

1 UNITED STATES DEPARTMENT OF LABOR  
2 OFFICE OF ADMINISTRATIVE LAW JUDGES  
3  
4 OFFICE OF FEDERAL CONTRACT ) OALJ Case No.  
5 COMPLIANCE PROGRAMS, UNITED ) 2017-OFC-00006  
6 STATES DEPARTMENT OF LABOR, )  
7 ) OFCCP No.  
8 Plaintiff, ) R00192699  
9 )  
10 vs. )  
11 )  
12 ORACLE AMERICA, INC., )  
13 )  
14 Defendant. )  
15 \_\_\_\_\_ )  
16  
17 VIDEOTAPED DEPOSITION OF JOYCE WESTERDAHL  
18 May 30, 2019  
19 Orange, California  
20  
21  
22  
23  
24 Reported by:  
25 Michael McMorran  
CSR No. 13735  
JOB No. 190530RCR

1

1 APPEARANCES:  
2 For Plaintiff:  
3 UNITED STATES DEPARTMENT OF LABOR  
4 OFFICE OF THE SOLICITOR  
5 By: CHARLES C. SONG, ESQ.  
6 NORMAN E. GARCIA, ESQ.  
7 350 South Figueroa Street  
8 Suite 370  
9 Los Angeles, California 90071-1202  
10 (213) 894-5365  
11  
12 For Defendant:  
13 ORRICK, HERRINGTON & SUTCLIFFE, LLP  
14 By: ROBERT S. SHWARTS, ESQ.  
15 LARA GRAHAM, ESQ.  
16 405 Howard Street  
17 San Francisco, California 94105-2669  
18 (415) 773-5760  
19  
20 Also Present:  
21 ZAVEN BAGHDANIAN, Videographer  
22  
23  
24  
25

3

1 UNITED STATES DEPARTMENT OF LABOR  
2 OFFICE OF ADMINISTRATIVE LAW JUDGES  
3  
4 OFFICE OF FEDERAL CONTRACT ) OALJ Case No.  
5 COMPLIANCE PROGRAMS, UNITED ) 2017-OFC-00006  
6 STATES DEPARTMENT OF LABOR, )  
7 ) OFCCP No.  
8 Plaintiff, ) R00192699  
9 )  
10 vs. )  
11 )  
12 ORACLE AMERICA, INC., )  
13 )  
14 Defendant. )  
15 \_\_\_\_\_ )  
16  
17 VIDEOTAPED DEPOSITION of JOYCE WESTERDAHL,  
18 taken on behalf of Plaintiff, at 770 The City Drive  
19 South, Orange, California, beginning at 9:01 a.m.,  
20 and ending at 6:02 p.m., on Thursday, May 30th,  
21 2019, before Michael G. McMorran, Certified Shorthand  
22 Reporter No. 13735.  
23  
24  
25

2

I N D E X

1 WITNESS: Joyce Westerdahl	
2 EXAMINATION	PAGE
3 By Mr. Song	7
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

E X H I B I T S

9 EX. DESCRIPTION	PAGE
10 58 Ms. Westerdahl's executive biography	16
11 59 E-mail exchange, the most recent of which is dated 03/03/15	146
12	
13 60 E-mail exchange, the most recent of which is dated 01/06/14	148
14 61 Packet entitled "Performance Appraisals FY15"	151
15	
16 62 Oracle Candidate Profile Summary	176
17	
18 63 E-mail exchange, the most recent of which is dated 07/09/14	274
19 64 E-mail exchange, the most recent of which is dated 02/17/14	278
20	
21 65 E-mail exchange, the most recent of which is dated 06/10/14	281
22 66 E-mail dated 08/31/13	282
23	
24	
25	

4

1 INDEX (Continued)

2

3 EXHIBITS

EX. DESCRIPTION	PAGE
67 E-mail dated 07/01/16	283
68 E-mail exchange, the most recent of which 287 is dated 09/17/18	
69 Affirmative Action Plan for Oracle America, January 2014	293
70 Series of e-mails	341
71 Document entitled "Confidential Placement 343 Goals Analysis Data as of 01/01/14"	

11

12

13 PREVIOUSLY MARKED EXHIBITS  
(Appended to the transcript)

14

DESCRIPTION	PAGE
Exhibit 5	92
Exhibit 7	123
Exhibit 13	167
Exhibit 28	290

19

20

21

22 INFORMATION REQUESTED

23 None.

24

25

5

1 EXAMINATION

2 BY MR. SONG:

3 Q Ms. Westerdahl, thank you very much for

4 coming today.

5 Have you had your deposition taken before?

6 A Yes.

7 Q Okay. How many times?

8 A I would say around ten or less.

9 Q Ten or less?

10 A I mean, to count them all up over the years,

11 but I think probably a ballpark.

12 Q Okay. Well, thank you for your estimate.

13 And fairly recently?

14 A I had one last fall taken.

15 Q Oh, okay. So you pretty much know the rules

16 of the road?

17 A Most -- yeah.

18 Q Okay. I'll just kind of gloss over most of

19 just the important ones, then.

20 A Okay. Well, don't forget the non-important

21 ones if there's a rule, but go ahead.

22 Q Okay. Well, if -- I just didn't want to

23 bore if you've done -- if you've had so many

24 depositions again.

25 Obviously, the most important one is that

7

1 ORANGE, CALIFORNIA; THURSDAY, MAY 30TH, 2019

2 9:01 A.M.

3 THE VIDEOGRAPHER: Good morning. This is

4 the video deposition of Joyce Westerdahl in the

5 matter of DOL versus Oracle America Incorporation,

6 Case No. 2017-OFC-00006.

7 Today's date is May 30th, 2019, and the time

8 on the video monitor is approximately 9:00 a.m. My

9 name is Zaven Baghdanian with

10 Gradillas Court Reporters, located at 520

11 North Central Avenue, Suite 720, Glendale,

12 California 91203.

13 Will counsel please voice-identify

14 themselves?

15 MR. SONG: Charles Song on behalf of OFCCP.

16 MR. GARCIA: Norman Garcia for OFCCP.

17 MR. SHWARTS: Robert Shwartz and Lara

18 Graham, Orrick, Herrington & Sutcliffe, on behalf of

19 Oracle.

20 THE VIDEOGRAPHER: Will the court reporter

21 please administer the oath?

22 JOYCE WESTERDAHL,

23 the Witness herein, having been first duly sworn,

24 testified as follows:

25 ///

6

1 the oath that you've just taken is the same oath

2 that you would take in court. Okay?

3 And I do need verbal responses so, you know,

4 shaking your head or nodding, things like that, even

5 though it's on video --

6 A Right. You need a "Yes" or a "No."

7 Q -- we still like a verbal response.

8 Obviously, objections are permitted, and you will

9 probably hear quite a few. But I'm still entitled

10 to a response unless your attorney or attorneys asks

11 you or instructs you not to answer.

12 A Okay.

13 Q If you need to take a break, just let us

14 know, but one thing that I would ask is that if I

15 ask a question, that you respond to the question

16 before you take a break.

17 A Okay.

18 Q Okay? And then like you did earlier where

19 you gave me an estimate of about ten or less, that's

20 great. We, obviously, don't want you to make wild

21 guesses as to like how many depositions that I've

22 taken because you would have no idea.

23 But if I can -- but if you can estimate how

24 many depositions you've been through, you can

25 estimate that, ten or less.

8

1 A Okay.  
2 Q Okay. So that's great. Thank you for that.  
3 If there's anything that you don't understand, just  
4 let me know, and I'll repeat the question or  
5 rephrase the question.  
6 Once the deposition is completed, you'll get  
7 a transcript, a copy of the transcript, and you'll  
8 get a chance to make any changes that you and your  
9 attorneys feel are necessary.  
10 A Got it.  
11 Q Is there anything that would impair your  
12 ability to take this deposition today?  
13 A None. None.  
14 Q Okay.  
15 A I need Kleenex just in case.  
16 Q Okay.  
17 A Not that I'm going to cry or anything.  
18 Q Okay.  
19 A There we go. My allergies are starting to  
20 kick in as well.  
21 Q Okay. And sorry. This is just a standard  
22 question I ask but have you ever been convicted of a  
23 crime?  
24 A No, I have not.  
25 Q And did you prepare for your deposition

9

1 today?  
2 A No.  
3 Q And did you -- did you search for -- or did  
4 you receive the document request that came along  
5 with your deposition notice?  
6 A I'm sure I did.  
7 Q Okay. And did you search for any of those  
8 documents that were included in the document  
9 request?  
10 MR. SHWARTS: Object. Counsel has been the  
11 subject of correspondence between counsel with  
12 respect to prior production of documents relating to  
13 Ms. Westerdahl much earlier in the case and about  
14 the timeliness of the request here as it relates to  
15 the discovery cutoff.  
16 So you may proceed to inquire, but . . .  
17 THE WITNESS: So at Oracle, we don't search  
18 for our documents. The lawyers come in and scan our  
19 computers and take everything off of our computers.  
20 That's the process.  
21 BY MR. SONG:  
22 Q Okay.  
23 A So we don't do, you know, search. They  
24 actually take it all.  
25 Q Okay. So you have seen the document

11

1 today?  
2 A I spent time with counsel yesterday.  
3 Q Okay. And how long did you spend?  
4 A I was late yesterday; so four hours maybe,  
5 if that.  
6 Q Okay. And did you review any documents?  
7 A Yes.  
8 Q Okay. Which documents did you review?  
9 MR. SHWARTS: Objection to the form.  
10 You can rephrase -- you can ask her if  
11 anything refreshed her recollection. But it's work  
12 product in terms of what documents she was shown.  
13 BY MR. SONG:  
14 Q Okay. Did any documents refresh your  
15 recollection?  
16 A I don't believe so. I mean, there was some  
17 that I had never seen before, and there were some I  
18 had seen before. So it wasn't like I haven't seen  
19 this and now I have seen it. I may have explained  
20 too completely, but . . .  
21 Q Okay. Outside of your meeting with counsel  
22 yesterday, did you review any documents to prepare  
23 for the deposition?  
24 A No.  
25 Q Okay. Did you bring any documents with you

10

1 requests, but you --  
2 A Correct.  
3 Q -- yourself did not respond to it?  
4 A Correct. The lawyers come in and scan our  
5 systems, yes.  
6 Q Okay. And did the lawyers come in and scan  
7 your systems for this document request?  
8 A Yes.  
9 Q Yes? Okay. And do you know when that was?  
10 A No idea.  
11 Q Okay. But you didn't do any kind of a  
12 search for your e-mails?  
13 A No.  
14 Q Okay. And what is your current title at  
15 Oracle?  
16 A Executive vice president of human resources.  
17 Q Okay. And what are your job duties there?  
18 A I run everything that encompasses HR,  
19 benefits, comp, employee relations, investigations,  
20 union worker counsel, activities. I also run the  
21 Oracle Foundation, Oracle Academy, Oracle High  
22 School. I'm missing things.  
23 Q That sounds like quite a bit already.  
24 A The data privacy groups, the emergency  
25 groups for disaster reliefs with our employees. I'm

12

1 trying to see my direct reports and what they do.  
2 Oh, systems. We run internal IT systems with our  
3 own software, and we run all of those  
4 implementations and maintain those systems for --  
5 for the HCM software and the recruiting software.  
6 **Q** Okay. Is there anything that you don't do  
7 at Oracle?  
8 **A** Well, I actually do help sell. I was going  
9 to say I don't sell anything, but I do sell our HR  
10 product, yeah.  
11 **Q** I was just kidding. Sorry. Would you say  
12 you're the top human resources person at Oracle?  
13 **A** I am.  
14 **Q** Okay. And who do you report to?  
15 **A** Safra Catz.  
16 **Q** Okay. And Safra reports to?  
17 **A** The board. She's the CEO.  
18 **Q** The board?  
19 **A** She's a co-CEO at Oracle.  
20 **Q** Okay. And what about Mr. Ellison?  
21 **A** Mr. Ellison is -- I would -- he's our chief  
22 technology officer at this point.  
23 **Q** Okay. So she doesn't necessarily report to  
24 him?  
25 **A** No.

13

1 under her -- she manages that company as well.  
2 I'm sure I'm missing someone. Oh, Jonn  
3 Noliitt, who runs internal recruitment programs.  
4 Jan Ackerman who runs executive -- general  
5 recruiting programs.  
6 Christie Book, who runs executive recruiting  
7 programs.  
8 Sheryl Cochran, who is my EA.  
9 Anje Dodson, A-n-j-e, who runs the Americas'  
10 line of business ER piece as well as our internal  
11 systems.  
12 I think I've run out of runway there.  
13 BY MR. SONG:  
14 **Q** Okay. What about Kate Waggoner?  
15 **A** Kate Waggoner works for Phil Jenish.  
16 **Q** For Phil Jenish. Okay. And what about  
17 Ms. Carrelli?  
18 **A** Is that Lynn Palmer?  
19 **Q** Yes.  
20 **A** Yes. Lynn works -- I think for Kate.  
21 **Q** For Kate. Okay. And Sheryl?  
22 **A** I think.  
23 **Q** Okay.  
24 **A** Yeah.  
25 **Q** That's all right. And Shauna

15

1 **Q** Okay. And that's your only -- that's the  
2 only person you report to is Ms. Safra Catz?  
3 **A** Correct.  
4 **Q** Okay. This could be a long list, but who  
5 reports to you or your reports?  
6 **A** Okay, Elizabeth Snyder, Jonn Noliitt --  
7 MR. SHWARTS: Why don't you do it this way?  
8 It will be easier. Why don't you do it, give the  
9 name, give the position. That way it will help you  
10 remember all of them. He's going to ask anyways.  
11 THE WITNESS: All right. Okay.  
12 Elizabeth Snyder, and that's Oracle Academy,  
13 Foundation, the high school, data privacy, and  
14 international immigration.  
15 Peter Shott, global benefits and M&A,  
16 activity on the onboarding side.  
17 Phil Jenish. He is executive compensation  
18 and Americas' compensation.  
19 Vickie Thrasher runs all kinds of programs  
20 from all of our diversity programs to our affinity  
21 groups, training, communications, all that fun  
22 stuff.  
23 Vance Kearney who runs EMEA, HR.  
24 Alison Sibree who runs Asia PAC Japan HR.  
25 And we own another company called OFSS. That's

14

1 Holman-Harries -- where would she fall under?  
2 **A** She currently works for Vickie Thrasher,  
3 Victoria Thrasher.  
4 **Q** Okay.  
5 MR. SONG: I'm going to show you Exhibit 58.  
6 (Exhibit 58 was marked.)  
7 THE WITNESS: Well, this would have been  
8 easier if you had just read this.  
9 BY MR. SONG:  
10 **Q** Well, I was getting to this because it  
11 sounds like you've accomplished quite a bit at  
12 Oracle. So you recognize this document?  
13 **A** Yes.  
14 **Q** Okay. What is it?  
15 **A** It's a version of my executive bio. I don't  
16 know if it's the latest version or not.  
17 **Q** Okay. But is -- well, I'll let you look at  
18 it very quickly.  
19 Is everything in here accurate?  
20 **A** Yes.  
21 **Q** Okay. And do you know where this bio is  
22 stored or kept right now?  
23 **A** No.  
24 **Q** No? Okay. Well, I got it from Oracle's  
25 website.

16

1 **A** Okay. Oracle's website.  
2 **Q** Okay. And everything looks accurate on  
3 here?  
4 **A** Yes.  
5 **Q** Okay. So I just wanted to ask you a couple  
6 of questions about your executive bio. And so  
7 you've been -- is it correct that you've been the  
8 senior executive vice president since 2000?  
9 **A** Yes.  
10 **Q** Is that correct? Okay. And when it says  
11 that "she has continuously implemented a roadmap of  
12 progressive HR modernization initiatives," what does  
13 that mean? What have you done since 2000 that would  
14 be included there?  
15 **A** Sure. So when I took over, HR was reported  
16 up into the line of businesses. It wasn't a global  
17 function, and we didn't have one system to run HR.  
18 There was multiple systems in different countries.  
19 Some countries had filing cabinets.  
20 So when I took over, we transformed the  
21 business and brought in our own product. At that  
22 point, it's an ERP product. Today we're in the  
23 cloud, which we've done a second transformation.  
24 This is our first.  
25 And we implemented a single instance of our

17

1 **A** -- we went from kind of manual systems to an  
2 ERP system. The last five years ago, we moved the  
3 On-Premise systems to the cloud.  
4 **Q** Okay. And I'm sorry. What is an ERP  
5 system?  
6 **A** Your old fashioned On-Premise systems, not a  
7 shared data center. Like with cloud-based systems  
8 are coded differently and then how they're stored  
9 and run are differently. And you still have a data  
10 center, but there's a different setup with that.  
11 It's more efficient.  
12 On-Premise systems are still kind of you  
13 think about it, you bought an IBM machine, that's an  
14 On-Premise system that you'd have an old fashioned  
15 data center that you went in.  
16 And then applications are on top of your IBM  
17 machines or your Sun machines or whatever machines  
18 you were -- your Intel machines.  
19 **Q** Okay. And in the last five years, you guys  
20 converted to the cloud and using a specific, like,  
21 HRIS software --  
22 **A** Our own.  
23 **Q** Your own?  
24 **A** Our own.  
25 **Q** Okay. And is there a name for that?

19

1 product in every country around the world. And that  
2 involved revamping our job code systems, all of our  
3 guidelines, all of our practices within every  
4 country, how we did offer letters, how we hired  
5 people, how we recruited them, and put it in a  
6 system.  
7 So we moved from a transactional system  
8 where you had clerks processing paperwork that went  
9 to payroll and then payroll clerks that processed  
10 paperwork. We transformed the business through  
11 technology.  
12 **Q** Okay.  
13 **A** Short version.  
14 **Q** Okay. But I am interested in the longer  
15 version.  
16 **A** Okay. Well --  
17 **Q** So you --  
18 **A** Well, it took two and a half years; so --  
19 yeah.  
20 **Q** Specifically you were saying that you  
21 transferred from the paper system --  
22 **A** Correct.  
23 **Q** -- to the cloud or --  
24 **A** No, no. This is in 2000 --  
25 **Q** Okay.

18

1 **A** We call it Fusion.  
2 **Q** Fusion. Okay. And is that software also  
3 sold outside of Oracle?  
4 **A** Yes.  
5 **Q** Okay.  
6 **A** It's one of our main product lines and  
7 applications.  
8 **Q** Okay.  
9 **A** As was our ERP system was a product that we  
10 sold, the On-Premise system.  
11 **Q** Okay. I see. And can you tell me more  
12 about your Fusion software and what it does and how  
13 it works?  
14 **A** How familiar are you with HR?  
15 **Q** I'm a Luddite, so -- and I don't know much  
16 about HR.  
17 **A** Okay. So everything you do in HR -- HR is  
18 heavily a transaction business. People change cost  
19 centers. They change managers. They change jobs.  
20 So the systems in the -- the olden days,  
21 which isn't that long ago, and still companies today  
22 do it all manually, you know, and make these  
23 changes.  
24 Everything is done through what they call  
25 self-service, and you would be familiar with that if

20

1 you've shopped on Amazon.  
2 **Q** Sure.  
3 **A** So -- and our software is all here on your  
4 phone. I spent the morning, like, doing my  
5 approvals off of my phone. All of our applications  
6 are mobile.  
7 And so the purchase recs come to me. That  
8 is enabled through the HR system. I approve my  
9 purchasing. I approve my hires.  
10 Everything you do in the world of HR,  
11 unfortunately, touches everything. And every part  
12 of business is done -- and HR foundation fuels your  
13 financials, your GL, your purchasing because it's  
14 your people setup and your approval matrixes for  
15 your finance approvals, your purchasing approvals,  
16 your -- every approval known to man that you do in a  
17 company.  
18 **Q** Okay.  
19 **A** So it's a comprehensive system that manages  
20 your people, and people is your business.  
21 **Q** Okay. So it's through that software, you  
22 can help manage all of your hires?  
23 **A** You can do your hires. You can do your  
24 performance management. You can manage your talent.  
25 You can do your focal processing. You can do your

21

1 hiring, like who's being hired from what schools?  
2 **A** We don't track -- I guess -- I guess we do  
3 track -- yes. I think -- yeah. I don't know what  
4 we track or whether they come from schools or  
5 previous companies. You can track that if you want  
6 to track that.  
7 **Q** Okay. And country of origin -- would you be  
8 able to track country of origin?  
9 **A** It would depend on why would I need that.  
10 **Q** Okay. But that's -- well, for example, I  
11 think a lot of -- a lot of the employees at Oracle  
12 are from other countries and maybe on visas or  
13 things like that --  
14 **A** Well, not a lot, but some are. We have a  
15 lot of people. We have 140,000 people. I wouldn't  
16 say a lot are from other countries.  
17 They're -- I don't know if their country of  
18 origin is stored in the HR system and maybe stored  
19 in a different system for privacy reasons. I can't  
20 answer that question.  
21 **Q** Okay. What about their visa or work  
22 eligibility?  
23 **A** It's probably stored in another system for  
24 privacy reasons. I'm not sure if it's stored on the  
25 HR table.

23

1 bonus processing. You can do your stock processing.  
2 You can hire someone. You can terminate someone.  
3 You can lay off someone. It's, you know, cradle to  
4 grave for your employees.  
5 **Q** Really A to Z.  
6 **A** Mmm-hmm.  
7 **Q** Sounds like great software.  
8 **A** Well, yes. I mean, there's other software  
9 companies that do this too. It's pretty standard  
10 stuff.  
11 **Q** Okay. And so all of -- all of these  
12 transactions that you're discussing or talking  
13 about, they're all stored within the software as  
14 well in the cloud?  
15 **A** It is -- yeah, it's stored in the systems,  
16 yeah.  
17 **Q** Okay. And can you run reports from the  
18 software as well?  
19 **A** You can.  
20 **Q** Okay. And what kind of reports can you get?  
21 **MR. SHWARTS:** Objection. Overbroad, but you  
22 can give an example.  
23 **THE WITNESS:** Turn-on is an easy one.  
24 **BY MR. SONG:**  
25 **Q** Turn-on? Okay. And can you do reports on

22

1 **Q** Okay. But -- so Fusion would have  
2 everything except for maybe --  
3 **A** We would have to go back and look and see  
4 where it's stored. I can't answer that question --  
5 **Q** Okay.  
6 **A** -- accurately right now.  
7 **Q** But Fusion would not have, like, immigration  
8 or country --  
9 **A** I can't answer that question --  
10 (Simultaneous discussion and reporter  
11 interruption.)  
12 **MR. SHWARTS:** He didn't give you that  
13 admonition, but that's one of the simple ones.  
14 **MR. SONG:** One of the ones that I --  
15 **THE WITNESS:** See, he skipped over that.  
16 Yes.  
17 **BY MR. SONG:**  
18 **Q** That was my fault. My apologies.  
19 I just want to -- well, I just wanted to  
20 clarify. I understand that you can't discuss this  
21 in detail, but can you just clarify whether there's  
22 immigration information in Fusion?  
23 **A** There's immigration information somewhere.  
24 I'm not sure where it's stored is what I'm trying to  
25 tell you technically.

24

1 Q Okay. But I'm just trying to find out about  
2 Fusion. So I just want to know is it in Fusion or  
3 no?  
4 A I am saying I can't tell you that. I'm not  
5 sure where it is stored, whether it's on the Fusion  
6 product or it's in a subset product.  
7 Q Okay. So you don't know. Okay.  
8 And work eligibility would be the same, you  
9 don't -- you're not sure?  
10 A I am not sure where it's stored.  
11 Q Okay. And country of origin would be the  
12 same?  
13 A Correct.  
14 Q Okay. But information like, you know,  
15 starting salary, salary ranges, all of that type of  
16 information would be in Fusion, correct?  
17 MR. SHWARTS: Objection. Compound.  
18 You may answer.  
19 THE WITNESS: Correct.  
20 BY MR. SONG:  
21 Q Were you involved in developing Fusion?  
22 A No.  
23 Q No? Okay. Did you consult at all in  
24 developing Fusion?  
25 A From a user perspective, development spoke

25

1 Q Your team was. Okay. But not you directly?  
2 A Yeah, correct.  
3 Q I'm sorry. Okay. And I'm guessing this  
4 Fusion -- is it correct to call Fusion "software  
5 that's in the cloud"?  
6 A You could just call it --  
7 Q A program?  
8 A Or HCM, human capital management. That  
9 would probably be easier is HCM.  
10 Q Okay. And Fusion can run compensation  
11 reports?  
12 A Correct.  
13 Q Okay. And that would include bonuses,  
14 stocks, everything that's involved in compensation?  
15 A Probably. All those things, yes.  
16 Q Okay. And then would Fusion also include  
17 information about salary increases?  
18 A Correct.  
19 Q Okay. And would it also include information  
20 about reviews of the salary increases or  
21 recommendations for salary increases?  
22 A Not always.  
23 Q Not always?  
24 A Are you trying to ask if there was  
25 commentary? What are you trying to ask? I don't

27

1 to us and my team.  
2 Q Okay. And did you -- did you make  
3 recommendations about what you wanted Fusion to do?  
4 MR. SHWARTS: The "you" in that question is  
5 Joyce Westerdahl.  
6 THE WITNESS: Not me particularly, no. The  
7 answer is no.  
8 BY MR. SONG:  
9 Q Okay. What kind of issues did you consult,  
10 you know, for the development of the software?  
11 THE WITNESS: Can I help him in this?  
12 BY MR. SONG:  
13 Q Please. Please do.  
14 A The ERP software that -- Fusion is next  
15 generation from ERP software. So that was an  
16 upgrade from ERP.  
17 That's a whole different development  
18 exercise than starting with a new product line. So,  
19 no, I wasn't a consultant for an upgrade of a  
20 product in Fusion.  
21 Am I being clear?  
22 Q Yes. But I thought you previously said that  
23 you were consulted about the development of the  
24 software for Fusion?  
25 A My team was.

26

1 understand.  
2 Q Yes. Well, there's a process for getting a  
3 salary increase at Oracle, correct?  
4 A Correct.  
5 Q Okay. So I'm just wondering how much of the  
6 information or how much of the process of a salary  
7 increase is included in Fusion?  
8 For example, you know, a manager makes a  
9 recommendation that this person gets a salary  
10 increase, it's reviewed by you and any number of  
11 people and then, you know, it's approved or rejected  
12 maybe, and there are reasons why.  
13 So I'm just wondering how much of that  
14 information is stored in Fusion?  
15 MR. SHWARTS: Objection. Overbroad and  
16 compound.  
17 You may answer.  
18 THE WITNESS: It depends on how the raise is  
19 put through.  
20 BY MR. SONG:  
21 Q Okay. So in -- and which scenario where the  
22 raise is put through would be included in that -- in  
23 Fusion?  
24 A Usually if it would be an off-cycle  
25 increase, there would be justification.

28

1 Q Okay. Any other types of salary increases  
2 that would be in there?  
3 A Uh-uh.  
4 Q Okay.  
5 MR. SHWARTS: You have to answer audibly.  
6 THE WITNESS: Sorry. I just put in new  
7 braces, and they actually hurt, which I --  
8 No. Sorry.  
9 BY MR. SONG:  
10 Q Okay. So the only types of salary increases  
11 that would have information in Fusion would be the  
12 off-cycle ones?  
13 A In general, yes.  
14 Q In general. Okay. So what about the focal  
15 reviews? Are those -- is that information not  
16 included in Fusion?  
17 A It's not required when you do an annual  
18 focal. So the answer is in general, no. I'm sure a  
19 manager may put something in if it's -- I can't  
20 speak for every transaction, but in general, no.  
21 Q Okay. Is there a different database for  
22 focal review information?  
23 A Different database?  
24 Q Yeah. So I'm wondering where, like, the  
25 information regarding focal -- because focal reviews

29

1 Q Okay. Okay. And then prior to -- so if we  
2 go back to your executive bio. Prior to 2000, in  
3 1999, it says that you learned to convert HR  
4 management from manual processing.  
5 That's the ERP process that you were talking  
6 about?  
7 A Yes, the On-Premise, if you think of it that  
8 way.  
9 Q Okay. And what was your title before 2000?  
10 A Vice president.  
11 Q Vice president. Okay. And you were  
12 vice president for how long? So you started in 1990  
13 it says.  
14 A I started as an individual contributor. So  
15 I -- I can't.  
16 Q Just approximately?  
17 A Five to seven years.  
18 Q Five to seven years? Okay.  
19 A Not really sure, actually.  
20 Q Okay.  
21 A Yeah.  
22 Q And then what were your job duties as a VP?  
23 A I'm trying to remember.  
24 Q Or maybe I can ask it in an easier way.  
25 What were your different job duties? What was

31

1 take place every year; is that correct?  
2 A Correct.  
3 Q Okay. So that information is stored in  
4 Fusion?  
5 A Yeah. So there's only one database.  
6 Q Okay.  
7 A For the -- everything. So there's not  
8 multiple databases.  
9 Q No.  
10 A Okay.  
11 Q That's the way it should be, right? It  
12 makes it much easier.  
13 And, sorry, back to kind of the immigration  
14 or visa documents, where would those -- that type of  
15 information be stored if it's not in Fusion?  
16 MR. SHWARTS: Objection. She's testified  
17 she doesn't know where it is.  
18 THE WITNESS: Correct. I don't know where  
19 it is.  
20 BY MR. SONG:  
21 Q Do you know who would know that?  
22 A Yes.  
23 Q Okay. And who would that be?  
24 A It would be in Peter Shott's organization,  
25 and he would know or Anje Dodson.

30

1 different about your job duties then as opposed to  
2 now?  
3 A I ran a -- I was running geographies, but --  
4 so -- I don't mean to be difficult, but I started at  
5 Oracle, and I think I've had 15 different jobs or 30  
6 different jobs. I've rotated through a number of  
7 functions at Oracle for a lot of years.  
8 So it's probably easier if I start from the  
9 beginning and go up.  
10 Q Okay, please.  
11 A Okay.  
12 Q That would be helpful.  
13 A All right. Well, this is going to take a  
14 while.  
15 Q Well, I mean, you don't have to --  
16 MR. SHWARTS: Yeah. I don't know. Just for  
17 our purposes given the time frame at issue here, I  
18 mean, she's been in her current job since 2000. So  
19 I don't know what utility it is to devote time to  
20 the pre-2000 world.  
21 BY MR. SONG:  
22 Q Well, maybe could you just list your  
23 different jobs? Because I'm just trying to get an  
24 idea of your background and experience.  
25 A Okay. When I came to Oracle, I actually

32

1 worked in the business operations group and handled  
2 a lot of project work there, which I -- I'll try to  
3 be brief and not go through all the stuff I did  
4 there.  
5 So anyway, as time went on, we had a new CFO  
6 come, and I was asked to move to human resources.  
7 Moved over to human resources, and at that point was  
8 running an MBA program that we -- that I shut down,  
9 and we started an internal recruiting program that I  
10 ran.  
11 Started and built that, as well as I  
12 supported the line of business which was consulting  
13 for many years. Probably for seven years run from  
14 an ER point of view, do employee relations, and  
15 rolling out the consulting business to all our  
16 countries that we are currently doing business in at  
17 the time.  
18 From there, I went and took over sales,  
19 employee relations. And at some point along the  
20 way, I took over some of the technology pieces  
21 before the operations group where we were doing the  
22 old fashioned manual stuff.  
23 At some point, I did benefits. I did a tour  
24 of running Latin America. And then eventually I  
25 also took over running employee relations for

33

1 development.  
2 I'm missing some jobs in here.  
3 Q That's okay. You don't have to go over  
4 everything.  
5 A You get the idea, though.  
6 Q Yeah. Okay. I just wanted to get an idea.  
7 You've done quite a bit in your tenure at Oracle.  
8 And do you directly oversee the HR business  
9 partners?  
10 A No.  
11 Q No? Okay. Well, what about the talent --  
12 is it the talent agents or talent analysts?  
13 A Do you mean recruiters, or do you mean  
14 organizational and development and talent?  
15 Q I was under the -- it's my understanding  
16 that the HR business partners work with talent  
17 people. I guess they would be the recruiters --  
18 A Okay.  
19 Q -- at Oracle, but I'm not sure about the  
20 actual term.  
21 A Okay. If it's recruiter, we should call  
22 them "recruiters."  
23 Q Okay.  
24 A Okay? Because there is a talent development  
25 group, too, but that's more career management.

34

1 Q Okay. Yeah, no, I think my understanding  
2 was that there were external people who looked at  
3 the marketplace to help determine what are, you  
4 know, competitive salaries and ranges and things  
5 like that for people.  
6 Maybe that's not what --  
7 A That's not what they do.  
8 Q Okay.  
9 A Okay.  
10 Q And what is your global career level?  
11 A Oh. I don't know. A 9 or an 8, something  
12 like that.  
13 Q Okay. And that would be like a M --  
14 A An M-8 or an M-9.  
15 Q Okay. And do you --  
16 A I know that's important to some people, but  
17 it's clearly not to me.  
18 Q Well, I guess you're pretty high up on the  
19 food chain; so . . .  
20 And do you do trainings for anybody in the  
21 organization or employees at Oracle?  
22 MR. SHWARTS: So, again, the "you" is  
23 Joyce Westerdahl.  
24 THE WITNESS: Right.  
25 ///

35

1 BY MR. SONG:  
2 Q Yes.  
3 A Do I personally do trainings?  
4 Q Yes.  
5 A No.  
6 Q Okay. And do you receive trainings?  
7 A I have, yes.  
8 Q What kinds of trainings do you receive?  
9 MR. SHWARTS: Object. Vague as to time.  
10 You may answer.  
11 THE WITNESS: Yeah. In the last year or the  
12 last 30 years?  
13 BY MR. SONG:  
14 Q How about -- how about since 2013?  
15 A Compliance, harassment training, ethics,  
16 public relations training related to press -- I'm  
17 missing a few things -- financial controls.  
18 That's not extensive, but that's kind of the  
19 highlights that I can pull off my brain right now.  
20 Q Okay. And who conducted these trainings for  
21 you?  
22 A Our harassment training is actually taught  
23 by Orrick with one of their lawyers there, and we  
24 have a variety of online training that's mat --  
25 that's mat -- not manual, mandatory that we take.

36

1 And so they can be online training, and some  
2 of our stuff is live person to person.  
3 **Q** Okay. And do you remember who did the  
4 compliance training?  
5 **A** Lynn -- oh. Who did the compliance  
6 training?  
7 **Q** Yes, that you attended.  
8 **A** It's under -- Dorian Daley delivers that  
9 compliance training, her organization.  
10 **Q** Okay. And which organization is that?  
11 **A** Legal. Internal legal to Oracle.  
12 **Q** And what did that compliance training cover,  
13 if you remember?  
14 **A** Seriously, how long are we going to be here?  
15 **MR. SHWARTS:** He's got seven hours.  
16 **THE WITNESS:** Okay. Compliance training  
17 covers everything from taking gifts from vendors,  
18 how to work with partners, what's appropriate when  
19 you're entertaining a client, bribes, inappropriate  
20 verbal promises, inappropriate written contracts.  
21 There's more to it, but that's what I got  
22 for you right now.  
23 **BY MR. SONG:**  
24 **Q** Okay. And when was that training?  
25 **A** I -- I took that -- I took that class within

37

1 overbroad. Calls for an opinion.  
2 You may answer.  
3 **THE WITNESS:** Yeah. I -- I guess I, yes, do  
4 have a philosophy.  
5 **BY MR. SONG:**  
6 **Q** Okay. Can you share that with us, please?  
7 **A** Well --  
8 **MR. SHWARTS:** Same objection.  
9 You may answer.  
10 **THE WITNESS:** Okay. I like to run a fair  
11 and transparent organization, and your word is your  
12 word. And we always behave above the line, not at  
13 the line.  
14 Ethics are very important to me. And you do  
15 what you say, and say what you do.  
16 **BY MR. SONG:**  
17 **Q** Okay. And I'm sorry. Were you done?  
18 **A** I'm sorry. That was my braces.  
19 **Q** Okay. And then are there specific things  
20 that you do to try to promote this culture or this  
21 philosophy?  
22 **A** Yeah. We talk about it among my directs and  
23 our values, and we talk about it at our annual  
24 meetings and various things like that. We have  
25 touch points.

39

1 the last year.  
2 **Q** Okay. And is that the only time since 2013  
3 that you've had that training?  
4 **A** Oh, no. I take that class every two years.  
5 **Q** Oh, it's every two years?  
6 **A** Yeah.  
7 **Q** Okay. And did that cover OFCCP  
8 requirements?  
9 **A** I don't believe that does cover -- yeah,  
10 this is -- yeah.  
11 **Q** Okay. What about affirmative action?  
12 **A** This is a -- that's not what kind of class  
13 that is.  
14 **Q** Okay.  
15 **A** This is a working with vendors and partners  
16 and customer compliance class.  
17 **Q** Okay. So it didn't discuss equal  
18 opportunity --  
19 **A** No.  
20 **Q** -- requirements?  
21 **A** No. It's talking about not taking bribes  
22 and things like that.  
23 **Q** Okay. And do you have a philosophy on human  
24 resources, how human resources should be run?  
25 **MR. SHWARTS:** Objection. Vague and

38

1 **Q** Okay. I'm sorry. What are touch points?  
2 **A** When you're communicating and talking to  
3 people and reinforcing your goals and your values.  
4 **Q** Okay. Is that an Oracle term, "touch  
5 points"?  
6 **A** No. I think it's a communications term.  
7 **Q** Okay. And is that written or verbal or  
8 both?  
9 **A** It's -- what we do is mostly -- our goals  
10 are written, but the pieces on ethics and our values  
11 there, we talk about them more. They may be written  
12 somewhere, but . . .  
13 **Q** Okay. Can you tell me how your HR  
14 department is organized?  
15 **MR. SHWARTS:** Today?  
16 **MR. SONG:** Yeah.  
17 **THE WITNESS:** The -- okay. Different from  
18 how I -- okay. Okay.  
19 **BY MR. SONG:**  
20 **Q** Before the people who are the subparts,  
21 et cetera.  
22 **A** Okay.  
23 **MR. SHWARTS:** Well, just to be clear -- so  
24 she gave you her list of direct reports.  
25 **MR. SONG:** Yes.

40

1 MR. SHWARTS: Having given you that, can you  
2 focus your question in terms of how you put you're  
3 looking for so she understands your question?  
4 BY MR. SONG:  
5 Q Yes. I wanted to understand the  
6 organization or the hierarchy. So there's you,  
7 there's your direct reports, and then who's under  
8 that? What other departments, et cetera?  
9 Like, for example, I asked about  
10 Kate Waggoner and Shauna Holman-Harries. So what  
11 other departments would people be under your watch?  
12 MR. SHWARTS: So what might be -- I'm sorry.  
13 I'm not trying to be difficult. But it might be  
14 helpful if you picked one and said, "Well, you gave  
15 me this. What flows under that one?"  
16 Would that be easier for you?  
17 THE WITNESS: Yeah. It's just -- it's going  
18 to take forever.  
19 BY MR. SONG:  
20 Q Okay. Well, how about we start with, the  
21 ones I'm most interested in are specifically  
22 Vickie Thrasher.  
23 A Okay. So Vickie Thrasher has development  
24 and training, and those -- and that's where we're  
25 getting confused on the talent. So it's talent and

41

1 organizational development --  
2 Q Okay.  
3 A -- is what she manages. Those are not  
4 recruiters. She has the diversity and affinity  
5 programs. All the affinity groups that Oracle has  
6 and helps manage, including OWL, which is the  
7 Oracle's Women's Leadership.  
8 Q Okay.  
9 A She has communications in her organization.  
10 She has diversity and compliance. So Shauna  
11 Holmes -- that group reports up to Vickie.  
12 And I am sure I am going to miss some  
13 things.  
14 Q That's okay. Just what you recall.  
15 And then below that are more line level  
16 people, or is that where it ends?  
17 A Well, no. She has direct reports, and then  
18 they may have direct reports --  
19 Q Okay.  
20 A -- in her organization.  
21 Q Okay. All right. Then what about  
22 Peter Shott?  
23 A So Peter Shott runs global benefits as well  
24 as America benefits. So he has senior benefits  
25 person that reports to him and there's a staff under

42

1 that. And then Rhonda Davidson.  
2 And then he has Mike someone --  
3 Q Okay.  
4 A -- who runs M&A. So once -- once the  
5 acquisition team has bought the company, there's an  
6 M&A team that integrates the company and helps  
7 manage them into their future line of business --  
8 Q Okay.  
9 A -- groups. So Mike has a team of people  
10 under that. Peter also has immigration, and Denise  
11 reports into Peter there. He has a gal, Lisa Kaiser  
12 that does our budgeting and a variety of  
13 miscellaneous things in his organization.  
14 And that's what I can remember right off my  
15 head.  
16 Q Okay. Well, that's pretty good. Thank you.  
17 And then just one more. I can't remember. Is  
18 Alison Cyberg --  
19 A Sibree.  
20 Q -- Sibree.  
21 A So she runs OFSS, that whole -- so ER, the  
22 company, comp and ben, all the things that go on for  
23 that company. She also runs Japan --  
24 Q Okay.  
25 A -- which Japan also is a separate company,

43

1 Oracle Japan. Everything that evolves around Japan,  
2 she's responsible for. And then she runs the region  
3 of Asia PAC.  
4 Q Okay. And I'm sorry. What is OFSS?  
5 A It's an Oracle financial systems company  
6 that we bought probably 10, 12 years ago.  
7 Q Okay.  
8 A And we don't -- we're a minority owner in  
9 it. We don't own it fully. It's based out of  
10 India.  
11 Q Do you get transfers from OFSS to Oracle  
12 U.S.?  
13 A Yes. On occasion, back and forth.  
14 Q Okay. And they would typically be on the  
15 L-1 visas, then?  
16 A No, not necessarily. They could transfer  
17 from Oracle India to Oracle OFSS and --  
18 Q Oh.  
19 A Yeah. Or in the United States. There's an  
20 OFSS division in the United States, and so they  
21 would need a visa to transfer back and forth.  
22 Q Okay. And I'm sorry one more. Phil Jenish?  
23 A Yes. He runs our business analytics group  
24 and all of our survey work, employment engagement,  
25 that kind of stuff.

