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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

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

Declaration of Lynn Snyder
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.

Declaration of Lynn Snyder
Executed on October 10, 2019, in San Carlos, California,

Lynn Snyder