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13 UNITED STATES DISTRICT COURT FOR THE  
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 LYNN SNYDER**  
17 )  
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19 )  
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17 Plaintiff,  
18 V.  
19 **ORACLE AMERICA, INC.**  
20 Defendant.  
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1 I, Lynn Snyder, 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 identify as a half-Asian and half-white woman. I worked for Oracle  
5 America, Inc. at the Redwood Shores facilities from approximately February 1999 to August  
6 2016. I have personal knowledge of the matters stated herein and, if necessary, I could and  
7 would testify to the facts stated below.

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9 3. I obtained a Master's degree in Library and Information Science from the  
10 University of Hawaii and a Bachelor's degree in American Studies from the University of  
11 California, Santa Cruz.

12 4. Prior to joining Oracle, I had 9 years of experience in the information services  
13 industry, which entailed customer service, product management, and marketing.

14  
15 5. Around 1998, I was referred to Oracle through a family member. This family  
16 member gave Oracle my resume, which resulted in Oracle contacting me for an interview. I  
17 interviewed at the Redwood Shores facility for a Beta Program Manager position. Oracle  
18 offered me the position and I began working for Oracle in February 1999.

19 6. When I started at Oracle, I worked as a Program Manager where I beta tested  
20 software products. As a Beta Program Manager, I was generally responsible for working  
21 with customers and partners to test software products for their technical stability and to see if  
22 customer expectations were being met. I did not have any employees reporting to me at that  
23 time. I reported to Deborah Migliore, also known as Debbie, and our team reported to John  
24 Pilot, who was the VP of a database technology group.

1           7.       On or around 2002, our team was reorganized and we began reporting to a  
2 manager in Database Server Technology. Several years later, our team was reorganized  
3 again, however the entire time I worked at Oracle I was in Product Development.

4           8.       When I started at Oracle, I worked on three products: Oracle Database,  
5 middleware, and Enterprise Manager. Around 2005 or 2006, upper management started  
6 asking our team to beta test more products, and my personal job responsibilities increased.

7  
8           9.       Around 2008, a woman named Tricia McCarthy was moved into my team.  
9 She was initially assigned to report to Debbie. Several months after Tricia started in my  
10 group, Debbie and I had a telephone conversation and Debbie asked if I would supervise  
11 Tricia. After that conversation, Tricia began reporting to me. When Tricia joined our team I  
12 saw her resume and she had minimal beta testing experience, and at that time I had more than  
13 8 years of beta testing experience. Once Tricia began reporting to me I was able to see her  
14 salary. When I saw Tricia's salary, I knew there was a problem with my salary because her  
15 salary was very close to my own salary. Eventually I received a salary increase, but it was  
16 only after I complained about my salary.

17  
18           10.      Around 2008 I was promoted to Director of Beta Programs. I retained my  
19 beta testing duties and supervised staff who ran their own testing programs.

20           11.      Throughout my time at Oracle, as a staff employee and manager, I  
21 consistently received a rating of "5-Outstanding" on my performance appraisals.

22           12.      Oracle gave me stock options most years based on my good performance.  
23 When I left Oracle not all of my stock options had vested.

24  
25           13.      By the time I left Oracle in 2016, I had 4 staff members on my team reporting  
26 to me. My new hires were recent college graduates, who were all women. When it came to  
27 setting their pay, I received mixed messages. Initially, when I started hiring, I was

1 encouraged by Debbie to make an offer at the lowest salary range as possible to save Oracle  
2 money. Later, a woman in Human Resources (HR) told me to bring my hires in at a higher  
3 salary because it would be unlikely that we would be able to give that person a raise anytime  
4 soon.

5  
6 14. It was very difficult to give any of my reports a raise. Oracle's senior  
7 management encouraged me to use stock options for performance based rewards, instead of a  
8 raise. The amounts allotted were always so small that I do not recall being able to give  
9 anyone a raise on my team, except for Tricia, who I was eventually able to give a small raise.

10 15. As a manager, I also was required to rank the members on my team as part of  
11 their performance appraisals. This meant that I could not have everyone ranked at the same  
12 level, even if they performed at the same level as their team members. Oracle instructed me  
13 that I had to rank someone on my team in last place, even if that person was performing at a  
14 high level on our team.

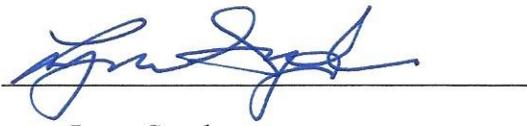
15  
16 16. Around 2013 I hired a new person for my team, Stephanie Hernandez.  
17 Around 2015 Stephanie asked to be promoted and receive a raise. I knew that a promotion  
18 did not necessarily mean that she would receive a raise because a promotion and pay raises  
19 were separate processes at Oracle. I knew Stephanie deserved a promotion because she was  
20 well organized, took on a lot of responsibility, she executed her duties at a high level, and she  
21 had a Master's in Business Administration. I asked HR to provide me the eligibility  
22 requirements for a promotion and the definitions of the IC levels, which they provided to me.  
23 I ended up giving Stephanie new goals to work towards for the next year so that she could be  
24 eligible for a promotion. While I was at Oracle, Stephanie never received a promotion  
25 despite my request, even though Stephanie met the promotion requirements.

26 17. I declare under penalty of perjury under the laws of the United States that the  
27 foregoing is true and correct.

1 Executed on October 10, 2019, in San Carlos, California,

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Lynn Snyder

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