. While my work on the team was more product oriented, PJ Tamayo’s work later became centered more on promoting a database language that was also used in the Cloud. PJ Tamayo and I also worked together on Cloud product projects after his work started to concentrate more on the database language. Also, I should note that I could have done the type of work that PJ Tamayo did. I say this because Lauren asked me if I wanted the job before she offered it to PJ. At no point did anyone tell me that this would result in a pay increase.

15. After I learned how much more money PJ Tamayo made than me, I raised the issue with Deirdre. Deirdre told me that she didn’t like it, but there was nothing she could do about it. I had already received notice of layoff when I approached Deirdre about the large difference in pay between PJ Tamayo and me.

16. In addition to the praise I received from my managers, I also received appraisal ratings of 4- exceeds expectation or 5 – outstanding, while I worked for Oracle.

17. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 24, 2019, in San Francisco, California,

[Signature]

Jill Arehart

Declaration of Jill Arehart