44

1 And he runs executive comp all for the comp  
2 committee and Americas' compensation.  
3 Q Okay. And how many -- how many -- so  
4 Kate Waggoner is under him, correct?  
5 A Correct.  
6 Q Okay. And then who -- who reports to  
7 Kate Waggoner, if you know?  
8 MR. SHWARTS: If you can do it by job too --  
9 if you can't figure it out -- if you don't a  
10 remember name, you can --  
11 THE WITNESS: I don't -- I don't know.  
12 Because he's added people, and that group has grown.  
13 And we've got analytics, and I don't know.  
14 BY MR. SONG:  
15 Q Okay.  
16 A Kate would have been the better person to  
17 ask that.  
18 Q Okay. And then what about Kris Edwards?  
19 A Kate would have been the girl to ask. I  
20 don't know where she -- if she's a direct report to  
21 Phil or if she works --  
22 Q Yeah. Where is she on this food chain, or  
23 if you don't --  
24 A I don't know if she works for Kate or she  
25 works directly for Phil.

45

1 and who reports to you.  
2 In terms of colleagues who are on their same  
3 level of different departments, who are these  
4 people?  
5 A My colleagues?  
6 Q Yeah. For example, other senior  
7 vice presidents; so you're HR. There's somebody  
8 comparable to you for sales, marketing, product  
9 development, et cetera.  
10 A Okay. So I'm an executive vice president.  
11 Q Oh, I'm sorry. Executive vice president.  
12 A So you're asking for who are my peers as  
13 executive vice presidents?  
14 Q Yes.  
15 A Okay. Okay. Good memory test. Let's start  
16 in --  
17 Q And who is she, what does she do?  
18 A Well, let's start in sales. I think there's  
19 only -- there's two executive vice presidents in  
20 sales. One is Rich Geraffo, and one is  
21 Dave Donatelli. So you're asking for all my peers  
22 that are executive vice presidents?  
23 Q Yeah. Who are on the same level, since we  
24 talked about who's above you and who's below you.  
25 A Okay.

47

1 Q Okay. And then do you know how many people  
2 are under Kate?  
3 A Still no.  
4 Q No? Okay. Do you know if there -- you  
5 know -- maybe what would help is do you know if  
6 there's some kind of a chart for Oracle on just how  
7 it's organized?  
8 A Are you asking for an org chart?  
9 Q Yeah. Like, an org chart for Oracle?  
10 MR. SHWARTS: For HR?  
11 BY MR. SONG:  
12 Q Yeah. For HR or just the entire  
13 organization because I don't think I've seen one, if  
14 we have one.  
15 A We would have to build it for you, but --  
16 Q Oh, okay.  
17 A Yeah.  
18 Q Yeah. I was thinking that could be easier  
19 just to try to picture all of this because I know  
20 it's a massive organization. You have how many  
21 employees? 135,000?  
22 A We have 140,000 employees and some change.  
23 Q And that's around the world, right?  
24 A Yes.  
25 Q So I -- so I asked about who you report to

46

1 Q Who's on the same level of the various  
2 departments.  
3 A I'm going to bore all of you --  
4 MR. SHWARTS: Do the best you can.  
5 THE WITNESS: I'm just going to bore all of  
6 you. Okay. So that's in sales. And then if we  
7 move to -- let's move to Safra's org next. So Corey  
8 West is an executive vice president. Doug Kehring  
9 is an executive vice president --  
10 BY MR. SONG:  
11 Q I'm sorry. You said Sac what?  
12 MR. SHWARTS: She said Ms. Catz's  
13 organization, Safra.  
14 BY MR. SONG:  
15 Q Oh, okay. I'm sorry. Go ahead.  
16 A So I said Corey West, Doug Kehring.  
17 Q And what is Ms. Catz's organization? What  
18 would that be called?  
19 A She runs finance and all the back office  
20 functions as well as legal, HR, and mergers and  
21 acquisitions.  
22 Q Okay.  
23 A Do you want me to keep going?  
24 Q Yeah.  
25 A Okay. Ken Glueck is an executive

48

1 vice president.  
2 MR. SHWARTS: G-l-e-u-c-k.  
3 THE WITNESS: Very good. All right. I  
4 think -- I mean, this is -- okay.  
5 BY MR. SONG:  
6 Q Well, if you're having trouble remembering  
7 the names, maybe if you can just give me the  
8 different organizations or departments that are kind  
9 of parallel to yours.  
10 A Okay. What do you mean by "parallel."  
11 Q So there's HR. There's a sales department,  
12 right?  
13 A Right.  
14 Q So who's the head of sales? I think you  
15 mentioned that, right?  
16 A Well, Mark Hurd --  
17 Q Mark Hurd? Okay.  
18 A -- runs all of sales globally and marketing.  
19 Q Okay.  
20 A And he's a CEO.  
21 Q Yes.  
22 A And then there's executive vice presidents  
23 in his organization.  
24 Q Okay. And how many of them are there?  
25 A Two.

49

1 vice president.  
2 BY MR. SONG:  
3 Q Okay. Great. Thank you.  
4 A Okay.  
5 Q Do you have a handbook at Oracle, an  
6 employee handbook?  
7 A We have a managers guide, but it's not like  
8 this. It's on the internet.  
9 Q Okay.  
10 A It's on the internal system. We have a --  
11 we have a managers guide, yeah.  
12 Q Okay. And that makes sense it would be  
13 electronic.  
14 A Yes.  
15 Q Not in paper form. And this managers  
16 guide -- who is it for?  
17 A Managers.  
18 Q Okay. And -- so everyone -- everyone from  
19 M-1 all the way up?  
20 A Correct.  
21 Q Okay. And what does this managers guide  
22 include in it?  
23 A Well, that's probably the closest thing --  
24 so a managers guide would help them -- resources for  
25 putting their employees through training, how to

51

1 Q Two?  
2 A Three.  
3 Q Three. And who are those?  
4 A I mean --  
5 Q If you remember.  
6 A Okay. I told you Rich Geraffo.  
7 Q Oh, okay.  
8 A Dave Donatelli, Alain Blanc is actually an  
9 EVP in the sales organization.  
10 Q Okay.  
11 A And then I mentioned all the people in  
12 Safra's organization.  
13 Q Okay.  
14 A And then there are some in development.  
15 Q Okay.  
16 A Steve Miranda.  
17 Q Okay.  
18 A Edward Screven, Andy Mendelsohn,  
19 Juan Loaiza.  
20 Q Okay.  
21 MR. SHWARTS: Dorian?  
22 THE WITNESS: I mentioned Dorian.  
23 MR. SHWARTS: You didn't say her name.  
24 THE WITNESS: Yeah. Dorian, yeah, who works  
25 for Safra our general counsel is also an executive

50

1 hire someone, how to terminate someone, how to  
2 transfer someone. It would teach you how to do  
3 things via the system, and if you needed help, who  
4 to call to get help.  
5 Q Okay. And would that include hiring,  
6 compensation, salary increases, termination, all of  
7 those things?  
8 A Probably, yes.  
9 Q Okay. And is it just one guide, or are  
10 there multiple guides?  
11 A There are probably -- there's one guide for  
12 the U.S. There's -- you know, it's -- there's one  
13 manager guide, but it has subsections depending on  
14 what country you're in.  
15 You still -- the technical aspect of it, how  
16 you do a transfer is the same around the world, but  
17 there may be differences in France than, excuse me,  
18 in Canada. Yeah.  
19 Q Sure. And when was this managers guide  
20 written?  
21 A Well, the first managers guide was written  
22 probably 30 years ago by myself -- or 28 years ago.  
23 Q 28 years.  
24 A Yeah.  
25 Q So shortly after you started?

52

1     **A** Mmm-hmm.  
2         **MR. SHWARTS:** You need to answer audibly.  
3         **THE WITNESS:** Yes, please. Yes.  
4 **BY MR. SONG:**  
5         **Q** Okay. And then this managers guide has  
6 probably been revised multiple times since then?  
7         **A** Multiple times. As the systems change  
8 and -- or modified or enhanced. Not necessarily --  
9 you would have to change them more than just between  
10 ERP and Fusion because there's been enhancements  
11 along the way to the technology.  
12         **Q** Okay. And did anybody help you write it?  
13         **A** Oh, years ago? Probably.  
14         **Q** Okay.  
15         **A** Probably.  
16         **Q** But you were the primary author?  
17         **A** Yes.  
18         **Q** Okay.  
19         **A** Years ago.  
20         **Q** When was the last revision of the managers  
21 guide?  
22         **A** Oh, I have no idea.  
23         **Q** Okay.  
24         **A** Yeah.  
25         **Q** And were you involved in the last revision?

53

1 managers guide?  
2         **A** No. If they don't know, they call HR.  
3         **Q** Okay. Do you guys do -- do you guys do  
4 training on the managers guide?  
5         **A** Yes.  
6         **Q** Yes? Okay. How often?  
7         **A** There's -- that's a -- that's a broad  
8 question, too. So there's cadence with -- like, we  
9 just went to a new recruiting system where you don't  
10 have to go in and out of two products.  
11         So they would do a training to reteach you  
12 or a training on demand -- because you don't hire  
13 all the time -- that you could look at that video or  
14 take the training -- oh, it's changed. That's not  
15 how you post a job or whatever it is.  
16         **Q** Okay.  
17         **A** So the cadence depends on what's happening  
18 with the business. So I cannot answer that  
19 specifically.  
20         **Q** Okay. But you guys don't have, like, an  
21 annual training on managers guide?  
22         **A** No.  
23         **Q** Okay. And is there a similar guide for  
24 employees?  
25         **A** There -- I don't know. I actually don't

55

1         **A** Oh, absolutely not.  
2         **Q** Okay.  
3         **A** I haven't touched it for probably 25 years.  
4         **Q** Okay. You haven't -- okay. Then who's been  
5 working on it since you stopped working on it?  
6         **A** There's a group in Kirstin -- I believe it's  
7 in Kirstin Ward's organization that reaches out to  
8 all the subject matter experts and keeps their  
9 sections up-to-date.  
10         **Q** Okay. So it's managed or edited by  
11 Kirstin -- or Kirstin Ward --  
12         **A** From a core group.  
13         **Q** Okay.  
14         **A** But they don't write the whole thing. They  
15 have to rely on the subject matter experts in the  
16 particular groups.  
17         **Q** Okay. Is there like a committee or  
18 something like that?  
19         **A** Probably. There's a group of people that  
20 run it.  
21         **Q** Okay. And do you know who kind of -- other  
22 than Kirstin Ward, does anybody else, like,  
23 supervise or manage the writing of the guidelines?  
24         **A** You should ask Kirstin Ward.  
25         **Q** Okay. And are managers required to know the

54

1 know if there's -- I don't know if -- it's not a  
2 guide. I mean, I think we publish things for  
3 employees like our holiday schedule and our winter  
4 break schedule and things like that.  
5         **Q** Are there trainings for employees to take  
6 like on Fusion or electronically somewhere?  
7         **A** So, no, you wouldn't take a training on  
8 Fusion unless you were selling it.  
9         **Q** Okay.  
10         **A** But -- yeah.  
11         **Q** Well, so I'm just trying to find out -- so  
12 there's a guide for managers, but I would think that  
13 there would be some kind of a guide or guidelines or  
14 something for employees on what Oracle's policies  
15 and things are for employees.  
16         **A** So I think there's a search site. So --  
17 that you would -- you can search, like, "I'm having  
18 a baby, what do I do?" You know -- and there's  
19 guidelines there, or you're referred to a benefits  
20 rep. So if you had a question, there's a place to  
21 go to ask that question.  
22         But everyone also has their HR rep too, that  
23 if you have a life-changing event, you're getting  
24 divorced, or whatever is happening, you can go to  
25 the benefits website and fill out the forms to make

56

1 that happen, but you can also call your benefits  
2 rep. And they would walk you through, "This has  
3 happened in your life, you gotten married, you  
4 gotten divorced, somebody died."  
5 **Q** And what -- you said that they would go and  
6 there's a search site. What site is this?  
7 **A** Well, there's --  
8 **Q** Like, on the intranet?  
9 **A** On My Oracle, there's a place where you can  
10 search for frequently asked questions. And then it  
11 refers you to either that department. Like, you may  
12 have a payroll question, but you would ask your HR  
13 rep. But you would need to talk to payroll, so --  
14 which I don't run.  
15 **Q** Okay. So, for example, if an employee had a  
16 privacy question about what personal information of  
17 theirs is protected and which is not, they would go  
18 to this site?  
19 **A** They would probably go to their HR manager.  
20 I mean, we may have a statement that says what we  
21 capture and what we don't. I'm not sure.  
22 But they could always go to their HR manager  
23 and ask the question of what do we keep that -- on  
24 their, you know -- on their background and what do  
25 we have stored.

57

1 If that's the question you're asking. I'm  
2 not really sure what you're asking.  
3 **Q** Yeah. Well, I'm just trying to figure out  
4 if I were an employee, you know, I would want to  
5 know what I can and can't do at Oracle, what Oracle  
6 expects of me.  
7 And if there's a managers guide, it seems  
8 like it would make sense that there's some kind of  
9 employee guide to say, you know, "Here's your  
10 holidays. Here's this. Here's the privacy policy,"  
11 things like that.  
12 **A** As I said, there's a site called  
13 "My Oracle," and you can search on all that. And  
14 you are even as an employee required to do a certain  
15 amount of training every year or every two years,  
16 and you have a training guide for what you're  
17 responsible to do as well.  
18 **Q** And that's on My Oracle?  
19 **A** And we push it to you as an employee. So  
20 whatever your -- as an employee in purchasing,  
21 you're sent e-mail alerts saying, "You're required  
22 to take the following training within this  
23 timeline," or, "You're required to do this within  
24 this timeline."  
25 **Q** Okay. And let's say some type of policy

58

1 like privacy or I guess we can take prior pay,  
2 right? The prior pay change because of the Gender  
3 Pay Equity Acts. So when there's like a new policy,  
4 how is that communicated to employees?  
5 **A** Usually through a send mail.  
6 **Q** Okay. And I'm sorry. What is that? Is  
7 that just an e-mail or --  
8 **A** It's -- well, it's a -- in companies, they  
9 call them -- you know, ours are called Red Banner,  
10 which says that you're required to read something  
11 that is sent to you.  
12 You probably have them in the Government as  
13 well where they'll push something to you that you're  
14 required to read this or this is for your  
15 notification. I'm not sure how you guys do it.  
16 We don't do -- we on occasion do paper too,  
17 but most of the time we do technical communications.  
18 **Q** Okay. And were you involved in designing  
19 the My Oracle page for employees?  
20 **A** Oh, please. No.  
21 **Q** No? Okay. Were you consulted?  
22 **A** No.  
23 **Q** What about --  
24 **A** We want someone who actually knows how to do  
25 these things.

59

1 **Q** What about your HR department? What about  
2 people under you?  
3 **A** We -- we use -- for all this kind of stuff,  
4 you use user -- people that are user-design people,  
5 and they're usually in development.  
6 So many of these people are resourced out of  
7 other groups that actually have degrees and know how  
8 to do these things.  
9 **Q** Okay. But for content, they would have had  
10 to ask you --  
11 **A** The user, they would go to the particular  
12 user for the content but -- yeah. To set up the  
13 sites, no, there's design experts.  
14 **Q** Okay. But, for example, human resource  
15 questions, the developers would come to you and ask  
16 what needs to be up here or what are the --  
17 MR. SHWARTS: The "you" in that question I  
18 think means the group. They would go to people in  
19 the organization.  
20 Is that what you're asking?  
21 BY MR. SONG:  
22 **Q** Yeah, the HR department.  
23 **A** Nobody asks me. Yeah. They go to the  
24 specific experts in whatever area.  
25 **Q** And who would that be within your

60

1 department?  
2 **A** Oh. Well, it depends on what it's for.  
3 **Q** Okay. Let's say compensation.  
4 **A** Again, what kind of compensation?  
5 **Q** U.S. compensation, let's say, salary  
6 increase?  
7 **A** Like, the process. Let's say we're  
8 launching the focal process?  
9 **Q** Yeah. Or an employee wants to, you know,  
10 know, "How do I ask for a raise," or, "How are  
11 raises" -- you know, "How does that process work?"  
12 Can they find that information on the My Oracle  
13 page?  
14 **A** I think they can somewhere, yeah.  
15 **Q** Okay. So who from your department would  
16 have consulted with the developers?  
17 **A** To write that -- someone in comp.  
18 **Q** Someone in comp?  
19 **A** Yeah.  
20 **Q** Like, maybe -- like, Kate or --  
21 **A** Kate might be a good choice.  
22 **Q** She seems to know a lot about comp, so . . .  
23 Let's see. And does the My Oracle -- so  
24 other than the My Oracle page or site, do employees  
25 have anywhere else to go other than the other

61

1 law. If you're a regular employee -- okay. So  
2 manager, managing in a law.  
3 Everyone is required to take the workforce,  
4 you know, when working in the environment -- in a  
5 harassment-free environment.  
6 Compliance training -- everyone is required  
7 to take the compliance training and ethics.  
8 I cannot give you all the training courses  
9 they're required to take.  
10 **Q** Okay. And about how many trainings do  
11 employees take a year?  
12 **A** There's -- when a new-hire starts, there's a  
13 list of trainings they must take within their first  
14 two weeks. And then most trainings repeat every two  
15 years.  
16 **Q** Okay. And do these trainings take place in,  
17 like, large auditoriums, or can they just do them  
18 online by themselves?  
19 **A** They can do them online. We do have some  
20 for new-hire orientation and trainings. We have  
21 some old fashioned in-classroom stuff especially  
22 when we hire large groups of people in certain  
23 countries, they do them in classrooms.  
24 They do some of the classroom stuff at  
25 headquarters in Austin. That's a big hub. And then

63

1 resources you mentioned like the HR people,  
2 et cetera -- is there anything written or anywhere  
3 else for them to go to find out about employee  
4 policies?  
5 **MR. SHWARTS:** You talking about, like, if  
6 they had to make a sexual harassment complaint or  
7 something like that? Is that what you're --  
8 **MR. SONG:** Yeah, yeah.  
9 **BY MR. SONG:**  
10 **Q** Well, I'm just trying to find out are all  
11 the employee policies on the My Oracle page, or is  
12 there another book, another site --  
13 **A** A secret site? No.  
14 **Q** Yeah, you know, a secret password to get  
15 in --  
16 **A** No. It's mostly -- not mostly. I suspect  
17 it's all there.  
18 **Q** It's all there?  
19 **A** And even other people's stuff is there like  
20 real estate and facilities or, you know.  
21 **Q** Okay. And you mentioned some trainings that  
22 employees are required to take. What trainings are  
23 those?  
24 **A** Okay. Let's see. When you start, if you're  
25 a manager, you're required to take managing in a

62

1 they're always available online as well.  
2 **Q** Okay. And do these trainings include  
3 information about equal employment opportunity?  
4 **A** I believe they do, yes, they do.  
5 **Q** Okay. And affirmative action policies?  
6 **A** Yeah.  
7 **Q** Okay. Okay. So I wanted to get into the  
8 next subject --  
9 **MR. SHWARTS:** We've been going about an  
10 hour. Do you want to take a short break?  
11 **BY MR. SONG:**  
12 **Q** Yeah. Before that, I wanted to see if you  
13 wanted to take a break?  
14 **THE WITNESS:** Do you need --  
15 **MR. SHWARTS:** I'm fine.  
16 **THE WITNESS:** I'm fine right now.  
17 **MR. SHWARTS:** Let's keep going.  
18 **THE WITNESS:** I want your coffee, but other  
19 than that, I'm fine.  
20 **MR. SHWARTS:** We'll take a break in a little  
21 while for that.  
22 **THE WITNESS:** Okay. And we'll go get  
23 coffee.  
24 **MR. SONG:** Oh, yeah. I'm sorry. I should  
25 check with you guys.

64

1 Are you guys okay, or do you need a break?  
2 THE REPORTER: I'm fine. Thank you.  
3 BY MR. SONG:  
4 Q Okay. I wanted to talk next about your  
5 compensation policies. So can you, I guess,  
6 generally describe your compensation policies first?  
7 MR. SHWARTS: Well, I'm going to object.  
8 She -- so Ms. Westerdahl is here in her personal  
9 capacity. She's not here as a 30(b)(6) witness.  
10 So it's not appropriate to ask what Oracle's  
11 policies are. She's not here to answer on behalf of  
12 the company today.  
13 So if you want to lay a different  
14 foundation, and she can speak about her personal  
15 knowledge to lay foundation, but she's not here as  
16 30(b)(6).  
17 MR. SONG: I understand. I was asking about  
18 her personal knowledge, but, yeah, I can clarify  
19 that.  
20 BY MR. SONG:  
21 Q Do you know about Oracle's compensation  
22 policies?  
23 MR. SHWARTS: Objection. Overbroad.  
24 You may answer.  
25 THE WITNESS: That -- what do you mean by

65

1 here a little bit. They may be helping with the  
2 bands, what -- you know, what band this person falls  
3 into, their competencies, working with the recruiter  
4 and their skills.  
5 Q Okay. And do you have a role in determining  
6 starting salaries?  
7 MR. SHWARTS: Is the "you" in that question  
8 Ms. Westerdahl?  
9 BY MR. SONG:  
10 Q Yeah. I'm sorry. Do you, Ms. Westerdahl,  
11 have a role in it?  
12 A No.  
13 Q Okay. And which members of HR would have a  
14 role in determining starting salaries?  
15 A It -- that's a big question because we hire  
16 18- to 22,000 new people a year.  
17 Q Okay.  
18 A So is there -- I can't give you an answer  
19 that says every single time the recruiter does this,  
20 the hiring manager does this, and HR does this or  
21 doesn't do this.  
22 It can be the recruiter and the hiring  
23 manager. It can be all three. It can be their  
24 mother-in-law -- I'm being silly.  
25 But with 18 -- other than college hires

67

1 "do you know" --  
2 BY MR. SONG:  
3 Q Well, do you know -- okay. Does Oracle have  
4 compensation policies?  
5 A Yeah, I believe so. Yeah. I mean, like --  
6 well, how to do a focal, or what specifically are  
7 you -- I'm sorry. I don't mean to be --  
8 Q Oh, no, no, no. I'm trying to understand  
9 the compensation, I guess, practice or the process  
10 from your point of view, like, how Oracle deals with  
11 compensation.  
12 So maybe we can start from the very  
13 beginning. How does -- to your understanding, how  
14 does Oracle decide starting salary of a new-hire?  
15 Let's start there.  
16 MR. SHWARTS: Objection. Overbroad.  
17 You may answer.  
18 THE WITNESS: On a day-to-day basis, on the  
19 general population, on hiring, there's a process  
20 with the recruiter, the hiring manager, and probably  
21 HR determining what that person should come in at.  
22 BY MR. SONG:  
23 Q And what's HR's role in determining starting  
24 salary?  
25 A They may be -- I mean, I'm going to project

66

1 where there's pretty much a set salary, and then  
2 there's a -- you know, if we're bringing in our  
3 finance people to Austin and this is what you're  
4 going to get and the salespeople when we do our  
5 college programs -- I can't tell you who's involved  
6 with every single hire.  
7 But those three players as well as maybe  
8 someone's boss may have some input. Or the finance  
9 person may have some input if they're being squeezed  
10 on budget.  
11 And -- so a lot of people or a couple of  
12 people depending on . . .  
13 Q Okay. Let's start with college hires, then.  
14 A Okay.  
15 Q How -- like, which members of your team are  
16 involved in setting the starting salary of college  
17 hires?  
18 A The college program for sales and finance is  
19 run out of my organization.  
20 Q Okay.  
21 A And it's a combination of folks that set  
22 again their starting salaries, market, what's  
23 happening in the market, the budget and the finance  
24 people, the schools. I think when we started these  
25 programs, the deans even had some input.

68

1 I don't have any input. So a group of  
2 people decide what the starting program is, the  
3 moving allowances, their sign-ons -- they set forth  
4 before they start recruiting every year on what's  
5 the salary programs for these folks.  
6 **Q** Okay. But are there specific people from  
7 your department that would work on that?  
8 **A** It's Kathi Baker that actually does the  
9 recruiting. And then there may be someone from  
10 comp, there may be someone from finance.  
11 So I can't answer exactly who they are, but  
12 I know it's a team that puts it together.  
13 **Q** Okay. And then let's take an example of a  
14 transfer. When you -- when you bring in a transfer,  
15 do you treat them as a new-hire, or do you treat  
16 them as like just a previous employee, like in a  
17 company?  
18 **MR. SHWARTS:** Objection. Lack of  
19 foundation. Overbroad.  
20 You may answer.  
21 **THE WITNESS:** They're treated as a transfer.  
22 They're treated not as a new-hire, but like someone  
23 that's moving either a lateral move in their career  
24 or moving up in their career.  
25 So I guess they wouldn't be treated as a --

69

1 So when transfers happen, if someone is  
2 moving from support to sales, probably the sales  
3 comp person would help make that transition happen.  
4 **Q** Okay. And who's the sales comp person now?  
5 Do you know?  
6 **A** Aren't you special?  
7 **Q** I'm giving you the test today.  
8 **A** It might be Kris Edwards. It might be  
9 Chris. But I don't know. I don't know. And they  
10 move things around. They rotate those people around  
11 in their careers.  
12 **Q** I'm sure just to confuse you.  
13 **A** Just to keep me on my toes.  
14 **Q** Okay. And then what about an acquisition  
15 hire. Would that be diff- -- is the way their  
16 salary is determined different than a lateral  
17 transfer?  
18 **A** If -- I mean, that's a broad question, too.  
19 **Q** Okay.  
20 **A** So if I come in in an acquisition and I'm  
21 the finance person, I don't want to do finance  
22 anymore. I want to go into HR. That's treated like  
23 a transfer.  
24 **Q** Okay.  
25 **A** Even though you haven't joined us yet. And

71

1 I actually don't know what you're asking.  
2 **BY MR. SONG:**  
3 **Q** Okay. So do they keep the same salary as  
4 they have before?  
5 **A** No. It would depend on what job -- what new  
6 role they're going into.  
7 **Q** Okay. So then how is the salary of a  
8 transfer decided or determined?  
9 **MR. SHWARTS:** In her organization?  
10 **BY MR. SONG:**  
11 **Q** Yeah. Within your organization.  
12 **MR. SHWARTS:** Like, who, what? Who within  
13 your organization do you --  
14 **THE WITNESS:** Okay. So if it's they're  
15 moving from -- they're moving from a pre-sales  
16 position to a sales position, the hiring manager  
17 would probably work with someone from HR or comp to  
18 figure out the new mix for this new role.  
19 **BY MR. SONG:**  
20 **Q** Okay. And is there anybody in particular  
21 that you --  
22 **A** I think in the comp group, there's people  
23 that specialize -- I know in the comp group, I don't  
24 think -- specialize in sales people, specialize in  
25 development people, specialize in support people.

70

1 that does happen quite a bit where -- but if I'm a  
2 salesperson, and I was selling for Taleo, we bought  
3 you, and you come and work for Oracle, they would  
4 look to put you in a different variable and maybe  
5 your base would change and your car allowance may  
6 change because you're going to an Oracle plan, and  
7 you're selling something -- maybe you're selling HCM  
8 instead of just Taleo.  
9 **Q** Okay. And you don't know any of the  
10 specific HR people that would work on --  
11 **A** They have in the M&A group under  
12 Peter Shott, they have people that facilitate all of  
13 that onboarding and putting them into our job  
14 structure.  
15 **Q** Okay.  
16 **A** And our job bands and moving them into new  
17 roles.  
18 **Q** Okay. Well, what about from HR?  
19 **A** That -- that's -- that group is in HR.  
20 **Q** Oh, that --  
21 **A** That's under Peter Shott in HR.  
22 **Q** Okay. And then what --  
23 **A** If we drew it out, it would be better.  
24 **Q** Yeah. It would make a little bit more sense  
25 to me.

72

1 A Yeah. Or we could use this?  
2 Q Yeah. That would be great. We could just  
3 project it.  
4 A Yeah.  
5 Q Well, maybe during the break, you can --  
6 A Don't tempt me. Give me a magic marker, I'm  
7 going to go crazy.  
8 MR. SHWARTS: You're not doing that.  
9 BY MR. SONG:  
10 Q That would make it easier for all of us.  
11 Make this go faster.  
12 Okay. And then the last category,  
13 "new-hire" --  
14 A Okay.  
15 Q -- how is -- how would your department be  
16 involved in setting the salary for a new-hire?  
17 A I thought we covered that, but we'll do it  
18 again.  
19 Q Yes, please.  
20 A Okay. So as I said, a new-hire, 18- to  
21 22,000 new-hires a year. That's -- college numbers  
22 are in there.  
23 But recruiter, hiring manager and maybe comp  
24 would determine how they fit, what -- with their  
25 skills and their competency, what band they fit into

73

1 on a computer?  
2 A No. I mean -- so it depends on who we're  
3 training. I mean, there's ongoing training all the  
4 time.  
5 So I don't -- if you have new recruiters or  
6 you have new HR managers, I'm sure they're  
7 constantly training.  
8 Or as we launch a focal program, there's  
9 always training right before we go into focal.  
10 Or -- but -- so I don't know exactly how the  
11 mechanics works on it, but there's training on our  
12 job codes and our ranges and our -- there are  
13 geographical differences on pay and country  
14 differences --  
15 Q Okay.  
16 A -- as people learn this stuff.  
17 Q Is there anything written on these  
18 trainings?  
19 A You would have to ask the comp people.  
20 Q Okay. And you're not involved in any of  
21 these trainings, correct?  
22 A No.  
23 Q Okay.  
24 MR. SHWARTS: Meaning, no, you're not  
25 involved? There's a double negative there, just so

75

1 and how to pay them.  
2 Q Okay. And, again, do you know who in your  
3 department would be working on that?  
4 A It's -- you know, whatever the recruiter --  
5 it would be an assigned recruiter --  
6 Q Okay.  
7 A -- who is working on the search. And then,  
8 like I said, someone -- let's say it's sales  
9 recruiter, then it would be a sales comp person,  
10 maybe hiring manager. You might have finance  
11 involved or not.  
12 Q And how do -- how do people in your  
13 department in HR know how to be involved in setting  
14 the starting salary? Is there -- are there  
15 practices or guidelines that they're trained on?  
16 A I believe so. There's job -- I mean,  
17 they're trained on the job bands and the ranges.  
18 Q Okay. And do you know what this training is  
19 called? Is this part of the managers guide?  
20 A I don't.  
21 Q Do you know how often these trainings take  
22 place?  
23 A I don't.  
24 Q Okay. And are these also the types of  
25 trainings that they would do by themselves online or

74

1 the record is clear.  
2 THE WITNESS: Yeah. No, and I don't deliver  
3 the training either. Yeah. No and no.  
4 BY MR. SONG:  
5 Q Okay. And then can we talk about salary  
6 increases?  
7 A Sure.  
8 Q Is there a process for that or --  
9 A Yes.  
10 Q Okay. And can you explain the process,  
11 please?  
12 A For -- we call it "focal." So it starts  
13 with a focal budget being set by country, and Phil's  
14 team does that work.  
15 Q Okay.  
16 A And then we roll the budget out by country,  
17 around the world, and we start communications that  
18 focal -- the focal process is coming.  
19 Q And when approximately does it start?  
20 A It's just wrapping up now. So we try to  
21 typically do it -- we close our year May 31st. We  
22 try to do our stock, our bonus, and our focal at  
23 this time and wrap up this week. It doesn't always  
24 happen that way.  
25 Q And then can we talk about the budget a

76

1 little -- the focal budget? How is the focal budget  
2 developed?  
3 **A** Like I said, it's based on CPI and in  
4 country and there is some market work that goes on,  
5 what our competitors are doing. And there's  
6 probably some other factors. Phil would be the best  
7 person to ask what he actually does on that.  
8 **Q** Okay. And he's doing -- so is there -- is  
9 there one focal budget per country? It's not by  
10 department?  
11 **A** It's by country.  
12 **Q** By country. Okay. And Phil's group does  
13 all of them?  
14 **A** Correct, including the inflationary  
15 increases.  
16 **Q** And once Phil comes up with the -- or Phil's  
17 group, I'm sorry -- comes up with the focal budget,  
18 what's the approval process for the budget?  
19 **A** It goes to Safra and Mark and Larry for  
20 approval.  
21 **Q** Okay. So once Phil's group develops these  
22 focal budgets by country, it just goes to Safra,  
23 Mark, and Larry. And if they approve, that's it?  
24 **A** Yes.  
25 **Q** Okay. And then I'm sorry. I cut you off.

77

1 So then how does that get divided up between  
2 all the employees?  
3 **MR. SHWARTS:** Objection. Overbroad.  
4 You may answer.  
5 **THE WITNESS:** Yeah. It's a -- so Phil and  
6 his team put it in this tool, and it is distributed.  
7 The tool calculates your world. Let's just say  
8 "you."  
9 **BY MR. SONG:**  
10 **Q** Okay.  
11 **A** And you have 300 employees, and they're in  
12 20 countries. And this tool will calculate your  
13 budgets by employees by countries and put it in this  
14 tool for you to distribute your budget.  
15 **Q** Okay. So are the salary increases  
16 determined before the focal budget is approved?  
17 **THE WITNESS:** Can you read that back?  
18 (Record read.)  
19 **THE WITNESS:** No.  
20 **BY MR. SONG:**  
21 **Q** Okay. So when are employees salary  
22 increases determined?  
23 **A** Once -- once you -- you're in your  
24 Comp Workbench, fancy spreadsheet, kind of think of  
25 it that way --

79

1 So after the focal budget is approved by  
2 country, then how does the process play out?  
3 **A** It's then loaded in our product, HCM product  
4 and the product within HCM is called  
5 Compensation Workbench. And it's distributed to  
6 every manager through a technical system.  
7 **Q** Okay. And can you explain, like, what's --  
8 well, what is Compensation Workbench first of all?  
9 **A** It's an application.  
10 **Q** Okay. That helps -- just helps with  
11 determining salary increases?  
12 **A** No. It processes the actual event.  
13 **Q** The increase?  
14 **A** It -- it manages the event, the focal event.  
15 **Q** Okay. And sorry for my ignorance --  
16 **A** No, no.  
17 **Q** -- is that included in Fusion? Is that part  
18 of Fusion?  
19 **A** Yes. It's a part of the HCM. Because we  
20 agreed we were going to call it "HCM," not Fusion.  
21 So I'm pointing to your notepad right there. It's  
22 part of the HCM suite.  
23 **Q** Okay. Okay. So if the -- so how does  
24 the -- so you have a focal budget for each country.  
25 Let's take the U.S.

78

1 **Q** Okay.  
2 **A** -- you determine what you're going to give  
3 your people in all -- you have 30 countries we  
4 talked about.  
5 **Q** Okay.  
6 **A** And you hit "Approved."  
7 **Q** Okay.  
8 **A** It then goes up for further approvals.  
9 **Q** Okay.  
10 **A** And then once it's approved, it comes back  
11 to you and says your spreadsheet's approved,  
12 basically. You may talk to your employees.  
13 **Q** I see. Now, in developing the focal budget,  
14 do individual managers get to recommend that  
15 their -- let's say they get to -- they have one  
16 really good employee or maybe five or whatever, do  
17 they get to recommend that these five get raises  
18 before the focal budget is approved?  
19 **A** They would do it after the budgets are  
20 actually approved.  
21 **Q** Okay. After?  
22 **A** Yeah.  
23 **Q** Okay. So manager -- so once the -- so the  
24 focal budget is approved and the managers are told,  
25 "This is how much money you have for increases"; is

80

1 that correct?  
2 **A** Correct.  
3 **Q** Oh, okay. And so then it's at that point  
4 that the manager decides how much increase to give  
5 each employee, if any, correct?  
6 **A** Correct.  
7 **Q** Okay. And is it done by the direct manager  
8 of the employee, like the direct supervisor of the  
9 employee?  
10 **A** Yes.  
11 **Q** Okay. So, for example, you would decide on  
12 your reports' increases?  
13 **A** Correct.  
14 **Q** Okay. And if we go to let's say an M-1,  
15 then does it go all the way up to the top? Or how  
16 far does the review or approval process go?  
17 **MR. SHWARTS:** Objection. Vague.  
18 **BY MR. SONG:**  
19 **Q** Okay. All right --  
20 **A** I don't even know how to answer that --  
21 **MR. SHWARTS:** I think I know where you were  
22 going, but I don't think you asked it the way you  
23 wanted to. Try again.  
24 **BY MR. SONG:**  
25 **Q** Okay. Let's say an M -- we'll take as an

81

1 **Q** Okay.  
2 **A** But the HR people look at all of them.  
3 **Q** Okay. So you don't know how many levels of  
4 review. But somebody from your department will look  
5 at the decisions that the managers make for salary  
6 increases?  
7 **A** Yes.  
8 **Q** Okay. And you don't need to approve every  
9 salary increase, you directly?  
10 **A** Technically I do. Like, if we're talking  
11 about my organization. But my comp person has kind  
12 of gone through and given me summaries, and she --  
13 my comp person is Kate.  
14 **Q** Okay.  
15 **A** See, I can answer that question.  
16 **Q** Thank you.  
17 **A** So -- but it doesn't happen -- different  
18 managers are different about how deep or how  
19 detailed they look. Some are very detailed. Some  
20 of them have full discussions with people.  
21 **Q** Okay. So you personally don't need to  
22 review every salary increase but your department  
23 does?  
24 **A** No.  
25 **Q** No? Okay.

83

1 example, an M-1 -- how many employees would they  
2 supervise? Maybe just a few?  
3 **A** It -- they -- it's a varied answer.  
4 **Q** Okay.  
5 **A** Yeah.  
6 **Q** It could be --  
7 **A** It could be --  
8 **Q** Okay.  
9 **A** -- 17. It could be a lot more.  
10 **Q** Okay. Let's take, for example, the M-1  
11 because I'm thinking that's the lowest management  
12 level; is that correct?  
13 **A** Yes.  
14 **Q** So they decide, "I'm going to give salary  
15 increases to, you know, five of my employees," just  
16 for example, is there any oversight or review of  
17 that manager's decision?  
18 **A** Yes.  
19 **Q** Okay. So how many levels?  
20 **A** For an M-1?  
21 **Q** Mmm-hmm.  
22 **A** Well, in reality, it's probably only -- I  
23 don't know. I mean, I don't -- I don't know if  
24 everyone looks at it. I certainly don't look at all  
25 of them.

