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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN MATEO

---oOo---

RONG JEWETT, SOPHY WANG, and)
XIAN MURRAY, individually and)
on behalf of all others)
similarly situated,)

Plaintiffs,)

vs.)

No. 17-CIV-02669

ORACLE AMERICA, INC.,)

Defendant.)

_____)

CONFIDENTIAL, PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED PMK DEPOSITION OF ORACLE AMERICA, INC.

BY: KATE WAGGONER

July 26, 2018

Volume I

(Pages 1 - 261)

Taken before JANE GROSSMAN

CSR No. 5225

JANE GROSSMAN REPORTING SERVICES
Certified Shorthand Reporters
1939 Harrison Street, Suite 460
Oakland, California 94612
510.444.4500
www.grossmanreporting.com

VIDEOTAPED PMK DEPOSITION OF ORACLE AMERICA, INC.

BY: KATE WAGGONER - VOLUME I

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I N D E X

VIDEOTAPED PMK DEPOSITION OF ORACLE AMERICA, INC.

BY: KATE WAGGONER

THURSDAY, JULY 26, 2018

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DEPOSITION EXHIBITS MARKED FOR IDENTIFICATION

* Document designated "CONFIDENTIAL"

[NOTE: Exhibits for Volumes I and II of the Deposition of Kate Waggoner were bound in separate volumes.]

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 23	Multipage document entitled "PLAINTIFFS' AMENDED NOTICE OF DEPOSITION OF PERSON MOST KNOWLEDGEABLE..." (No Bates numbers)	13
Exhibit 24 *	Multipage packet of documents, the first page of which is on the letterhead of ORACLE, entitled "Global Compensation Training, Managing Pay Module" (ORACLE_JEWETT_00000327 - ORACLE_JEWETT_00000677)	65

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EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 25	Multipage document on the letter-head of ORACLE, entitled "Oracle Compensation & Mapping" (Hand numbered 4822-1 - 4822-19)	90
Exhibit 26	One-page, two-sided document entitled "Global Job Classification" (Hand numbered 6678 - 6679)	94
Exhibit 27	Multipage document entitled "New Employee Paperwork, for Xiang Wang, dated as "Start Date" 1-Oct (sic), with handwritten entries (ORACLE_JEWETT_00000164 - ORACLE_JEWETT_00000199)	107
Exhibit 28	Multipage document entitled "New Employee Paperwork," for Rong Yang, dated as "Start Date" 4/2/2012, with handwritten entries (ORACLE_JEWETT_00000101 - ORACLE_JEWETT_00000146)	111
Exhibit 29 *	Multipage document entitled "New Employee Paperwork," for Xian Luo, dated as "Start Date" 03/01, with handwritten entries (ORACLE_JEWETT_00000784 - ORACLE_JEWETT_00000845)	112
Exhibit 30 *	Multipage document, the first page of which is an e-mail, dated 10/5/2015, addressed to DUHONG, TRINH, et al., from Les Cundall, "Subject: FY 16 Core schools comp numbers" (ORACLE_JEWETT_00006658 - ORACLE_JEWETT_00006670)	116

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Exhibit 32	Multipage spreadsheet entitled "Global Approval Matrix - Automated, Last updated June 1, 2015" (Hand numbered 5428-1 - 5428-15)	125
Exhibit 33	Multipage spreadsheet entitled "Global Approval Matrix - Automated, Last updated August 12, 2015" (Hand numbered 5432-1 - 5432-12)	130
Exhibit 34	Multipage spreadsheet entitled "Global Approval Matrix - Automated, Last updated May 12, 2016" (Hand numbered 5433-1 - 5433-12)	130
Exhibit 35	Multipage spreadsheet entitled "Global Approval Matrix - Automated, Last updated June 1, 2016" (Hand numbered 5429-1 - 5429-13)	133
Exhibit 36	Multipage spreadsheet entitled "Global Approval Matrix - Automated, Last updated September 2, 2016" (Hand numbered 5431-1 - 5431-13)	134
Exhibit 37 *	Three-page document entitled "Oracle HR Global Approval Matrix User Guide" (ORACLE_JEWETT_00006671 - ORACLE_JEWETT_00006673)	135
Exhibit 38 *	Two-page e-mail chain, the top-most of which is dated Wednesday, September 10, 2014, addressed to Cammie Salazar, from Rick Jewell, "Subject: Re: Focal Report" (ORACLE_JEWETT_00001157 - ORACLE_JEWETT_00001158)	143

