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UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES

OFFICE OF FEDERAL CONTRACT) OALJ Case No.
COMPLIANCE PROGRAMS, UNITED) 2017-OFC-00006
STATES DEPARTMENT OF LABOR,)
) OFCCP No.
Plaintiff,) R00192699
)
v.)
)
ORACLE AMERICA, INC.,)
)
Defendant.)
_____)

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VIDEOTAPED DEPOSITION OF ALI SAAD, PH.D.,
October 11, 2019
Philadelphia, Pennsylvania

Reported by:
Ann Medis, RPR
NCRA No. 22052
JOB No. 191011AME

04:34:20 1 MS. MANTOAN: Objection. Vague.
2 THE WITNESS: You mean for the employee?
3 BY MR. SONG:
4 Q. Yes. Because I'm presuming that at least some
04:34:28 5 employees don't stay on the same product forever.
6 A. I would suspect that's probably true.
7 Q. You haven't seen any data fields that include
8 which products employees work on; correct?
9 MS. MANTOAN: Objection. Vague as to "data
04:34:50 10 fields." And misstates testimony.
11 THE WITNESS: I have not seen any fields in
12 the HR data or personnel data that I've analyzed that
13 relate to products worked on specifically.
14 BY MR. SONG:
04:35:01 15 Q. And just to clarify, so you haven't seen any
16 data fields with which products an employee works on at
17 Oracle; right?
18 MS. MANTOAN: Objection. Vague. Misstates
19 prior testimony.
04:35:24 20 THE WITNESS: As I said, in the HR data,
21 there's no column labeled product worked on. That
22 doesn't mean there isn't information that is available
23 where one could not determine --
24 BY MR. SONG:
04:35:37 25 Q. Sure.

04:35:37 1 A. -- to some extent the product worked on,
2 namely, requisitions, perhaps also promotion
3 justifications, transfer requests, performance
4 evaluation materials. There's a whole host of
04:35:54 5 materials that would include this information.

6 Q. Sure. I understand that. But I'm just
7 specifically asking about data fields like in the
8 electronic data.

9 MS. MANTOAN: Objection. Vague.

04:36:05 10 THE WITNESS: Well, all the other information
11 I just referred to, that's all electronic.

12 BY MR. SONG:

13 Q. What about data fields?

14 MS. MANTOAN: Objection. Vague.

04:36:12 15 THE WITNESS: You mean like a column in a
16 dataset?

17 BY MR. SONG:

18 Q. Yes, exactly. That's what I'm trying --

19 A. Yeah. I think I said that I have not -- I
04:36:19 20 have not seen a column in a dataset that's labeled
21 product employee worked on.

22 Q. What about a data field that records the
23 skills of an employee?

24 MS. MANTOAN: Objection. Vague. Vague as to
04:36:34 25 time. Vague as to "data field." Vague as to "skills."

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04:36:44 1 THE WITNESS: I guess I could answer I haven't
2 seen a column in the data labeled skills employee has.

3 BY MR. SONG:

4 Q. Do you know if every organization is -- I'm
04:37:22 5 sorry. Strike that.

6 Do you know if every product has an organization
7 associated with that?

8 MS. MANTOAN: Objection. Vague.

9 THE WITNESS: So if I can rephrase that, are
04:37:40 10 you asking if there are products that are created
11 outside of an organization?

12 BY MR. SONG:

13 Q. Yeah. Well, let me rephrase that.

14 Is every organization associated with a product?

04:37:56 15 MS. MANTOAN: Objection. Vague.

16 THE WITNESS: As a general matter, probably
17 not. Most certainly not --

18 BY MR. SONG:

19 Q. Okay.

04:38:05 20 A. -- as a general matter.

21 Q. Do you know how many are not associated with a
22 product?

23 MS. MANTOAN: Same objection.

24 THE WITNESS: Well, I'm sure in the -- you did
04:38:32 25 not restrict your question here. So there are probably

1 COMMONWEALTH OF PENNSYLVANIA)
2 COUNTY OF ALLEGHENY) SS:

3 C E R T I F I C A T E

4 I, Ann Medis, Registered Professional
5 Reporter, Certified Livenote Reporter and Notary Public
6 within and for the Commonwealth of Pennsylvania, do
7 hereby certify:

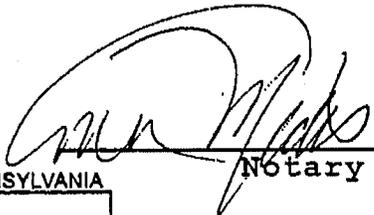
8 That ALI SAAD, PH.D., the witness whose
9 deposition is hereinbefore set forth, was duly sworn by
10 me and that such deposition is a true record of the
11 testimony given by such witness.

12 I further certify the inspection, reading and
13 signing of said deposition were not waived by counsel
14 for the respective parties and by the witness.

15 I further certify that I am not related to any
16 of the parties to this action by blood or marriage and
17 that I am in no way interested in the outcome of this
18 matter.

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 14th day of October, 2019.

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Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Ann Medis, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Jan. 7, 2021
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES