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United States Department of Labor

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

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

1 I, Dalia Sen, 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-Indian woman and worked for Oracle America, Inc. and split
5 my time between the Pleasanton and Redwood Shores offices from 2005 to 2014. I have
6 personal knowledge of the matters stated herein and, if necessary, I could and would testify
7 to the facts stated below.

8
9 3. I obtained a Master's degree in Computer Science from California State
10 University – Hayward, a Master's degree in Earth Sciences from Indian Institute of
11 Technology – Roorkee, and a Bachelor's degree in Physics and Mathematics from D.A.V.
12 College in Dehradun, India.

13
14 4. Prior to joining Oracle, I had four and half years of experience in the software
15 industry. I came to Oracle as a part of Oracle's acquisition of PeopleSoft, where I had
16 worked from 2003 to 2005. At PeopleSoft, I was a certification engineer and worked with
17 the DB2 database on the Unix and OS390 operating systems.

18 5. During the acquisition, I was placed in Oracle's ATG group and then moved
19 to Oracle's Middleware group, called Oracle Fusion. I was offered the same salary that I had
20 been making at PeopleSoft, which was \$54,000. I accepted the offer, but I was concerned
21 that my salary was too low.

22 6. My role at Oracle for the Oracle Fusion Middleware technology was in quality
23 assurance. I worked several days each week at Oracle's Pleasanton office and several days
24 each week at the Redwood Shores facility. My duties included testing products as a user
25 would in order to determine how to improve the quality of the product. In the Middleware
26 team, engineers worked to combine the PeopleSoft technology within Oracle's framework.
27

1 In this team, I worked with people who had come from PeopleSoft as well as Oracle
2 employees who had not worked at PeopleSoft previously. There was no training in the
3 Middleware team and we were expected to independently learn how to work within Oracle's
4 Middleware framework. During this time, I raised my salary concern with the manager from
5 Oracle who was leading my team. I told him that I thought my salary was not on par with the
6 market. He told me that he understood and would see what he could do. But after that
7 conversation, my salary was not increased to anywhere close to what my friends with similar
8 experience were making at other companies.

9
10 8. While I was in Middleware, I began to take on more and more responsibility
11 on our team. As I gained experience and realized my value to Oracle, I decided to start
12 pushing for a higher salary again. I had several managers at Middleware, and I spoke to each
13 of them about whether they could increase my salary. One only manager, Rick Nultemeier,
14 seemed to really try. He told me that he couldn't significantly increase my salary, but he did
15 try to make up for my low salary by getting me better bonuses. At some point in time my
16 title changed to Senior QA and at another point I held the title of Senior Member of
17 Technical Staff.

18 10. Around 2010, I transferred internally to a different product, Fusion Financials. I
19 was hopeful that I would get paid more by transferring to a product that was Oracle's cash
20 cow in the marketplace. Before I moved to Financials, I had a very frank conversation with
21 Ritu, who was the Director of QA in Financials that I was looking for a significant salary
22 increase. She promised me that she would make things right for me, but in didn't end up
23 happening. I never received a salary increase while working in the Financials team.

24
25 11. At Fusion Financials, I continued to work around three days at Oracle's
26 Pleasanton facility and two days a week at the Redwood Shores facility. I was also doing the
27 same type of QA work as I was doing at Middleware, but in a different product. For the first

1 couple of weeks, Fusion Financials managers and my peers helped introduce me to the
2 product and I was given bugs that were low-hanging fruit. It only took about two months for
3 me to come up to speed.

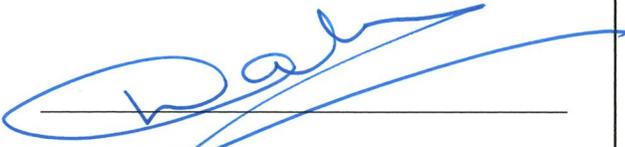
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5 12. While I was at Financials, I spoke with Shailendra Agarwal, my manager at
6 that time, about a salary increase that wouldn't be just \$1,000 or something similar, but a real
7 increase to match my salary to the market rate. He said that he would try. He later got back
8 to me, and he told me that he had been told that there was a salary range for my position and
9 that I was within that range, but at the lower end of the scale. He said that he couldn't do
10 anything about my salary because there was no budget to give me an increase.

11 13. In 2005, when I joined Oracle I was making \$54,000 a year, and when I left
12 Oracle almost ten years later, I was making only about \$67,000 a year. I received only about
13 \$13,000 in salary raises during my time as an Oracle employee. I did not receive a salary
14 increase from at least 2009 until I left Oracle in 2014.

15 14. In 2014 I left Oracle to take a new job at a company called Veeva, making at
16 least 20 percent more than I had been making at Oracle. I have had a drastically different
17 experience at Veeva, where I have been promoted several times and have had numerous
18 salary increases.

19
20 15. I declare under penalty of perjury under the laws of the United States that the
21 foregoing is true and correct.

22 Executed on October 26, 2019, in Fremont, California,

23
24
25 
26 Dalia Sen