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EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 39 *	Multipage document on the letter-head of ORACLE entitled "Global Corporate Bonus Process and Fusion Workforce Compensation...", dated June 2014 (ORACLE_JEWETT_00004668 - ORACLE_JEWETT_00004713)	147
Exhibit 40 *	Multipage document entitled "Annual Stock Grant Process," dated as updated June 2013 (ORACLE_JEWETT_00006549 - ORACLE_JEWETT_00006563)	149
Exhibit 41 *	One-page document entitled "Compensation Review & Oversight," undated (ORACLE_JEWETT_00004666)	153
Exhibit 42 *	Four-page document entitled "Oracle Compensation Guidelines," undated (ORACLE_JEWETT_00004662 - ORACLE_JEWETT_00004665)	163
Exhibit 43 *	Multipage spreadsheet, untitled, the first column being "Job Code," undated (Hand-numbered Oracle-Jewett 00001110-1 - 00001110-32)	209
Exhibit 44	Multipage spreadsheet, untitled, the first line designated "Contributes through FOLLOWING DIRECTIONS...", undated (Hand-numbered Oracle Jewett 00000889-1 - 00000889-4)	227
Exhibit 45 *	One-page document with the heading "Human Resources United States, U.S. Compensation" (ORACLE_JEWETT_00000913)	245
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Exhibit 46 *	Three-page document entitled "Global Compensation, Total Compensation" (ORACLE_JEWETT_00000914 - ORACLE_JEWETT_00000916)	257

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Proceedings Commenced: 9:07 a.m.

RECESSES

10:04 a.m. until 10:15 a.m.

11:21 a.m. until 11:33 a.m.

Luncheon Recess: 12:41 p.m. until 1:50 p.m.

2:50 p.m. until 3:02 p.m.

4:01 p.m. until 4:08 p.m.

Off the record: 5:00 p.m. until 5:02 p.m.

Proceedings Adjourned: 5:02 p.m.

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VIDEOTAPED PMK DEPOSITION OF ORACLE AMERICA, INC.

BY: KATE WAGGONER

VOLUME I

BE IT REMEMBERED that, pursuant to Notice of Taking Videotaped Deposition, and on Thursday, July 26, 2018, commencing at the hour of 9:07 a.m., at the LAW OFFICES OF ALTSHULER BERZON LLP, 177 Post Street, Suite 300, San Francisco, California 94108, before me, JANE GROSSMAN, a Certified Shorthand Reporter of the State of California, personally appeared

KATE WAGGONER,

produced as the person most knowledgeable for Oracle America, Inc., who, being by me first duly sworn, was thereupon examined as a witness in said cause.

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A P P E A R A N C E S

FOR PLAINTIFFS RONG JEWETT, SOPHY WANG, and XIAN MURRAY,
individually and on behalf of all others similarly
situated:

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A P P E A R A N C E S

(Continued)

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By: JESSICA JAMES, Attorney at Law
jjames@orrick.com

ALSO PRESENT:

KEVIN GOGARTY, Videographer

EMILY SULLIVAN, In-house counsel,
Oracle America, Inc.
(Present as indicated in the record)

---oOo---

1 testimony. 11:19:21

2 THE WITNESS: No.

3 Salary -- we get down to job code and
4 location and market data.

5 MR. FINBERG: Q. Okay. And what does a 11:19:39
6 job code consist of?

7 A. It's numbers, and it's the unique
8 identifier for the jobs within a job family.

9 Q. Okay. Well, there are some other pages
10 here that have it in more specific detail that we'll 11:20:02
11 come to a bit later.

12 But for the purpose of this page, it
13 says:

14 "PRODUCT

15 "Is the position associated with a 11:20:11
16 particular product?"

17 What does that mean?

18 A. We -- we don't use that anymore.

19 And, again, I did not develop this.

20 But I believe we used to have certain job 11:20:32
21 codes that were only used in association with people
22 who worked on a certain product.

23 Q. Okay. And when did you stop doing that?

24 A. I don't know.

25 The job codes in IT and development, in 11:20:52

1 particular, have never been product-associated. 11:21:01

2 I'm not familiar with support.

3 Q. So IT and product development were
4 never -- people in IT and product development were
5 never coded based on particular products? 11:21:26

6 A. No.

7 Q. "No" meaning that's correct; they never
8 were?

9 A. That is correct; they never were.

10 MS. CONNELL: Jim, again, when you get to 11:21:38
11 a breaking point, if we could take a short break.

12 MR. FINBERG: Okay. One last question.

13 Q. It says:

14 "If required, a product is assigned
15 directly to an employee's record in the 11:21:46
16 HRDB."

17 Is that the human resources database?

18 A. Yes.

19 MR. FINBERG: Okay. Let's take a short
20 break. 11:21:55

21 THE VIDEOGRAPHER: We're going off the
22 record at 11:21.

23 (Recess taken: 11:21 a.m. until 11:33 a.m.)

24 THE VIDEOGRAPHER: We're back on the
25 record at 11:33, beginning Media No. 3. 11:33:45

1 record at 12:48.

12:48:56

2 All original videos will be retained by
3 Jane Grossman Reporting Services.

4 (Whereupon, the deposition was adjourned at
5 12:48 p.m.)

6 ---oOo---

7 I declare under penalty of perjury that
8 the foregoing is true and correct. Subscribed at
9 _____, California, this ____ day
10 of _____, _____.

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KATE WAGGONER

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CERTIFICATE OF REPORTER

I, JANE GROSSMAN, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition is a true record and was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

I further certify that I am not of counsel or attorney for any of the parties to said deposition, nor in any way interested in the events of this cause, and that I am not related to any of the parties thereto.

Dated: August 6, 2018

JANE GROSSMAN, CSR No. 5225