82

1 **A** No. I think we're getting hung up on  
2 approval levels.  
3 **Q** Okay.  
4 **A** So the approvals, there is -- the approvals  
5 do go all the way up --  
6 **Q** Okay.  
7 **A** -- to Safra.  
8 **Q** To Safra?  
9 **A** In Safra's world.  
10 **Q** Okay. Safra's world. Okay.  
11 **MR. SONG:** Oh, five minutes to end of media.  
12 **MR. SHWARTS:** That's where we'll take a  
13 break.  
14 **THE WITNESS:** I forgot what I was going to  
15 say.  
16 **MR. SHWARTS:** You were -- well, what you  
17 said was in Safra's world, the approvals go all the  
18 way up to her in her world. That's what you said.  
19 **THE WITNESS:** But I think we're getting hung  
20 up on -- I'm answering -- I'm answering to our  
21 approval matrix, and you're looking to see who  
22 approves.  
23 And technically they're approved in every  
24 organization up to either Larry, Mark, or Safra --  
25 ///

84

1 BY MR. SONG:  
2 Q Okay.  
3 A You're -- I think --  
4 THE WITNESS: I'm not supposed to tell  
5 him -- I think he's trying to say what oversight.  
6 I don't know what you're trying to say.  
7 BY MR. SONG:  
8 Q Well -- and how much oversight -- so -- but  
9 I think you're trying to say that there's not  
10 necessarily five or six levels --  
11 A There can be.  
12 Q There can be, but it's not always. But  
13 everyone needs to be approved by either Mark or --  
14 A Overall.  
15 Q -- or Larry or Safra?  
16 A The entire -- that entire budget, the final  
17 sign-off is the head of the business leader.  
18 Q Okay. The business leader. Okay.  
19 MR. SONG: Okay. All right. Maybe we'll  
20 take a break here, then, since we're almost out of  
21 tape.  
22 THE WITNESS: Okay.  
23 MR. SHWARTS: Thank you.  
24 THE VIDEOGRAPHER: This is end of  
25 Media No. 1 of video deposition of Joyce Westerdahl.

85

1 handbook or pamphlet.  
2 Q Okay.  
3 A But I'm not quite sure what's in that  
4 new-hire kit.  
5 Q Okay. And do you know what's contained in  
6 the employee handbook?  
7 A In general? Just -- I think questions like  
8 you were asking on holiday schedules and affirmative  
9 action and EEOC guidelines and where to find your  
10 pay stubs, you know, all of it, a very general  
11 information.  
12 Q Okay. Would it include information about  
13 compensation?  
14 A I'd have to go -- we'd have to -- I'm sure  
15 it does. It talks about focal -- I just -- I  
16 haven't read it in a long, long time.  
17 Q Okay. And do you know who wrote that  
18 handbook?  
19 A At this point, no.  
20 Q Okay. And --  
21 A It's -- it's -- I bet you it's still out of  
22 that group that, you know, keeps all those policies,  
23 the manager resource guide, the employee handbook,  
24 all those things up-to-date out of that --  
25 Kirstin Ward's organization.

87

1 Going off the media record at approximately  
2 10:31 a.m.  
3 (Off the record from 10:33 a.m. to 10:50  
4 a.m.)  
5 THE VIDEOGRAPHER: This is the beginning of  
6 Media No. 2 in the continuing deposition of  
7 Joyce Westerdahl. Back on the video record at  
8 approximately 10:49 a.m.  
9 MR. SHWARTS: Mr. Song, Ms. Westerdahl  
10 wanted to clear up one of her responses with respect  
11 to the employee handbook.  
12 MR. SONG: Okay.  
13 THE WITNESS: We do have an employee  
14 handbook. It's online like the manager resource  
15 guide as well.  
16 I think I was confused. I don't think I  
17 was -- I was -- I am confused or was confused with  
18 your line of questioning.  
19 BY MR. SONG:  
20 Q Okay. And is that employee handbook --  
21 thanks for clarifying.  
22 Is that employee handbook given out to  
23 employees, or is it only available online?  
24 A I believe it may be given out in hard copy  
25 when they join along with the code of conduct

86

1 Q Okay. And do you know when it was first  
2 written?  
3 A I don't.  
4 Q Okay. And you don't know when the last  
5 revision was made?  
6 A No.  
7 Q Okay. And you think that Kristen -- is it  
8 Kirstin or --  
9 A Kirstin --  
10 Q Kirstin?  
11 A Kirstin Ward.  
12 Q Her group --  
13 A Could answer all those questions, yes.  
14 Q Okay. And you're not sure if it has  
15 information about how to file complaints?  
16 A Oh, I bet it does, yes. I would imagine it  
17 does. That's kind of the law and where our hotline  
18 is and how to call it and all that other stuff.  
19 Q Okay. I had a few more questions about the  
20 Compensation Workbench. After managers make their  
21 recommendations, can they change them?  
22 A Up until the point the product is frozen  
23 going into approvals.  
24 Q Okay. What does that mean?  
25 A There's a timeline. So you're given three

88

1 weeks to work on your organization. So within that  
2 timeline, yes, I could change my mind as many times  
3 as I wanted to.  
4 Q Okay.  
5 A And then if -- which just happened. We had  
6 several people resign. And they wanted to  
7 reallocate those dollars, but it hadn't been finally  
8 approved. So then someone from comp went in and  
9 reallocated those dollars.  
10 So somebody did it for you, but you wanted  
11 to make that change before final approval, we could  
12 accommodate you.  
13 Q Okay. So you can make changes to your  
14 recommendations until final approval?  
15 A Correct.  
16 Q And final approval is by Larry, Safra --  
17 A And Mark.  
18 Q Okay. And does the  
19 Compensation Workbench -- does that track the  
20 changes that you make?  
21 MR. SHWARTS: If you know.  
22 THE WITNESS: I don't know.  
23 BY MR. SONG:  
24 Q Okay. And do you know if it's common for  
25 managers to make changes?

89

1 they report to?  
2 A Well, they report up through me.  
3 Q Oh, up through you.  
4 A But they don't directly report to me.  
5 Q Okay. Who is their direct report?  
6 A In the Americas, it would be Anje Dodson.  
7 Q Okay.  
8 A In EMEA, Vance, and Alison for Asia PAC.  
9 Q Okay.  
10 MR. SHWARTS: EMEA is E-M-E-A all caps.  
11 THE REPORTER: Thanks.  
12 BY MR. SONG:  
13 Q And then one more question about the -- so  
14 we talked about setting the starting salary for  
15 college hires for sales and another group, but would  
16 it be any different for product development?  
17 A Product development doesn't -- up until  
18 recently, I wasn't responsible for product  
19 development. University hires for headquarters. So  
20 I can't speak to how they determine the base salary  
21 process.  
22 Q Okay. So HR is not involved at all in  
23 setting the starting salaries for college hires for  
24 product development?  
25 A I don't know if we were involved at all. I

91

1 MR. SHWARTS: Objection. Overbroad and  
2 vague.  
3 You may answer.  
4 THE WITNESS: I don't -- I don't know. I  
5 could only speak for what I do.  
6 BY MR. SONG:  
7 Q Okay. So you wouldn't have any idea of how  
8 many changes are made to the Compensation Workbench?  
9 A No, I would not.  
10 Q Okay.  
11 THE WITNESS: How did I burn myself? Look  
12 at that. And it's hurting. Sorry. Clearly I'm  
13 never making coffee again downstairs.  
14 BY MR. SONG:  
15 Q And regarding the salary increases, why does  
16 it need to be finally approved by Safra? Why does  
17 it need to go all the way up there?  
18 A It's just our approval matrix. And that  
19 would just be Safra's world and Mark's world. It's  
20 not the three of them. It's each -- their  
21 divisions --  
22 Q Okay.  
23 A -- would approve.  
24 Q Okay. And you said the human resources  
25 business partners don't report to you, but who do

90

1 don't know. I don't know if they consulted us at  
2 all.  
3 Q Okay. And when you have a new-hire, is  
4 there like a ceiling to what you can pay a new-hire?  
5 MR. SHWARTS: Objection. Overbroad. Vague.  
6 You may answer.  
7 THE WITNESS: Not really. I mean, I guess  
8 if you -- if you wanted to go above the band with  
9 approval, I guess you could.  
10 BY MR. SONG:  
11 Q Okay. And are you -- when you talk about  
12 the band, are you -- is that within the salary  
13 grade?  
14 A Yeah. The salary band within the job code.  
15 MR. SONG: Okay. Okay. I want to show  
16 you -- let's see, the next exhibit. So this was  
17 marked as Exhibit 5 in the Waggoner deposition.  
18 THE WITNESS: Do I take that or not take  
19 that?  
20 MR. SHWARTS: Do you want to remark it or do  
21 you want to just call it --  
22 MR. SONG: I'll just call it 7 because it's  
23 already been --  
24 MR. GARCIA: Right.  
25 MR. SHWARTS: No. It's got a sticker on it

92

1 from Waggoner 5. Do you want him to restamp it?  
2 MR. SONG: Oh, no. That's okay.  
3 THE WITNESS: Okay.  
4 MR. SONG: We'll just keep it as 7 to keep  
5 it simple.  
6 BY MR. SONG:  
7 Q Okay. Do you -- I'll give you a second to  
8 read it.  
9 A See, I was right.  
10 MR. SHWARTS: Let him ask a question,  
11 please.  
12 BY MR. SONG:  
13 Q Okay. Have you had a chance to review?  
14 A Yes.  
15 Q Do you recognize this document?  
16 A I recognize this document. This, I don't  
17 remember. I don't remember this document.  
18 MR. SHWARTS: When you say "this document,"  
19 can you identify -- on the bottom right, there's a  
20 number, just so we can --  
21 THE WITNESS: I recognize the first four  
22 pages of this document. The last page, I may have  
23 seen in the past. It's just -- I don't remember it  
24 at this point.  
25 ///

93

1 request?  
2 A No.  
3 Q No? Okay. And for the document requests,  
4 was it the attorneys that searched for the documents  
5 and produced them?  
6 A In my world, yes.  
7 Q Okay.  
8 A Yeah.  
9 Q And you weren't involved in writing this  
10 document, correct?  
11 A No.  
12 MR. SHWARTS: Okay. Again, I'm sorry.  
13 The -- just so the record is clear because the way  
14 you asked the question meaning you were not involved  
15 in writing the document?  
16 THE WITNESS: Correct.  
17 BY MR. SONG:  
18 Q You personally?  
19 A No. Me personally.  
20 MR. SHWARTS: There was a double-negative in  
21 there.  
22 THE WITNESS: Sorry.  
23 BY MR. SONG:  
24 Q And does everything in this document look  
25 correct to you? Is it accurate?

95

1 BY MR. SONG:  
2 Q Okay. So you recognize ORACLE 380594  
3 through 380597?  
4 A Correct.  
5 Q And do you know who wrote this?  
6 A Not -- I'm sure it's been updated over the  
7 years. I don't know the original author of it.  
8 Q Okay. And do you know how old this is?  
9 A I am sure -- I don't know how old this is,  
10 but I'm sure this has been, as some of these other  
11 documents, updated over the years.  
12 Q Okay. Was it somebody from your department  
13 that wrote this from HR?  
14 A I'm going to have to assume yes.  
15 Q But you're not sure who?  
16 A I'm not sure who. I'm not sure if it was  
17 Sue Charlie's group, which is, you know -- which it  
18 was originally written under. I don't know.  
19 Q Okay. Do you know if this document is  
20 current?  
21 A I could not say for certain if it's the most  
22 latest document or not. It doesn't have a date  
23 here.  
24 Q Okay. And do you remember producing this  
25 document in response to the Government's document

94

1 MR. SHWARTS: Objection. Vague and  
2 overbroad.  
3 THE WITNESS: To the best of my knowledge,  
4 it looks correct.  
5 BY MR. SONG:  
6 Q Okay. So the first question I have for you  
7 is it says (As read:) When determining the  
8 employee's total compensation package, the following  
9 factors may be taken into account.  
10 And you can, obviously, see in the second  
11 paragraph, it lists "salary range, global career  
12 level, other employees."  
13 Can you talk about each of those factors,  
14 please, and then the weight given to each of those  
15 factors?  
16 MR. SHWARTS: Objection. Overbroad. Lacks  
17 foundation.  
18 THE WITNESS: I could not.  
19 BY MR. SONG:  
20 Q Okay.  
21 A Yeah. I'm not the best person to answer  
22 that.  
23 Q Okay. So when it says the job's salary  
24 range, they're talking about the external salary  
25 range, correct, not the internal Oracle one?

96

1 MR. SHWARTS: Objection. Lack of  
2 foundation.  
3 You may answer.  
4 THE WITNESS: Which is based on the external  
5 market value for the job. That's a market  
6 valuation.  
7 BY MR. SONG:  
8 Q Okay. Okay. But I just want to clarify  
9 it's not the Oracle salary band?  
10 A No. It's external market valuation.  
11 Q Okay. And then what do they mean by "global  
12 career level" as a factor?  
13 MR. SHWARTS: Objection. Lack of  
14 foundation.  
15 You may answer.  
16 THE WITNESS: So we have a job structure  
17 as -- which we haven't talked about, but we have job  
18 codes, and we have a global career level system,  
19 which you've cited: M-1, M-2, M-3.  
20 And I see, you know, 1s, 2s, 3, 4, 5, 6 --  
21 that's what's held within the system as the global  
22 job system.  
23 BY MR. SONG:  
24 Q Okay. And how would that factor into the  
25 compensation?

97

1 measured. Like, you asked me about all the EVPs,  
2 whatever I am, an M-8 or whatever I am, so -- but  
3 not all the M-8s are paid the same because we're in  
4 different locations.  
5 And we -- I am probably paid nowhere near  
6 what a development executive vice president is paid.  
7 So depending -- but we're both M-8s.  
8 Q Okay. But there would be -- but your global  
9 career level, like let's say you're an IC-1, there  
10 would be a range or a limit to what your  
11 compensation would be under IC-1?  
12 MR. SHWARTS: Objection. Lack of  
13 foundation. Overbroad.  
14 You may answer.  
15 THE WITNESS: Yeah, but that's -- you're  
16 confusing the global job level with the salary  
17 range.  
18 BY MR. SONG:  
19 Q Okay.  
20 A They're two different things.  
21 Q Okay. Well, I'm just asking because it  
22 lists global career level --  
23 A Yeah.  
24 Q -- as one of the factors in determining  
25 compensation package.

99

1 MR. SHWARTS: Objection. Overbroad and lack  
2 of foundation.  
3 You may answer.  
4 THE WITNESS: It doesn't -- what was your  
5 question?  
6 BY MR. SONG:  
7 Q So how is -- how does that factor into the  
8 compensation? Because --  
9 MR. SHWARTS: Same objection.  
10 You may answer.  
11 THE WITNESS: Yeah. It doesn't really  
12 factor into the compensation. It's a -- everyone  
13 needs to fit in a global job level so we have a way  
14 of managing the business.  
15 BY MR. SONG:  
16 Q That's where the salary bands are, right?  
17 A No. Because the global job level is just an  
18 M-1, let's just say. You're an M-1.  
19 Q Okay.  
20 A But if you're in Tokyo, a job rate, a job  
21 band is different in Tokyo than it is in  
22 San Francisco. Maybe not, actually. That's a bad  
23 example.  
24 Q Okay.  
25 A But the global -- that's just how we're

98

1 A Yeah. And they probably put it in a global  
2 career level which then moves to a job code, a  
3 number, and then commutes to a job title and then  
4 you have a band. If you're in that equals, I am in  
5 the Philippines, and I'm an M-1.  
6 Q Okay. So that's how it would factor in  
7 compensation?  
8 A Mmm-hmm.  
9 Q Okay. And then the third factor was the  
10 salaries of other Oracle employees in the same job  
11 and location.  
12 Can you explain that factor, please?  
13 MR. SHWARTS: Objection. Lack of foundation  
14 and overbroad.  
15 I have an issue with asking a witness in her  
16 personal capacity to explain a document she didn't  
17 write and she's not responsible for administering at  
18 the very highest level.  
19 You may answer if you can.  
20 THE WITNESS: So -- yeah. I'm -- you would  
21 base it on -- so they look at other Oracles in the  
22 same job and location as what -- what to pay for  
23 that individual.  
24 BY MR. SONG:  
25 Q Okay. So they would -- they would compare

100

1 the salaries of other employees in the same job and  
2 location, for example, Philippines?  
3 **A** Correct, yeah.  
4 **Q** Okay. And when they say "same job," are  
5 they talking about IC-1 product development or the  
6 actual job title?  
7 **MR. SHWARTS:** Objection. Overbroad.  
8 **BY MR. SONG:**  
9 **Q** Or job code?  
10 **MR. SHWARTS:** Vague. And lack of  
11 foundation.  
12 **THE WITNESS:** Yeah. You're not talking to  
13 an expert here, but it would have to be in the  
14 same -- so we're still in the Philippines. So it  
15 would still be that systems engineer in the  
16 Philippines.  
17 You wouldn't compare that level with a  
18 facilities person at the same level.  
19 **BY MR. SONG:**  
20 **Q** Okay. Okay.  
21 **A** Yeah.  
22 **Q** So if it was the -- let's say if we're in  
23 the U.S., then it would be the same job title like  
24 systems engineer at Redwood Shores?  
25 **MR. SHWARTS:** Objection. Same objection.

101

1 that are set by their organizations or their direct  
2 manager.  
3 **Q** Okay. And are those -- are those  
4 evaluations -- are those written?  
5 **A** They can be.  
6 **Q** Okay. And so sometimes they're verbal?  
7 **A** They're -- sometimes they're verbal, and  
8 they -- and we do use a top talent system of rating  
9 people. It's not really rating. It's high  
10 potential, the 9-box square.  
11 **Q** Okay. And can you explain the top talent --  
12 I've never heard of that. How does that work?  
13 **A** Okay. There's a 9-box square, and you have  
14 all of your employees. And you have some employees  
15 that are emerging talent, and there are some people  
16 that aren't doing well or there's new-hires. They  
17 haven't been able -- they may be emerging talent,  
18 you think they're talented, and they're in one box.  
19 So it's a typical -- it's actually a  
20 management -- university system of managing your  
21 talent. And you may have the conversation with your  
22 person that, "You're one of my top talents, and we  
23 need you to expand your career. And I would like  
24 you to go work over here next year," or whatever.  
25 But it's a way to have the conversation with people

103

1 **THE WITNESS:** Yes.  
2 **BY MR. SONG:**  
3 **Q** And the fourth and final factor was the  
4 individual's performance. How does that factor into  
5 compensation?  
6 **MR. SHWARTS:** Objection. Vague and  
7 overbroad. Lack of foundation.  
8 You may answer.  
9 **THE WITNESS:** So -- so -- so you talked  
10 about earlier you had, like, five of your employees  
11 who were overperforming. So they -- you as a  
12 manager would take into account their performance.  
13 **BY MR. SONG:**  
14 **Q** Okay.  
15 **A** Certainly, if you were thinking about  
16 getting rid of someone -- and this is talking about,  
17 you know, the focal process -- you probably wouldn't  
18 give someone a raise if you were counseling them out  
19 of the company.  
20 **Q** Okay. And how do they evaluate performance?  
21 **A** Within certain managers, different MBOs on  
22 what, you know -- I do it slightly different on what  
23 people are delivering, how well they work well with  
24 people, I have certain projects for my directs.  
25 So they're measured against their projects

102

1 about what they're doing.  
2 **Q** Okay. And the 9-box square -- is that --  
3 so, like, is there, like, a 1 through 5 scale, like  
4 5 being the top?  
5 **A** No. Because it's not, like, a stack  
6 ranking. It's -- you could be you're new, and  
7 you're an emerging talent. That doesn't mean you're  
8 bad. It's just you're not -- you know, you're not a  
9 seasoned top talent in this area. It allows for  
10 individual growth. But it's nowhere -- not a stack  
11 ranking system or something.  
12 **Q** Okay. And is this top talent rating -- is  
13 that written? Is that provided in writing to the --  
14 **A** I don't know what materials we give -- we  
15 give -- we train managers on it, and we have -- you  
16 would have to talk to someone in our talent  
17 organization group on what materials come with that  
18 and how we manage that process.  
19 **Q** Okay. Are these performance evaluations  
20 discussed in the employee handbook?  
21 **A** I don't know if they are or they're not.  
22 **Q** Okay. And do you know how often the  
23 employees are given talent -- I mean -- I'm sorry --  
24 performance reviews or evaluations?  
25 **MR. SHWARTS:** Objection. Overbroad.

104

1 You can answer.  
2 THE WITNESS: Yeah. It really depends by  
3 the line of business.  
4 BY MR. SONG:  
5 Q Okay. Let's take, for example, product  
6 development. Do you know how often they would give  
7 performance reviews?  
8 A I actually don't. And we have several  
9 leaders in product development. So I don't.  
10 Q Okay.  
11 A I can't answer that directly.  
12 Q Is there a goal for how many performance  
13 evaluations an employee should be given?  
14 A No.  
15 Q Okay. And there's no goal about whether it  
16 should be written or verbal?  
17 A No. And the top talent system is not really  
18 a performance -- traditional performance evaluation  
19 system.  
20 Q Okay.  
21 A Okay.  
22 Q And is the top talent thing -- is that in  
23 the computer or in the cloud or somewhere?  
24 A If you Google it, it's actually -- anyway,  
25 yeah, I think it is in the cloud. I think it is in

105

1 an instructor bonus.  
2 Q Okay. If we take, for example, product  
3 development in the U.S. or Redwood Shores, how -- or  
4 who determines whether they get a bonus, first?  
5 A We -- it's first funded by -- if we perform  
6 a certain way.  
7 Q Okay.  
8 A And then once that happens, just like focal,  
9 there's a pool.  
10 Q Okay.  
11 A And it goes into that Comp Workbench thing  
12 again. And -- and then managers would do the exact  
13 same thing as they do with the focal process and  
14 make a judgment on how to give out their bonus  
15 dollars.  
16 Q So it's similar to the salary increases  
17 where the manager -- there's a budget, the manager  
18 gets to make recommendations?  
19 A Correct.  
20 Q And this is -- this would be contained in  
21 the Compensation Workbench again?  
22 A Correct.  
23 Q Okay. And the managers can make changes  
24 again?  
25 A Up to --

107

1 product. I think you're right. How about that?  
2 Q Wild guess. Makes sense if it's there. I  
3 wouldn't know how to find it, but . . .  
4 Okay. And then in the chart in the middle  
5 of the first page, when is compensation paid out, so  
6 it says "corporate bonus annual."  
7 Can you explain how the corporate bonus  
8 process works?  
9 MR. SHWARTS: Ignore the document. He's  
10 just asking you a question.  
11 And objection. Overbroad, but you may  
12 answer.  
13 THE WITNESS: I forgot the question.  
14 MR. SHWARTS: The corporate bonus. He asked  
15 you about the --  
16 THE WITNESS: How does it work?  
17 BY MR. SONG:  
18 Q Yeah. How does that work?  
19 A It's a financial metric setup. And if we  
20 meet our -- whatever that formula is, if we meet  
21 that, it funds the corporate bonus to be paid to  
22 employees.  
23 Q Across the board?  
24 A No. It funds to employees that aren't  
25 eligible for either a sales or a consulting bonus or

106

1 Q The approval?  
2 A Correct.  
3 Q Okay. And then how do the stock options  
4 work?  
5 A Very similar thing. There is a budget set  
6 every year. And it's a tiny -- little bit  
7 different, but the budget is set. Mark, Safra, and  
8 Larry approve the budget. And then the budget is  
9 taken to comp committee for their approval.  
10 Q Okay. And what is the comp committee?  
11 A It's a subset committee of the board of  
12 directors.  
13 Q Okay. And do you know how many members are  
14 part of that?  
15 MR. SHWARTS: Presently?  
16 BY MR. SONG:  
17 Q Yes, presently. Sorry.  
18 A Four. We have four members.  
19 Q Okay. Do you know who they are?  
20 A We have a new member, and I cannot tell you  
21 his name, but we have Leon Panetta.  
22 THE WITNESS: Is that how you pronounce his  
23 last name?  
24 MR. SHWARTS: Panetta.  
25 THE WITNESS: Panetta. Naomi Seligman. And

108

1 our chair is George -- it will come to me.  
2 BY MR. SONG:  
3 Q That's okay if not.  
4 A Yeah. You can -- it's on our -- it's on our  
5 website.  
6 Q Yeah. Probably can find that. So it was  
7 Leon Panetta, Naomi, George, and was there one other  
8 person?  
9 A There is a new member and I can't --  
10 MR. SHWARTS: It was Leon Panetta,  
11 Naomi Seligman --  
12 THE WITNESS: Seligman. And George and we  
13 have a new member. We have a new board member, and  
14 he's on comp committee as well. And I cannot pull  
15 his name from my brain right now.  
16 BY MR. SONG:  
17 Q Okay. And comp committee means compensation  
18 committee?  
19 A Compensation committee.  
20 Q Okay. And then what do they do?  
21 MR. SHWARTS: Objection. Overbroad.  
22 As it relates to stock awards or generally?  
23 BY MR. SONG:  
24 Q Just what does the compensation committee  
25 do?

109

1 A They approve the executive bonuses.  
2 Q Okay. And executive salaries?  
3 A And executive -- they really don't have  
4 authority -- they approve their bonuses, and they  
5 approve their stock grants.  
6 Q Okay. So -- but for nonexecutive staff,  
7 they don't -- they don't approve the bonuses for  
8 nonexecutive staff?  
9 A No.  
10 Q Okay. Or salaries, correct?  
11 A No.  
12 Q Okay. And the focal salary that's listed in  
13 this document, that's just the focal review that we  
14 discussed, correct?  
15 MR. SHWARTS: Objection. Overbroad. Lacks  
16 foundation.  
17 You may answer.  
18 THE WITNESS: Say the question again.  
19 MR. SHWARTS: He was asking now about the  
20 document.  
21 THE WITNESS: Okay. So this covers -- say  
22 the question again.  
23 BY MR. SONG:  
24 Q Yeah. So under "annual," it says  
25 "focal-based salary." That's just the focal review

111

1 MR. SHWARTS: You may answer.  
2 THE WITNESS: They -- they oversee the  
3 executive comp, meaning Safra, Larry, and Mark. And  
4 they approve -- they approve a variety of things.  
5 BY MR. SONG:  
6 Q Okay. What other -- what other things do  
7 they approve?  
8 A Executive vice presidents, titles. They  
9 approve stock grants over a certain amount.  
10 Q Okay. Over how much amount? Do you know?  
11 MR. SHWARTS: You have to answer.  
12 THE WITNESS: No. I should know. I  
13 can't -- we change it from time to time. I can't  
14 tell you what it currently is.  
15 BY MR. SONG:  
16 Q Okay.  
17 A They approve a senior hire at an executive  
18 vice president level. They would approve that hire  
19 with a stock grant and look at -- and look at the  
20 terms and conditions of that hire and may even  
21 interview -- at the senior levels, may actually  
22 interview folks.  
23 Q Okay. So they -- they approve the stock  
24 options but not the bonuses or salaries or anything  
25 like that?

110

1 that we previously discussed?  
2 A Right. Correct. Sorry.  
3 Q Okay. And if you turn to the second page.  
4 If you look at the -- what is that? I guess the  
5 second full paragraph where it begins "Bonuses are  
6 discretionary," and then if you go to the last  
7 sentence of that paragraph (As read:) The company  
8 regularly reviews the plan. And at its sole  
9 discretion, the company may cease the plan or change  
10 the plan to ensure that the strategic direction of  
11 the company is supported.  
12 How does the company review the bonus plan?  
13 MR. SHWARTS: All right. Ignore the  
14 document. Answer his question.  
15 THE WITNESS: How does the company review  
16 the bonus plan?  
17 BY MR. SONG:  
18 Q Yes.  
19 A How does the company review the bonus plan?  
20 I'm not even sure what that means.  
21 Q Okay. Well, do you know if Oracle reviews  
22 the bonus plan?  
23 A I'm not sure what that means. If Oracle --  
24 like, who at Oracle reviews the bonus plan?  
25 Q Well -- okay. So let me go back to this --

112

1 maybe if we read the rest of the paragraph, it,  
2 basically, says that (As read:) They're  
3 discretionary, designed to reward employees for  
4 assisting the company in meeting key strategic  
5 company goals and objectives, including  
6 profitability. Bonuses are not entitlements. This  
7 bonus plan is funded according to performance  
8 criteria determined by the company with individual  
9 employee bonuses being ultimately awarded at the  
10 discretion of management. The company regularly  
11 reviews the plan.  
12 So that's the plan that I'm talking about,  
13 but I'm just trying to find out what you know about  
14 the company's review of the bonus plan?  
15 MR. SHWARTS: Objection. Assumes facts.  
16 Lacks foundation.  
17 You can answer based on your personal  
18 knowledge of how bonuses are awarded and approved is  
19 what he's getting at.  
20 THE WITNESS: Okay. What I take this is  
21 there is a bonus calculation set up every year at  
22 the beginning of the year. So that's how they  
23 review the plan.  
24 BY MR. SONG:  
25 Q Okay. Well, let me back up a second.

113

1 didn't make it, the financial goals of the plan.  
2 MR. SHWARTS: You guys are talking past each  
3 other.  
4 THE WITNESS: I guess we are. Yeah.  
5 BY MR. SONG:  
6 Q Well, maybe I can just move on. It was just  
7 something that --  
8 THE WITNESS: Or you can answer it since you  
9 understand what he's asking. I'm trying my best.  
10 MR. SHWARTS: Once again, I'm not going to  
11 help you.  
12 BY MR. SONG:  
13 Q Okay. Let me see if I can --  
14 So I guess -- I guess what it sounds like to  
15 me is that you don't know if Oracle reviews the  
16 bonus plan, right?  
17 A Define what you mean by "review."  
18 Q Okay. So I was trying to explain. Okay.  
19 So let me try to put it another way.  
20 To your understanding, Oracle reviews the  
21 bonus budget and the recommendations through Safra,  
22 Safra reviews them and approves them?  
23 A Correct.  
24 Q Okay. Do you know of any other review that  
25 Oracle does for the bonus plan?

115

1 Do you -- well, do you know if Oracle  
2 reviews the bonus plan?  
3 A They do -- well, I guess I'm stuck on  
4 "review."  
5 Q Okay.  
6 A There's a person in finance, a senior person  
7 in finance that creates the plan every year, and  
8 Safra reviews it.  
9 Q Okay. But does anybody review the actual  
10 process of awarding the bonuses?  
11 MR. SHWARTS: Objection. Vague.  
12 BY MR. SONG:  
13 Q So instead of the -- so you're talking about  
14 Safra reviews the -- once they make the decisions on  
15 the bonuses, but what about just the process for  
16 allocating bonuses?  
17 Does anybody -- does the company review that  
18 and say, "We should" -- "we're doing bonuses this  
19 way now, but, you know, we should do it this way  
20 next year. This is a better way to do it"? I'm  
21 talking about the process.  
22 A So I can talk, but there is a process to set  
23 up the plan every year. And we either make it, or  
24 we don't make it. And then the end of the year,  
25 there's a review where we either made it, or we

114

1 A I guess not.  
2 Q Okay.  
3 A It does seem really hard.  
4 Q It's a little complicated, but I'm trying to  
5 understand here, you know, the documents.  
6 A I know, and it's hard because people talk in  
7 different languages in companies.  
8 Q Okay. If you turn to the last page of this  
9 exhibit, in the first paragraph, the third sentence  
10 says (As read:) A new-hire's salary is reviewed at  
11 hire to make sure they are being placed in the right  
12 job, level, and salary based on their experience and  
13 skills.  
14 So can you tell me what review is conducted  
15 of a new-hire's salary?  
16 MR. SHWARTS: All right. You can ignore the  
17 document since you haven't seen this page before.  
18 Focus on his question.  
19 THE WITNESS: Okay.  
20 MR. SHWARTS: If you know the answer.  
21 THE WITNESS: Well, we talked about this  
22 before where the process for new-hires can involve  
23 the recruiter, the hiring manager, HR manager and  
24 maybe even a finance person.  
25 But the question was on the skills.

116

1 BY MR. SONG:  
2 Q Well, just how -- how is a new-hire's salary  
3 reviewed? Like, what does Oracle do to review that  
4 the salary is the right salary?  
5 A You review -- they would review the  
6 background of that candidate, years of experience,  
7 education. Education may not matter if it's, you  
8 know, in the workplace a lot, or some engineers  
9 don't have even degrees.  
10 But it would be based on the performance up  
11 to date and years of experience that the employee  
12 was coming in with.  
13 Q Okay. Would they also look at the market  
14 rate for somebody of that skill level and  
15 experience?  
16 MR. SHWARTS: Objection. Overbroad. Lack  
17 of foundation.  
18 You may answer.  
19 THE WITNESS: Yeah. The market rate, yeah,  
20 would be looked at for that job band, yes.  
21 BY MR. SONG:  
22 Q Okay. And then how do they review a  
23 new-hire's job assignment or which job they're  
24 placed in?  
25 MR. SHWARTS: Objection. Overbroad. Lack

117

1 BY MR. SONG:  
2 Q Okay.  
3 A -- you know, the masses specifically. But  
4 certainly at senior levels, we've interviewed people  
5 for one role and in the middle of the process went,  
6 "How about over there?"  
7 Q Do you know about how many times that's  
8 happened?  
9 A At a senior level, it happens 10 percent,  
10 15 percent.  
11 Q Okay. And then how do you -- how does the  
12 HR department review that a new-hire is placed at  
13 the appropriate level?  
14 A It's based on sort of years of experience  
15 and the HR person maps them to that job range or job  
16 band.  
17 Q Okay. And it says -- and you don't have to  
18 look at the document, but it says --  
19 A Which is good because --  
20 Q Yes, since you haven't seen it before.  
21 A Yes.  
22 Q But the document also says that the HR staff  
23 may analyze or may request a manager to explain the  
24 reasons for the pay level to make sure it's  
25 consistent.

119

1 of foundation.  
2 You may answer.  
3 THE WITNESS: Well, I posted a job, and I'm  
4 interviewing candidates. So I'm selecting someone  
5 that is going to fit that -- those duties that I'm  
6 looking for; so . . .  
7 BY MR. SONG:  
8 Q And are new-hires ever assigned a different  
9 job than they applied for?  
10 MR. SHWARTS: Objection. Overbroad. Lack  
11 of foundation.  
12 You may answer.  
13 THE WITNESS: It can happen.  
14 BY MR. SONG:  
15 Q Okay.  
16 A Yeah.  
17 Q Do you know if it's happened?  
18 A Yeah. At senior level, certainly it has  
19 happened.  
20 Q Okay. And what about at lower levels?  
21 MR. SHWARTS: Same objection.  
22 You may answer.  
23 THE WITNESS: Yeah. I can't speak to  
24 that --  
25 ///

118

1 Do you know if that's ever happened?  
2 A I'm sure it has.  
3 Q Okay. And do you know -- have you  
4 personally analyzed a pay situation?  
5 A Explained how -- why we're paying you what  
6 we're paying you? At a senior level, yes.  
7 Q At a senior level?  
8 A Yes.  
9 Q Okay. But your staff would do the analysis  
10 for lower level positions?  
11 MR. SHWARTS: Objection. Calls for  
12 speculation. Lack of foundation.  
13 You may answer.  
14 THE WITNESS: In general, yes, they would be  
15 the people -- or if the manager didn't feel  
16 comfortable doing it.  
17 BY MR. SONG:  
18 Q Okay. And have you ever requested a manager  
19 to explain a pay level or job placement or salary?  
20 A I can't speak to that specifically, but I'm  
21 sure that has happened. Have I --  
22 MR. SHWARTS: He asked you if you  
23 personally.  
24 THE WITNESS: -- personally have asked? No.  
25 Typically an executive asks me to explain it to

120

1 their candidate.  
2 BY MR. SONG:  
3 Q Okay.  
4 A I typically have them turn around and go,  
5 "Well, why don't you do it?"  
6 Q Okay. So you personally haven't asked a  
7 manager to explain a salary or a job placement?  
8 A No.  
9 Q Okay.  
10 A Yeah.  
11 Q Do you know if the HR department has asked a  
12 manager to explain a placement or assignment or  
13 salary --  
14 A I am sure that has happened, yes.  
15 Q Okay. All right. Do you have any idea how  
16 many times?  
17 A No.  
18 Q Okay. Okay. I know you haven't seen this  
19 document before, but it also says that, for example  
20 (As read:) A new employee may be hired by Oracle as  
21 a result of an acquisition, in which case, the  
22 acquisition hire comes to Oracle usually in their  
23 same job and salary.  
24 Is that correct?  
25 MR. SHWARTS: Objection. Lacks foundation.

121

1 BY MR. SONG:  
2 Q Okay.  
3 A Okay.  
4 MR. SONG: Okay. I'm going to show you the  
5 next exhibit, which is already marked as Exhibit 7.  
6 And because it's such a large document, I  
7 only printed one --  
8 THE WITNESS: We'll have to share. Okay.  
9 BY MR. SONG:  
10 Q Kill less trees. So I'll give you a few  
11 minutes to review.  
12 A Oh, you want me to review the whole thing?  
13 Q Well, just -- you can just skim it. You  
14 don't need to read -- I'm going to ask about  
15 specific pages, but just so that you can review the  
16 document to see if you recognize it and know what it  
17 is.  
18 A I don't recognize this document. I  
19 recognize the material, but I don't recognize this  
20 document. I haven't seen it before.  
21 Q Okay. You said you recognize some of the  
22 material?  
23 A Well, yeah, I know job codes, salary, salary  
24 range. I know the material, what they're talking  
25 about, but I haven't seen this document.

123

1 Overbroad.  
2 You may answer.  
3 THE WITNESS: It may be true. I don't know  
4 if it's currently true.  
5 BY MR. SONG:  
6 Q Okay.  
7 A Yeah. Since I haven't seen this document, I  
8 don't know what year it was produced.  
9 Q Okay.  
10 A But I guess it's a general statement that,  
11 yeah, they try to keep them the same.  
12 Q Okay. So if you guys --  
13 A Versus less -- versus less, right?  
14 Q Less or more?  
15 A Yeah.  
16 Q Okay. But typically they try to keep them  
17 in the same job and salary --  
18 MR. SHWARTS: Objection. Lack of  
19 foundation --  
20 BY MR. SONG:  
21 Q -- for an acquisition hire?  
22 MR. SHWARTS: Objection. Lack of  
23 foundation. Overbroad.  
24 You may answer.  
25 THE WITNESS: Yeah.

122

1 Q Okay. And do you know if you are -- your HR  
2 department produced this document?  
3 A I would assume that the H -- the  
4 compensation department produced this document.  
5 Q Okay. And do you have any idea who would  
6 have written this?  
7 A No, I do not.  
8 Q Okay. But most likely it came from the  
9 compensation department?  
10 MR. SHWARTS: You deposed Ms. Waggoner. You  
11 know the answer to these questions already; so I  
12 don't know why you need to take up her time asking  
13 her. You already deposed Ms. Waggoner on this  
14 document.  
15 MR. SONG: Yeah. I just want to know what  
16 she knows for her personal knowledge.  
17 THE WITNESS: I actually don't know anything  
18 but I read to the last page. It was actually a  
19 document that was presented. It was a training  
20 document. I don't know who presented it, who did  
21 the training or created it, but I can tell it's a  
22 training document.  
23 BY MR. SONG:  
24 Q Okay. If you -- if you turn to 56234-5.  
25 A -5.

124

1 Q So it would be like page 5 of this document.  
2 A Thank you.  
3 Q So one -- one -- I understand all of those  
4 categories. One thing I wasn't sure about was  
5 "Specialty."  
6 What is that compared to some of these other  
7 categories, "specialty" --  
8 MR. SHWARTS: Objection. Lack of  
9 foundation. You haven't established that she even  
10 knows what this page is and does she know -- when a  
11 witness testifies that she hasn't seen a document  
12 before, it's inappropriate to ask questions about  
13 the document.  
14 You can ask -- you know, ask her if she  
15 knows stuff about global job table, et cetera, but  
16 it's not appropriate to ask a witness who's here in  
17 her personal capacity about a document she hasn't  
18 seen --  
19 MR. SONG: But she said she recognized some  
20 of the material --  
21 MR. SHWARTS: Some of them, yeah, so lay a  
22 foundation, and then I'll let her answer.  
23 BY MR. SONG:  
24 Q Okay. Do you recognize these categories in  
25 this table or chart on page 56234-5?

