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11  
12 UNITED STATES DISTRICT COURT FOR THE  
13 NORTHERN DISTRICT OF CALIFORNIA

14 **OFFICE OF FEDERAL CONTRACT** ) Case No.: 2017-OFC-00006  
15 **COMPLIANCE PROGRAMS, UNITED** )  
16 **STATES DEPARTMENT OF LABOR** ) **DECLARATION OF BHAVANA**  
17 ) **SHARMA**  
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16 Plaintiff,  
17 V.  
18 **ORACLE AMERICA, INC.**  
19 Defendant.

1 I, Bhavana Sharma, state and declare as follows.

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

4 2. I am an Asian woman and I worked for Oracle America, Inc. at the Redwood  
5 Shores facilities from approximately September 2001 to October 2017. I have personal  
6 knowledge of the matters stated herein and, if necessary, I could and would testify to the  
7 facts stated below.

8  
9 3. I obtained a Master's degree in Enterprise Software Engineering from San  
10 Jose State University, and a Bachelor's degree in Instrumentation and Controls from the  
11 Delhi Institute of Technology.

12 4. Prior to joining Oracle, I had 4 years of experience in the technology industry.  
13 In the job I had prior to working at Oracle, I held the title of Systems Engineer where I was  
14 responsible for developing and testing the application to ensure customers' requirements  
15 were met. In my prior position we used Oracle technologies, for example Oracle forms and  
16 reports, and Oracle's database to develop these application.

17  
18 5. In 2001, I began my career at Oracle as a Senior Quality Assurance (QA)  
19 Engineer, as an Individual Contributor (IC) 2, position in Product Development. In around  
20 April of 2005, I was promoted to Principal QA Engineer, an IC 3 position. I completed my  
21 Master's Degree in 2007 while I was working full time at Oracle. I took classes in the  
22 evening to finish this degree. In around the spring of 2007, I took a position as a Senior  
23 Product Manager, and my IC level was lowered back to an IC 2. Before accepting the  
24 position, I spoke with Earl Eldridge, who later became my manager, about the position as  
25 Senior Product Manager, and I asked him why my IC level would be lowered. I explained  
26 that I would like to stay as an IC 3, considering that I had just completed my master's degree.  
27 Earl told me that because my current role was not in a Product Manager role, I would need to

1 accept a lower IC level initially, but he would put me in for a promotion during the next focal  
2 review. I worked as a Senior Product Manager for approximately three years, and then  
3 received a promotion to Principal Product Manager and was returned to an IC 3. I was a  
4 Principal Product Manager from approximately 2010 until around 2014. The last promotion  
5 I received while working for Oracle was to Senior Principal Product Manager, an IC 4  
6 position, which occurred in around 2014. I held the position of Senior Principal Product  
7 Manager until I separated from employment with Oracle in October 2017.

8  
9 6. Generally speaking as a Senior QA Engineer, I worked on testing the Oracle  
10 Quoting product, and my duties included: setting up the product, promotions, and ATP  
11 (availability to promise). As a Principal QA Engineer, my duties were the same as when I  
12 was a Senior QA Engineer. I was doing the job of a Principal QA prior to my promotion.

13 7. As a Senior Product Manager, I worked on four Oracle sales products, which  
14 included: Oracle Field Sales, Oracle Telesales, Oracle Sales Off-line, and Oracle Mobile  
15 Sales. I also worked on Oracle Advanced Pricing and Oracle Territory Manager. In this role I  
16 was generally responsible for creating the product functionality requirement documents and  
17 prototyping the user experience navigation. I interacted with QA, Engineers, and  
18 Documentation Writers to ensure they understood the product requirements, the correct  
19 testing methods, and I helped create proper implementation and user guides. I also created  
20 product training videos to ensure users understood how to use the products' new features. As  
21 a Principal Product Manager, my duties remained the same as when I had been a Senior  
22 Product Manager. I was doing the job of Principal Product Manager prior to my promotion. I  
23 had no additional responsibilities in my role as a Senior Product Manager.

24  
25 8. While working for Oracle, I found it frustrating that my male coworkers  
26 would often get credit for my work. For example, my manager Earl, requested that I help my  
27 male co-worker, **Redacted**, create a prototype for channel revenue management

1 because Earl told me that Redacted did not know how to create the prototype properly. I  
2 complied with Earl's request and after I completed the prototype I was not given credit for  
3 my work. During this time, Redacted was an IC 4 and I was an IC 3. On another occasion, a  
4 product manager left and there was extra work that our team needed to do. Earl asked me to  
5 take on this new product, called Advanced Pricing, because he did not think Redacted had the  
6 skills to complete the work on Advanced Pricing. Earl told me that when he gave me a task  
7 to do, he knew I would be able to complete it without him having to follow-up with me  
8 again.

9  
10 9. In fact, I often helped my male coworkers with their work. We had another  
11 team member located in Redacted who would come to headquarters every so often, his name  
12 was Redacted was Product Manager for Oracle's Marketing product. Earl requested  
13 that I help Redacted with some of his duties on his product that Earl felt I might be better at  
14 completing than Redacted. I believe Redacted was an IC 3, which was my level at that time. On one  
15 occasion, when Redacted was working from the Redwood Shores office, we attended a large  
16 technology conference hosted by Oracle, called Oracle Open World. Redacted and I gave a joint  
17 presentation and after the presentation, Redacted discouraged me from attending an informal event  
18 that only male colleagues were planning to attend. I did not end up attending this event.

19 10. After I helped Redacted with his work, I remember asking Earl for a raise and he  
20 rebuffed my request saying he did not have enough money in his budget to give me a raise.  
21 On another occasion, I asked Earl for a raise, and he indicated that he needed to show that I  
22 had recently done something special in order to get a raise approved by his higher-ups. I  
23 asked Earl if my prior good work for him counted, and Earl replied that if I had done  
24 something special recently he would be able to give me a raise. When he used the word  
25 "special" I did not understand why all of the projects I had done for Earl, that he had  
26 described to me as "special projects" did not qualify me for a raise.

