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UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES

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OFFICE OF FEDERAL CONTRACT)	
COMPLIANCE PROGRAMS, UNITED)	
STATES DEPARTMENT OF LABOR,)	
)	
Plaintiff,)	OALJ Case
)	No. 2017-OFC-00006
)	
vs.)	OFCCP
)	No. R001926999
ORACLE AMERICA, INC.,)	
)	
Defendant.)	

VIDEOTAPED DEPOSITION OF TAMERLANE BAXTER
July 3, 2019
San Francisco, California

Stenographically Reported by:
GINA V. CARBONE, CSR, RPR, RMR, CRR, CCRR
California State Lic. No. 8249
Job No. 190703GCB

1 BY MS. BREMER:

2 Q. Well, let me ask again then.

3 A. Sure.

4 Q. Did the training that you received from the
5 Association of Workplace Investigators include any
6 training on analyzing compensation?

7 MR. PARKER: You can go ahead and answer
8 that question.

9 Let me just, just for form's sake, vague
10 and ambiguous.

11 Have at it.

12 THE WITNESS: No. Not that I recall.

13 BY MS. BREMER:

14 Q. Was -- have you attended any training on
15 conducting statistical analyses of compensation?

16 A. No.

17 Q. Have you ever conducted statistical
18 analyses of compensation as part of your
19 investigation of discrimination complaints?

20 A. I can't answer what I may or may not have
21 done in any given investigation because that would
22 be --

23 MR. PARKER: You can answer that just yes
24 or no.

25 THE WITNESS: Generally?

1 MR. PARKER: Yeah, just yes or no.

2 THE WITNESS: Personally, me specifically?

3 MR. PARKER: Yes. That's the question.

4 THE WITNESS: No.

5 BY MS. BREMER:

6 Q. Have you worked with anyone else or
7 obtained statistical analyses of compensation during
8 an investigation of compensation discrimination?

9 MR. PARKER: Now I'll assert the privilege.
10 Instruct not to answer.

11 THE WITNESS: I'm not going to -- I can't
12 answer that question.

13 BY MS. BREMER:

14 Q. And that's because of your attorney's
15 instruction?

16 A. That's because that information is the part
17 of our investigation that's at the direction of
18 counsel. Yes.

19 Q. What training have you received regarding
20 discrimination other than the training given to all
21 employees at Oracle?

22 A. Are you asking me about a specific time
23 frame or...?

24 Q. I'm talking about -- actually, no, I'm not
25 talking about a specific time frame.

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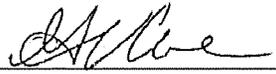
REPORTER'S CERTIFICATE

I, GINA V. CARBONE, CSR No. 8249, RPR, RMR, CRR, CCRR, certify: that the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was duly sworn; and that the transcript is a true record of the testimony so given.

The dismantling or unbinding of the original transcript will render the reporter's certificate null and void.

I further certify that I am not financially interested in the action, and I am not a relative or employee of any attorney of the parties, nor of any of the parties.

Dated this 17th day of July, 2019.



GINA V. CARBONE
CSR #8249, STATE OF CALIFORNIA