125

1 MR. SHWARTS: You may be eating lunch alone  
2 today.  
3 THE WITNESS: I know.  
4 BY MR. SONG:  
5 Q Okay. Do you recognize this chart?  
6 A I don't recognize the chart, but I  
7 understand what it is. I mean, I understand what  
8 the chart is. I haven't seen it before, or I  
9 haven't seen it in a very long time.  
10 Q Okay. And -- so -- so you -- you would be  
11 with the M-7 through M-10, your personal position?  
12 A Yes.  
13 Q Okay. And what's the main difference  
14 between IC levels and manager levels?  
15 A Managing people.  
16 Q So the IC people wouldn't manage anyone?  
17 A Individual contributors.  
18 Q Okay. And are the managers -- they're  
19 exclusively managing people?  
20 A Correct.  
21 Q Okay. And then how -- let's say -- let's  
22 take, for example, a new-hire or -- I guess it could  
23 be a new-hire, or we'll just use the new-hire  
24 example.  
25 How is it determined if they're going to be

127

1 A Yes.  
2 Q Okay. So can you tell me what special -- or  
3 do you know what specialty or specialty area is?  
4 A Yes.  
5 Q Okay. Can you please tell me what it is?  
6 A It would be a special product area.  
7 Q Okay.  
8 A In this particular case actually.  
9 Q Okay. And that would -- the special -- the  
10 specialty area usually relates to the function?  
11 A No.  
12 Q No?  
13 A It would -- so we'll talk about something  
14 you know. Application sales rep, I sell -- I sell  
15 applications. I sell HCM. That's my product  
16 specialty.  
17 Q Okay. Okay. If you turn to 56234-9, and do  
18 you recognize this chart?  
19 A I don't recognize it. No, I don't recognize  
20 the chart, per se, no.  
21 Q Okay. And do you recognize the information  
22 in this chart?  
23 A I understand the information in this chart.  
24 Q Okay. And then if you turn to page 10.  
25 A I should have gone to law school.

126

1 at a IC level, placed in an IC level, or a manager  
2 level?  
3 MR. SHWARTS: Objection. Overbroad.  
4 You may answer.  
5 THE WITNESS: Yeah. It would -- what I've  
6 been -- what did I apply to, what the job I'm  
7 interviewing for, do I have management experience.  
8 You may not if you're going for -- if it's a  
9 beginning manager job, but it's that matching  
10 process, what did I apply for.  
11 BY MR. SONG:  
12 Q Could a -- could a -- could somebody without  
13 management experience be placed in a management  
14 position?  
15 MR. SHWARTS: Objection. Overbroad.  
16 You may answer.  
17 THE WITNESS: It could happen.  
18 BY MR. SONG:  
19 Q And then is it also possible that a -- is  
20 that somebody with management experience could be  
21 just placed in a IC level?  
22 MR. SHWARTS: Same objection.  
23 You may answer.  
24 THE WITNESS: Most likely if I have  
25 management experience, I could be in a IC level if

128

1 I'm not managing people.  
2 BY MR. SONG:  
3 Q And then who -- who selects the -- who makes  
4 the final determination on global career level?  
5 MR. SHWARTS: Objection. Overbroad.  
6 You may answer.  
7 THE WITNESS: I'm not sure who makes the  
8 final determination. I think it's back to the  
9 combination: Recruiter, HR, and hiring manager.  
10 BY MR. SONG:  
11 Q Okay. And maybe the business partner, the  
12 HR business partner?  
13 A It could be.  
14 Q Okay. Can you turn to page 25 and 26 of  
15 this exhibit?  
16 A Okay.  
17 Q Do you recognize page 25 and page 26?  
18 A No.  
19 Q Okay.  
20 A I can't even read page 26.  
21 Q Yeah. It's a little bit small.  
22 Do you recognize the information contained  
23 on page 25?  
24 A I mean, I understand what they're trying to  
25 say. I don't recognize the way I understood when

129

1 job code?  
2 A Again, it could be the HR business partner,  
3 the recruiter, the hiring manager. You know, it  
4 could be a group of people or the manager knows to  
5 put them in the correct job code.  
6 Q Okay. And does somebody have to approve the  
7 job code before it's final?  
8 MR. SHWARTS: Objection. Overbroad.  
9 You may answer.  
10 THE WITNESS: Well, when it goes through the  
11 approval process, there is a review to make sure  
12 that the resume kind of matches to the job code.  
13 BY MR. SONG:  
14 Q Okay. And you don't personally approve job  
15 codes?  
16 A No.  
17 Q Okay. But I did notice that your signature  
18 is on all the job offer letters. But --  
19 A Lucky me.  
20 Q And it's, obviously, an electronic  
21 signature.  
22 A Yes. Yeah, because it got really squished,  
23 yeah.  
24 Q But who has authority to sign those for you?  
25 A I think the computer signs them.

131

1 they're talking about job -- I mean, I have never  
2 seen this chart before. I understand what they're  
3 trying to convey.  
4 Q Okay. And how is the job code selected?  
5 A Well, again, it's -- it starts -- I mean, in  
6 a new-hire, it's what you've applied for, what  
7 you've been recruited for.  
8 So it's not a big debate on what you're  
9 interviewing for. And as it says, it's important  
10 because it has, you know, getting the right job code  
11 gives you the right other pieces that goes with your  
12 job.  
13 Q Okay. When an applicant applies for a job,  
14 are they applying for a specific job code, or is  
15 that determined after they're hired?  
16 A They typically are applying for a position  
17 that already has a job code assigned to it --  
18 Q Okay.  
19 A -- or job grade, you know, or band.  
20 Q So unless they're assigned to a different  
21 job or job code, that job code is already  
22 determined?  
23 A If they're qualified to get the offer for  
24 that particular job, yeah.  
25 Q Okay. And then who makes the decision about

130

1 Q Just the computer?  
2 A Yeah, I think the computer.  
3 Q But who's actually formulating those letters  
4 to send them out?  
5 A It goes up through the approval and then the  
6 system generates all the documents.  
7 Q Okay. When you say "it goes up through the  
8 approval," how far does it go?  
9 A Again, depending on where it is in an  
10 organization -- so if I'm hiring someone directly, I  
11 would approve it -- I would put it through and then  
12 Safra would approve it and then an offer letter  
13 would come out of the system --  
14 Q Okay.  
15 A -- sent electronically to you.  
16 Q Okay. So for the new-hires, it would have  
17 to go all the way up to the business head --  
18 A Business head, yeah.  
19 Q Okay. All right. And then if we can turn  
20 to page 27 -- or, actually, I'm sorry, yeah, 27 and  
21 28.  
22 So I want to ask you about salary ranges.  
23 You don't -- you don't recognize this chart or this  
24 document?  
25 A Correct, I don't.

132

1 Q Okay. So maybe just generally what I can  
2 ask you is what market surveys are you using?  
3 A In general, we use a company -- for as much  
4 as we can, we use a company called Radford.  
5 Q Okay.  
6 A But we certainly have to in certain --  
7 certainly in Latin America, we use some other  
8 specialized surveys, and same in some European  
9 countries.  
10 Q Okay. And in the U.S., is it exclusively  
11 Radford?  
12 A I believe -- I believe there may be a  
13 secondary survey or was at one point, but I think  
14 it's primarily Radford.  
15 Q Okay. And do you know what the Radford  
16 surveys show in general?  
17 A Market data for particular jobs especially  
18 in the software industry.  
19 Q Okay. And are they broken down by region,  
20 like parts of the U.S.?  
21 A You would have to ask Phil Jenish or  
22 Kate Waggoner if they -- we do pay based on  
23 geography pay, but we may get that from other  
24 sources. I don't know.  
25 Q Okay. And are they broken down by gender?

133

1 A So we'll talk about it today, but we go back  
2 in time, too, because this happens in technology all  
3 the time.  
4 So in the -- this is just -- let's just talk  
5 about development. In software engineering, a  
6 JD Edwards programmer or systems engineer,  
7 PeopleSoft engineer -- it's kind of a dying product  
8 line versus a cloud.  
9 Q Okay.  
10 A So the cloud person would be paid  
11 dramatically more than JD Edwards or PeopleSoft.  
12 Even our old ERP systems, they're going away.  
13 Q Okay. And then let's turn to page 29 and  
14 30. Have you -- do you recognize either of these  
15 pages?  
16 A No.  
17 Q Okay. Do you recognize the information  
18 that's contained --  
19 A Yes.  
20 Q -- on page 29 and 30? Okay. Can you  
21 explain how you arrived at the midpoint?  
22 MR. SHWARTS: Objection. Overbroad. Lack  
23 of foundation.  
24 You may answer.  
25 THE WITNESS: It's based -- for engineering

135

1 A No.  
2 Q Gender? And not by ethnicity or country of  
3 origin?  
4 A No.  
5 Q Okay. And how do you use those surveys?  
6 MR. SHWARTS: Objection. Overbroad.  
7 You may answer.  
8 THE WITNESS: Certainly Kate Waggoner could  
9 give you a fuller answer, but we use it to make sure  
10 we are paying people appropriately.  
11 BY MR. SONG:  
12 Q Okay. So when you're looking at a market  
13 survey, are you guys shooting for the midrange of  
14 that survey or just to be within that range?  
15 MR. SHWARTS: Objection. Lack of  
16 foundation.  
17 THE WITNESS: The -- you could say -- they  
18 would probably -- Kate and that team would probably  
19 say in general we're shooting for the midrange, but  
20 that's not always true.  
21 It varies depending on hot skills. It could  
22 vary on geography, but hot skills could change that  
23 dramatically.  
24 BY MR. SONG:  
25 Q Okay. And what are hot skills?

134

1 and other technology companies, it's based to the  
2 market data.  
3 So that's how we establish these ranges are  
4 based on what's happening around us with our  
5 competitors and the market.  
6 BY MR. SONG:  
7 Q Okay. How do you determine who's fully  
8 experienced and competent?  
9 A So there would be a job description, you  
10 know, and you would have -- some employees are still  
11 learning their role and who's contributing below the  
12 required salary, they would put them -- you wouldn't  
13 want them below the range, but you would put them in  
14 the first cortile. So it's experienced based.  
15 Q Okay. And who's making these  
16 determinations?  
17 A Manager, recruiter, HR business partner.  
18 Q Okay. And is there any kind of a written  
19 analysis done on where to place these employees?  
20 A No.  
21 Q Okay. And after these determinations are  
22 made, it goes up the approval chain again to Safra  
23 and your department?  
24 A Yes, if it was in Safra's group, yes.  
25 Q Okay. And are job codes -- when a job code

136

1 is determined, is that communicated to the employee?  
2 **A** I don't know. I would expect probably not.  
3 I don't know my job code.  
4 **Q** Okay.  
5 **A** It's not important to them. Their title is  
6 what they post.  
7 **Q** Okay. Can you explain compa ratio, please?  
8 **A** So did you read this?  
9 MR. SHWARTS: He's asking you --  
10 THE WITNESS: Okay.  
11 MR. SHWARTS: He's asking for your personal  
12 knowledge.  
13 THE WITNESS: Yeah.  
14 BY MR. SONG:  
15 **Q** Well, I was going to try and take you to the  
16 page --  
17 **A** But it is the ratio of the employee's salary  
18 to the job salary range. And we look at -- yeah.  
19 **Q** Okay. And how do you use these comp ratios?  
20 **A** I can read here --  
21 MR. SHWARTS: No.  
22 THE WITNESS: Don't read? Well, I'll tell  
23 you what, this is true. We use it for international  
24 transfers between two countries where they are in  
25 that particular range in France, coming into America

137

1 question is we're in the middle of, as we talked  
2 about, in focal. And in Comp Workbench, when you  
3 look at your people, it lists their comp ratio in  
4 there.  
5 So if we do a focal every year, I guess,  
6 we -- as a manager, I look at that every year. How  
7 often does the comp department look at it? You  
8 would have to ask them.  
9 BY MR. SONG:  
10 **Q** Okay. And do you personally look at comp  
11 ratios?  
12 **A** I look at it for my team and my people  
13 underneath them.  
14 **Q** Okay. So everyone in HR?  
15 **A** I have a process where I look at that.  
16 **Q** Okay. How often do you look at comp ratios?  
17 **A** I look at it personally during focal,  
18 whenever focal occurs so hopefully once a year.  
19 **Q** Okay.  
20 **A** But that's my personal view, yeah.  
21 **Q** Okay. And do you know if -- or do you make  
22 adjustments based on a low comp ratio?  
23 **A** I question.  
24 **Q** You question. Okay. What would be -- what  
25 would be a low enough comp ratio that you would

139

1 or whatever. It is used for benchmarking.  
2 But the comp ratio can change over time when  
3 people are in a role for a long period of time, and  
4 they have tenure. They're typically in the higher  
5 end of the range, and it may not be as valuable of  
6 information.  
7 Or they -- you're in the high end of the  
8 ratio, and their comp ratio states so, but they've  
9 been there, in their role for 15 years or whatever  
10 it is; so it's just a tool.  
11 BY MR. SONG:  
12 **Q** Okay. And how often are the comp ratios  
13 evaluated?  
14 **A** They're -- evaluated?  
15 **Q** So -- I'm sorry. Maybe that's a little bit  
16 confusing, but -- so you were mentioning that comp  
17 ratios change?  
18 **A** For individuals, yeah, they can change.  
19 **Q** Yeah. Over time --  
20 **A** As I get raises and move up, yeah.  
21 **Q** So are those kind of reexamined or  
22 reevaluated every year, every two years?  
23 MR. SHWARTS: Objection. Overbroad.  
24 You may answer.  
25 THE WITNESS: Yeah. How I would answer that

138

1 start questioning?  
2 MR. SHWARTS: Objection. Meaning  
3 Joyce Westerdahl would consider a low --  
4 MR. SONG: Yes, her personal.  
5 THE WITNESS: Yeah. So I just went through  
6 this -- I'll tell you, I went through it for my  
7 group, and I have, I don't know how many people,  
8 13-, 1400, 1500 people in my organization.  
9 There was 34 people that were identified --  
10 I asked Kate to review it -- that were identified at  
11 an inappropriate comp ratio or very low in the  
12 range.  
13 BY MR. SONG:  
14 **Q** Okay.  
15 **A** And then I hold back dollars for those  
16 individuals to have those 34 conversations with  
17 whoever they report to on why is that happening.  
18 If we have a performance problem, we have a  
19 performance problem. We have a newly promoted  
20 person, they're low in the range, why are they low  
21 in the range? How are they doing? We need to move  
22 them up.  
23 So I have active conversations about where  
24 people when they lie in this -- at the low end.  
25 **Q** Okay. And what would you consider the low

140

1 end?  
2 **A** Well, if they're at the -- the minimum of  
3 the band at the low end -- I'm using the wrong word,  
4 at the low end of the band or below the band they're  
5 in, that's a red flag for me.  
6 **Q** Okay. And is there a -- is there a certain  
7 comp ratio that's so low that you would  
8 automatically make a pay adjustment?  
9 **MR. SHWARTS:** Meaning, again, her  
10 personally?  
11 **MR. SONG:** Yeah. Her personally, of course.  
12 **THE WITNESS:** No, I would still have a  
13 discussion.  
14 **BY MR. SONG:**  
15 **Q** Okay. So you would start a review or  
16 investigation --  
17 **A** Correct.  
18 **Q** -- about why it's so low? Okay.  
19 And have you ever looked at comp ratios by  
20 gender?  
21 **A** Me personally?  
22 **Q** Yes, you personally.  
23 **A** No.  
24 **Q** Okay. And have you ever looked at comp  
25 ratios by race?

141

1 **BY MR. SONG:**  
2 **Q** Or promotion, okay.  
3 **A** And they put in a justification and put in  
4 what they would like to propose in form of a focal  
5 or stock or bonus, and then it goes up through the  
6 approval process.  
7 **Q** Okay. And then HR goes to Safra?  
8 **A** Correct.  
9 **Q** All the way up to Safra. Okay.  
10 And are you able to approve any off-cycle  
11 salary increases without Safra's approval?  
12 **A** No. That's not true. But I can't remember  
13 what the rule is. There's -- I can approve up to a  
14 certain amount in M&A but not in my own org.  
15 When we bring people in in M&A, they get  
16 adjusted, and there's a certain percentage that I  
17 just approve their increases, but I don't know what  
18 that is.  
19 **Q** And what is a change in cost center?  
20 **A** I -- I'm just moving to a change -- it's a  
21 finance way of managing budgets, is a cost center.  
22 **Q** Okay.  
23 **A** And we've decided that you're going to move  
24 over and work for Rob, but Rob used to work for me,  
25 and -- but you're going to change cost centers

143

1 **A** No.  
2 **Q** Okay. And then in addition to the comp  
3 ratios, do you conduct salary reviews other than  
4 like at the focal review?  
5 **A** Salary reviews? I guess the answer to that  
6 is yes. We may have a salary discussion on an  
7 individual all the time throughout the year that we  
8 have to -- we feel we need to adjust for whatever  
9 reason.  
10 **Q** Okay. And are -- are there salary increases  
11 only at the focal review?  
12 **A** No.  
13 **Q** Okay. When else can salary increases occur?  
14 **A** Feels like every second of every day.  
15 **Q** Well, if you have 140,000 employees --  
16 **A** It happens pretty -- it happens every day, I  
17 think.  
18 **Q** Okay. How do off-cycle salary increases  
19 happen?  
20 **MR. SHWARTS:** Objection. Overbroad.  
21 You may answer.  
22 **THE WITNESS:** The manager fills out a form  
23 in the product, in HCM. There's a place to do an  
24 off-cycle salary review, and they put that in  
25 there -- or promotion.

142

1 because now you're going over to Rob's cost center  
2 versus you and mine.  
3 **Q** Okay.  
4 **A** And cost centers hold the budget dollars and  
5 head count, so . . .  
6 **Q** Is there -- you mentioned -- is compensation  
7 tied to product?  
8 **MR. SHWARTS:** Objection. Overbroad.  
9 **THE WITNESS:** Is compensation tied to  
10 product? It can be.  
11 **BY MR. SONG:**  
12 **Q** Okay. Is that one of the factors involved  
13 in determining salary increases?  
14 **A** No. I wouldn't state it that way. I'm not  
15 sure what you're asking, but . . .  
16 **Q** Well, I didn't see anything in this -- in  
17 this exhibit, managing compensation about products.  
18 So I just wanted to know if product -- if  
19 product is a factor in approving salary increases or  
20 compensation.  
21 **MR. SHWARTS:** Meaning if someone is doing  
22 PeopleSoft versus doing Taleo or doing something  
23 else.  
24 **THE WITNESS:** In general, no.  
25 ///

144

1 BY MR. SONG:  
2 Q Okay. In the -- would you know what product  
3 an employee works from their job code?  
4 A I know what product they work on by their  
5 specialty code, wherever that was, which we talked  
6 about earlier.  
7 Q Okay. Through their specialty code?  
8 A Yeah.  
9 Q What about through their job function?  
10 A No, because you and I both could be  
11 software -- we all could be software engineers. But  
12 by my specialty code, then I know what we code on.  
13 Q Okay.  
14 A Or sell.  
15 Q And is there a second level of review for  
16 compensation?  
17 MR. SHWARTS: Objection. Vague and  
18 overbroad.  
19 THE WITNESS: Like -- I don't know what that  
20 means.  
21 BY MR. SONG:  
22 Q Well, it's my understanding that there's a  
23 second level of review at Oracle for promotion,  
24 hiring, and termination decisions in 2019 that was  
25 implemented?

145

1 BY MR. SONG:  
2 Q I'll give you a minute to read that.  
3 Okay. Have you had a chance to review?  
4 A Yes.  
5 Q Do you recognize this?  
6 A Yes.  
7 Q Okay. And what is it?  
8 A It's a out-of-cycle raise and stock grant.  
9 Q Okay. And did you write the e-mail at the  
10 very top?  
11 A Yes.  
12 Q Okay. And is this -- so when it says "Yes,  
13 it is approved and on to CC," does that mean the  
14 compensation committee?  
15 A Yes.  
16 Q And this was also -- according to it -- it  
17 looks like the third e-mail from the bottom, it was  
18 LGE. That was Larry Ellison --  
19 A Correct.  
20 Q -- that's what it looks like? Okay. And so  
21 he had also approved of this counteroffer?  
22 A It -- Safra approved on behalf of Larry.  
23 Q On his behalf. Okay. So for a  
24 counterproposal like this, Safra was able to approve  
25 on Mr. Ellison's behalf.

147

1 A There -- so for -- like we talked about  
2 earlier, a comp decision, like we're giving someone  
3 a raise outside of cycle, someone lower than me  
4 would go -- it's more than a second level review.  
5 It would go all the way up.  
6 Q To Safra?  
7 A Right. But there is an HR review as well.  
8 Q Okay. Okay. Let's see. Show you the next  
9 exhibit.  
10 MR. SONG: How are you guys doing in terms  
11 of hunger?  
12 MR. SHWARTS: Are you good?  
13 THE WITNESS: I'm not hungry. Do I have  
14 that look?  
15 MR. SONG: Well, it's noon; so I just want  
16 to make sure.  
17 THE WITNESS: Okay. I think you have to put  
18 a thing on this.  
19 MR. SONG: And the reporter -- are you okay  
20 too?  
21 MR. SHWARTS: Yeah, give it to him. He  
22 needs to stamp it.  
23 THE REPORTER: Yes, I'm fine.  
24 (Exhibit 59 was marked.)  
25 ///

146

1 Why did it need to go to the compensation  
2 committee?  
3 A Because the stock --  
4 Q Stock?  
5 A -- was over a certain amount that whatever  
6 year this was, it had to go -- it's 2015. They  
7 granted 250,000 in options. And that hit -- hit or  
8 went over the threshold in which comp committee had  
9 to approve it.  
10 Q Okay.  
11 MR. SONG: Okay. This is the next exhibit.  
12 I'll give you a minute to review that.  
13 (Exhibit 60 was marked.)  
14 MR. SONG: What exhibit number is that?  
15 MR. SHWARTS: 60?  
16 MR. SONG: 60?  
17 MR. SHWARTS: The one you just marked is 60.  
18 MR. SONG: 60.  
19 BY MR. SONG:  
20 Q Okay. Have you had a chance to review?  
21 A Mmm-hmm.  
22 Q Do you recognize this document?  
23 A Mmm-hmm. It's familiar.  
24 Q Okay. And what is it?  
25 A It's, again, an out-of-cycle proposal for a

148

1 number of people, I believe.  
2 Q Okay. And were you cc'd on this e-mail?  
3 A At -- yes. From Thomas and then Safra. And  
4 then these hit the threshold where they had to go to  
5 comp committee as well; so she's asking me for the  
6 memo for comp committee to have them review this and  
7 approve it or not approve it --  
8 Q Okay. And when --  
9 A Because there's a spreadsheet attached, if  
10 you see.  
11 Q Okay. And when Ms. Catz asked you to  
12 "please prepare these for comp committee approval,"  
13 what did she mean by that?  
14 A She meant they have to go to memo form --  
15 Q Okay.  
16 A -- and there's a format in which they go in.  
17 And so it will list their background. And many  
18 times -- list, you know, their -- a short version of  
19 their bios and then what's proposed and what group  
20 they work in.  
21 So she was asking it to be put in that  
22 format versus just a regular old spreadsheet that  
23 was being passed around.  
24 Q Okay. So what you would do is prepare a  
25 package?

149

1 (Exhibit 61 was marked.)  
2 MR. SONG: Sorry. This is kind of long; so  
3 I only have one copy. This is Exhibit 61.  
4 BY MR. SONG:  
5 Q So let me give you a few minutes to review  
6 that.  
7 A I've never seen this.  
8 Q Okay. Have you ever seen this document?  
9 A No.  
10 Q No? Do you recognize the information  
11 contained in this document?  
12 A I actually don't.  
13 Q Okay. And do you know Tim Burke and  
14 Justin Field?  
15 A I don't.  
16 Q Do you know if they work for Oracle?  
17 A I assume they work for Oracle. They --  
18 they're in the organization development group in my  
19 organization, 2015, but I don't know who they are.  
20 Q Okay.  
21 A And I don't know if they still work for us.  
22 Q Okay. So this was -- this was written by  
23 people from the HR department, correct?  
24 A I would have to assume so. Yeah.  
25 Q Okay. And so you weren't involved in

151

1 A An executive memo.  
2 Q Okay.  
3 A Actually, who would prepare it would be  
4 Phil Jenish, but --  
5 Q Okay.  
6 A -- but my team would prepare it, yes.  
7 Q Okay. And so in addition to the  
8 spreadsheet, what else would be included?  
9 A It could be --  
10 Q A number of different things?  
11 A A number. Sometimes it would have their  
12 bios, sometimes it would not. Certainly if it was a  
13 new-hire, it would have their bios.  
14 If it's people that are currently at the  
15 company, sometimes they would have their bios,  
16 sometimes they would not, and sometimes Thomas would  
17 speak to it.  
18 It just would depend. But it -- you know,  
19 they have a very formal way of presenting a memo to  
20 these committees.  
21 Q Okay. But you yourself would not?  
22 A No. Phil would do that.  
23 Q Phil would take care of it. Okay.  
24 MR. SONG: Okay. Let me show you the next  
25 exhibit.

150

1 preparing this document?  
2 A I was not.  
3 Q Okay. And you were not consulted about it?  
4 A I was not.  
5 Q Okay. Do you know -- for this year, do you  
6 know the percentage of employees a performance  
7 review was completed for?  
8 A I do not.  
9 Q Okay. And do you know for the prior year?  
10 A I do not.  
11 Q Okay.  
12 A I know in 2015, it was 78 percent because I  
13 read this line. Sorry.  
14 I'm not getting lunch, I can tell.  
15 Q Well, I think that they were -- that the  
16 eligible employees created a performance --  
17 A Oh, okay. I may have even read it wrong,  
18 but . . .  
19 Q Do you know for 2015 whether there were more  
20 than 50 percent of performance evaluations completed  
21 for employees?  
22 A I don't.  
23 Q Okay. And have you ever looked at the --  
24 have you ever -- you, personally -- obviously your  
25 HR department did -- but have you ever personally

152

1 examined performance evaluation completion rates?  
2 **A** No.  
3 **Q** No? Okay. And have you ever asked anyone  
4 to -- to examine completion rates for performance  
5 evaluations?  
6 **A** No.  
7 **Q** Okay. And what do employees know about  
8 performance reviews?  
9 **MR. SHWARTS:** Objection. Calls for  
10 speculation.  
11 You may answer.  
12 **THE WITNESS:** Employees know they exist, and  
13 it's something we do do, but we have moved past  
14 this. And as I brief this, we moved to more of the  
15 talent model.  
16 Even though performance reviews still go on,  
17 clearly, but it talks about what's coming in  
18 product. So at this point, we were launching talent  
19 management.  
20 **BY MR. SONG:**  
21 **Q** Okay.  
22 **A** Which we talked about earlier, the 9-box,  
23 the top talent stuff.  
24 **Q** Okay. And is information about performance  
25 reviews included in the employee handbook?

153

1 **MR. SHWARTS:** Okay. Go ahead.  
2 **THE WITNESS:** I don't know.  
3 **BY MR. SONG:**  
4 **Q** Okay. And do you know if anyone has looked  
5 at performance scores by race?  
6 **A** I don't know.  
7 **Q** Okay.  
8 **A** I don't know how they'd know, but . . .  
9 **Q** Well, they could just look at, you know, the  
10 performance scores of all women as compared to men  
11 or something like that. Okay.  
12 And to your knowledge, when are performance  
13 reviews conducted?  
14 **A** Every line of business has a certain cadence  
15 about what they want to do or if they don't want to  
16 do it.  
17 **Q** Okay. So it's not required?  
18 **A** No.  
19 **Q** Okay. Do you know -- do you know within --  
20 let's say HR, how often they take place?  
21 **A** We do it once a year.  
22 **Q** Okay. And about what time?  
23 **A** Right before early -- late winter right  
24 before we go into focal stock planning.  
25 **Q** Okay. And are those -- do you factor those

155

1 **A** I would imagine it is.  
2 **Q** Okay. And are employees given trainings on  
3 performance reviews?  
4 **A** I believe we do have a training on  
5 performance review as well as talent review.  
6 **Q** Okay. And is that an online training or is  
7 that a training done in, like --  
8 **A** I think it's done online, and it's done live  
9 at various times over the years.  
10 **Q** Okay. And do you know who does these  
11 trainings?  
12 **A** It comes out of this organization typically  
13 within HR.  
14 **Q** Okay. Organization development?  
15 **A** Yeah, organization and talent development.  
16 **Q** Okay. And do you know if these trainings  
17 were documented?  
18 **A** I don't know.  
19 **Q** Okay. And do you know if anyone has looked  
20 at performance scores by gender?  
21 **A** I do not --  
22 **MR. SHWARTS:** Objection. Vague.  
23 Performance scores?  
24 **MR. SONG:** Yeah. So there's the performance  
25 evaluations, and they're given these ratings.

154

1 performance reviews into salary increases?  
2 **MR. SHWARTS:** Again, he's talking about HR.  
3 For your --  
4 **THE WITNESS:** HR --  
5 **BY MR. SONG:**  
6 **Q** For you, yeah.  
7 **A** Yes.  
8 **Q** And how do you factor the performance review  
9 into salary increases?  
10 **A** Well, we -- I mean, there's other factors  
11 before -- besides performance reviews, but if  
12 someone is low in the range and they have a top  
13 score, that would be a questionable conversation,  
14 right?  
15 So you would have that conversation and  
16 either fix it or have a conversation of why -- if  
17 they're rated so highly, why are they paid at this  
18 rate.  
19 **Q** Okay. Do you know, for example, within  
20 product development how often they do product -- I  
21 mean performance reviews?  
22 **A** I don't know.  
23 **Q** Okay. Are you familiar with performance  
24 reviews in any other organization or unit?  
25 **A** Yes.

156

1 Q Yes? Which ones?  
2 A Support has an active program, but they do  
3 top talent like we talked about where they have --  
4 it's a performance discussion, but they use the  
5 9-box. And Mark Hurd uses the 9-box in his sales  
6 organization.  
7 Q Okay. And do you know if Mark Hurd does  
8 performance reviews?  
9 A He himself?  
10 Q I'm sorry. Like, within his department.  
11 A He does.  
12 Q Okay. And do you know how often?  
13 A I know he personally does his own very much  
14 ongoing.  
15 Q But you don't know how often he does it for  
16 his employees?  
17 A Are you -- so wait. I answered Mark has  
18 kind of an ongoing process himself for his direct  
19 reports. His direct reports do performance reviews  
20 because they have -- it's measurable salespeople.  
21 It's a little more active; so I don't know if they  
22 have an anniversary date, or they do it every  
23 quarter. I don't know.  
24 Q Okay. And what about support? Do they do  
25 performance reviews?

157

1 A They do an annual process.  
2 Q Okay. And do you know if support does  
3 written ones?  
4 A I don't know if they're actually written or  
5 not.  
6 Q Okay. And product development you said you  
7 don't know?  
8 A It's a mixed bag.  
9 Q Okay. So regarding performance reviews,  
10 those are just handled by the line of business?  
11 A With their HR partner.  
12 Q With their HR partner. And so they can  
13 determine whether they want to do them and when to  
14 do them and how often --  
15 A Correct, yeah.  
16 Q Okay. Great.  
17 MR. SONG: We're almost out of tape again;  
18 so I think this might be a good time for a lunch  
19 break.  
20 MR. SHWARTS: Okay. That's fine.  
21 THE VIDEOGRAPHER: This is the end of  
22 Media No. 2 of video deposition of Joyce Westerdahl.  
23 We're going off the record at approximately  
24 12:20 p.m.  
25 (Off the record from 12:22 p.m. to

158

1 1:16 p.m.)  
2 THE VIDEOGRAPHER: This is the beginning of  
3 Media No. 3 in the continuing deposition of  
4 Joyce Westerdahl. Back on the video record at  
5 approximately 1:15 p.m.  
6 BY MR. SONG:  
7 Q I wanted to go back to talking a little bit  
8 about the talent review and the talent 9-box metric  
9 thing, whatever you name it.  
10 When did that process start?  
11 A The talent review process?  
12 Q Yeah, Mmm-hmm.  
13 A So actually -- yeah, I misspoke. I think it  
14 started -- we launched it seven years ago when  
15 Mark Hurd had joined.  
16 Q Okay. And was that for the entire  
17 organization at Oracle?  
18 A For Mark's -- we started with Mark's  
19 organization first.  
20 Q And when did the organization -- or Safra's  
21 start?  
22 A Safra doesn't use it.  
23 Q Okay.  
24 A She just uses -- you know, if they use  
25 anything, they use performance.

159

1 Q Oh, I see.  
2 A I use the talent; so that's not really true.  
3 I do use the 9-box.  
4 Q Okay. And when did you start using it --  
5 A Oh, probably when we first kicked it off  
6 seven -- we were probably one of the first users.  
7 Q Okay. So along with Mark Hurd --  
8 A Yeah. We probably tested on us first.  
9 Q Okay.  
10 A Not probably. We did --  
11 MR. SHWARTS: You mean the HR --  
12 THE WITNESS: HR organization -- we  
13 typically test everything on HR first.  
14 BY MR. SONG:  
15 Q Okay. And when -- have you ever considered  
16 gender in the -- in the compensation analysis?  
17 A Meaning?  
18 MR. SHWARTS: Objection. Vague and  
19 overbroad.  
20 BY MR. SONG:  
21 Q Like, in determining, like, salary or salary  
22 increases, have you ever considered gender?  
23 MR. SHWARTS: Meaning "you"  
24 Joyce Westerdahl.  
25 ///

160

1 BY MR. SONG:  
2 Q Yes, you personally, or -- well, let's start  
3 with you personally.  
4 A I make, you know -- I make an effort to pay  
5 people, men, women, people of color all the same.  
6 Q Okay.  
7 A Yeah. So I guess have I considered gender?  
8 I'm aware --  
9 Q You're aware?  
10 A -- of, you know, gender, making sure your  
11 women are paid fairly and --  
12 Q Okay. So you're saying you have considered  
13 gender in determining compensation?  
14 MR. SHWARTS: Objection. Asked and  
15 answered.  
16 THE WITNESS: Yeah. I consider paying  
17 everyone fairly no matter who they are and equally.  
18 BY MR. SONG:  
19 Q Okay. What about race? Have you ever  
20 considered race in a compensation analysis?  
21 A In my organization?  
22 Q Well, you personally first.  
23 A Okay. I don't know what you mean by that.  
24 I mean, to pay them more or to pay them less or --  
25 Q Or at all --

161

1 BY MR. SONG:  
2 Q Okay.  
3 A I can't say that, can I?  
4 MR. SHWARTS: No, if you don't understand  
5 the question, ask him to explain it to you.  
6 BY MR. SONG:  
7 Q Okay. I know these can be very complicated  
8 questions, but has HR -- has HR considered gender in  
9 determining compensation, like how much, you know,  
10 somebody should be paid?  
11 A I don't think so. I think we look at skills  
12 is what -- yeah.  
13 Q Okay.  
14 A Yeah. I hope no one is considering me --  
15 I'm not sure what you're asking, I don't think, but,  
16 okay.  
17 Q Well, just whether you consider gender or  
18 not when you're determining compensation?  
19 A No. I believe we're looking to pay people  
20 equally regardless of their --  
21 Q Okay. So you're not considering gender when  
22 you're determining salary?  
23 A I don't think -- I'm not sure really how to  
24 answer that. I don't -- I don't do that.  
25 Q Okay. And what about as an organization,

163

1 A Or just consider.  
2 Q Yeah, consider race.  
3 A I kind of -- no matter who they are, they  
4 come to the table with their competencies in who  
5 they are, I'm going to pay them fairly regardless of  
6 race or color.  
7 Q Okay. But when you're trying to -- for  
8 example, when you're trying to determine a salary,  
9 do you consider race when you're looking at the  
10 starting salary or determining salary?  
11 A I mean, no, I would consider paying them  
12 fairly within my organization, even if they're a  
13 different race.  
14 Q Okay. What about with -- okay. I asked you  
15 on a personal level.  
16 A Okay.  
17 Q What about HR as an organization? Do you  
18 know if HR as an organization has considered gender  
19 in analyzing compensation?  
20 A Doing -- analyzing compensation. Has HR  
21 considered race analyzing compensation?  
22 MR. SHWARTS: Objection. Vague.  
23 You may answer.  
24 THE WITNESS: Ask it a different way.  
25 ///

162

1 HR, does HR consider race when they're trying to  
2 determine salary or salary increase?  
3 A I don't believe we consider race when we're  
4 considering a salary increase.  
5 Q Okay. And then I have just a follow-up  
6 question regarding specialty area because I think  
7 you previously testified that specialty area is  
8 related to product.  
9 A Yes.  
10 Q So --  
11 A Or can be.  
12 Q Okay. Can be?  
13 A It can be.  
14 Q Okay.  
15 A So that example was a sales rep, and their  
16 product was HCM. We made that up. But you could  
17 have a lawyer where their specialty area is contract  
18 law versus employment law, but they're still a  
19 lawyer.  
20 Q Okay. Yeah. Because I was -- that's what I  
21 was confused about because in product development,  
22 there are quality assurance and technical writer  
23 people, right --  
24 A Yes.  
25 Q And their specialty areas are not related to

164

1 product?  
2 **A** They could be --  
3 **Q** They could be?  
4 **A** -- in some areas.  
5 **Q** Okay. But for some, it could also not be?  
6 **A** Right. In quality assurance, if it's all  
7 ERP products, all the basic products, that could be  
8 PeopleSoft, JD Edwards, Oracle -- all of those  
9 products, that QA person probably can do it all on  
10 that, then you would have a specialty QA, but you  
11 might also have a specialty cloud QA. So it could  
12 even have a different shade over there.  
13 **Q** Okay. Okay. And I apologize if I asked  
14 this before, I couldn't remember, but salary grade,  
15 do employees have access to that information, their  
16 salary grade?  
17 **A** I don't think so. They know their global  
18 level because approvals are built off of their -- so  
19 I'm not sure. I don't think so.  
20 **Q** Okay.  
21 **A** They may. They may. It may be there in  
22 their description in the system.  
23 **Q** Do they have access to their salary range?  
24 **A** They do not. I don't think so.  
25 **Q** And do they have access to their compa

165

1 **MR. SONG:** Oh, I'm sorry. This is already  
2 premarked as Exhibit 13.  
3 **THE WITNESS:** Oh, never mind. There you go.  
4 **MR. SHWARTS:** Exhibit 13? Yeah.  
5 **THE WITNESS:** Do you want to use that --  
6 another one?  
7 **MR. SHWARTS:** Do you got another one for me?  
8 Thank you.  
9 **BY MR. SONG:**  
10 **Q** Okay. Have you had a chance to review?  
11 **A** I have.  
12 **Q** Okay. And do you recognize this document?  
13 **A** I do not.  
14 **Q** Okay. And do you know -- or are you  
15 familiar with the contents of this document?  
16 **A** I -- somewhat. I mean, I have not -- I know  
17 why they did this document, but I haven't seen this  
18 document.  
19 **Q** Okay. Do you know if this document was  
20 produced by HR?  
21 **A** I don't.  
22 **Q** Do you have any idea who would have produced  
23 this?  
24 **A** I would assume probably HR.  
25 **Q** Okay.

167

1 ratios?  
2 **A** I don't think so.  
3 **Q** So if you're -- so if you're trying to  
4 create a transparent environment or culture,  
5 shouldn't employees have access to that type of  
6 information?  
7 **A** Some companies believe that. And isn't --  
8 okay. Now, I'm going to start talking and being  
9 preachy. That's not what you want me to do, is it?  
10 **MR. SHWARTS:** Just answer his question.  
11 **THE WITNESS:** Yeah. No, that's not what I'm  
12 talking about when I'm talking about being  
13 transparent with people.  
14 I'm talking about when you're working with  
15 people and treating fairly, and if you have an  
16 investigation or someone has a complaint, you're  
17 addressing them honestly.  
18 And there are certain things that we can't  
19 be transparent in, in an investigation, for example.  
20 **MR. SONG:** Okay. Okay. I want to show you  
21 Exhibit 62, if my math is correct, which is not very  
22 good.  
23 Is that right? 62?  
24 **THE REPORTER:** Yes.  
25 **MR. GARCIA:** It's already premarked.

