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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

OFFICE OF FEDERAL CONTRACT COMPLIANCE PROGRAMS, UNITED STATES DEPARTMENT OF LABOR Plaintiff, V. **ORACLE AMERICA, INC.** Defendant.	Case No.: 2017-OFC-00006 **DECLARATION OF LYNN SNYDER**

I, Lynn Snyder, 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 half-Asian and half-white woman. I worked for Oracle America, Inc. at the Redwood Shores facilities from approximately February 1999 to August 2016. I have personal knowledge of the matters stated herein and, if necessary, I could and would testify to the facts stated below.

3. I obtained a Master's degree in Library and Information Science from the University of Hawaii and a Bachelor's degree in American Studies from the University of California, Santa Cruz.

4. Prior to joining Oracle, I had 9 years of experience in the information services industry, which entailed customer service, product management, and marketing.

5. Around 1998, I was referred to Oracle through a family member. This family member gave Oracle my resume, which resulted in Oracle contacting me for an interview. I interviewed at the Redwood Shores facility for a Beta Program Manager position. Oracle offered me the position and I began working for Oracle in February 1999.

6. When I started at Oracle, I worked as a Program Manager where I beta tested software products. As a Beta Program Manager, I was generally responsible for working with customers and partners to test software products for their technical stability and to see if customer expectations were being met. I did not have any employees reporting to me at that time. I reported to Deborah Migliore, also known as Debbie, and our team reported to John Pilot, who was the VP of a database technology group.

7. On or around 2002, our team was reorganized and we began reporting to a manager in Database Server Technology. Several years later, our team was reorganized again, however the entire time I worked at Oracle I was in Product Development.

8. When I started at Oracle, I worked on three products: Oracle Database, middleware, and Enterprise Manager. Around 2005 or 2006, upper management started asking our team to beta test more products, and my personal job responsibilities increased.

9. Around 2008, a woman named Redacted was moved into my team. She was initially assigned to report to Redacted. Several months after Redacted started in my group, Redacted and I had a telephone conversation and Redacted asked if I would supervise Redacted. After that conversation, Redacted began reporting to me. When Redacted joined our team I saw her resume and she had minimal beta testing experience, and at that time I had more than 8 years of beta testing experience. Once Redacted began reporting to me I was able to see her salary. When I saw Redacted salary, I knew there was a problem with my salary because her salary was very close to my own salary. Eventually I received a salary increase, but it was only after I complained about my salary.

10. Around 2008 I was promoted to Director of Beta Programs. I retained my beta testing duties and supervised staff who ran their own testing programs.

11. Throughout my time at Oracle, as a staff employee and manager, I consistently received a rating of "5-Outstanding" on my performance appraisals.

12. Oracle gave me stock options most years based on my good performance. When I left Oracle not all of my stock options had vested.

13. By the time I left Oracle in 2016, I had 4 staff members on my team reporting to me. My new hires were recent college graduates, who were all women. When it came to setting their pay, I received mixed messages. Initially, when I started hiring, I was

encouraged by Debbie to make an offer at the lowest salary range as possible to save Oracle money. Later, a woman in Human Resources (HR) told me to bring my hires in at a higher salary because it would be unlikely that we would be able to give that person a raise anytime soon.

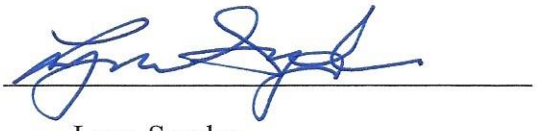
14. It was very difficult to give any of my reports a raise. Oracle's senior management encouraged me to use stock options for performance based rewards, instead of a raise. The amounts allotted were always so small that I do not recall being able to give anyone a raise on my team, except for Redacted who I was eventually able to give a small raise.

15. As a manager, I also was required to rank the members on my team as part of their performance appraisals. This meant that I could not have everyone ranked at the same level, even if they performed at the same level as their team members. Oracle instructed me that I had to rank someone on my team in last place, even if that person was performing at a high level on our team.

16. Around 2013 I hired a new person for my team, Redacted Around 2015 Redacted asked to be promoted and receive a raise. I knew that a promotion did not necessarily mean that she would receive a raise because a promotion and pay raises were separate processes at Oracle. I knew Redacted deserved a promotion because she was well organized, took on a lot of responsibility, she executed her duties at a high level, and she had a Master's in Business Administration. I asked HR to provide me the eligibility requirements for a promotion and the definitions of the IC levels, which they provided to me. I ended up giving Redacted new goals to work towards for the next year so that she could be eligible for a promotion. While I was at Oracle, Redacted never received a promotion despite my request, even though Redacted met the promotion requirements.

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

Executed on October 10, 2019, in San Carlos, California,



Lynn Snyder