166

1 **A** But I don't know.  
2 **Q** Okay. And do you know which specific people  
3 in HR might have produced this?  
4 **A** Probably -- I don't -- the honest answer is  
5 I don't know. If you're asking me to guess, it  
6 would be compensation probably did this.  
7 **Q** Okay. Could it have been Kate Waggoner?  
8 **A** I don't know.  
9 **Q** Okay.  
10 **A** I don't know why I'm suddenly crying. You  
11 did nothing. No. It's allergies I'm sure.  
12 **Q** Allergies? Okay. Can you -- if you're  
13 familiar with the contents of this exhibit -- or are  
14 you? Let me ask.  
15 **A** I am not familiar with the contents of that  
16 exhibit.  
17 **Q** Okay. Well -- okay. So I guess we don't  
18 need to talk too much about this exhibit then if  
19 you've never seen it.  
20 Do you need a break?  
21 **A** No, I'm fine. It's just allergies.  
22 **THE WITNESS:** You gave them to me.  
23 **BY MR. SONG:**  
24 **Q** Yes. I think it's contagious.  
25 Has Oracle ever had -- has Oracle ever

168

1 considered a person's prior salary in determining  
2 their starting salary?  
3 MR. SHWARTS: Objection. Overbroad as to  
4 time.  
5 You may answer.  
6 THE WITNESS: I think in the past, it was  
7 one of the considerations.  
8 BY MR. SONG:  
9 Q Okay. And when you say it was one of the  
10 considerations, was it something that -- something  
11 that was required of applicants to provide to  
12 Oracle?  
13 A No.  
14 Q No?  
15 A No, not in our market.  
16 Q Okay. But was that -- was prior salary  
17 requested by Oracle from applicants?  
18 MR. SHWARTS: Objection. Vague as to time.  
19 You may answer.  
20 THE WITNESS: Yeah. I mean, I know in the  
21 past -- I don't -- you know, we stopped the  
22 practice, but in the past, some people may have  
23 asked, some people may have not asked.  
24 BY MR. SONG:  
25 Q Okay. So when you say you stopped the

169

1 give me an estimate.  
2 A You know, we have 600 recruiters. I can't  
3 tell you when exactly it all took place and it  
4 got -- certainly at the executive levels, it got to  
5 be, you know, not just -- you just had to pay what  
6 you were going to pay because the market is so hot.  
7 And then even below that, your engineers --  
8 you know, you make your best offer.  
9 Q Well, just so we can try to understand when  
10 this change took place, was it more than five years  
11 ago?  
12 A I don't -- I don't think it was more than  
13 five years ago, but yeah.  
14 Q Okay. So it was less than five years ago?  
15 A Uh-huh.  
16 Q But you're not sure when. All right. And  
17 you said --  
18 A In the cloud market, we threw it out at  
19 least five years ago because the market was just  
20 insanity. It was -- it was like a runaway real  
21 estate market. You put in your best offer.  
22 Q Okay. But even though you put in your best  
23 offer, couldn't you still ask about prior pay?  
24 A You could, but what -- no engineer in cloud  
25 was -- you weren't -- he was -- you could ask. He's

171

1 practice at one point -- or when did you stop the  
2 practice? Let me ask that.  
3 A Well, we stopped far before the law as well  
4 because certainly in the Valley, if someone is  
5 looking, you're not even competing on what you're  
6 currently making. You're actually competing with  
7 the world of where they're looking.  
8 Q Okay. And you say that you stopped well  
9 before the law. Do you remember when you stopped  
10 asking for prior salary?  
11 MR. SHWARTS: Objection. Misstates her  
12 prior testimony.  
13 THE WITNESS: I don't remember exactly when  
14 we did, but we routinely get in and out of hot  
15 markets and mostly hot, so it really didn't matter.  
16 BY MR. SONG:  
17 Q Was it more than a year ago?  
18 MR. SHWARTS: Objection. Again, misstates  
19 her prior testimony.  
20 THE WITNESS: Yeah. I don't remember when  
21 exactly, I'll say it again, that we stopped asking.  
22 BY MR. SONG:  
23 Q Okay. But the law is fairly recent --  
24 A Right.  
25 Q -- so I'm just kind of curious if you can

170

1 a free agent. It's like those football players that  
2 are taught -- I mean, you just -- you got to put in  
3 your best offer and hope you win.  
4 Q And you said that prior pay was a  
5 consideration in determining salary?  
6 A It could be, but, yeah, not in the cloud  
7 area.  
8 Q Okay. How strong of a consideration was  
9 prior pay in determining salary?  
10 MR. SHWARTS: Objection. Vague. Overbroad.  
11 You may answer.  
12 THE WITNESS: Certainly in my hiring with  
13 executives and senior technical people, it really  
14 didn't matter at all. We were constantly setting a  
15 new bar on paying insane amounts of money to get the  
16 talent.  
17 BY MR. SONG:  
18 Q Okay. What about for lower-level hires?  
19 A I didn't -- I don't do -- I do more the key  
20 senior executive engineers. I don't have experience  
21 in that area.  
22 Q Okay. So you don't know how much weight was  
23 given to prior salaries --  
24 A No. I can't talk about those.  
25 Q Okay. When you were involved with some of

172

1 the higher level executives, et cetera, were you --  
2 were you still requesting prior salary up until the  
3 policy stopped?  
4 **A** We -- if it was offered, we presented to  
5 comp committee with their bios, but it wasn't  
6 necessary if they didn't -- you know, they weren't  
7 presenting it.  
8 **Q** Okay.  
9 **A** What they would more present was their stock  
10 information, their vesting information that they  
11 were leaving on the table.  
12 **Q** Okay. Would you request prior salary  
13 information in writing from applicants --  
14 **A** No.  
15 (Simultaneous discussion and reporter  
16 interruption.)  
17 BY MR. SONG:  
18 **Q** Didn't you have forms that would actually  
19 ask for prior salary for applicants?  
20 **A** In our executive -- so you're -- I don't  
21 deal with the masses; so I can't answer those  
22 questions.  
23 **Q** Okay.  
24 **A** Executive search is a whole different  
25 process. It certainly is more concierge service.

173

1 level.  
2 **MR. SONG:** All right. I'm sorry. Let's  
3 just let her answer the question.  
4 **THE WITNESS:** Yeah. Which question? Yeah.  
5 BY MR. SONG:  
6 **Q** So did -- if an applicant provided -- or  
7 let's say -- okay. Not an applicant because they  
8 wouldn't have got -- so let's say a new-hire  
9 provided prior salary information, would Oracle  
10 verify that prior salary information?  
11 **MR. SHWARTS:** Hold on. She's not a 30(b)(6)  
12 witness; so she's not testifying what Oracle would  
13 or wouldn't do.  
14 She's here to testify about her personal  
15 knowledge. So unless you can establish she has  
16 personal knowledge about what someone did with a  
17 new-hire on salary, it's an improper question. And  
18 on that basis I would instruct.  
19 She's not here to testify about what Oracle  
20 would or wouldn't do.  
21 BY MR. SONG:  
22 **Q** Okay. Do you know if -- do you personally  
23 know if prior salary information was verified for  
24 new-hires?  
25 **A** I don't know.

175

1 We wouldn't ask anyone to fill out a form until  
2 we've already made an offer. Then we asked them to  
3 take a background check. Then they could put in  
4 their education and all that, but it's a whole  
5 different finesse.  
6 **Q** Okay. When applicants or new-hires did  
7 provide you with prior salary information, did  
8 Oracle verify that prior salary information?  
9 **MR. SHWARTS:** Objection. She just testified  
10 that she doesn't deal with new-hires in that  
11 respect; so she wouldn't know. So it's calling for  
12 her to speculate.  
13 **MR. SONG:** Well, she can answer the  
14 question.  
15 **MR. SHWARTS:** I'm not telling her not to  
16 answer the question. I think it's inappropriate.  
17 She's already testified that she doesn't know how  
18 and when it was used at that level.  
19 **MR. SONG:** Well, yeah, but she testified  
20 that she did use it at her level; so --  
21 **MR. SHWARTS:** No, she didn't testify that  
22 she used it at her level. She testified to the  
23 opposite of that.  
24 She testified the opposite. She testified  
25 that she doesn't use prior salary at the executive

174

1 **Q** Okay.  
2 **A** I don't even know if we require that in a  
3 background check. I don't think we do. I don't --  
4 anyway, I don't know at a lower level.  
5 **Q** Okay. Well, what about at a higher level,  
6 then?  
7 **A** We don't -- we don't check it.  
8 **Q** Okay.  
9 **MR. SONG:** Let me show you -- I think this  
10 is Exhibit 62.  
11 (Exhibit 62 was marked.)  
12 BY MR. SONG:  
13 **Q** Have you had a chance to review this?  
14 **A** Yeah.  
15 **Q** Okay. Do you recognize this document?  
16 **A** No.  
17 **Q** Do you recognize any of the information in  
18 this document?  
19 **A** No.  
20 **Q** No? Okay. If you -- in this little chart  
21 or box, if you go about two-thirds or three-quarters  
22 of the way down, it says "Compensation: \$70,000  
23 base salary plus stock options, W-2, 2012."  
24 Do you know what that means?  
25 **MR. SHWARTS:** Objection. We haven't --

176

1 there's no foundation. We don't even know if this  
2 is a sample document or a real document. We don't  
3 know what this document is.  
4 So without laying a foundation for it, it's  
5 improper to ask questions to her, to ask her what it  
6 means. She's never seen it before; so she's not  
7 going to answer questions about a document she's  
8 never seen before without some foundation being  
9 laid. It's improper.  
10 MR. SONG: Well, this is a document that you  
11 guys produced in discovery.  
12 MR. SHWARTS: So what? She's a witness --  
13 this is Joyce Westerdahl here giving a deposition.  
14 MR. SONG: Yeah.  
15 MR. SHWARTS: This is not her document.  
16 She's not answering questions about documents she  
17 doesn't know anything about.  
18 Find the person who did, that's fine. But  
19 you can't just stick a document in front of a  
20 witness and say, "Tell me what this means."  
21 MR. SONG: Well, I can ask her if she can  
22 answer.  
23 MR. SHWARTS: She's never seen the document  
24 before.  
25 MR. SONG: I'm not asking her about the

177

1 MR. SONG: -- I will ask her.  
2 BY MR. SONG:  
3 Q Have you ever seen these types of documents  
4 before?  
5 A I have not.  
6 Q Do you know who prepares these documents?  
7 A No.  
8 Q Okay. Have you ever prepared a candidate  
9 profile summary?  
10 A I have not.  
11 Q And do you know what one is?  
12 A I can figure out --  
13 MR. SHWARTS: No. He's asking you if you  
14 know what one is. Don't guess.  
15 THE WITNESS: Okay. This is not how -- what  
16 was the question? Oh, shit. What was the question?  
17 Do I know what one is?  
18 BY MR. SONG:  
19 Q Do you know what a candidate profile summary  
20 is?  
21 A I know what they are in my world. This is  
22 not in my world. I don't know -- I have not seen  
23 this document before.  
24 Q Okay. And your world, you're speaking of --  
25 A At the executive level.

179

1 document --  
2 MR. SHWARTS: Yes, you are. You're asking  
3 her what that line means.  
4 MR. SONG: Well, I'm asking her about the  
5 information on it.  
6 MR. SHWARTS: Right. And without her having  
7 a basis to do that, then it's improper to ask her.  
8 She has no foundation to answer that question.  
9 MR. SONG: Well, she's the head of HR, and  
10 this is a deposition --  
11 MR. SHWARTS: Right. And there's people  
12 that are below her that you can depose if you want,  
13 but this is the head of a 140,000-employee -- head  
14 of HR for 140,000 employees, and you're handing her  
15 one candidate profile summary that she's never seen.  
16 So unless you can establish that she sees  
17 these type of documents, that she knows how they're  
18 prepared, what's the basis for putting the  
19 information into it, it is not appropriate to ask  
20 this witness here. She's -- frankly, she's at too  
21 high of a level to even ask that question of this  
22 person. So, you know, it is improper.  
23 MR. SONG: Well, I think she has personal  
24 information about this, but --  
25 MR. SHWARTS: What --

178

1 Q At the executive level.  
2 A Something we would take to comp committee.  
3 Q Okay.  
4 A Yeah.  
5 Q And what is a candidate profile summary in  
6 your world?  
7 A Their resume, what they've accomplished,  
8 so --  
9 Q Okay.  
10 A -- not their address, not, you know -- not  
11 what they're looking for. Their background and what  
12 their accomplishments are.  
13 Q Okay. Does it include -- would a candidate  
14 profile summary include prior history?  
15 A It may or may not depending on what point in  
16 time we were presenting that.  
17 Q What about for lower-level hires?  
18 A I can't -- I just can't speak to that. I  
19 don't deal with any of that.  
20 Q Okay. Do you know if HR has ever required  
21 hiring managers to take into account a person's  
22 prior salary when making a hiring decision?  
23 A I don't know if they have or they haven't.  
24 Q Okay. But you've never instructed hiring  
25 managers to take into account a person's prior

180

1 history --  
2 **A** No.  
3 **Q** -- for hiring?  
4 **A** No, I haven't.  
5 **Q** Okay. All right. I would like to talk  
6 about transfers, lateral transfers from one product  
7 to another?  
8 **A** Okay.  
9 **Q** If an Oracle employee transferred laterally  
10 from one product to another in product development,  
11 would that factor into pay?  
12 **MR. SHWARTS:** Objection. Vague and  
13 overbroad.  
14 You may answer.  
15 **THE WITNESS:** I'm not sure what you're  
16 asking. If they're transferring into the exact same  
17 level and job and kind of just in another division,  
18 it would be what they call -- you said lateral  
19 transfer; so it's lateral transfer. It wouldn't  
20 necessarily constitute a change in pay.  
21 **BY MR. SONG:**  
22 **Q** Okay. And is the -- so if an Oracle  
23 employee transferred from one product to another,  
24 that wouldn't necessarily involve a salary if  
25 they're transferring to the same job or level,

181

1 ratio was in that range and then bring it into the  
2 local, you know, market and then pay appropriately  
3 to the local market and what their peers are making  
4 in that job, in that range in California.  
5 **Q** So would they use the exact same compa  
6 ratio, or would it be just a similar?  
7 **MR. SHWARTS:** Objection. Overbroad.  
8 You may answer.  
9 **THE WITNESS:** There's judgment in it. They  
10 could use the same -- they look at initially the  
11 same, but it's a pretty dramatic jump from India to  
12 Redwood Shores and getting established and -- you  
13 know, there would be a lot of factors to making sure  
14 that person would be successful --  
15 **BY MR. SONG:**  
16 **Q** Okay.  
17 **A** -- with their salary.  
18 **Q** And who would determine that salary?  
19 **A** The -- that's kind of a different group of  
20 people. So there's kind of an international group  
21 that helps support all of that because there's  
22 relocation, there's other tools to help support  
23 going anywhere, or if you're going to India, vice  
24 versa.  
25 And -- so it would be the immigration group

183

1 et cetera, right?  
2 **A** Correct.  
3 **Q** And do you know how employees pay is handled  
4 if employees transfer from India to the U.S.,  
5 specifically at Redwood Shores?  
6 **A** How their pay would be handled?  
7 **Q** Yes.  
8 **A** Well, depends on if they're going into an  
9 alike position.  
10 (Reporter clarification.)  
11 **THE WITNESS:** So a Systems Engineer 2 coming  
12 from India going to System Engineer 2 at  
13 headquarters, they would look at California salary,  
14 and they would look at what their comp ratio was in  
15 India and probably translate that to the same comp  
16 ratio in Redwood Shores, but with a different --  
17 certainly a different salary.  
18 **BY MR. SONG:**  
19 **Q** Okay. But how would that salary be  
20 determined?  
21 **A** So they would -- they would look at their  
22 comp ratio in India in their range, if it's the same  
23 kind of position. If it's a promotion, it's a  
24 little different, but if it was -- let's just say it  
25 was the same position, they look at what their comp

182

1 and an HR manager from both probably countries  
2 working together with a comp person and the hiring  
3 manager.  
4 **Q** Okay. And is that determination reviewed?  
5 **A** Well, it's reviewed by all those folks.  
6 **Q** Okay. But once that decision is made by  
7 those folks, is there a review or -- by anyone else?  
8 **A** Once the HR people check off, then it goes  
9 through the standard approval matrix for just a  
10 sign-off.  
11 **THE WITNESS:** Sorry. I didn't mean to kick  
12 you.  
13 **BY MR. SONG:**  
14 **Q** And what about for acquisition hires? How  
15 is -- how is their starting salary determined?  
16 **A** So acquisition hires are all -- for the  
17 130-plus that we've done, they're sort of all over  
18 the board.  
19 Most of the time they want to keep them  
20 whole and in their same job family and even their  
21 same titles, even if their titles -- even if they're  
22 overtitled compared to our system. We try not to  
23 bring them down.  
24 But every deal is sort of different because  
25 it's key to keep the talent. You're not just buying

184

1 product. You're buying the people. And the people  
2 are key to keep.  
3 So there would be different strategies of  
4 what they wanted to do from retention bonuses to  
5 giving them additional stock.  
6 I mean, even silly things like they had a  
7 full kitchen and a snack bar and alcoholic  
8 beverages, we would -- we would -- we're starting to  
9 eliminate the alcohol now. We have because it's  
10 gotten out of control.  
11 But we would copy those things or leave them  
12 in their same building, even though it wasn't  
13 cost-effective. So our goal was to retain as much  
14 of those folks as possible.  
15 You could talk to Peter Shott and get a  
16 whole dissertation on that.  
17 Q And are those decisions reviewed by anyone?  
18 A They don't go through -- they're signed off  
19 by whoever is buying the -- you know, Thomas Kurian,  
20 he signs off, and we're sort of done.  
21 It's not in the system. So if you're in the  
22 system, the system moves the approvals along. A lot  
23 of these deals are done by spreadsheet, and then  
24 there's just a spreadsheet moves to the top of the  
25 business, whether it's me for my people -- I just

185

1 sign it off, and they join or sign-on bonuses or  
2 whatever it is.  
3 Q All right. And when you said "system," are  
4 you talking about the compensation ratios?  
5 A No, the HCM system. So, like, once you're  
6 on the system, you kind of can't get off that  
7 railroad. And, you know, the approvals just move  
8 through.  
9 These are not put in the system. These are  
10 treated differently as an acquisition. And the head  
11 of the line of business would sign off on it, but  
12 it's probably in a spreadsheet form in an e-mail.  
13 Q Okay. So the acquisition hire information  
14 is not contained?  
15 A And then it's loaded, and then when they  
16 join --  
17 Q Then they're loaded?  
18 A -- they're uploaded as existing employees in  
19 the system.  
20 Q Okay.  
21 A And they get -- and then they get things  
22 like their tenure. They get additional tenure; so  
23 they -- five years, and we bought them, they get  
24 that five years. So they get the higher vesting  
25 rate for their 401(k). They get the -- when we used

186

1 to have vacation -- now we have unlimited vacation,  
2 but when we used to have tier vacation, they would  
3 get the more advanced vacation.  
4 So they wouldn't lose anything coming to  
5 Oracle. In fact, they gain in some things. So they  
6 could be a month, their company -- they get bought,  
7 and suddenly they have five weeks of vacation, and  
8 they have the higher vesting for their 401(k). And  
9 so we did that for retention. So we treated them  
10 differently.  
11 Q And they would be given a compa ratio?  
12 A Once they got in, you know -- that -- that  
13 necessarily wasn't always looked at bringing them  
14 in.  
15 Q Okay. But in determining their salary,  
16 would the comp ratio be looked at?  
17 A We -- so -- I can give you -- there was --  
18 there's well over 130 deals, and I can give you  
19 130-plus examples of how things were done  
20 differently.  
21 We bought a company called MICROS.  
22 Completely not really in our space. It's retail  
23 swiping for restaurants. When you go into  
24 restaurants, it's all the back office systems.  
25 There's a company called MICROS. People sell it or

187

1 ex-bartenders, ex-waitresses -- they were paid a  
2 whole different structure of salespeople versus an  
3 Oracle salesperson, you know, does pretty well in  
4 life.  
5 So that company, we gave, like, everybody  
6 sort of an uplift, you know. Now, are we paying  
7 them the same as selling an application sales rep?  
8 No, but there were decisions that went in and said,  
9 "We want these groups of people being paid more," or  
10 we had -- they have a big facility in the  
11 Philippines. We felt they weren't paying market.  
12 Everybody got a raise.  
13 And then there's other cases -- Taleo. We  
14 bought a company called Taleo. It's an HR product.  
15 They were paid insanely amounts of money.  
16 Did we take that away? No. We left them --  
17 everybody seemed to be an executive vice president  
18 or a president, and we grandfathered their titles.  
19 So we kind of -- how much do we want to keep  
20 these people? You know, we want to keep them for  
21 periods of time. Key developers -- we'll give them  
22 retention bonuses to -- you know, we'll give them a  
23 raise. We'll give them more stock, and then we'll  
24 throw in retention up to three years.  
25 So they're treated sort of special and

188

1 differently to, you know -- because they've had a  
2 disruption. You know, a change of a job is like a  
3 divorce. It's -- you know, they didn't plan on  
4 changing jobs.  
5 **Q** For the acquisition hires, who's making the  
6 decisions for their starting salary?  
7 **A** It's a group between -- it's the HR people  
8 working with the business leaders and even  
9 Doug Kehring who runs the M&A group. And there's a  
10 lot of care and feeding that go into that, depending  
11 on the product line.  
12 **Q** Okay. And is HR involved as well?  
13 **A** They are, but we may be just, you know,  
14 helping with what the business needs to do and how  
15 they want to run it.  
16 **Q** Okay. Are you contributing to determining  
17 the starting salary?  
18 **A** We can be, yeah.  
19 **MR. SHWARTS:** Wait. So just be clear. Your  
20 "you" in that sentence -- was that HR or her?  
21 **MR. SONG:** HR.  
22 **THE WITNESS:** HR.  
23 **MR. SHWARTS:** Thank you. I think that's  
24 what she understood, but I wanted to be clear.  
25 **THE WITNESS:** HR.

189

1 **THE WITNESS:** Oh, how I -- well, I have a  
2 need. Wait, I'm bringing someone in from the  
3 outside?  
4 **BY MR. SONG:**  
5 **Q** Yes.  
6 **A** Okay. So I have a need. I need someone to  
7 be a privacy expert in the HR space. So I would  
8 look for someone with data privacy in the HR space  
9 and assign them that assignment because that's what  
10 I'm looking for.  
11 Am I being too simplistic?  
12 **Q** No.  
13 **A** No. Okay.  
14 **Q** No. That was good. Thank you.  
15 But I believe -- and please correct me if  
16 I'm wrong, I'm sure you will -- but I think you  
17 testified earlier that sometimes people aren't  
18 assigned the job that they applied for?  
19 **A** Correct.  
20 **Q** Okay. And so what are those situations  
21 where that might happen?  
22 **A** At the senior level, vice president, senior  
23 vice president, we have a -- the co-CEO, Mark Hurd,  
24 has a philosophy about building benches. So I guess  
25 that's a sports analogy, you know -- okay.

191

1 **BY MR. SONG:**  
2 **Q** Because you personally are not involved at  
3 that level?  
4 **A** I have been involved in the past with the  
5 senior executives, yes, I have, with the senior  
6 people.  
7 **Q** Okay. But not on a lower level?  
8 **MR. SHWARTS:** You need to answer the  
9 question orally.  
10 **THE WITNESS:** Yes.  
11 **BY MR. SONG:**  
12 **Q** Okay. I want to talk about initial job  
13 assignments.  
14 **A** Okay.  
15 **Q** So what is the practice for assigning  
16 people, new employees job assignments?  
17 **MR. SHWARTS:** Objection. Overbroad and  
18 vague.  
19 Meaning in HR or --  
20 **BY MR. SONG:**  
21 **Q** Yeah. Well, in HR from what you know?  
22 **A** In HR?  
23 **Q** Yes.  
24 **MR. SHWARTS:** That's your organization,  
25 so --

190

1 And we do a lot of searches that we may have  
2 an initial search where we're looking for the head  
3 of sales for applications, and we look at someone  
4 and we say, "We're not ready. We don't want you for  
5 this, but we would like you to go run channels for  
6 two years and then we'll rotate you back to another  
7 assignment."  
8 So that's where it typically happens, kind  
9 of the senior director, vice president level where  
10 we have some holes, and we can move them around, let  
11 them learn Oracle, and they may not exactly be  
12 matched to the job that we initially recruited them  
13 for.  
14 **Q** Okay. Do you know if this happens on lower  
15 levels?  
16 **A** It may. I'm not aware of it as a practice.  
17 **Q** Okay. Do you know if employees were ever  
18 assigned to a different job level than they applied  
19 for, for example, IC versus manager, or if they  
20 applied for an IC-4 job but then ended up being  
21 assigned to an IC-3 job?  
22 **MR. SHWARTS:** Objection. Overbroad.  
23 You may answer.  
24 **THE WITNESS:** It does happen where they  
25 apply for a job, and we don't feel they're at a IC4.

192

1 And then we have a conversation that you're not at  
2 this level, it's you're at this level. And then  
3 they have to make a decision that this is the right  
4 move for them to come to us or not.  
5 BY MR. SONG:  
6 Q Okay. And who makes those decisions?  
7 A It would be a combination of the recruiter  
8 and HR and probably the manager realizes it, too, as  
9 they go through the interview process.  
10 Q Okay. And if they were assigned to a  
11 different job level, would that affect their  
12 compensation?  
13 MR. SHWARTS: Objection. Overbroad.  
14 You may answer.  
15 THE WITNESS: It could or, you know, the  
16 ranges are big or maybe, you know -- it's just a  
17 different job level, but the comp is still  
18 acceptable to them.  
19 BY MR. SONG:  
20 Q Okay. Would it result in a different  
21 supervisor for an employee?  
22 A Not likely. You know, I mean, it's  
23 possible, but not likely.  
24 Q Not likely? And would this be any different  
25 for transfers?

193

1 A -- internally.  
2 Q So that process would be very different?  
3 A It's just whatever -- yeah.  
4 Q Transfers lateral for new-hires? And you  
5 won't -- and you only play a role in determining as  
6 job assignments for senior level executives,  
7 correct?  
8 MR. SHWARTS: The "you" in that question  
9 this time was you, Joyce Westerdahl.  
10 THE WITNESS: And, yes, that is correct.  
11 BY MR. SONG:  
12 Q Okay. For senior executives, who else would  
13 be involved in determining assignments or job  
14 levels?  
15 A It would depend on where they're coming  
16 from. So if it's Mark's world, and it's a sales  
17 executive, Mark and I would have a conversation.  
18 So just to be clear, when you're buying a  
19 company, those people get their stock all vested.  
20 So they don't really want to stay. They want to  
21 take their cash ticket and leave.  
22 So usually with an executive, we are  
23 convincing them to stay on, as well as all the  
24 developers who can say "Cash me out. And oh, I just  
25 noticed this is a really hot market, I can get a job

195

1 MR. SHWARTS: Objection. Overbroad.  
2 You may answer.  
3 BY MR. SONG:  
4 Q So if the transfer wanted to come over to  
5 Oracle U.S., would they ever --  
6 A Or internally U.S.  
7 Q Yes, that's true.  
8 A It could. I mean, it could. You know, we  
9 all think well of ourselves, I think.  
10 Q Okay.  
11 A Yeah. Kind of -- but if you're -- let's say  
12 I'm already in a IC-3, it's not likely I go in an  
13 interview and they say I'm an IC-2 if you've been in  
14 the Oracle system for a while. Then you have the  
15 experience of an IC-3. It would be kind of highly  
16 unlikely that someone would say, "Oh, I don't think  
17 you're at this level," even though they are. I  
18 mean, everyone has an opinion, I guess, but . . .  
19 Q That they do.  
20 Would this process be any different for an  
21 acquisition hire?  
22 A That's -- I mean, as I stated before,  
23 acquisitions are so unique that I wouldn't even  
24 compare acquisitions to what we do --  
25 Q Okay.

194

1 in two seconds. Not two minutes, but two seconds."  
2 So that process is almost courting them to  
3 stay on because they can take -- they can pull their  
4 golden ticket and walk.  
5 Q When you're determining in the initial job  
6 level, are you following any practice or pattern?  
7 A We try --  
8 MR. SHWARTS: Hold on. Objection.  
9 Can you be more specific as to what you're  
10 referring to with your "you" there?  
11 BY MR. SONG:  
12 Q I'm sorry. You personally.  
13 A For the executives?  
14 Q Yes. Because you're involved in those  
15 personally.  
16 A Yes. For the executives, we try to have  
17 them fit into our system of what a SVP should have  
18 in span and control, and an ADP and all that and a  
19 vice president, yes, we try to have them fit into  
20 that market or structure.  
21 Q Okay. Are -- are employees ever given a  
22 different job title than the one they applied for?  
23 A I'm sure it happens. I can't give you an  
24 example for an applicant where that happened.  
25 Q Okay.

196

1 A Other than executives. But executives don't  
2 apply typically, the senior people -- we recruit  
3 them.  
4 Q Okay. Has that happened with execs?  
5 A Yes. As my previous testimony on we recruit  
6 them for kind of a bench program in moving around.  
7 Q And does that happen very often?  
8 A I think I mentioned before, it can happen 10  
9 to 15 percent of those senior hires.  
10 Q Have employees ever been assigned to  
11 different projects or products than they applied  
12 for?  
13 MR. SHWARTS: Objection. Overbroad.  
14 You may answer.  
15 THE WITNESS: Yeah, I can't really answer  
16 that. I can't give you a specific if I was a  
17 PeopleSoft developer and I applied for a PeopleSoft  
18 job and they put me in Java, maybe.  
19 BY MR. SONG:  
20 Q Okay.  
21 A I mean, that's a -- yeah.  
22 Q What about within HR?  
23 A I can't give you an example that would come  
24 to mind.  
25 Q And have you played any role in drafting job

197

1 Q Okay. But you don't know of a specific  
2 guidance or guidelines or practice --  
3 A No.  
4 Q -- that they work from?  
5 And your external market surveys, they  
6 were -- they were from Radford; is that correct?  
7 A The majority of them are from Radford. I  
8 mean, we use other surveys in other local country  
9 markets.  
10 Q Do you use anyone else in the United States?  
11 A I think we have in the past, as I mentioned  
12 earlier, and I cannot pull who that vendor was.  
13 Q But now it's primarily Radford?  
14 A It may be Radford and still another firm.  
15 Radford is the largest in the tech space.  
16 Q What about in India? Do you know?  
17 A I don't know who it is in India, but -- I  
18 don't know if it's Radford or someone else.  
19 Q Do you know if the people who are writing  
20 the job descriptions receive training on writing job  
21 descriptions?  
22 A If they're -- you know, if they're comp  
23 people, they're all certified and go through  
24 additional, you know, master's education. And so  
25 assuming that's all part of their curriculum and

199

1 descriptions?  
2 A No.  
3 Q Do you review job descriptions?  
4 A I haven't in a very, very long time.  
5 Q Who drafts job descriptions for HR?  
6 A Someone in my organization.  
7 Q Do you know which unit or --  
8 A No. It's probably compensation, but it  
9 could come out of programs too -- out of that  
10 program group. Because I know our competencies  
11 that, you know, map to jobs come out of that program  
12 management organization, development and talent.  
13 Q And do you know who reviews job  
14 descriptions?  
15 A I don't know who -- I mean, I think there's  
16 a group of people. Can I tell you what that group  
17 of people is?  
18 Q You guessed my next question.  
19 A Yep.  
20 Q And are they working off of any guidance or  
21 guidelines?  
22 A I would think so. I would think they, you  
23 know work -- I mean, the people that do that are  
24 probably experts at that kind of work and are market  
25 savvy.

198

1 they're -- you know, there's things like those kind  
2 of things, competencies are reviewed by legal. So  
3 at some point there's legal reviews on things.  
4 Q And you were saying that comp people have  
5 master's degrees?  
6 A They have master's programs where -- you  
7 know, they have to be certified in certain elements  
8 of what they do and go to additional education.  
9 They're kind of like teachers. They have to keep up  
10 on things.  
11 Q So do all of your comp people have master's  
12 degrees?  
13 A No. I'm not saying master's. I'm saying  
14 they have to do additional education for what they  
15 do in comp and certifications.  
16 So I don't know if they all have master's,  
17 but certainly they have to get educated. And even  
18 what they do with executive comp and comp  
19 committees, there's seminars and programs you go off  
20 to learn to do those things.  
21 Q So you're talking about continuing  
22 education --  
23 A Correct.  
24 Q -- beyond college?  
25 A Right.

200

1 Q And -- but some of them do have master's  
2 level degrees?  
3 A I assume so. I assume that we have a number  
4 that have Ph.D.s.  
5 Q In compensations, economics?  
6 A In organizational development and business  
7 analytics and various sciences within HR.  
8 Q And are those -- are some of those people in  
9 your compensation department?  
10 A I don't know if I have a Ph.D. in -- I don't  
11 know the comp people very well other than Kate, as  
12 we've already established in prior testimony.  
13 Q Regarding determining starting salaries,  
14 does your -- does HR provide trainings for people on  
15 how to determine starting salaries?  
16 MR. SHWARTS: Objection. Overbroad.  
17 You may answer.  
18 THE WITNESS: Yeah. I mean, the comp group  
19 provides lots of training. I have other groups that  
20 provide training. Specifically, yes, I would  
21 imagine it.  
22 Have I actually seen the work? I've seen  
23 some of the documents you've given me today and what  
24 to consider in a starting salary. So, yes, I would  
25 believe that is included in their training.

201

1 BY MR. SONG:  
2 Q How do you ensure starting salaries are  
3 competitive?  
4 MR. SHWARTS: Objection. Overbroad.  
5 You may answer.  
6 THE WITNESS: Okay. Well, there's lots of  
7 ways. Certainly if -- you know, from basic stuff,  
8 if you're losing people and you have attrition in  
9 particular regions, you have to look and see what  
10 your problem is, whether it's a bad manager, you're  
11 not paying people well.  
12 You have market data from Radford and alike  
13 firms. You have market data from your recruiters  
14 that will scream if you're not paying when they're  
15 doing their searches and they're not getting people  
16 for what we're paying.  
17 Managers have views. So I guess that's four  
18 off of my head right there, but . . .  
19 BY MR. SONG:  
20 Q All right. What about salary ranges? How  
21 do you guys come up with salary ranges?  
22 A Ranges.  
23 Q Yeah.  
24 MR. SHWARTS: I think she's answered that  
25 already, but you can answer again.

202

1 THE WITNESS: Yeah. It's based on the  
2 market data, it's based on what Radford gives us,  
3 and that's how we build the ranges for the  
4 particular job bands. And then they're modified by  
5 geography, as you know. I think we've covered that.  
6 BY MR. SONG:  
7 Q And you've only played a role in determining  
8 starting salary for executives, correct?  
9 A Yes.  
10 Q Have you ever played a role in determining  
11 starting salary for lower-level hires?  
12 A No. I mean, I just had a lower-level hire  
13 come in to my organization that I referred and was  
14 involved in recruiting this gal. And comp set her  
15 salary -- had, you know, no input and was happy with  
16 what they did. And she was happy with what they  
17 did, and we went from there.  
18 Q What about in your previous positions at  
19 Oracle -- were you involved in determining starting  
20 salary?  
21 A When I was at lower levels?  
22 Q Yeah. When you weren't the executive  
23 vice president.  
24 A Yeah. We've had -- you know, I built the --  
25 I brought in the recruiting organization years ago;

203

1 so I typically have not been recruiting in the mass  
2 market. I really was only focused forever on  
3 bringing in senior hires.  
4 Q Okay. And when you say you brought in the  
5 recruiting organization, what does that mean?  
6 A We built our own recruiting organization  
7 versus paying headhunters to fill our jobs.  
8 Q From the ground up within Oracle?  
9 A Right. Yeah.  
10 Q Okay. So it wasn't that you brought in  
11 outside --  
12 A No. We got rid of those outside people.  
13 Q And you used internal salary bands in  
14 addition to external market surveys?  
15 A Internal salary bands?  
16 MR. SHWARTS: Objection. Overbroad.  
17 You may answer.  
18 BY MR. SONG:  
19 Q Yeah. Or let me ask if that's confusing --  
20 did you use internal salary bands?  
21 A To do what?  
22 Q To help determine starting salary.  
23 MR. SHWARTS: Objection. Overbroad and  
24 vague.  
25 You may answer.

204

1 THE WITNESS: I guess so. I mean, me?  
2 BY MR. SONG:  
3 Q You personally, yes.  
4 A No, I -- yeah, no. I never used a salary  
5 band. I just hope it fits in a salary band.  
6 Q Do you know if HR has ever -- Oracle's HR  
7 has ever used an internal salary band?  
8 A I'm sure they look to the internal salary  
9 bands as a guideline, yes.  
10 Q Okay. And how do they come up with those  
11 salary -- internal salary bands?  
12 A Again, we work with market data to create  
13 our bands.  
14 Q Okay. And do you provide -- does HR provide  
15 trainings on the salary bands?  
16 A I -- I believe we do. I think I saw it in a  
17 document there.  
18 Q Other than maybe one of these documents --  
19 A I mean -- yeah, I -- my organization trains,  
20 trains, trains, trains, trains. Do I know what's  
21 going on every week? Absolutely not, in training.  
22 I mean, I know before we hit a focal, I know there's  
23 a mass amount of training.  
24 Q Well, I'm just trying to find out, I know  
25 you're not going to know every detail about every

205

1 continual education on this stuff, but it's been a  
2 long time since I've been in a training course on a  
3 salary band.  
4 Q But the last one you remember was in the  
5 '90s?  
6 A It feels like it.  
7 Q And would you say that that was over like a  
8 five-year period that you received trainings?  
9 A Seriously, I don't think I can really answer  
10 that accurately over the past, you know, 30 years of  
11 my career when was the last time I had any training.  
12 I thought I was pretty good telling you what I did  
13 in the last year. Beyond that, I think it gets a  
14 little dicey.  
15 Q '90s weren't so long ago.  
16 A Maybe for you.  
17 Q Are there any factors in determining  
18 starting salary that we haven't talked about?  
19 MR. SHWARTS: Objection. Overbroad.  
20 You may answer.  
21 THE WITNESS: That we haven't talked about?  
22 BY MR. SONG:  
23 Q Is there anything I missed?  
24 A We talked about market pressure, our  
25 competitors, we watch what they're doing. I think

207

1 training, but just kind of the broad categories  
2 of --  
3 A I would imagine --  
4 (Simultaneous discussion and reporter  
5 interruption.)  
6 BY MR. SONG:  
7 Q But do you train -- has HR trained on  
8 internal salary bands?  
9 A I'm fairly positive they have.  
10 Q Do you know of any documentation of  
11 trainings on salary bands?  
12 A I thought I saw something in there, but --  
13 I'm not aware of anything right now and when it  
14 happened, no.  
15 Q Have you ever received any training on  
16 determining salary bands?  
17 A Determining salary bands?  
18 Q Yes.  
19 A No. Using a salary band, yes, but not how  
20 to determine a salary band.  
21 Q Okay. When did you receive the training on  
22 using salary bands?  
23 A Like in the '90s, a long time ago.  
24 Q Okay. And that was just one time?  
25 A No. I'm sure over the years, you know,

206

1 we've covered it.  
2 Q And of the factors in determining a starting  
3 salary, are any -- any of those factors given more  
4 weight? Are any of them more important than the  
5 others?  
6 MR. SHWARTS: Objection. Overbroad. Lack  
7 of foundation.  
8 You may answer.  
9 THE WITNESS: I mean, that's hard to say  
10 because I think a good example of this, you can have  
11 a brilliant engineer that dropped out of MIT and  
12 doesn't have a degree.  
13 So there's people that would say that  
14 education counts and maybe it does count. I think  
15 it does count in the lawyer category. I want him to  
16 have a real JD, you know --  
17 BY MR. SONG:  
18 Q Sure.  
19 A Yeah, that's important. But certainly in  
20 engineering and technology -- and the only companies  
21 I've ever worked for are engineering companies --  
22 some of your brightest people didn't have the  
23 patience to get through a four-year program. So,  
24 you know, weighting that is kind of tough.  
25 Q So it's more case by case?

208

1     **A** It certainly is in the software engineering  
2 world. I mean, you have Steve Jobs, Bill Gates,  
3 Larry Ellison that did not finish college.  
4     **Q** And how do you, for example -- like, let's  
5 say, for example, experience -- that's one of the  
6 factors in determining salary.  
7         How do you measure that?  
8     **A** Well --  
9     MR. SHWARTS: Hold on. Objection.  
10 Overbroad. Lacks foundation.  
11         You may answer.  
12     THE WITNESS: Okay. In -- well, in  
13 engineering, it's kind of -- it can be  
14 project-based, years of experience, what they worked  
15 on. They go through a technical interview with  
16 their managers or a peer -- a peer group of people.  
17         And I just forgot the question.  
18 BY MR. SONG:  
19     **Q** Oh, just how you measure some of the --  
20 yeah, how you measure the factors in determining  
21 starting salary.  
22     **A** Okay. Starting pay.  
23     **Q** For example, experience.  
24     MR. SHWARTS: Same objection.  
25         You may answer.

209

1 looking at that, as well as the comp ratio, but  
2 if -- I'll stop talking because I'm not making any  
3 sense past that.  
4     **Q** Well, that made sense. But can you give me,  
5 like, an actual number, like --  
6     **A** The actual comp ratio, I can't. I don't  
7 know. Yeah.  
8     **Q** Would, like, a .5 be concerning?  
9     **A** That might be concerning, yeah.  
10     **Q** Okay.  
11     **A** But sometimes you see them where they're not  
12 even in the -- yeah. The comp ratio is low, but  
13 they're not even within the range. And that usually  
14 suggests that someone did a dry promotion without an  
15 increase, and you need to address that.  
16     **Q** And what is a dry promotion?  
17     **A** Where they may promote someone without  
18 giving them an increase, and we don't like those.  
19     **Q** Okay. And does that happen every so often?  
20     **A** It does.  
21     **Q** Do you know in the past year how many times  
22 that's happened?  
23     **A** In my organization?  
24     **Q** Yes.  
25     **A** I think we've found three in an organization

211

1     THE WITNESS: Sorry. Experience is key on  
2 some -- in some of these areas.  
3     MR. SONG: Okay.  
4     THE WITNESS: I may need a break. My brain  
5 just dropped out of my body.  
6     MR. SONG: Okay. That's fine. We can take  
7 a break.  
8         (Off-the-record discussion held.)  
9     THE VIDEOGRAPHER: Going off the record.  
10 The time is approximately 2:17 p.m.  
11         (Off the record from 2:19 p.m. to 2:33 p.m.)  
12     THE VIDEOGRAPHER: Going back on the record,  
13 and the time is approximately 2:32 p.m.  
14 BY MR. SONG:  
15     **Q** A follow-up question regarding comp ratios.  
16 You mentioned earlier that if there were a low or  
17 inappropriate comp ratio, that you would probably do  
18 a review or investigate; is that right?  
19     **A** In my organization?  
20     **Q** Yeah. Within HR.  
21     **A** Yes.  
22     **Q** What could you consider a low comp ratio?  
23     **A** Something -- well, I would look at something  
24 that was in the first cortile of the range or the  
25 range in general, let alone -- I would look -- I'm

210

1 of 16- or 1500 people, in my world.  
2     **Q** Okay.  
3     **A** And they were all in one particular group.  
4     **Q** Does that mean that one manager or  
5 supervisor was responsible for them?  
6     **A** Yes, and got talked -- and got spoken to  
7 about it.  
8     **Q** Okay. So when you're looking at comp  
9 ratios, there isn't a specific target that you're  
10 looking at, like .5 or .6, .7?  
11     **A** No -- I mean, because you could have someone  
12 new in a role; so it's a little more complicated  
13 than the comp ratio. You have to look at it more  
14 holistically as well. It's one indicator.  
15     **Q** Okay. And just looking at comp ratios and  
16 how they're used, I just wanted to clarify. So back  
17 to my hypothetical about a transfer from India, if  
18 they had the exact -- so let's just assume that they  
19 have the same job title, same code, title,  
20 everything, and they transferred to the U.S. to  
21 headquarters, would you -- you would use the comp  
22 ratio to determine their salary?  
23     MR. SHWARTS: Objection. Hypothetical.  
24         You may answer.  
25     THE WITNESS: No. I mean, it would be one

212

1 tool, again, one indicator of where to start.  
2 BY MR. SONG:  
3 Q Okay.  
4 A I believe comp is -- is a bit of a -- is a  
5 science but it also has a bit of art in it as well,  
6 at least on some of those international transfers  
7 and their situation and all that.  
8 Q Okay. So a transfer from India -- even if  
9 they transferred to the exact same situation, their  
10 job in the U.S. wouldn't necessarily be paid  
11 specifically according to the comp ratio?  
12 A Yeah. Because you're picking -- like,  
13 you're picking India, and you're picking the Bay  
14 Area. So, you know, I want this person to be able  
15 to eat and feed his family.  
16 So there may -- you know, there may be a  
17 moving bonus, there -- you know, I mean, there could  
18 be a variety of things that people would look at to  
19 make this a successful transfer, let alone we're  
20 moving someone from another culture to the U.S.  
21 Q Okay. I also wanted to follow up on my  
22 question regarding second-level reviews for  
23 compensation.  
24 A Okay.  
25 Q So I think that might have been a little bit

213

1 from an exempt to nonexempt or vice versa. There's  
2 a check and balances by HR. The HR people and comp  
3 to make sure that they're being paid fairly, to make  
4 sure it's the right promotion, just to make sure  
5 we're doing it correctly, make sure that they put in  
6 a \$3,000 raise, and it didn't go in as \$30,000,  
7 which happens more than you can ever imagine, or  
8 \$600,000.  
9 So there is a second review process that I'm  
10 aware of that comp does, and some of the HR people  
11 does for quality and accuracy, and it's not  
12 excluding any area like comp.  
13 BY MR. SONG:  
14 Q So it includes compensation?  
15 A As far as I'm aware, it does, yeah.  
16 Q Okay. Are -- are new-hires able to  
17 negotiate starting salary?  
18 MR. SHWARTS: Objection. Overbroad.  
19 You may answer.  
20 THE WITNESS: They certainly try. Certainly  
21 at my level, my hires.  
22 BY MR. SONG:  
23 Q And would that be true for transfers?  
24 A I -- I can't speak to that specifically.  
25 Q Okay. That would be true for acquisition

215

1 confusing because what I was talking about was --  
2 I'm not sure if you're familiar with this, probably  
3 not, but probably you are -- but  
4 Shauna Holman-Harries testified that they instituted  
5 second-level reviews outside of the chain of command  
6 for promotions and other things but not for  
7 compensation.  
8 Are you aware of that?  
9 MR. SHWARTS: He's asking you to assume that  
10 she testified to that. Either you have knowledge of  
11 this, or you don't. All right?  
12 He's just -- he's not putting the testimony  
13 in front of you. He's just saying she said this.  
14 The question is do you know it or you don't know it.  
15 THE WITNESS: I -- I kind of think I know  
16 what she's talking about, but I'm not sure.  
17 MR. SHWARTS: Then no guessing.  
18 THE WITNESS: Okay.  
19 BY MR. SONG:  
20 Q Okay. But you've heard of these  
21 second-level reviews?  
22 MR. SHWARTS: Object. Calls for the witness  
23 to speculate.  
24 THE WITNESS: We have second-level reviews  
25 that HR does when people are promoted or they go

214

1 hires?  
2 A I can speak to that specifically. They  
3 actively negotiate higher salaries.  
4 Q And college recruits as well?  
5 A I'm not involved at all with college  
6 recruiting; so I would -- I mean, I would imagine  
7 everyone tries to negotiate if they can, but I can't  
8 speak directly to that.  
9 Or I bet their parents try to negotiate  
10 their starting salary.  
11 Q Or their spouses?  
12 A Yeah. No, their mothers. We do have  
13 mothers calling in on a whole variety of issues.  
14 Q Have you ever seen a decision for starting  
15 pay overturned?  
16 A Have I ever seen --  
17 Q You personally?  
18 MR. SHWARTS: Objection. Vague as to time.  
19 You may answer.  
20 THE WITNESS: Okay. Wait. Have I ever seen  
21 a proposal for starting pay overturned?  
22 BY MR. SONG:  
23 Q Yes.  
24 A By who -- like, overturned by -- like --  
25 Q Powers that be.

216

1     **A** Like somebody above me say, "No, we're not  
2 paying that"?"  
3     **Q** Yes. So, for example, a starting -- like,  
4 the normal process was used to determine a starting  
5 salary and then somebody overturns it.  
6     **MR. SHWARTS:** Again, vague as to time.  
7     You may answer.  
8     **THE WITNESS:** Yeah, I mean, I've been aware  
9 of when it's been challenged, if it's, you know --  
10 especially if it's a senior person where it may be  
11 challenged, but -- and there's a discussion at my  
12 level on some things where they have thought I've  
13 lost my mind in what we're paying this person.  
14 **BY MR. SONG:**  
15     **Q** Okay. And who -- who can challenge these  
16 decisions?  
17     **A** I've had -- I've had Thomas Kurian as a  
18 hiring manager challenge me that, you know, "This is  
19 a lot to pay," and, you know.  
20     **Q** The Thomas Kurian -- I'm sorry, if I'm  
21 mistaken -- isn't he a report to you?  
22     **A** No, he was a president of development, and  
23 he recently left. And he's now at Google as their  
24 CEO.  
25     **Q** Oh, okay. And who else can challenge these

217

1     **A** I mean, I guess you could deny the -- deny  
2 it in -- is there a formal process? No, I don't  
3 think we have anything documented.  
4     Could I reject a transaction? Yes. Could I  
5 ask more questions about a transaction in the  
6 system? Yes.  
7     Does it happen? I don't know how much.  
8     **Q** Have any internal equity assessments been  
9 performed in reviewing starting pay?  
10     **A** Starting pay?  
11     **Q** Starting pay.  
12     **MR. SHWARTS:** You mean has HR done that? Is  
13 that what you're asking?  
14 **BY MR. SONG:**  
15     **Q** Yes, HR.  
16     **A** So, like, your first, like, starting pay,  
17 not current pay incumbents?  
18     **Q** Yes. Starting pay.  
19     **A** Starting pay -- I don't know if they have  
20 done -- if we have done starting pay.  
21     **Q** Okay. And what about you personally? Do  
22 you know?  
23     **A** I was answering for me and my group. I  
24 don't know if we've done audits on starting pay.  
25     **Q** And you've never -- then you've never played

219

1 salary determinations?  
2     **MR. SHWARTS:** Objection. That was vague and  
3 misleading.  
4     You may answer.  
5     **THE WITNESS:** Yeah. I mean, I guess, anyone  
6 who would want to, but -- yeah.  
7 **BY MR. SONG:**  
8     **Q** But they would have to be above you?  
9     **A** I have not experienced this very often, but  
10 typically when I have experienced it, it has been  
11 with the business when I'm helping recruit someone,  
12 and they, you know, have challenged why we have to  
13 pay so much money.  
14     **Q** Okay. And how are those challenges  
15 instituted? Are they in writing or verbal?  
16     **A** No. We usually use the telephone, or we  
17 talk to each other in the hallway.  
18     **Q** Okay. And is there any documentation of  
19 this process?  
20     **A** No, unless Google is recording us in the  
21 hallways.  
22     **Q** May well be.  
23     **A** Yeah. They are.  
24     **Q** Is there a formal process for overturning or  
25 challenging starting salary decisions?

218

1 a role in conducting an internal equity assessment  
2 for starting pay?  
3     **A** I have not -- I have not conducted a role,  
4 but we have certainly done it. I have not done the  
5 audits. You're asking me, yeah.  
6     **Q** So equity assessments have been done for  
7 current salary but not for starting salary?  
8     **A** I just don't know if they've done them for  
9 starting salary, so --  
10     **Q** Okay. But they have done them for --  
11     **MR. SHWARTS:** Who's the "they" -- objection.  
12 Who's the "they" --  
13     **THE WITNESS:** Yeah. Who's the "they"?  
14 **BY MR. SONG:**  
15     **Q** So HR -- let's start with HR.  
16     **A** HR has not done for either current or  
17 starting pay people.  
18     **Q** Okay. Then when you were talking about  
19 "they," who were you talking about?  
20     **A** Sorry. You are going to get me in this --  
21 well, who were you talking about?  
22     **Q** I told you who I'm talking about.  
23     **MR. SHWARTS:** There's no question pending.  
24     **THE WITNESS:** Yeah. Okay.  
25     **MR. SHWARTS:** Reask the question.

220

1 BY MR. SONG:  
2 Q Who were you talking about when you said  
3 "they"?  
4 A When you have internal audits, legal  
5 conducts the internal audit.  
6 Q Legal?  
7 A Yeah.  
8 Q So legal has conducted an internal equity  
9 assessment?  
10 MR. SHWARTS: All right. Stop. It's  
11 privileged. We're not talking about what legal  
12 does. Those are privileged audits.  
13 BY MR. SONG:  
14 Q Okay. Has anyone outside of legal conducted  
15 an internal equity assessment for employees?  
16 A No.  
17 Q Were you involved personally in the internal  
18 equity assessment?  
19 MR. SHWARTS: Objection. We're not going to  
20 get into what role she played in a privileged audit;  
21 so I'm going to instruct her not to answer on  
22 privilege grounds.  
23 MR. SONG: But if she didn't play a role,  
24 can she answer?  
25 MR. SHWARTS: Well, I don't -- whether

221

1 done?  
2 THE WITNESS: I have to answer more.  
3 MR. SHWARTS: Just he asked a date question.  
4 That's it.  
5 THE WITNESS: Okay. But -- okay.  
6 MR. SHWARTS: If you know.  
7 THE WITNESS: If I know. I know of one  
8 particular one that happened a few years ago,  
9 probably three years ago.  
10 BY MR. SONG:  
11 Q Do you know of any others?  
12 A I have -- I -- no.  
13 Q So you only know about the one?  
14 A Yes.  
15 Q Do you know if the company used consultants  
16 to conduct an equity assessment?  
17 MR. SHWARTS: Objection. Again, she's not  
18 here as a 30(b)(6) witness, and she's not testifying  
19 on behalf of the company, what the company did or  
20 did not do.  
21 MR. SONG: I'm just asking about her  
22 personal knowledge.  
23 THE WITNESS: I don't know.  
24 MR. SHWARTS: There we go.  
25 THE WITNESS: Yeah.

223

1 she -- well, no, she can't because how legal  
2 conducted an audit, who they talked to and whatever  
3 is privileged.  
4 So whether she participated or not, we're  
5 not going to get into that. It's a privileged  
6 discussion, and I'm going to instruct.  
7 MR. SONG: But I'm not asking about her  
8 conversations or communications, just her action.  
9 MR. SHWARTS: And you're asking about how  
10 legal conducted an audit, and that would entail who  
11 they talked to. And we are not having that  
12 discussion, and she is not going to respond to that  
13 question, so --  
14 MR. SONG: Okay. So you're instructing her  
15 not to answer?  
16 MR. SHWARTS: I am on privilege grounds,  
17 correct.  
18 BY MR. SONG:  
19 Q Do you know when the equity assessments were  
20 done?  
21 MR. SHWARTS: He just asked a question about  
22 when. Do you know when?  
23 THE WITNESS: Yes.  
24 BY MR. SONG:  
25 Q Okay. When were the equity assessments

222

1 BY MR. SONG:  
2 Q Do you know if Oracle used outside vendors  
3 for analysis -- for an equity analysis?  
4 MR. SHWARTS: Same objection.  
5 THE WITNESS: I don't know.  
6 I think he just asked that, no?  
7 MR. SHWARTS: Similar.  
8 THE WITNESS: Okay. Okay. Sorry. So not  
9 to give feedback, in other words.  
10 BY MR. SONG:  
11 Q Do you know if any guidelines were followed  
12 in conducting the equity assessment?  
13 MR. SHWARTS: Objection. Instruct on  
14 privilege grounds. She's not talking about the  
15 audits.  
16 BY MR. SONG:  
17 Q Based on the -- based on any equity  
18 assessments that were conducted, do you know  
19 personally if Oracle made any pay adjustments?  
20 MR. SHWARTS: I'm going to instruct on  
21 privilege grounds because to answer that question  
22 would be to reflect advice that she was given from  
23 counsel; so the answer is it's privileged; so I'm  
24 going to instruct.  
25 MR. SONG: Well, I don't know if that means

224

1 that -- well, that would necessitate that every pay  
2 adjustment would have been at the instruction of  
3 counsel? Maybe she made some -- or there were  
4 some --  
5 MR. SHWARTS: No. You're free to ask her if  
6 at any point in time were changes made to their  
7 processes or whatever.  
8 But you tie that question specifically to a  
9 privileged audit. And you've said, "As a result of  
10 this, did this happen?" Okay. That's a privileged  
11 question, and it would seek -- and it's deliberately  
12 seeking to invade attorney-client privilege; so you  
13 can make an application to try to invade the  
14 privilege.  
15 This witness is not going to answer  
16 questions about that; so, you know -- and I'm not  
17 going to allow her to.  
18 MR. SONG: Okay.  
19 MR. SHWARTS: If you want to take it up with  
20 the ALJ, you're free to do that.  
21 MR. SONG: All right. You're instructing  
22 her not to answer --  
23 MR. SHWARTS: I am.  
24 MR. SONG: -- so I'll move on.  
25 MR. SHWARTS: Thank you.

225

1 than five times, but I don't manage -- I -- those  
2 either come in hotline. They're very infrequent  
3 from what we do in investigation work. But they do  
4 come in, from time to time.  
5 Q Okay. You said that you're aware of less  
6 than five times?  
7 A Yes. Currently, yeah.  
8 Q And do you know if any of -- any of those  
9 complaints resulted in pay adjustments?  
10 A Those -- yes. Yeah.  
11 Q How many of them resulted?  
12 A I believe two of the ones that I was aware  
13 of did result in pay adjustments.  
14 Q And how were those pay adjustments  
15 communicated to employees?  
16 MR. SHWARTS: In those two instances?  
17 BY MR. SONG:  
18 Q Yes. In those two instances.  
19 A Yeah. So standard when -- you know, came in  
20 as a, you know, complaint. It was investigated.  
21 And then whether it was a positive outcome  
22 for them or a negative outcome for them, they were  
23 all communicated that we found, yes, we agree with  
24 what you're saying. We're making this change. Or  
25 we don't agree, and we're not making any changes.

227

1 BY MR. SONG:  
2 Q Do you know if Oracle made any changes in  
3 their practices, their compensation practices as a  
4 result of equity concerns?  
5 A No --  
6 MR. SHWARTS: Object -- okay. Sorry.  
7 You may answer.  
8 THE WITNESS: No. Yeah, sorry.  
9 BY MR. SONG:  
10 Q Do you know if Oracle made any pay  
11 adjustments as a result of equity concerns?  
12 A Ever?  
13 Q Let's go to 2013, limit it to 2013. I'll  
14 help you out here.  
15 MR. SHWARTS: If you know, within your  
16 sphere of knowledge.  
17 THE WITNESS: Yeah. I mean, if you get a  
18 claim or someone brings forward a claim that they  
19 have equity concerns, we investigate. And has there  
20 been changes in those? Sometimes yes; sometimes no.  
21 BY MR. SONG:  
22 Q Okay.  
23 A Yeah.  
24 Q Do you know how many times that's happened?  
25 A No. I mean, I've been aware of it for less

226

1 So that would be the communication process,  
2 a conversation.  
3 Q Okay. Would those communications be in  
4 writing as well?  
5 A I don't believe so.  
6 Q And would those communications or those  
7 complaints be in the HCM?  
8 A No. No. They wouldn't -- no.  
9 Q Where would those be stored?  
10 A There -- if they came in through the  
11 investigation group, they have their own system of  
12 filing, you know, an investigation, putting a case  
13 number to it and doing it that way.  
14 Q Okay. And when you say investigation group?  
15 A Your 800 number, you know, your code of  
16 conduct hotlines.  
17 Q Again, there's a unit just for  
18 investigations?  
19 A Yes.  
20 Q Okay. And is this investigations unit under  
21 HR?  
22 A It's -- it's under -- it's under legal. And  
23 then the investigations are divvied up depending on  
24 what the nature of the investigations are to be  
25 investigated. So whether it's internal audit, or

228

1 it's an HR complaint, because they can use, you  
2 know -- every company has them, they can use it for  
3 everything. And they do.  
4 **Q** Do you know how many people are in the  
5 investigations unit?  
6 **A** Oh. There's -- there's one lawyer and  
7 then -- I mean, I don't. I actually don't know.  
8 **Q** And HR -- your department is not involved in  
9 this investigations unit?  
10 **A** If it's in an HR area, they do the  
11 investigation. If it's like -- let's say someone is  
12 cheating with a customer -- I mean, there's lots of  
13 investigations -- cheating on your expense report,  
14 everything you can imagine, sleeping with an  
15 employee, sky's the limit.  
16 So it's farmed out. It's under the umbrella  
17 of a lawyer, but then it's farmed out to different  
18 investigators, depending on the complaint.  
19 **Q** Okay. Are there investigators within HR?  
20 **A** Yes.  
21 **Q** How many investigators do you have?  
22 **A** I don't know how many people. It's  
23 Timi Baxter, and I don't know how many people she  
24 has. She probably has five people, five, six  
25 people.

229

1 to handle the situation.  
2 BY MR. SONG:  
3 **Q** Okay. And would that summary be written?  
4 **A** I think there's investigation notes. I'm  
5 not sure how it's all done over there.  
6 **Q** Okay. And then it's -- who gets the  
7 summary? What do they do with the summary?  
8 **A** I don't know what they do with the summary.  
9 It's held under the lawyer over there.  
10 **Q** Okay. So maybe the lawyer gets the summary?  
11 **A** Yeah, it's -- the lawyer gets all the  
12 summaries, yeah.  
13 **Q** Okay. From --  
14 **A** Whoever.  
15 **Q** The -- Timi's team?  
16 **A** Or -- or if it's an audit or -- depending on  
17 what it is.  
18 **Q** And does this summary include a  
19 recommendation on what to do?  
20 **A** I don't know. I actually -- you know, I'm  
21 sure there's discussions on what to do, but I'm not  
22 sure there's a recommendation on the form.  
23 **Q** Okay. And then who ultimately decides what  
24 action to take?  
25 **A** I think Emily makes most of the decisions or

231

1 **Q** Okay. Are any of them lawyers?  
2 **A** No.  
3 **Q** Okay. And who do they report to?  
4 **A** Vickie Thrasher.  
5 **Q** Okay. So if I understand correctly, if  
6 there's -- okay. Let's take a complaint regarding  
7 compensation. If a complaint regarding compensation  
8 came to the hotline, it would be funneled by the  
9 attorney from investigations to the HR  
10 investigators; is that correct?  
11 MR. SHWARTS: Objection.  
12 He's asking is that correct?  
13 THE WITNESS: Yes, that's -- yeah. Yes.  
14 BY MR. SONG:  
15 **Q** Okay. And then what would be -- the next  
16 step be? It would be referred to Timi Baxter and  
17 her team. Then what happens? What do they do?  
18 MR. SHWARTS: In general. Speak in general.  
19 THE WITNESS: Okay. In general, they would  
20 assign someone to whatever the complaint was. They  
21 have a procedure that they would go through if it's,  
22 you know -- we've been told there's some  
23 inappropriate sexual relationship going on, and they  
24 would put together witnesses and, you know, go  
25 interview people and come back with a summary on how

230

1 maybe a team of people --  
2 MR. SHWARTS: She's referring to a lawyer.  
3 THE WITNESS: Yeah, Emily Sullivan, yeah.  
4 BY MR. SONG:  
5 **Q** Emily Sullivan. And is she the lawyer  
6 that's in the investigations?  
7 **A** No. She's in the employment law group.  
8 **Q** Okay. And she's the one that would make the  
9 final decision on what to do with the complaint?  
10 **A** Most likely. I mean, she would have  
11 discussions -- I mean, again, every situation is  
12 different.  
13 **Q** Sure.  
14 **A** This is hard to give you a one-size-fits-all  
15 answer.  
16 **Q** Yeah. I'm just speaking generally.  
17 **A** Yeah. I mean, you can only imagine what  
18 comes in and what isn't real and what is real, and I  
19 don't know her process -- her process is probably  
20 quite varied depending on what the situation is.  
21 **Q** Okay. And I know it can be a little bit  
22 tricky to answer this, but what -- what does Emily  
23 do with her decision?  
24 MR. SHWARTS: All right. Well, that's --  
25 what the lawyer does is not relevant here. With

232

1 respect to complaints, with respect to comp, we've  
2 identified the complaints. We've identified the  
3 actions taken based on those complaints.  
4 What happened between A and B is not  
5 relevant here. This action is not about complaints.  
6 MR. SONG: It's about compensation.  
7 MR. SHWARTS: Right. And you've got  
8 complaints, and you have results.  
9 MR. SONG: And what about -- I'm asking  
10 about compensation complaints.  
11 MR. SHWARTS: Right, but what a lawyer does  
12 is privileged and work product; so we're not going  
13 to get into what Emily Sullivan does or doesn't do.  
14 MR. SONG: Okay. But after -- after a  
15 complaint is resolved --  
16 MR. SHWARTS: Right.  
17 MR. SONG: -- and is made --  
18 THE WITNESS: And we've covered that.  
19 MR. SHWARTS: And I let her answer that we  
20 communicate that result to the employee.  
21 BY MR. SONG:  
22 Q And is that the end of the process once it's  
23 communicated to the employee?  
24 A In -- yeah, the one -- I mean, we would also  
25 inform the manager. And the manager would be aware

233

1 of this stuff is not very deemed, you know, a lot of  
2 this stuff coming in is, you know -- the sky is --  
3 this person looks at me funny, you can't even  
4 imagine what -- you can imagine what you get.  
5 So -- I mean, in the past when we've had  
6 harassment issues, we have put a different  
7 investigator on it. You know, if there was  
8 disagreements. And then like I said, then there's  
9 silly things that go on for the rest of their lives,  
10 and we just let it happen.  
11 Q Are these decisions communicated to the  
12 employees in writing?  
13 A I don't know if they are or they're not or  
14 if they're just talked to. Yeah.  
15 Q And where are the records of these  
16 complaints stored?  
17 A I think they have a system that they assign,  
18 you know, a number; so some kind of system.  
19 Q It's not an HCM?  
20 A No.  
21 Q Okay. Are they in the -- would they be  
22 stored in HR?  
23 A No.  
24 Q Then would this information be stored in  
25 legal?

235

1 that we were investigating it as well. So we close  
2 it out and talk to people and, yeah, that's the end  
3 of it.  
4 Q If the employee is not satisfied with the  
5 decision, does the employee have a right to appeal?  
6 A I wouldn't know that. We'd have to ask  
7 someone in that group.  
8 Q And is the -- is the -- I'm sorry. Go  
9 ahead.  
10 A No, I was saying, I would imagine -- I mean,  
11 we have employees appealing things for the whole 20  
12 years they work for us.  
13 So I guess we have no policy saying you  
14 can't appeal because people can keep talking about  
15 things for the rest of their tenure if they want to,  
16 and we seem to tolerate that.  
17 Q So people do appeal?  
18 A Yeah. But, I mean, not related to comp. I  
19 mean, related to everything, territory setups. You  
20 know, you can hear the same -- you have people that  
21 just like to repeat their talk tracks for years.  
22 Q Okay. But if they wanted to formally or  
23 officially appeal, is there a procedure for that?  
24 A I'm sure they do and they could and perhaps  
25 if it's something that's deemed serious because some

234

1 A It's -- okay. There's different answers to  
2 this question.  
3 If we're just talking comp, I think it's  
4 stored within the investigation system.  
5 If someone has done something bad, and we've  
6 given them a warning and they've got a warning  
7 letter, they've got a letter in their HR file. And  
8 they haven't done something bad enough to be  
9 terminated, but they get a warning letter. So  
10 there's lots of -- lots of different answers on --  
11 depending on the situation.  
12 Q Okay. And you just mentioned that there  
13 was -- there's an investigation system.  
14 A I talked about that earlier. They have -- I  
15 mean, I think they have a -- they sign a rec number  
16 to it, and you would have to ask, you know, what  
17 system they use.  
18 But I think most companies are required to  
19 log and -- you know, every complaint that comes  
20 through.  
21 Q Okay. But the HR-related complaints are not  
22 stored in HR?  
23 A No. They are not -- yeah. If they go in  
24 through the code of conduct, you know, the  
25 Sarbanes-Oxley thing, you know, that we all had to

236

1 do, they're assigned a number and they're followed  
2 up on. But they're not -- the majority of them are  
3 not HR issues. They are everything under the sun.  
4 **Q** And this investigations unit is within  
5 legal?  
6 **A** Yes.  
7 **Q** Okay. But you're not sure where the  
8 complaints of that nature would be stored?  
9 **A** Because I don't run their --  
10 **Q** System?  
11 **A** -- system, and it's in legal, it's not in my  
12 world. So that's why I sound like I don't know what  
13 I'm talking about because I don't.  
14 **Q** You're talking to the right person there.  
15 **MR. SONG:** How much time do I have left?  
16 **THE VIDEOGRAPHER:** A few minutes.  
17 **MR. SONG:** Okay. I'll try to finish this  
18 topic up, and then we'll stop.  
19 **BY MR. SONG:**  
20 **Q** Is there a review procedure for these  
21 complaint decisions?  
22 **MR. SHWARTS:** Objection. Vague.  
23 You may answer.  
24 **THE WITNESS:** Yeah. I mean -- yeah, there's  
25 a -- of course. There's a review procedure for all

237

1 comp -- if it was a comp decision.  
2 **THE WITNESS:** It would still depend. I  
3 mean, on one in particular that came to my office,  
4 in particular, I did the communications on it and  
5 closed it out.  
6 On others, I'm not involved, you know. I  
7 mean, I may not know the person personally, or I  
8 know a lot of Oracle employees. I've been there a  
9 long time, and I would just have somebody else  
10 handle it.  
11 **BY MR. SONG:**  
12 **Q** And if you didn't like an HR -- a comp  
13 complaint decision, could you overrule it or  
14 challenge it?  
15 **A** I'm sure I could, yeah, and ask why they're  
16 doing what they're doing, sure.  
17 **Q** Okay.  
18 **MR. SONG:** All right. Let's stop there and  
19 take a short break.  
20 **THE VIDEOGRAPHER:** This is the end of  
21 Media No. 3 of the video deposition of  
22 Joyce Westerdahl. Going off the video record at  
23 approximately 3:07 p.m.  
24 (Off the record from 3:09 p.m. to 3:18 p.m.)  
25 **THE VIDEOGRAPHER:** This is the beginning of

239

1 of them.  
2 **BY MR. SONG:**  
3 **Q** Okay. Well, what's the review procedure,  
4 then?  
5 **A** I don't run this group. So, again, I know  
6 that, you know, I get pulled in on things, but, you  
7 know.  
8 **Q** If the -- if the complaint was HR-related,  
9 would you get the decision as well? Are you part of  
10 that decision?  
11 **A** It would depend on what the problem is.  
12 **Q** Let's say it's compensation.  
13 **A** It would depend if it came -- the ones -- I  
14 only am aware of people if they came to me first  
15 directly. So if it's a sexual harassment, if it's a  
16 comp, I'm only privy to those things.  
17 The 800 number in general -- they don't  
18 inform me if somebody is cheating a vendor in  
19 South Africa. I have no -- you know, so no. I only  
20 know what comes through to me, and then I turn them  
21 over to the investigative people.  
22 **Q** Okay. And who communicates the decision to  
23 the employee?  
24 **A** It would depend. Certain situations --  
25 **MR. SHWARTS:** Why don't we focus on the

238

1 Media No. 4 in the continuing deposition of  
2 Joyce Westerdahl. Back on the video record at  
3 approximately 3:17 p.m.  
4 **BY MR. SONG:**  
5 **Q** Ms. Westerdahl, were any actions taken by HR  
6 as a result of the internal equity assessments?  
7 **A** No. Wait. Isn't that the question you  
8 asked me before --  
9 **MR. SHWARTS:** Yeah.  
10 **THE WITNESS:** -- and I answered.  
11 **MR. SHWARTS:** And you answered it.  
12 **BY MR. SONG:**  
13 **Q** Well, similar but a little bit different.  
14 **A** Is it? It's still a no if we're talking  
15 about -- okay.  
16 **Q** Did HR give legal any documents regarding  
17 the internal equity assessments?  
18 **MR. SHWARTS:** Don't answer that. Come on,  
19 Charles, please. No. We're not going there.  
20 Move on, please.  
21 **MR. GARCIA:** Wouldn't that be in the  
22 privilege log?  
23 **MR. SONG:** Yeah. That's not in a privilege  
24 log.  
25 **MR. GARCIA:** So the privilege log would

240

1 disclose whether documents were given; so we're not  
2 asking --  
3 MR. SHWARTS: She's not discussing whether  
4 she did or did not give any documents to legal as  
5 part of legal's request for documents.  
6 It's a privilege when -- even answering the  
7 question gets into a privileged area. And you're  
8 trying desperately to try to invade privilege.  
9 There's no reason to have this discussion --  
10 MR. SONG: No.  
11 MR. SHWARTS: Sure you are. You're talking  
12 to the head of HR --  
13 MR. SONG: I have both your privilege logs  
14 right here, and none of them contain any documents  
15 given to legal for the audit.  
16 MR. SHWARTS: So what does this have to do  
17 with this witness?  
18 MR. SONG: So then there's no privileged  
19 documents that were given to legal.  
20 MR. SHWARTS: So what is the basis for your  
21 question other than to try to invade privilege? If  
22 you have a privilege log that has no documents on  
23 it, why are you asking this witness whether there  
24 were documents that were given to legal?  
25 MR. SONG: I want to confirm that she didn't

241

1 salaries --  
2 A Publicly.  
3 Q Publicly?  
4 A Publicly.  
5 Q Okay. What about nonexecutive salaries?  
6 A No. We don't publicly post them.  
7 Q Okay. So employees have, obviously, access  
8 to their own salaries, access to information about  
9 their own salaries. Do they have access to any  
10 other salary information?  
11 A No.  
12 Q Even aggregate salary information?  
13 A Well, managers have access to all of their  
14 employees' salaries.  
15 Q Okay.  
16 A And managers' managers, you know.  
17 Q So as the EVP of HR, you would have access  
18 to everyone's salaries below you?  
19 A I have access to everyone's salary if I  
20 wanted it.  
21 Q In the entire organization?  
22 A Yes.  
23 Q Okay. Wow.  
24 A I know. Isn't that great? Have I ever  
25 looked? No.

243

1 give any documents to legal.  
2 MR. SHWARTS: So she's not doing that.  
3 MR. SONG: So you're instructing her not to  
4 answer?  
5 MR. SHWARTS: I'm instructing her not to  
6 answer.  
7 BY MR. SONG:  
8 Q Did HR give any data to legal for the  
9 internal equity assessments?  
10 MR. SHWARTS: Instruct her not to answer.  
11 BY MR. SONG:  
12 Q Is salary kept confidential at Oracle?  
13 MR. SHWARTS: Objection. Vague and  
14 overbroad.  
15 You may answer.  
16 THE WITNESS: Confidential -- you mean we  
17 don't share everyone's salary with everyone?  
18 BY MR. SONG:  
19 Q Yes. Is there a general confidentiality  
20 policy regarding salary?  
21 A I don't know if there is. We certainly  
22 share our executive salaries, and I don't know if we  
23 have a specific policy that says we don't share  
24 salaries.  
25 Q Okay. When you say you share executive

242

1 Q Okay. For less powerful people like  
2 Safra Catz, would she only have access to salaries  
3 of people within her business?  
4 A Yes.  
5 Q Okay. And the same would be true for  
6 Mark Hurd?  
7 A Correct.  
8 Q And for lower-level managers, they would  
9 only have access to the salaries of their reports?  
10 A And below them.  
11 Q And below them?  
12 A They would have their line of business that  
13 they were responsible for.  
14 Q Okay. And people would not have access  
15 to -- employees would not have access to kind of --  
16 how do I say that? Just like if they're on the same  
17 level -- like, they don't have access to their  
18 colleagues who are at the same job title and  
19 position, et cetera?  
20 A No. They don't have access to that.  
21 Q Okay. Just people who are reports and  
22 below?  
23 A Yeah.  
24 Q Okay. Were employees instructed not to  
25 discuss salary at Oracle?

244

1     **A** No --  
2     MR. SHWARTS: I want to be careful  
3 because --  
4     THE WITNESS: Yeah. I don't know.  
5     MR. SHWARTS: Well, there are various  
6 California law issues. There are state law issues  
7 on salary discussions.  
8     So -- but, anyway, you can answer the  
9 question.  
10    THE WITNESS: Okay. Yeah. I am not aware  
11 of any policy or direction where we tell people not  
12 to discuss each others salaries unless, of course,  
13 it is the law, but I don't -- I don't have knowledge  
14 on this topic.  
15 BY MR. SONG:  
16    **Q** Okay. Have employees been encouraged not to  
17 discuss salary with each other?  
18    **A** It's -- I mean, it's never really come up.  
19 I mean, I'm sure they discuss salaries with each  
20 other, but we don't say -- we don't wag our fingers  
21 at them and say, "You shouldn't do that."  
22    **Q** Okay. Is the culture at Oracle one that  
23 would, you know -- one that is open to employees  
24 discussing salary with each other?  
25    MR. SHWARTS: You're asking based on her

245

1 their performance reviews?  
2    **A** Just their managers.  
3    **Q** Okay. Their direct supervisors?  
4    **A** Yeah, their direct supervisor. And I guess  
5 some HR people, I would imagine. Yes.  
6    **Q** Okay. I want to switch topics to  
7 promotions. How are promotions decided at Oracle?  
8    MR. SHWARTS: Objection. Overbroad and  
9 vague.  
10   THE WITNESS: It is overbroad.  
11 BY MR. SONG:  
12    **Q** Can you just talk about the process  
13 generally?  
14    **A** Well, you know, moving into like a first  
15 manager position, there would be kind of a  
16 discussion with HR, and the person would be required  
17 to go to some first manager training and there's a  
18 process and you want to make sure they get more  
19 advanced training and the organization supports the  
20 right amount of directs, the right amount of people  
21 in that organization.  
22    And then kind of then generally as you move  
23 up -- so let's jump from first line manager to SVP.  
24 As an SVP, you would have to be responsible for so  
25 much revenue of the business, have an organization

247

1 personal experience?  
2    MR. SONG: Based on her personal experience.  
3    THE WITNESS: I know people share, and I  
4 certainly know in M&A they share their salaries more  
5 openly as they're coming into the company.  
6    So we don't caution them not to do it. It's  
7 a personal choice. And I think, you know,  
8 generational, it's changing.  
9    We never -- my parents never even knew how  
10 much money I made. I would be impolite to talk  
11 about that.  
12 BY MR. SONG:  
13    **Q** Employees have access to their performance  
14 reviews, correct?  
15    **A** Correct.  
16    **Q** And is that available on their My Oracle  
17 page?  
18    **A** It's available -- they have -- it's not  
19 in -- they have their own -- in the HR system, you  
20 kind of have your own page, and you have all your  
21 training certificates.  
22    And if you were a guru in technology or if  
23 you have patents or -- you have a place to collect  
24 your work things.  
25    **Q** Okay. And who has -- who else has access to

246

1 that's X, Y, Z. So then there's more specific  
2 criteria as you move up in the ranks at those  
3 levels.  
4    And a first line manager and a second line  
5 manager get additional hand-holding and training,  
6 especially if they're moving up through -- if  
7 they're college graduates and moving up through the  
8 system.  
9    **Q** And can promotions be initiated by  
10 employees?  
11    MR. SHWARTS: Objection. Overbroad.  
12    You can answer.  
13    THE WITNESS: Sure. I think employees ask  
14 all the time if they can be promoted.  
15 BY MR. SONG:  
16    **Q** Okay. And then once an employee -- well,  
17 first who does the employee ask for a promotion?  
18    MR. SHWARTS: Objection. Calls for  
19 speculation. Overbroad.  
20    You may answer.  
21    THE WITNESS: I mean, yeah. You're asking  
22 me to project. So, you know, if I wanted a  
23 promotion, I would ask my boss. I wouldn't ask you,  
24 I mean, that's the logic flow I would cover there,  
25 but I can't speak specifically how it happens every

248

1 time.  
2 But employees do work to get promoted, and  
3 they communicate that with their managers and we  
4 also have mentor programs at Oracle, and we have  
5 training tracks that help them get to where they  
6 want to go and be promoted if they want management  
7 or if they want guru architect individual  
8 contributor, that -- that track.  
9 So we -- we support that. But sure they can  
10 ask.  
11 BY MR. SONG:  
12 Q Okay. And typically they would ask their  
13 manager or supervisor?  
14 MR. SHWARTS: Objection. Calls for  
15 speculation.  
16 You may answer.  
17 THE WITNESS: Yeah. They can -- yeah, they  
18 can ask them. They can work with HR. We have an  
19 internal mobility program. They can talk to them.  
20 There's a lot of ways to move up.  
21 BY MR. SONG:  
22 Q Okay. After an employee asks a manager or  
23 HR for a promotion, what happens after that?  
24 MR. SHWARTS: Objection. Calls for  
25 speculation. Overbroad.

249

1 the ground level?  
2 A You mean in my own organization.  
3 Q Yeah. Within HR?  
4 A Yeah, I've had people ask if they could be  
5 promoted, sure.  
6 Q Okay. So that's what I'm trying to, you  
7 know, figure out, like what is the pattern, what is  
8 the practice, do you have a policy on promotions,  
9 how does that process work is what I'm trying to  
10 figure out.  
11 MR. SHWARTS: Objection. Compound.  
12 You can speak about the HR. Speak about  
13 your own group.  
14 THE WITNESS: Okay.  
15 BY MR. SONG:  
16 Q Yes.  
17 A I mean -- yeah. I mean, on occasion, it's  
18 happened, I've either agreed with that, or I haven't  
19 agreed with that person being promoted, and I told  
20 them where the gaps were.  
21 Or the position wasn't qualified to be what  
22 you're looking for. It doesn't have the span or the  
23 scope of this position. If you want to get to this  
24 level in this world, that's not going to happen. We  
25 can talk about you going to work over here or doing

251

1 THE WITNESS: Yeah. I mean, every situation  
2 is different. I don't really know how to -- I mean,  
3 a manager could say, "You're not ready. I want you  
4 to take these three training classes." A manager  
5 could say, "Brilliant idea. Let's do that."  
6 BY MR. SONG:  
7 Q And then let's say the manager says, "No.  
8 I'm not going to give you a promotion," is there a  
9 review of that decision?  
10 A If they -- if they formalized a complaint  
11 with HR, I guess there would be a review of that.  
12 Q And that would be the investigation system?  
13 A Or directly. So like we talked about  
14 earlier, it could either go to the hotline, or it  
15 could go directly -- they could talk to their HR  
16 manager.  
17 And their HR manager could either broke --  
18 could broker a conversation with their manager,  
19 could look into it further, could help them move to  
20 a different group.  
21 But I'm being very speculative here. I'm  
22 giving you all the scenarios that could happen, and  
23 there's probably more.  
24 Q Okay. And is that -- is that because you  
25 don't have direct experience with promotions from

250

1 something different.  
2 Q Okay. Let's take the opposite scenario.  
3 Let's say that the manager or HR says, "Oh, yeah.  
4 You're absolutely correct. You deserve a  
5 promotion," what do they do?  
6 What does the manager or HR person do when  
7 they think an employee deserves a promotion?  
8 A So I don't know what's happened. I mean --  
9 I mean, there's a lot of -- I haven't been brought  
10 in on that particular situation. And maybe I have  
11 in years past, but, you know, if the HR partner is  
12 strong with that -- I'm just -- I'm absolutely just  
13 giving you theory. I'm not giving you any real life  
14 experience other than the one about my own group.  
15 So certainly if something like that happened  
16 to me, I would work with their manager to see where  
17 the gaps were, if there wasn't a communication and  
18 talk to that person about the communication.  
19 Or if I supported it, I would probably voice  
20 that to that manager. And if he or she disagreed,  
21 then maybe look for another opportunity within  
22 Oracle.  
23 Q Okay. Have you ever had a manager or  
24 somebody from your HR staff recommend an employee  
25 get a promotion?

252

1 A That has never been brought to my level of  
2 attention, yeah.  
3 Q So does it usually get resolved below your  
4 level?  
5 A It must because I can't speak to it.  
6 Q Okay. But you're not exactly sure of the  
7 process that goes on down there?  
8 A Well, I've given you a whole bunch of  
9 scenarios that probably are the process, you know --  
10 Q Okay.  
11 A -- because one size doesn't fit all.  
12 Q Okay. So if a manager does believe that an  
13 employee -- one of his or her employees is eligible  
14 or should get a promotion, they move it up the chain  
15 of command.  
16 And who approves those?  
17 MR. SHWARTS: Objection. Calls for  
18 speculation. Compound. Overbroad.  
19 You may answer.  
20 THE WITNESS: Yeah. So if they agree that  
21 this person should be promoted, then that manager  
22 would need their manager's buy-in.  
23 BY MR. SONG:  
24 Q Okay. But that's not necessarily you?  
25 A No. No.

253

1 want to take on more management, we will move things  
2 around and routinely do.  
3 BY MR. SONG:  
4 Q Okay. But do you need to approve every  
5 promotion within HR?  
6 A As it comes up my way, yeah, I guess I do,  
7 but --  
8 Q Okay. Are there people -- are there  
9 managers below you that can also approve promotions  
10 without --  
11 A Certainly first line -- once it got into the  
12 system -- once again, because our system is such, it  
13 goes all the way up through the -- well, that may  
14 not be true. That may -- promotions may only be two  
15 levels.  
16 So I think promotions below SVP are only two  
17 levels -- you're forcing me to learn the approval  
18 matrix -- and I would never see it. But we would  
19 have already had the discussion as a group.  
20 Q So Safra would also not need to approve  
21 every promotion?  
22 A Not -- not at some of these lower levels,  
23 no, not at all.  
24 Q Okay. And does a promotion always come with  
25 an increase in salary?

255

1 Q And that's not --  
2 A You mean HR or me?  
3 Q You -- you within HR because you're the  
4 highest person in HR.  
5 A No. But if you were moving to an executive  
6 vice president and some cases in senior  
7 vice presidents, I would be asked to review that.  
8 MR. SHWARTS: I think he was asking, for  
9 example, in one of your lines under HR, the  
10 promotion in one of your lines -- does it reach you  
11 if there's a promotion in the HR lines?  
12 Is that what you're asking? I'm sorry.  
13 MR. SONG: Yeah, essentially.  
14 THE WITNESS: I review -- we have talent  
15 discussions, our practice is because we do a talent  
16 review. We have talent discussions twice a year,  
17 and people that are moving into first line managers  
18 or vice presidents and everything in the middle are  
19 discussed with all my directs and myself.  
20 And we talk about that person. We also move  
21 people around within the groups. We do rotation  
22 assignments. So we have a fluid discussion about  
23 those folks.  
24 And if there isn't -- if the organization  
25 isn't big enough, and they're ambitious, and they

254

1 A We like to see an increase in salary unless  
2 the person is way above their range to begin with,  
3 and then they move into the correct -- they're  
4 hitting the range, the next range, you know, the  
5 next range.  
6 Q And that's what you're referring to when you  
7 said --  
8 A Dry promotion.  
9 (Simultaneous discussion and reporter  
10 interruption.)  
11 BY MR. SONG:  
12 Q And does the promotion always involve a  
13 change in level, like director to VP?  
14 MR. SHWARTS: Objection. Overbroad.  
15 You may answer.  
16 THE WITNESS: It may not. I mean, you can  
17 have a special assignment where we're asking you to  
18 step up and do something, and you maintain the same  
19 level.  
20 BY MR. SONG:  
21 Q What about job title? Does a promotion  
22 always involve a different job title?  
23 MR. SHWARTS: Objection. Overbroad.  
24 You may answer.  
25 THE WITNESS: I would not think so. It

256

1 may -- someone may change their discretionary title.  
2 BY MR. SONG:  
3 Q Does a promotion always mean a change in  
4 career level?  
5 MR. SHWARTS: Objection. Overbroad.  
6 You may answer.  
7 THE WITNESS: No. I wouldn't think so.  
8 BY MR. SONG:  
9 Q So an IC-1 could get a promotion and still  
10 be IC-1?  
11 A Well, you're going way low. Okay. But a  
12 senior vice president could get a promotion doing  
13 something different and still be a senior vice  
14 president.  
15 An IC-1 that got a promotion, for God's  
16 sake, let's make them an IC-2.  
17 Q Okay. But it is possible to just have a  
18 change -- get a promotion and just change your job  
19 duties?  
20 A I was promoted a lot from 2000 on and took  
21 on more groups and different responsibilities than  
22 just HR, but my title didn't change until 2015.  
23 And it may have never changed to executive  
24 vice president. But did I get promotions and get  
25 added responsibilities without any change in title?

257

1 How about performance?  
2 A I mean, performance is a factor, but you can  
3 be a high-performing person and still you maybe  
4 don't get a promotion.  
5 Q Okay. What about --  
6 A And you want an example of that real quick?  
7 Q Sure.  
8 A So you're a technical person. You never  
9 want to manage people. You're already an IC-5.  
10 You're considered a guru, a specialist.  
11 You're not -- you know, we don't give you an  
12 SVP title with no direct reports, but you -- you  
13 know, you gain other responsibilities and things,  
14 and you may get paid more, but you may not move up  
15 in a level.  
16 Q Okay. What would be the next step up from  
17 IC-5? It would be 6?  
18 A Yeah. It's kind of a top guru person level.  
19 Q Okay. And then can you go from IC to  
20 management at some point?  
21 A Sure.  
22 Q Do you have to be at the top IC level to do  
23 that?  
24 A No. Because you -- you know, people make  
25 different decisions in their life -- just -- you

259

1 Absolutely.  
2 Q And what factors are considered for  
3 promotions?  
4 MR. SHWARTS: Objection. Overbroad. In HR?  
5 In her group?  
6 BY MR. SONG:  
7 Q In HR, what factors are considered?  
8 A Okay. What requirements was the question?  
9 Q We can go with requirements for promotions.  
10 A It depends on the level. I mean, if someone  
11 wants to be a senior vice president, they have to  
12 have scope and size for that.  
13 This is too hard to answer, I mean, with all  
14 the different levels. It really kind of is. I  
15 mean, we could be here until next Tuesday, but --  
16 Q I'm free.  
17 A You're good with that? You like  
18 Southern California?  
19 MR. SHWARTS: Or until we hit seven hours on  
20 the video.  
21 THE WITNESS: Right.  
22 BY MR. SONG:  
23 Q Well, let me talk about a few specific  
24 factors, then, and you can let me know if they are  
25 considered for promotions or not.

258

1 know, you may -- in my organization, I know there  
2 were a number of women who were managers, and they  
3 had their childbearing years. And they stepped out,  
4 and they stepped out as management. They stayed as  
5 individual contributors. And they're ready to jump  
6 back in and manage, they jump back in and manage.  
7 Or they said, "No, this is good. I'm going to stay  
8 as an independent contributor."  
9 So certainly with women, there's a lot of  
10 flexibility in that arena. It happens to men, too.  
11 They like the break. Some men don't like to manage  
12 people. Many men don't like to manage people.  
13 Q What about experience? Are you also looking  
14 for experience in deciding whether somebody gets a  
15 promotion?  
16 A Well, I mean, how you get -- so that's the  
17 age old question: How do you get experience into  
18 management if you don't get promoted?  
19 So we do have tools and training to get you  
20 there. So certainly as I went up in my career at  
21 Oracle, there were probably people would say, you  
22 know, I wasn't qualified to get this.  
23 Did I earn that position once I was promoted  
24 on the job? I did, but I had done all the steps  
25 necessarily -- necessary and then got promoted.

260

1 But are we always -- you know, we're a  
2 company that has promoted for years internally. You  
3 want to give people those opportunities.  
4 **Q** What about skills? Are you also considering  
5 skills when deciding to promote somebody?  
6 **A** Yes. I should just go to the "yes" or "no"  
7 answers.  
8 **THE VIDEOGRAPHER:** Oh, I'm sorry. I lost  
9 power. I'm sorry. Could we take a break?  
10 **MR. SONG:** Yes. We can go and take a break  
11 off the record.  
12 **MR. SHWARTS:** Off the record.  
13 (Off-the-record discussion held.)  
14 **BY MR. SONG:**  
15 **Q** I think my last question was were skills  
16 also considered in determining promotions?  
17 **A** Yes.  
18 **Q** And can you think of any -- anything else  
19 that you consider when deciding whether an employee  
20 should get a promotion?  
21 **A** What did we cover?  
22 **Q** Performance, experience. You mentioned  
23 scope and size. You mentioned skills. If you can't  
24 think of any, that's fine.  
25 **A** That's fine.

261

1 **Q** Okay. And does it say why they've been --  
2 **A** Sometimes there's a justification.  
3 Sometimes there is not.  
4 **Q** Okay. And is there a written decision on  
5 why an employee is given a promotion or not given a  
6 promotion?  
7 **A** Is there a written decision on if they're  
8 given a promotion or not a promotion? No --  
9 **Q** Yes.  
10 **A** No, not necessarily.  
11 **Q** Okay. Then how is the decision communicated  
12 to the employee?  
13 **A** I mean, they could e-mail the employee back,  
14 the manager. We don't encourage that. We actually  
15 encourage a conversation. And then if they are  
16 promoted, they can put justification in the system,  
17 or sometimes they will talk to their direct manager  
18 without the justification and have a conversation  
19 with their direct manager on what they're doing; so  
20 they don't provide the justification.  
21 **Q** But some sort of written communication is  
22 sent to the employee, correct?  
23 **A** On -- no, that's not what I said.  
24 **Q** Okay. But -- okay. But that's what I'm  
25 asking. Do employees get written communication

263

1 **Q** Of those, is there one thing that's most  
2 important about determining who gets a promotion and  
3 who doesn't?  
4 **MR. SHWARTS:** Within your organization.  
5 **THE WITNESS:** Within my -- no.  
6 **BY MR. SONG:**  
7 **Q** Yeah, that you can --  
8 **A** No, I think -- I think they're all  
9 important. You know, I don't -- I wouldn't weigh --  
10 I mean, certainly if you're putting someone in to  
11 run my business -- business analytics team, I need  
12 them to be highly skilled.  
13 And I'm not going to care as much about  
14 their management skills. I'm looking for someone  
15 who can code in AI.  
16 **Q** And is information about these promotion  
17 requests and denials, approvals -- are they retained  
18 in Fusion or HCM?  
19 **A** When they request a promotion?  
20 **Q** Mmm-hmm.  
21 **A** No.  
22 **Q** What about the promotion decisions?  
23 **A** If they've been promoted?  
24 **Q** Yes.  
25 **A** Yes, it shows a change in their record.

262

1 about their promotions?  
2 **A** No.  
3 **Q** So it can just be a verbal communication?  
4 **A** If they're -- you asked if they're -- you  
5 asked if they're being promoted -- if it's a yes or  
6 no, do they get a written -- the answer is if  
7 they're not getting promoted, no, we don't send them  
8 a letter saying you're not getting promoted.  
9 **Q** Or why?  
10 **A** Right, or why. If they are being promoted,  
11 there may be a justification in the system, and  
12 they've been told they're getting promoted.  
13 **Q** Okay. But they won't necessarily get a  
14 written communication saying they've been promoted?  
15 **A** If it's a first line manager, they get a  
16 communication from us suggesting that they take a  
17 number of coursework as their first line manager.  
18 **Q** And if an employee disagrees with a  
19 promotion decision, can they appeal?  
20 **A** Yes, they can.  
21 **Q** Okay. And how would they do that?  
22 **A** I guess they would complain to HR.  
23 **Q** Do they file written complaints?  
24 **A** They -- I mean, they can do what they want.  
25 They can file an e-mail, you know, send an e-mail.

264

1 They can, you know -- it probably wouldn't be a good  
2 idea to call the code of conduct hotline because  
3 that's anonymous, but they're free to do it any way  
4 they wish.  
5 **Q** Okay. Is there a formal procedure for  
6 filing an appeal of a promotion decision?  
7 **A** No.  
8 **Q** And without an employee asking, can a  
9 manager or an HR person recommend an employee for a  
10 promotion, even if the employee doesn't ask for one?  
11 **A** In -- in -- yes, in my organization, if  
12 someone -- yes.  
13 **Q** Okay. And how would that happen?  
14 **A** What I explained earlier, we have a talent  
15 review process; so twice a year we have that. And  
16 certainly it happens not just twice a year when they  
17 want to promote someone, and then they would have a  
18 conversation with their boss about why they wanted  
19 to promote them before they talk to the individual.  
20 **Q** Okay. And then it would just go up the  
21 chain of command again two levels?  
22 **A** Yes.  
23 **Q** Okay.  
24 **A** If that's how it works.  
25 **Q** And after a promotion decision had been

265

1 **A** Our job posting system?  
2 **Q** Yeah.  
3 **A** No, it's on our iRec system; so they can see  
4 what's there. Also if they're in the top talent  
5 program and they're wanting to be promoted or  
6 wanting to transfer to another country or just  
7 transferred to another group, their -- all managers  
8 are -- in that organization are made aware that  
9 these people are open to transfer out of that  
10 particular organization or looking to advance their  
11 careers.  
12 **Q** And what is the iRec system?  
13 **A** It's part of the HCM software, and it's how  
14 you post jobs. And then those jobs post to all  
15 external sites as well as internal posting.  
16 **Q** So internal -- internal Oracle employees can  
17 see all jobs --  
18 **A** All jobs that are posted.  
19 **Q** Okay. And is that the only way that they're  
20 notified of promotional opportunities?  
21 **A** That's the systems way. And then you have  
22 your direct manager, and then we have this  
23 AdvantageU group that also may tap somebody on a  
24 shoulder that they weren't aware that the job hasn't  
25 been posted yet. But we try to consider internal

267

1 made, have you ever seen it be challenged?  
2 **A** By who?  
3 **Q** By anybody. Let's say, you know, you're --  
4 your manager -- one of your managers approves a  
5 promotion for somebody below them, and then you --  
6 you or somebody else that's higher catches wind of  
7 it and then decides no, they should not get a  
8 promotion?  
9 **A** It hasn't happened in my org; so . . .  
10 **Q** Do you know if that's happened in any other  
11 orgs?  
12 And how are employees made aware of  
13 promotional opportunities?  
14 **A** Well, they -- we have a job posting system,  
15 and so they can apply to that particular job or they  
16 can apply -- they can have -- hopefully they're  
17 having the conversation with their manager.  
18 Or we have a talent advisory group that  
19 helps people navigate into other parts of the  
20 organization that may or may not involve a  
21 promotion, maybe just a transfer to a different  
22 group, but there is a group that facilitates that.  
23 **Q** Okay. And are -- and how are these  
24 promotional opportunities communicated? Are they  
25 e-mailed?

266

1 people first as much as we can.  
2 **Q** And what's AdvantageU?  
3 **A** It's a program for our employees to move  
4 them around and promote them not just in one line of  
5 business, but expand their careers and help them  
6 with training and help them to move around, get  
7 promoted, lateral transfers.  
8 **Q** And how does that program work?  
9 **A** It's, basically, like an internal recruiting  
10 organization. So instead of the recruiter  
11 soliciting from that -- the outside as well as  
12 candidates soliciting us, we can solicit people  
13 internal to Oracle to tap them on the shoulder and  
14 let them know that they've made themselves available  
15 through the top talent program, or they can contact  
16 the internal -- this internal recruiting program and  
17 express where they want to go with their career.  
18 And then those people are recruiters and  
19 also sort of career counselors. So you're a college  
20 hire, you came into finance, and you decided that  
21 you actually want to sell financial applications  
22 versus being an accountant. So you need to take  
23 these four classes, and we'll help you get into that  
24 division and grow your career that way.  
25 **Q** And all employees can take advantage of this

268

1 program?  
2 **A** Yeah -- yes.  
3 **Q** Okay. But even if they don't contact  
4 AdvantageU themselves, AdvantageU can specifically  
5 go out and recruit people?  
6 **A** You know, we talked about the 9 bar -- the  
7 9-Square program. And in there, you know, they know  
8 where they are in their top talent, but there's also  
9 a profile they fill out for themselves whether  
10 they're interested in working in France because they  
11 have a fiance, whatever it is, they speak 15  
12 languages, whatever it is.  
13 So we can query this pool of people, and we  
14 look at this internal pool first. And even if they  
15 don't respond to something, we may find -- we find  
16 people that way that speak certain languages or want  
17 to do different opportunities in different parts of  
18 the world or the country. And that's another way  
19 they move their career.  
20 **Q** Does the AdvantageU program consider gender  
21 when it's considering people to recruit?  
22 **A** I mean, you say that in a negative way. I  
23 mean --  
24 **Q** Oh, no. In a positive way?  
25 **A** A positive way? Do they consider, "Oh, this

269

1 positive.  
2 **Q** Okay.  
3 **A** But they're not -- you know, they're not  
4 putting -- we're going to put this woman in this job  
5 because she's just a woman. You're -- you manage  
6 them based on their competencies and their skills.  
7 **Q** And it's primarily based on this talent  
8 review process you're talking about?  
9 **A** Right, yeah. And people are also growing  
10 their careers. We hire -- you know, two-thirds of  
11 our company are millennials. So we have to keep  
12 moving them every two years into new opportunities,  
13 so . . .  
14 **Q** And do you personally know of promotions  
15 that were granted where the employee did not request  
16 the promotion?  
17 **A** Yes.  
18 **Q** Okay. How many times have you seen that?  
19 **A** Well, I've got three coming right now where  
20 I'm going to promote three people in my group that  
21 didn't request it. They don't know it yet.  
22 **Q** And then other than those three, do you know  
23 of any others?  
24 **A** Typically, I -- other than I've had one or  
25 two situations, typically my people haven't

271

1 is a woman, we want her"? No --  
2 **Q** Yeah -- well -- or if they see some, you  
3 know -- if Oracle notices there's some gender  
4 inequity like this unit or organization has, you  
5 know, 90 percent men --  
6 **A** It needs more women?  
7 **Q** Yeah, essentially, an affirmative action  
8 program.  
9 **A** Yeah, I mean --  
10 MR. SHWARTS: Objection. Assumes facts.  
11 Incomplete hypothetical.  
12 But you may answer.  
13 THE WITNESS: Yeah. I mean, I don't know if  
14 they -- I'm not sure it's colored quite that way,  
15 but yeah, I mean, no, they don't say, "Oh, I'm going  
16 to put this woman over in Dubai where the women," or  
17 whatever -- that's not a good example, but --  
18 BY MR. SONG:  
19 **Q** Okay. So they don't consider gender?  
20 **A** Yeah. They're looking to move competent  
21 people no matter who they are around.  
22 **Q** Okay. And so by that token, they're  
23 probably not considering race as well?  
24 **A** I mean -- I mean -- I mean, it's not -- it's  
25 not a disqualifier. Yeah, it's all good. It's

270

1 requested a promotion. I've kind of tapped them on  
2 the shoulder, or they've been in rotational  
3 assignments, and we keep tapping them to do  
4 different things or promote them or . . .  
5 **Q** Okay. Are promotions -- are promotions  
6 included in the employee handbook?  
7 **A** I suspect they are, but I should have read  
8 it before I came here this morning.  
9 **Q** It's kind of a big handbook.  
10 **A** Yeah. I was here very early. I could have  
11 been reading it out in the car.  
12 **Q** Is there anywhere else that employees can  
13 learn about how to get a promotion if they're  
14 interested?  
15 **A** So from their manager, AdvantageU, HR  
16 business partners, recruiters are very helpful, too,  
17 the external recruiters because they know them.  
18 They brought them in.  
19 And then there's training. They can sign up  
20 for the training and the training courses can be  
21 completely crafted for them for wherever they want  
22 to go in their career.  
23 **Q** Okay. Are there trainings provided on how  
24 to get promotions?  
25 **A** That's what I was just talking about.

272

1 Q It would be that?  
2 A Yeah.  
3 Q Okay. And then do you provide trainings for  
4 your managers on how to determine promotions?  
5 A We do. The comp people train in that area,  
6 yes, as well.  
7 Q Okay. And do you know how often?  
8 A No.  
9 Q Okay. Do you know if those trainings are  
10 documented?  
11 A I -- I think you have pages of those  
12 trainings somewhere.  
13 Q Yeah. We have PowerPoints and things like  
14 that.  
15 A Right.  
16 Q I don't know if they list --  
17 A But those are -- those are training, and  
18 they're live broadcasts typically.  
19 Q Okay. And have you received trainings on  
20 how to do promotions?  
21 A Yes, over the years, I have.  
22 Q Okay. And when was your last one?  
23 A I don't know. Five years ago.  
24 Q Okay. And do you remember who conducted it?  
25 A No. We were actually going through -- we

273

1 Q And did you write at least this first  
2 e-mail?  
3 A I didn't write it. Kirstin Ward wrote it  
4 for me.  
5 Q Okay. But it's from you --  
6 A But it's from --  
7 MR. SHWARTS: No. You're looking at two  
8 different ones. You're pointing to the top, and  
9 she's pointing to the bottom; so -- just so the  
10 record is clear.  
11 There's two e-mails back -- there's two  
12 e-mails from Ms. Westerdahl on the first page. So  
13 she was looking at the bottom one, and you were  
14 pointing to the top. I'm sorry. I don't mean to  
15 interrupt your flow, but . . .  
16 THE WITNESS: So I did write this. This  
17 communication was written by one of my  
18 communications people for me.  
19 BY MR. SONG:  
20 Q Okay.  
21 MR. GARCIA: And let the record reflect that  
22 when she said "I wrote this," she's pointing to the  
23 top e-mail. And when she said it was written by one  
24 of her employees, she's pointing to the lower  
25 e-mail.

275

1 had changed the guidelines for being an SVP. So I  
2 hadn't changed the guidelines; so I sat through that  
3 presentation, so . . .  
4 And VPs and regionals and Mark Hurd came in.  
5 He changed some of the guidelines; so we sat through  
6 what -- how we -- what we were doing.  
7 Q Okay. But you don't remember who did that  
8 training?  
9 A I think it was Anje Dodson actually.  
10 Q And I'm sorry. Who is she again?  
11 A She is the gal that runs technology for us,  
12 and she -- at that time, because she rotates, she's  
13 in a different job now -- she ran all the programs  
14 for training and organizational development.  
15 Q Okay.  
16 A At that time.  
17 MR. SONG: Okay. I'm going to show you my  
18 next exhibit. And I think we're at 63, right?  
19 THE REPORTER: Yes.  
20 (Exhibit 63 was marked.)  
21 BY MR. SONG:  
22 Q Have you had a chance to review?  
23 A Yes.  
24 Q Do you recognize this document?  
25 A Yep.

274

1 MR. SHWARTS: That's correct.  
2 BY MR. SONG:  
3 Q Okay. This from Joyce Westerdahl for the  
4 second e-mail or the bottom e-mail -- that's from  
5 your e-mail address?  
6 A Correct. I sent it, someone drafted it and  
7 wrote it for me.  
8 Q Okay. So I've got a question about this  
9 Global Corporate Bonus Fusion Workforce Compensation  
10 Pilot.  
11 So can you tell us what that is -- or what  
12 that was? I guess it's in '14.  
13 A So we moved to the new product in Fusion.  
14 So we had an old product. It was a global comp  
15 product. We moved to a new product in the cloud.  
16 So when we moved to a new product, we always  
17 tested in our own organization, and we were testing  
18 it in the finance area as well as development area.  
19 Q Okay.  
20 A So we're asking them to start the process,  
21 and their role was to also -- we were doing the  
22 bonuses, but to give us feedback as well as how they  
23 liked or disliked the new product compared to the  
24 old product.  
25 Q Okay. In the e-mail that's at the bottom --

276

1 so after that first sentence, there's the first kind  
2 of full paragraph, it's saying Fusion -- that (As  
3 read:) Managers will use Fusion Workforce  
4 Compensation instead of Compensation Workbench to  
5 administer bonus recommendations?  
6 **A** Correct.  
7 **Q** Okay. I was a little bit confused by that  
8 because I thought Compensation Workbench was part of  
9 the HCM or part of Fusion?  
10 **A** It is.  
11 **Q** Okay. But they're using Fusion -- Fusion  
12 Workforce Compensation instead of the  
13 Compensation Workbench?  
14 **A** So we were On-Premise. Okay? And then when  
15 we went to cloud, we weren't all in cloud. So on  
16 some of the applications, we were still On-Premise.  
17 **Q** Okay.  
18 **A** So the rest of the company was using old  
19 product, On-Premise, and this pilot group was using  
20 new version product in cloud.  
21 **Q** Okay.  
22 **A** Okay?  
23 **Q** All right. Maybe I'm just confused with the  
24 terminology.  
25 **A** It's just one -- it's a new version of the

277

1 MR. SHWARTS: 4.  
2 MR. SONG: 64.  
3 BY MR. SONG:  
4 **Q** Have you read this?  
5 **A** Yes.  
6 **Q** Do you recognize this document?  
7 **A** Yes.  
8 **Q** Okay. And what is it, please?  
9 **A** For senior -- some senior people in  
10 development, they had MBO bonus plans that had  
11 basically MBOs attached to whether they would get a  
12 bonus or not.  
13 **Q** Okay. And what is MBO? I'm sorry.  
14 **A** Management by objectives.  
15 THE WITNESS: I know, but I got to get  
16 someone into my house.  
17 MR. SHWARTS: It's all right.  
18 BY MR. SONG:  
19 **Q** And is this the typical -- is this kind of  
20 the usual process for getting a bonus plan approved?  
21 **A** For senior people.  
22 **Q** For senior people. Okay. So here it looked  
23 like Safra took it to Mr. Ellison and had it  
24 approved?  
25 **A** Correct.

279

1 same product.  
2 **Q** Okay. But you're still calling it  
3 Compensation Workbench?  
4 **A** Yes. Just new version of old product.  
5 **Q** All right. That's what I --  
6 **A** In cloud.  
7 **Q** That's where I got confused. And did you  
8 get any feedback from this pilot program?  
9 **A** Oh, yes.  
10 **Q** And what was that feedback?  
11 **A** The screen -- the fields were too large.  
12 They couldn't collapse them. I can go through  
13 lots -- there was -- and then we have done a lot of  
14 edits to the program from where it is today. This  
15 was in '14.  
16 So we listened to them. We made development  
17 changes.  
18 **Q** Okay. But overall, it was positive, people  
19 seemed to --  
20 **A** Yeah. It was almost too robust. It was  
21 like overengineered. We had to skinny it down.  
22 MR. SONG: Okay. I'm going to skip that  
23 one.  
24 (Exhibit 64 was marked.)  
25 MR. SONG: 63, I believe.

278

1 **Q** Okay.  
2 MR. SHWARTS: Do you need to -- do you need  
3 to do something?  
4 THE WITNESS: In a minute I do. I need to  
5 get somebody in my house.  
6 MR. SHWARTS: Do you want to go off the  
7 record for a second?  
8 MR. SONG: Okay. Let's go off the record.  
9 THE WITNESS: It will just take a second.  
10 It will just take a second.  
11 MR. SONG: It's okay. We can take a break  
12 now.  
13 THE WITNESS: It won't take long.  
14 MR. SONG: Okay.  
15 MR. GARCIA: The advantages of modern  
16 technology.  
17 MR. SHWARTS: Why don't you go off the  
18 record?  
19 THE VIDEOGRAPHER: Going off the record, and  
20 the time is approximately 4:07 p.m.  
21 (Off the record from 4:08 p.m. to 4:09 p.m.)  
22 THE VIDEOGRAPHER: Going back on the record.  
23 And the time is approximately 4:08 p.m.  
24 MR. SONG: This is Exhibit 65.  
25 ///

280

1 (Exhibit 65 was marked.)  
2 THE WITNESS: Okay.  
3 BY MR. SONG:  
4 Q Okay. Do you recognize this document?  
5 A Yes, sort of.  
6 Q Okay. Were you cc'd on this document?  
7 A Yes -- I think. Yes.  
8 Q So right below Ms. Catz's e-mail is an  
9 e-mail from Kate Waggoner. And it mentions that (As  
10 read:) Joyce sent to me two changes this morning  
11 for Chris Cheadle to 400,000 options and  
12 Richard Sarwal to 200,000 options.  
13 Can you explain if you recall why you made  
14 those changes?  
15 A Mark wanted to increase Chris Cheadle's  
16 options. I think we were promoting him and moving  
17 him to Asia PAC. This was in 2014. That probably  
18 is correct.  
19 And Chuck or Mark made a change with  
20 Richard Sarwal's and reduced his grant size, his  
21 direct boss.  
22 Q Okay. So those were -- those were at the  
23 request of other people?  
24 A Of their managers, yes.  
25 Q Okay. And then it goes on to say (As read:)

281

1 conversation, performance review, and it's how you  
2 do talent review, how I discussed how we sit around  
3 and talk about promotions or transfers or  
4 assignments.  
5 So it's a product, and it's in core HCM, and  
6 this was in '13. And this was our first product  
7 launch into the cloud.  
8 Q Okay. So that's when the Fusion -- when the  
9 talent review --  
10 A It was the first -- yeah, it was the first  
11 step into the cloud.  
12 Q Okay. And so as far as you can recall, it  
13 started around 2013, then?  
14 A It did start 2013 because it's date stamped.  
15 MR. SONG: This is 67.  
16 (Exhibit 67 was marked.)  
17 BY MR. SONG:  
18 Q Bring back good memories?  
19 A No. It's just -- this is when you guys  
20 scanned my computer, you get everything that has the  
21 word "compensation" in it.  
22 Q Do you recognize the document?  
23 A It's again the newsletter in July of '16 --  
24 or the news -- yeah, whatever.  
25 Q Okay. And what I was curious about here was

283

1 There were also some minor adjustments that were  
2 requested in Joyce's and Matt Mayerson's hierarchy?  
3 A Correct.  
4 Q Do you remember what the changes were that  
5 you requested for your hierarchy?  
6 A I think we both had people resign, and we  
7 took those budgets and moved them to other people.  
8 MR. SONG: Okay. We can skip this one.  
9 66, right?  
10 (Exhibit 66 was marked.)  
11 BY MR. SONG:  
12 Q Okay. Do you recognize this document?  
13 A Yes.  
14 Q Okay. And can you tell us what it is?  
15 A It's our monthly communication newsletter to  
16 the HR community.  
17 Q Okay. So is the HR community just people in  
18 your organization?  
19 A Yes.  
20 Q Okay. My specific question was about Fusion  
21 talent review. Who is that?  
22 A So talent review is the 9-box program.  
23 Q Okay.  
24 A And it's also -- so it's not just the 9-box.  
25 It's the nine boxes. It's a performance

282

1 the first phase of the compensation initiative. Can  
2 you tell us what that is?  
3 A They were doing a global review. We needed  
4 a refresh before we go to the cloud. So we're  
5 getting ready to go to the new version of Comp  
6 Workbench.  
7 And you need to -- you have to go back and  
8 make sure that your job tables and all pieces of  
9 your comp framework are intact before you load into  
10 a new system.  
11 So every time you go live with a new system,  
12 you do a refresh. We're in the first phase. It  
13 took us a while to do a complete refresh because  
14 this is a global review of all the countries.  
15 And once again, collecting whether our job  
16 families are correct, do we need to expand our job  
17 families, do we need to tweak, whatever we need to  
18 do, it takes a long time to do in all the countries  
19 you have.  
20 Q Sure.  
21 A Yeah.  
22 Q And has that compensation initiative been  
23 completed?  
24 A That I believe was completed. I think it  
25 took a couple of years. It says "multi-year," but I

284

1 think we brought that in at least '17 or '18 it was  
2 completed.  
3 **Q** Okay. And how many phases were there?  
4 **A** Well, you had to go country to country and  
5 then -- and then we also added -- during this  
6 process, we moved to GeoPay. So we defined further  
7 our pay by location around the world, and we  
8 expanded our market data where we had holes, whether  
9 that was Argentina or wherever we had holes in this  
10 process around.  
11 So it was a big refresh. And you would  
12 probably do this again in another ten years. It's  
13 just -- and you would do it on -- anytime you go  
14 live with it, like Core HR, anytime you go live with  
15 Core, we would do a refresh on, like, cost centers.  
16 And it's cleanup data. It's simplified  
17 data. It's expand data, test data. It's all about  
18 good reporting and having a system that works.  
19 **Q** Okay. And what were the results from this  
20 initiative in the U.S.?  
21 **A** Well, as I said, this -- we went to --  
22 during this process, this is where we went to Geo  
23 ranges, so we added more insightful data on where  
24 you -- if you lived in Silicon Valley, if you lived  
25 in Austin, Texas -- on how to -- how to -- what the

285

1 (Exhibit 68 was marked.)  
2 THE WITNESS: Okay.  
3 BY MR. SONG:  
4 **Q** Okay. Do you recognize this exhibit?  
5 **A** I don't recognize this particular send mail,  
6 even though I was copied on it, but I'm familiar  
7 with what they were doing.  
8 **Q** Okay. And so this exhibit actually has two  
9 documents. One is an e-mail and then the second  
10 document is the global rehire guidelines.  
11 Do you recognize the global rehire  
12 guidelines?  
13 **A** Yep.  
14 **Q** Okay. Do you know who wrote those?  
15 **A** No. Someone in Phil's group.  
16 **Q** Okay. But you're familiar with this  
17 document?  
18 **A** I am.  
19 **Q** Okay. If you go towards the bottom of that  
20 document, under compensation offer considerations,  
21 there's a subheading called "Internal Pay Equity."  
22 How does the offer for the rehire compare  
23 against peers in the same role, hierarchy, and/or  
24 location review comparable peers?  
25 Now, were you involved -- you personally

287

1 market was in those particular -- that was part of  
2 that process.  
3 And clean up on job titles where, you know,  
4 things were out of whack or they weren't meaningful  
5 anymore. Or I don't know where we exactly wrote --  
6 bought MICROS, but that would have been part of that  
7 too when we added a whole new line of business, like  
8 we did with Sun, you know, ten years ago. When we  
9 bought a hardware company, we had to redo all our  
10 tables because suddenly we had hardware people.  
11 **Q** Was anything in the U.S. compensation  
12 process changed as a result of the initiative?  
13 **A** This is all back office systems stuff.  
14 **Q** Okay.  
15 **A** Yeah. Other than GeoPay, which is front  
16 end, everything is a back office process you have to  
17 go through.  
18 **Q** Okay. So none of the actual process --  
19 **A** No. We didn't -- I mean, yeah. No, I don't  
20 think they changed like, "Oh, we're going to change  
21 how we do a promotion." No. This is about -- this  
22 is about your structure to your systems.  
23 **Q** Okay. I see.  
24 **A** It's your engine.  
25 ///

286

1 involved in any of these actions?  
2 **A** Personally involved with --  
3 **Q** Comparing against peers.  
4 MR. SHWARTS: I'm sorry. Are you asking  
5 about specific -- like, was she involved in any  
6 specific rehire scenario, or are you speaking about  
7 this process as it was developed?  
8 MR. SONG: This specific process comparing  
9 against peers.  
10 THE WITNESS: But everything we talked about  
11 today, you know, we -- we compare like new-hires  
12 against incumbents and the role. So that's no  
13 different than this or -- this is just restating  
14 what we've always done.  
15 BY MR. SONG:  
16 **Q** Okay. But I just wanted to know if you were  
17 specifically involved in looking at this internal  
18 pay equity, did you compare against peers in the  
19 same role, hierarchy, and/or location?  
20 Like, did you -- were you actually involved  
21 in any of this?  
22 MR. SHWARTS: For rehire in your group.  
23 THE WITNESS: For a rehire in my group? No.  
24 I mean, no. I mean, if we're doing a rehire in my  
25 organization, the comp people do it for us. We

288

1 don't even . . .  
2 BY MR. SONG:  
3 Q Okay. Do you know if anybody within HR  
4 participated in this?  
5 A I don't think I know what you're asking.  
6 Q Okay. Did any -- so you personally have not  
7 been involved in comparing a rehire against some of  
8 their peers?  
9 A No. I -- no, I wouldn't.  
10 Q But what about people in your department in  
11 HR? Were they involved in this?  
12 A We have rehired people. I just let -- when  
13 we hire -- rehire people or I hire someone off the  
14 street that I've never met, I let the comp  
15 department determine what to pay them. So I don't  
16 even -- so they would follow this --  
17 Q This?  
18 A -- and make it what we should pay them and  
19 what's fair to pay them and what's fair to  
20 incumbents and . . .  
21 Q So what I'm curious about is how they would  
22 compare them with -- you know, compare them with  
23 peers. Is it based on the job level, location --  
24 A It would be based on their resume and  
25 experience against the people currently in that same

289

1 seen this. Do you want me to go ahead and read the  
2 whole thing?  
3 BY MR. SONG:  
4 Q No.  
5 A Okay.  
6 Q If you have --  
7 A Okay.  
8 Q Okay. I just -- that was one of the  
9 questions for you is if -- so you don't recognize  
10 this?  
11 A No. And it's a long read; so I just thought  
12 I would shorten that.  
13 Q Okay. And you don't know who wrote this?  
14 MR. SHWARTS: Don't guess.  
15 THE WITNESS: I don't know.  
16 BY MR. SONG:  
17 Q Okay. Yeah, then you don't need to respond  
18 to questions on this, but let me see -- okay. Then  
19 I'm not going to ask you any questions about this  
20 document.  
21 MR. SONG: How much time do I have left on  
22 the tape?  
23 THE VIDEOGRAPHER: Can we go off the record?  
24 MR. SONG: Yeah. I'm sorry. Go off the  
25 record.

291

1 role --  
2 Q Okay.  
3 A -- at any department.  
4 Q Okay.  
5 A Yeah.  
6 Q But that would probably also include the job  
7 career level?  
8 MR. SHWARTS: Objection. Calls for  
9 speculation.  
10 You may answer.  
11 THE WITNESS: It may. I mean -- yeah. I  
12 mean, yeah. It's typically -- yeah. It's in the --  
13 that -- that band, that job, that responsibilities  
14 that they're in the same group, they're comparing  
15 those folks against one another.  
16 BY MR. SONG:  
17 Q Okay.  
18 A Yeah.  
19 Q To help determine the salary for the rehire?  
20 A Yes.  
21 Q Okay.  
22 MR. SONG: Okay. This was previously marked  
23 as Exhibit 28.  
24 THE WITNESS: Okay. Oh, previously. I  
25 don't hand to you. I have -- I haven't actually

290

1 THE VIDEOGRAPHER: We're going off the  
2 record, and the time is approximately 4:25 p.m.  
3 (Off the record from 4:27 p.m. to 4:28 p.m.)  
4 THE VIDEOGRAPHER: Going back on the record,  
5 and the time is approximately 4:27 p.m.  
6 BY MR. SONG:  
7 Q When employees leave Oracle, do they have to  
8 sign a confidentiality agreement?  
9 A No.  
10 Q And is there a confidentiality agreement  
11 that they sign when they're onboarded?  
12 A They sign a PIA, proprietary information  
13 agreement, which you're a lawyer, I'm not; so they  
14 sign that they can't share trade secrets; so --  
15 yeah.  
16 MR. SONG: Okay. Let's go ahead and take a  
17 break now.  
18 THE WITNESS: Okay.  
19 MR. SONG: This is a good place to stop.  
20 THE VIDEOGRAPHER: This concludes the -- I'm  
21 sorry. This is the end of Media No. 4, video  
22 deposition of Joyce Westerdahl. Going off the  
23 record at approximately 4:28 p.m.  
24 (Off the record from 4:29 p.m. to 4:36 p.m.)  
25 THE VIDEOGRAPHER: This is the beginning of

292

1 Media No. 5 in the continuing deposition of  
2 Joyce Westerdahl. Back on the video record at  
3 approximately 4:35 p.m.  
4 MR. SONG: Okay. I'm going to show you the  
5 next exhibit, which is Exhibit 68?  
6 THE REPORTER: 69.  
7 MR. SONG: 69. Okay.  
8 (Exhibit 69 was marked.)  
9 MR. SONG: Sorry. I only made -- wait. Do  
10 I have two copies? Oh, I do. Better than I  
11 thought.  
12 THE WITNESS: I haven't seen this in a long  
13 time; so I'll save you from asking that. This is  
14 '14 now.  
15 MR. SHWARTS: You ready?  
16 THE WITNESS: Yes. I just stayed on this  
17 because it's highlighted.  
18 BY MR. SONG:  
19 Q Do you recognize this document?  
20 A Yes.  
21 Q And what is it?  
22 A It's our affirmative action plan.  
23 Q Okay. And you mentioned that you haven't  
24 seen this in a while?  
25 A Well, this one is 2014. I don't know if

293

1 A Yes. But maybe because Safra -- so what  
2 year is this? '14.  
3 Q 2014.  
4 A Safra maybe -- I don't -- I don't know why  
5 Safra wanted to be a part of this.  
6 Q Okay.  
7 A Yeah.  
8 Q Okay. Do you know if she's involved in  
9 implementing this affirmative action plan?  
10 A She is heavily involved in our affirmative  
11 action and moving the dial.  
12 Q Okay. What did she do for the affirmative  
13 action plan?  
14 A Well, she's active in many of our affinity  
15 groups as a speaker, as cohosting, as sponsorship.  
16 She's a repeated speaker at our OWL -- for our OWL  
17 program, Oracle's Women's Leadership group.  
18 She spearheaded along with a gal that works  
19 for me, Colleen Cassity, putting up a high school on  
20 our campus, a tech charter school.  
21 What year did we open? I guess we opened  
22 early -- it's '19 -- I think early '17, we opened  
23 that high school. Before we had the physical  
24 building built, we had the kids in our CVC, our  
25 customer visit center, classroom -- we converted it

295

1 there's a more recent one.  
2 Q Okay.  
3 A Yeah. But I would imagine there is  
4 somewhere.  
5 THE WITNESS: No? I don't know.  
6 I'm asking you like you work at Oracle.  
7 BY MR. SONG:  
8 Q So you're not -- you're not aware if there's  
9 a more recent one?  
10 A I am not aware if there is a more recent  
11 one.  
12 Q Okay. And then do you know who wrote this?  
13 A Shauna, it looks like.  
14 Q Okay. She's the author?  
15 A Yeah. I mean, there was overview for sure.  
16 Other people helped her write it, I'm sure.  
17 Q Okay. Did you help write this?  
18 A No, I did not.  
19 Q Do you know who else helped her write this?  
20 A No, I do not.  
21 Q Okay. And under -- on page 1, it says  
22 "Individual responsible for plan implementation," it  
23 just lists Shauna Holman-Harries and Safra Catz.  
24 But isn't this one of your responsibilities  
25 as well?

294

1 to classrooms for them.  
2 She's committed to advance the STEM  
3 education, clearly, for -- and the high school isn't  
4 for our population. It's -- it's for whoever would  
5 like to attend.  
6 Q Okay. Has she been involved with looking at  
7 gender pay equity at Oracle?  
8 A You would have to ask her what she's looked  
9 at.  
10 Q Okay. And if you could turn to page 6,  
11 let's see, one, two, three, four, five -- if you go  
12 to the fifth bullet point under implementation  
13 guidelines, it says (As read:) Designing and  
14 implementing systems to determine if Oracle's  
15 affirmative action planning goals and objectives are  
16 met.  
17 Do you know what's been done to design and  
18 implement systems?  
19 A I would imagine that's related to product  
20 and making sure our project collects what we need to  
21 collect for reporting.  
22 Q Okay. And then do you know if that's been  
23 done?  
24 A Yes.  
25 Q Okay. How has that been done?

296

1 **A** Specifically, like in applicant tracking, we  
2 actually in '14 -- I don't know if it was '14 or '15  
3 or '13, we upgraded our iRecruit system because we  
4 were having trouble capturing certain data.  
5 **A** And we recently upgraded to a better skin  
6 for our candidate selection and tracking on the  
7 front end of our product. So ease of  
8 administration, we've improved -- and tracking  
9 abilities versus a lot of times, it was a very  
10 manual process for us.  
11 **Q** Okay. Are there any other systems that have  
12 been designed or implemented to determine if Oracle  
13 is in compliance with its AA plan?  
14 **A** No. I think the HCM system encompasses it,  
15 as far as I can . . .  
16 **Q** Okay. What systems specifically have been  
17 designed or implemented to ensure gender pay equity?  
18 **A** What --  
19 **MR. SHWARTS:** So I'll object to the form  
20 only that it calls for speculation. I note that the  
21 person who by the document is responsible for  
22 administering this plan has been deposed.  
23 So you answer if you know.  
24 **THE WITNESS:** I don't know what she's doing  
25 specifically in this area, Shauna.

297

1 colleges for us to get diverse candidates sent to us  
2 for the development side.  
3 **Safra** is now taking a leadership role in  
4 that with our colleges to give us solid pipelines of  
5 what we want and desire to fill our ranks with  
6 diverse populations.  
7 **Q** Okay. And do you know what the affirmative  
8 action goals are from Oracle?  
9 **A** Well --  
10 **MR. SHWARTS:** Objection. Vague as to time.  
11 **THE WITNESS:** Yeah. They're -- you know,  
12 they're based by location, and, you know, I can't go  
13 that specific for you.  
14 **BY MR. SONG:**  
15 **Q** Okay. What about for Redwood Shores now?  
16 What are the affirmative action --  
17 **A** Well, it maps to what that population  
18 reflects there.  
19 **Q** Okay.  
20 **A** And, no, I can't speak specifically for that  
21 location.  
22 **Q** Okay. What about for human resources?  
23 **A** Oh, I score pretty well in that area.  
24 **Q** Good to hear.  
25 **A** Yeah.

299

1 **BY MR. SONG:**  
2 **Q** Okay. Do you know what's -- you know, any  
3 specific systems that have been designed or  
4 implemented to ensure pay equity regarding races?  
5 **A** I don't believe so. I don't believe within  
6 our HCM system there is such a thing.  
7 **Q** Okay. And then if you go down to the  
8 seventh bullet point, it says (As read:)  
9 Communicating to executive management affirmative  
10 action goals and action programs that provide  
11 solutions to address goals and deficiencies.  
12 Do you know what action programs have been  
13 designed or implemented to provide solutions?  
14 **A** Well, I mean, I don't want to brag on Safra,  
15 but, I mean, she personally spearheaded the high  
16 school initiative. Also, all the affinity groups,  
17 she, as I said, actively participates.  
18 **Mark** takes on the veterans groups and  
19 actively promotes the veterans populations, as well  
20 as our gay, transexual, lesbian communities. **Mark**  
21 is heavily involved with that. Something just went  
22 out of my brain. Uh-oh.  
23 Oh. **Safra** just signed up, starting this  
24 summer -- and -- well, **Mark** has his own university  
25 program, and he personally works with the deans of

298

1 **Q** So what are -- what are your affirmative  
2 action goals for HR?  
3 **A** Well, they're sort of -- I mean, we  
4 mirror -- we mirror the U.S. population in what we  
5 have in African-Americans and Hispanics and Asian  
6 and, you know -- and you can get criticism because  
7 it's HR, but women dominate in HR, even worldwide in  
8 our organization.  
9 **And Safra** is our president so, you know, a  
10 good portion of her direct reports are female, as  
11 well as many women of color.  
12 **Q** Okay. But do you have specific goals for  
13 your organization?  
14 **A** I -- we -- I mean, we kind of -- I mean, if  
15 we keep where we are, we're still better than the  
16 national average, certainly in African-Americans and  
17 other areas, so . . .  
18 Can we always do better? Of course. I can  
19 always have more -- I mean, probably the challenge  
20 with some of my group would say once in a while we  
21 can hire a white guy.  
22 **Q** What about your affirmative action  
23 deficiencies?  
24 **A** In my organization?  
25 **Q** Yes.

300

1 A In HR?  
2 Q Yes. Within HR.  
3 A My deficiencies.  
4 MR. SHWARTS: Objection. Assumes facts.  
5 You may answer.  
6 THE WITNESS: My deficiencies. I'm not sure  
7 I have any deficiencies.  
8 BY MR. SONG:  
9 Q Okay. Regarding affirmative action?  
10 A Yeah.  
11 Q Okay.  
12 A Yes.  
13 Q And then do you have any specific action  
14 programs within HR to provide solutions to, you  
15 know, address your goals?  
16 A We -- we are starting our own intern and  
17 then college program ourself. It will be small, but  
18 we -- you know, we're going to start our own feeder  
19 program as well.  
20 And that -- I don't know if that's  
21 necessarily affirmative action. I mean, we will  
22 have women and people of color, but we are in a  
23 highly competitive Bay Area situation; so we need to  
24 grow more of our own than to hire inexperienced  
25 help. So that's kind of a two-prong goal system.

301

1 Q Okay. And have you done anything within HR  
2 to ensure gender pay equity?  
3 A We -- we have -- we have looked at that, and  
4 we are in great shape.  
5 Q Okay. And how have you looked at that?  
6 A It's what we talked about earlier. We  
7 had -- you know, three years ago, we had a law firm  
8 look at my organization, and men are -- men, women,  
9 people of color were paid exactly the same.  
10 Q You had a law firm do that or an internal --  
11 A We had our internal whatever it was --  
12 MR. SHWARTS: Do not testify about that,  
13 please.  
14 THE WITNESS: Okay. That's what we talked  
15 about earlier, but, yeah, again.  
16 BY MR. SONG:  
17 Q And then if we go to the last bullet point,  
18 it says that one of the guidelines is to (As read:)  
19 Periodically review personnel processes to ensure  
20 freedom from stereotyping against any applicants or  
21 employees including on the basis of disability or  
22 protected veteran status in a manner that limits  
23 access to jobs for which these individuals are  
24 qualified.  
25 Have -- has HR reviewed personnel processes

302

1 periodically?  
2 A Yes, they do.  
3 Q And how often do they do that?  
4 A Whenever there's a new -- like, we're  
5 looking at a new applicant interviewing system, and  
6 that's actively going through a review with Vickie  
7 and her team to ensure there's no discriminatory  
8 practices, and we -- and so that team routinely --  
9 any new system coming in like that where we're  
10 training people on, that team is on the ground  
11 making sure it's not discriminatory in any way.  
12 Q Okay. And how often does that happen?  
13 A Every -- it happens when -- it happens  
14 whenever you're looking at something new; so . . .  
15 Q Maybe every couple of years?  
16 A It could be -- it could -- it just depends  
17 on what -- what's happening.  
18 Q Okay. Then if you turn to page --  
19 A Oh. I thought I was done.  
20 Q Almost done with this document.  
21 A Yeah.  
22 Q Page 14.  
23 A Okay.  
24 Q So at the very top of page 14 under "Audit  
25 and Recording System," it says (As read:) Oracle

303

1 evaluates the effectiveness of its affirmative  
2 action program by, number one, measuring the  
3 effectiveness of its affirmative action program.  
4 Do you know if Oracle does that?  
5 A Where are we? Yes, this -- I believe this  
6 team does this, yep.  
7 Q Okay. Which team?  
8 A This is Shauna's team under Vickie.  
9 Q Okay. And how do they do this?  
10 A You would have to ask them.  
11 Q Okay. So you don't know how they --  
12 A I don't know exactly what they do.  
13 Q Okay. And then if we go to the second  
14 section there, "Implementation Responsibility," the  
15 very last sentence says (As read:) These  
16 responsibilities include monitoring all affirmative  
17 action equal opportunity employment opportunity  
18 activities and recording the effectiveness of this  
19 affirmative action plan as required by federal,  
20 state, and local agencies.  
21 Do you know if Oracle is monitoring all the  
22 affirmative action plans?  
23 A I -- I am sure they are.  
24 Q Okay. But do you --  
25 A Do I know for -- exactly what they do, and

304

1 do they hit them all? No. But we could ask Shauna.  
2 **Q** Okay. And it would be Vickie and Shauna?  
3 **A** Mmm-hmm.  
4 **Q** And are they reporting the effectiveness of  
5 this affirmative action plan?  
6 **A** Again, we would have to talk to them.  
7 **Q** Okay. And do you know of any other -- do  
8 you know of any other equal employment opportunity  
9 policy at Oracle?  
10 **A** What? I'm not sure what you're asking.  
11 **Q** Well, is this -- so you said you didn't know  
12 if there were other versions of this affirmative  
13 action plan, correct?  
14 **A** Yeah. I don't know. Yeah.  
15 **Q** Okay. Are there any other policies at  
16 Oracle that discuss equal employment opportunity?  
17 **MR. SHWARTS:** To your knowledge.  
18 **THE WITNESS:** To my knowledge?  
19 **BY MR. SONG:**  
20 **Q** Yes.  
21 **A** I would imagine, like we said, the handbook  
22 would talk about it. Certainly probably even the  
23 new-hire paperwork talks about it when they're  
24 onboarding someone. I'm sure it's in other places.  
25 Can I name them all? No.

305

1 **MR. SHWARTS:** Objection. Well, again, speak  
2 to your personal knowledge --  
3 **THE WITNESS:** Right. I mean, I could go  
4 back, and I think it's stated in here, but, no, I  
5 can't repeat what the mission statement is.  
6 **BY MR. SONG:**  
7 **Q** Okay.  
8 **A** I mean, we support it. We believe in it. I  
9 think we have good actions on what we put our  
10 activities around it, and our senior people do too.  
11 **Q** And do you personally know if Oracle  
12 periodically analyzes Oracle to make sure that it's  
13 in compliance with equal -- equal employment  
14 opportunity policies?  
15 **MR. SHWARTS:** It's a yes-or-no question.  
16 **THE WITNESS:** I don't know what their rigor  
17 is on that.  
18 **BY MR. SONG:**  
19 **Q** Okay. Have you received training on this  
20 affirmative action plan?  
21 **A** When I was first in HR along the way, yes,  
22 we received training along at different points for  
23 HR-manager training.  
24 **Q** Okay. That's when you first started?  
25 **A** Well, I didn't start in HR. But as I moved

307

1 **Q** Okay. Do you know if there are any equal  
2 opportunity employment statements or documents in  
3 the employee's My Oracle page?  
4 **A** I would imagine there are, yes.  
5 **Q** Okay. And do you know if this affirmative  
6 action plan, which is Exhibit 69, if this is -- if  
7 this is distributed to employees?  
8 **A** I don't think this is distributed to  
9 employees.  
10 **Q** Do you know if they have access to it?  
11 **A** I don't know.  
12 **Q** Okay.  
13 **A** I mean, we distribute the plans to the  
14 managers individually, but I don't know -- I don't  
15 know how far, you know, I don't know their rigor.  
16 **Q** Okay. And does Oracle conduct training on  
17 the affirmative action plan?  
18 **A** Specific training? You would have to ask  
19 them, just like with all the other training.  
20 I'm assuming there is some training, and  
21 there's training in the code of conduct on equal  
22 employment. But I don't know if there's a specific  
23 EEOC just targeted training.  
24 **Q** Okay. And do you know -- do you know what  
25 Oracle's equal opportunity employment policy is?

306

1 into HR and then along the way, we've had  
2 affirmative action training, yes.  
3 **Q** Okay. And do you remember approximately  
4 when that was?  
5 **A** No. Again, I did really well with what I've  
6 done in the last year. I want to remind everyone of  
7 that.  
8 **Q** Okay. But since then, you haven't had the  
9 training on affirmative action?  
10 **A** No. I mean, I -- I mean, there's briefings  
11 and things like that, too, so certainly with the  
12 amount of audits we had, there -- anyway, not formal  
13 training, but certainly briefings over the years.  
14 **Q** And the affirmative action training that  
15 you've received, do you remember who conducted that  
16 training?  
17 **A** Well, we've -- I mean, we haven't had a  
18 number of -- no, I don't remember who did that  
19 training or the diversity training over the years.  
20 I don't remember that vendor.  
21 **Q** Okay. Do you know if Oracle does live  
22 trainings for employees on equal employment  
23 opportunity or affirmative action?  
24 **A** Well, we do -- with the live orientation,  
25 there's a component probably of EEOC because it's a

308

1 new-hire orientation.  
2 **Q** Okay. And do they also talk about  
3 affirmative action?  
4 **A** Yes.  
5 **Q** Okay. And that's at the live orientation  
6 for new-hires?  
7 **A** And it's only available in some locations,  
8 and then the rest is done -- there's online  
9 training.  
10 **Q** Okay. And do you know how long the equal  
11 employment opportunity portion of that training is?  
12 **A** No.  
13 **Q** And have you received any training about  
14 OFCCP regulations?  
15 **A** I wouldn't say it's training. Certainly  
16 over the years, I've had briefings from our outside  
17 counsel.  
18 **Q** Okay. And you've had briefings on what the  
19 requirements are?  
20 **A** Requirements, what's happening with the  
21 agency, our audit status, a whole variety of topics  
22 within that category.  
23 **Q** Okay. Do you know what the OFCCP  
24 regulations require?  
25 **A** For?

309

1 You may answer.  
2 **THE WITNESS:** I'll just say I do not at this  
3 point. I mean, I understand we're at a dispute and  
4 a disagreement on certain points.  
5 **BY MR. SONG:**  
6 **Q** Okay. But you're not familiar with that  
7 executive order?  
8 **A** No, I don't -- yeah.  
9 **Q** Okay. What steps does Oracle -- to your  
10 knowledge, what steps has Oracle taken to ensure  
11 that -- to ensure that there's gender pay equity?  
12 **MR. SHWARTS:** To your understanding.  
13 **THE WITNESS:** Well, what steps have we done  
14 along the way to ensure, or what we do every day?  
15 I can't believe I just messed this up here.  
16 I'm sorry.  
17 **BY MR. SONG:**  
18 **Q** You're okay.  
19 **A** No, because they were in order.  
20 **Q** Yes. What has Oracle done?  
21 **A** I mean, I think it's an ongoing process of  
22 every -- every -- you know, that happens every day  
23 from bringing candidates in from the outside and  
24 having a review with that process. We look at  
25 market data.

311

1 **Q** Oracle.  
2 **A** For me? No, for what? Sorry.  
3 **Q** Well, for Oracle to do work, to conduct.  
4 **A** The actual -- all the requirements?  
5 **Q** Yes.  
6 **A** No, I probably can't do chapter and verse of  
7 what they ask us to report on. And I know there's  
8 applicant tracking. There's a variety of things we  
9 have to do, but I can't give you chapter and verse.  
10 **Q** Okay. And do you know what the executive  
11 order that requires the OFCCP monitor Oracle  
12 requires? Are you familiar with the executive  
13 order?  
14 **A** That we received years ago from you guys, or  
15 where are we going with this?  
16 **Q** Well, there's an executive order that's the  
17 subject of this lawsuit. So, you know, OFCCP is  
18 alleging that Oracle has not complied with the  
19 executive order, you know, specifically in terms of  
20 discrimination and for certain reporting  
21 requirements and affirmative action plans.  
22 So do you know what that executive order  
23 requires?  
24 **MR. SHWARTS:** Objection to the extent it  
25 calls for a legal conclusion.

310

1 Ask the question again. Sorry. The blood  
2 is draining from my head.  
3 **Q** Yeah. It's late for all of us.  
4 **A** Yeah.  
5 **Q** What has Oracle done to ensure gender pay  
6 equity at Oracle?  
7 **A** As I said, I think it's an ongoing process  
8 for us. And we look at people coming in and ensure,  
9 have steps as they're coming in, managing them  
10 through the process.  
11 Certainly we talked about this at focal. We  
12 look at -- we read line or, you know, the comp  
13 people, make sure managers are looking at people  
14 that are inappropriately paid, whether a woman or  
15 man or whoever they are in a range and highlighting  
16 that.  
17 So I think it's -- I think we're addressing  
18 it at all points where you can touch an employee  
19 transaction.  
20 **Q** Okay. What about -- what has Oracle done to  
21 ensure racial pay equity?  
22 **A** I think that's the same answer. You know,  
23 we -- you know, we're looking at this. You know,  
24 that's not as obvious when you come through, you  
25 don't identify in a -- you can identify a woman.

312

1 But if you treat everyone with the same review,  
2 you're going to catch all of it.  
3 Q Okay. And you guys have conducted training  
4 on pay equity?  
5 A Pay equity specifically? I'd have to look  
6 at the slides and see if they cover that. I would  
7 imagine they do, but . . .  
8 Q Okay. And Oracle has conducted trainings on  
9 affirmative action?  
10 A Yes, we have.  
11 Q Okay. And equal employment opportunity?  
12 A Mmm-hmm.  
13 Q Okay. Has Oracle conducted an analysis of  
14 pay data?  
15 A What does that mean?  
16 Q So has Oracle examined or analyzed pay data  
17 to make sure that first women are being paid fairly?  
18 MR. SHWARTS: Does HR do that? In your  
19 organization, to your knowledge.  
20 THE WITNESS: Does my organization? My  
21 organization does not do that.  
22 BY MR. SONG:  
23 Q Okay. Do you know if Oracle has done that?  
24 A Aren't we doing this again?  
25 MR. SHWARTS: Yeah. We've been down this

313

1 A Yes.  
2 Q Okay. And that was by legal?  
3 A Our legal department.  
4 Q Okay. And has Oracle conducted analysis of  
5 pay data to make sure minorities are paid fairly?  
6 MR. SHWARTS: Yes-or-no answer, if you know.  
7 THE WITNESS: I believe that's a yes too.  
8 BY MR. SONG:  
9 Q Okay.  
10 A I guess . . .  
11 Q And that was also by internal legal?  
12 A Yes.  
13 Q What efforts has Oracle made to identify  
14 disparities in pay between men and women?  
15 MR. SHWARTS: Objection. Assumes facts.  
16 And, again, you're asking in terms of her  
17 organization to her knowledge?  
18 MR. SONG: To her knowledge, we'll start  
19 with HR?  
20 THE WITNESS: So say that question again,  
21 but, I mean, I'm sure -- say that question again,  
22 please.  
23 BY MR. SONG:  
24 Q Okay. Has Oracle made any efforts to  
25 identify disparities between men and women's pay?

315

1 road before.  
2 THE WITNESS: There, yeah.  
3 MR. SHWARTS: You asked this question three  
4 hours ago.  
5 MR. SONG: Well, no. This is a little bit  
6 more general of a question. But, I mean, if you're  
7 instructing her not to answer --  
8 MR. SHWARTS: Well, again, if we're going to  
9 start getting into -- I mean, Joyce -- she's head of  
10 HR. She says HR doesn't do it. Asking her about  
11 whether she knows if Oracle does it -- she's not  
12 here to testify to Oracle.  
13 MR. SONG: No. She's testifying to her  
14 knowledge. She can testify to her knowledge. She's  
15 not saying that Oracle -- on behalf of Oracle.  
16 THE WITNESS: Okay.  
17 MR. SHWARTS: It's a yes-or-no question.  
18 THE WITNESS: Yes. Okay.  
19 BY MR. SONG:  
20 Q Okay. Do you want me to repeat the  
21 question?  
22 A Yes.  
23 Q Do you know if Oracle has conducted analysis  
24 of pay data to ensure that women are being paid  
25 fairly?

314

1 A Yes --  
2 MR. SHWARTS: Assuming that there are  
3 disparities, to see if there are?  
4 MR. SONG: Yeah. And there may not be any.  
5 THE WITNESS: Yeah. I just feel like I'm  
6 asking -- answering the same question every time,  
7 and maybe it's because I've lost brainpower, but --  
8 and then I'm -- okay. So yes again. Yeah.  
9 BY MR. SONG:  
10 Q Okay. What efforts have they made to  
11 identify --  
12 A So they're -- so despite the -- including  
13 all the proactive stuff that we talked about earlier  
14 for internal process, yes, there's a -- legal  
15 runs --  
16 MR. SHWARTS: All right. Stop.  
17 THE WITNESS: Yeah. But -- so I --  
18 MR. SHWARTS: The answer is you know legal  
19 does something.  
20 THE WITNESS: Legal does something. But I  
21 keep going -- I seem to keep answering the same  
22 question.  
23 MR. SHWARTS: Yeah.  
24 THE WITNESS: Am I not hearing -- is it a  
25 different question, and I'm not hearing it?

316

1 BY MR. SONG:  
2 Q Okay. So legal does something.  
3 A Yes. Okay.  
4 Q Okay. But what about other parts of Oracle,  
5 does anybody else -- outside of legal, does anybody  
6 else at Oracle do anything to identify disparities  
7 between men and women's pay, if any?  
8 A Is there a management team that goes out and  
9 looks at it? No.  
10 Q Okay.  
11 A There's programs within HR, and that's what  
12 we do.  
13 Q Okay. What programs are you talking about?  
14 A We're going to -- okay. So it's the same --  
15 it's the same things I keep covering.  
16 As people come in, as they transfer, as  
17 they're promoted, as we go through focal, as we do  
18 these exercises, there's HR reviews at every step  
19 and touch points along the way.  
20 Q Okay. But what about -- okay. I'm  
21 specifically asking about -- I know it's getting  
22 late in the day.  
23 A Yeah.  
24 Q I'm specifically asking about efforts to  
25 identify whether there are disparities between men

317

1 brain cells right now, other than the proactive  
2 programs we do around diversity as well.  
3 Q Okay. And that would include gender and  
4 racial disparities? So is there anything different  
5 regarding --  
6 A No. I would consider them all in the same  
7 category.  
8 Q Okay. Okay.  
9 MR. SONG: Can we take a quick break, then?  
10 THE WITNESS: Sure.  
11 THE VIDEOGRAPHER: Going off the record, and  
12 the time is approximately 5:12 p.m.  
13 (Off the record from 5:14 p.m. to 5:26 p.m.)  
14 THE VIDEOGRAPHER: Going back on the record,  
15 and the time is approximately 5:25 p.m.  
16 BY MR. SONG:  
17 Q Okay. When I asked you a few minutes ago  
18 about efforts to identify disparities, you mentioned  
19 the focal review process; is that right?  
20 A Yes.  
21 Q All right. But when you're -- during the  
22 focal review process, you're -- the managers only  
23 have access to their employees, correct?  
24 A Correct.  
25 Q So they're not looking at large groups of

319

1 and women's pay.  
2 So just the effort to identify. Are there  
3 other efforts outside of legal?  
4 A So within HR --  
5 Q Yeah.  
6 A -- despite what we've done in HR? So  
7 ignoring HR and ignoring legal, are there other  
8 programs?  
9 Q No, not really programs.  
10 MR. SHWARTS: He's asking not what you do  
11 day to day to implement your programs. He's asking  
12 if HR does something specific to see whether or not  
13 there is.  
14 BY MR. SONG:  
15 Q There is a problem.  
16 A That there is a problem?  
17 Q Disparity, yes.  
18 A So I would consider what we're doing through  
19 the focal process a program to see if there's a  
20 disparity, which I've mentioned.  
21 Q Okay.  
22 A Okay.  
23 Q So focal process is one. Anything else?  
24 A Well, we -- so programs to discover --  
25 that's probably it is what I can pull out of my

318

1 employees to see if men and women are being paid  
2 fairly, but they're only looking at their reports?  
3 A Their organizations.  
4 Q Yeah. So -- because they don't have access  
5 to salaries of people across the organization,  
6 correct?  
7 A Correct.  
8 Q Okay. But -- so if they only have access to  
9 their direct reports, then how can they ensure --  
10 how can they identify gender pay disparity, for  
11 example?  
12 A Well, first of all, they don't just have  
13 access to their direct reports. They have access to  
14 their whole organization.  
15 So -- and if it's a small group and --  
16 you're right. So maybe they don't make a big impact  
17 on the whole company, but they're responsible for  
18 their organizations.  
19 Q Okay. So if -- let's say -- we'll take an  
20 M-1 manager, a lower -- lowest level manager, that  
21 manager would have access to salaries of the entire  
22 HR organization?  
23 A No. What you said was in the focal review  
24 process, the manager would only have access to their  
25 direct reports.

320

1 Q Yes.  
2 A They have access to their whole  
3 organization. So even if I'm an M-1, I have direct  
4 reports, and then I have people underneath my -- so  
5 we're talking -- I was just correcting you on -- so  
6 don't pick on me, let's just pick on a director.  
7 So a director has -- can see the direct  
8 report information and has access to their entire  
9 organization.  
10 Q Below them?  
11 A Yes.  
12 Q Okay. But if it was a really low level  
13 manager like an M-1, they would only have four or  
14 five -- like, a small group of reports or people --  
15 salaries that they could see, right?  
16 A They would see everybody in their  
17 organization. If it was four people, it would be  
18 four people.  
19 Q Okay. But the people below them?  
20 A And they could see the people below them.  
21 Q Yeah. Only below them?  
22 A Yes.  
23 Q Okay. And does Oracle have any compensation  
24 affirmative action goals?  
25 MR. SHWARTS: Again, to your knowledge.

321

1 A I think it's from Shauna.  
2 Q Okay. And those are written reports?  
3 A You mean like handwritten or you mean --  
4 Q Yeah, like, on --  
5 A They're typically you get an e-mail with a  
6 report in it.  
7 Q Okay. As an attachment, or it's in the body  
8 of the e-mail?  
9 A Yeah. I think it's more in the body of  
10 the --  
11 Q Okay. So these reports are in e-mails?  
12 A They are in e-mails, yes.  
13 Q Okay. And there's no attachment?  
14 A I don't believe there's an attachment. I  
15 think there's a report that's sent to specific  
16 leaders in the organization, and I'm not sure it's  
17 delivered in an attachment or it's actually the body  
18 of the report is in the e-mail. I can't tell you.  
19 Q Okay. And who is the e-mail from?  
20 A As I said earlier, I believed it was from  
21 Shauna, for my organization.  
22 THE WITNESS: What is wrong with me? I am  
23 hearing the same questions over and over again.  
24 MR. SHWARTS: That's because you are.  
25 ///

323

1 She's not here to testify on behalf of Oracle.  
2 If you know.  
3 THE WITNESS: I'm trying to even translate  
4 what that means, and I think I know what it means.  
5 And I'm not sure if they have compensation -- direct  
6 affirmative action compensation goals stated in any  
7 of their materials.  
8 BY MR. SONG:  
9 Q Okay. Do you know what the affirmative  
10 action goals for Oracle are?  
11 A In general, we're deficient, and where we  
12 have done a higher end and --  
13 Q Yeah, the specific goals that they have.  
14 MR. SHWARTS: Today?  
15 MR. SONG: Yes, today.  
16 THE WITNESS: No.  
17 BY MR. SONG:  
18 Q Okay. Do you receive reports from Vickie or  
19 Shauna about how the affirmative action program is  
20 going?  
21 A For the company or for my organization?  
22 Q Well, let's start with your organization.  
23 A I -- yes, every -- periodically I get a  
24 report on where I am in my organization.  
25 Q Okay. But -- and that report is from who?

322

1 BY MR. SONG:  
2 Q Okay. So Shauna sends these e-mails to you  
3 directly, and Vickie does not send them to you?  
4 A I don't believe they come from Vickie, no.  
5 Q Okay. And then what do you do with the --  
6 or how often are these reports?  
7 A I think I only see them once a year and then  
8 they go to, like, my directs for their  
9 organizations.  
10 Q Okay. And then what do you do with the  
11 reports?  
12 A It depends on what they say and where we're  
13 deficient. And we have conversations about actively  
14 recruiting new folks in our organization and when we  
15 do our talent reviews.  
16 Q Okay. And do you ever send -- do you ever  
17 forward these reports to Ms. Catz?  
18 A No.  
19 Q Or what about to Mr. Ellison or Mr. Hurd?  
20 A No.  
21 Q Okay.  
22 A On my organization, no.  
23 Q Okay. And other than receiving these annual  
24 reports from Shauna, what else do you do to make  
25 sure that the affirmative action programs are

324

1 effective or being run correctly?  
2 MR. SHWARTS: In her group?  
3 BY MR. SONG:  
4 Q Yes, in your group.  
5 A Well, we're always looking at adding more  
6 programs or tweaking the programs that we have if  
7 they're not being effective.  
8 Looking -- we're conscious to look at is  
9 this really reaping the rewards if we're doing these  
10 job fairs? Is it really -- are we just doing the  
11 job fairs, or are we getting the results?  
12 We're expanding the development program to  
13 include more minority schools, and we're going to be  
14 outreaching more to the deans of these universities  
15 as well. So that's a tweak.  
16 So we're constantly looking at what we're  
17 doing. We're always thinking of ways to add. We  
18 talk to other companies on what they're doing, if  
19 they have any special magic.  
20 Unfortunately, in some of the areas in women  
21 and engineering, you're competing against each other  
22 for the same talent, but -- so you don't want to  
23 share everything on what you do because you want to  
24 get the lion's share of it.  
25 And our college programs -- we focus on

325

1 sit at the table. We talk about our talent. We  
2 talk about continually diversifying our talent. And  
3 then we run a lot of programs, so . . .  
4 Q What about in terms of compensation?  
5 A What in terms of compensation?  
6 Q What -- have you been satisfied with the  
7 comp -- you know, with Oracle -- with your  
8 affirmative action plans progress towards  
9 compensation?  
10 MR. SHWARTS: Objection. It misstates facts  
11 and assumes facts.  
12 You may answer.  
13 THE WITNESS: What's worse I don't know what  
14 you're asking. Compensation -- the affirmative  
15 action plan related to compensation?  
16 BY MR. SONG:  
17 Q Yeah. Have you been satisfied with Oracle's  
18 progress on compensation in terms of pay equity?  
19 A I don't even know how to answer that.  
20 Q Okay. What -- so what are you doing to  
21 ensure that there is pay equity in Oracle?  
22 MR. SHWARTS: Objection. She's -- first of  
23 all, she's answered that question about three  
24 different ways.  
25 But it is -- you're asking her in terms of

327

1 having those classes very equal, 50/50. And then,  
2 of course, retaining them is important because just  
3 building these college programs and then have  
4 everybody else steal our women and minorities isn't  
5 very useful since we spend the first two years  
6 training them.  
7 Q Okay. And in any of the reports that Shauna  
8 has sent to you in the past few years, have you been  
9 unhappy with any of her reports?  
10 MR. SHWARTS: Objection. Vague.  
11 You may answer.  
12 THE WITNESS: No. The emotion unhappy  
13 didn't come across.  
14 BY MR. SONG:  
15 Q Okay. Did you feel like you needed to take  
16 any action based on those reports?  
17 A I don't think -- you know, affirmative  
18 action is not a report-driven exercise. It's  
19 something you have to do every day, right?  
20 So you're looking for reaction to the  
21 report? I don't know. "Oh, in Atlanta, we need to  
22 hire more African-Americans." I don't have a big  
23 presence in Atlanta. I have one person in Atlanta.  
24 Could we do better in Atlanta? Of course we can.  
25 So it's -- my organization, we have a -- we

326

1 her job responsibility, does she have a job  
2 responsibility to do that?  
3 MR. SONG: No. I'm not asking about that.  
4 I'm asking what's --  
5 MR. SHWARTS: If you're asking what Oracle  
6 does, again, she's not a 30(b)(6) witness. You can  
7 ask for one.  
8 MR. SONG: No. I'm asking her what she  
9 does.  
10 MR. SHWARTS: What Joyce Westerdahl does?  
11 MR. SONG: Yes.  
12 MR. SHWARTS: All right.  
13 You can answer that question.  
14 THE WITNESS: Ask the question again.  
15 BY MR. SONG:  
16 Q Okay. What have you done to ensure that  
17 there's pay equity at Oracle?  
18 A At Oracle or in my own department?  
19 Q At Oracle.  
20 A At Oracle. What have I done to ensure that  
21 there's pay equity at Oracle? I -- should we --  
22 okay.  
23 So starting with hiring people, do I -- I'm  
24 not sure I can give you more to the answer I've  
25 already given you several times on what we do from a

328

1 programmatic point of view and the comp department  
2 to really look at what we're doing with pay.  
3 **Q** Okay. What --  
4 **A** I feel like you're looking for an answer to  
5 something, and I don't know what you want me to say.  
6 Not that I should try to help you with that, but --  
7 **Q** Yes. I'm definitely looking for more  
8 information. Okay.  
9 Okay. What else is Shauna Holman-Harries  
10 doing to ensure pay equity at Oracle?  
11 **MR. SHWARTS:** To your knowledge.  
12 **THE WITNESS:** To my knowledge.  
13 **BY MR. SONG:**  
14 **Q** To your knowledge.  
15 **A** You should ask them. I don't know what they  
16 are doing formally on programs. That's maybe  
17 something you should -- she's -- that's her area,  
18 that's her priority, and you should have that -- I  
19 think you have had that conversation with her.  
20 **Q** But you're one of her supervisors, correct?  
21 **A** Correct, but there's things there that  
22 they're doing that I may not be aware of, and you've  
23 had her here.  
24 **Q** Okay. Then what does she provide in the  
25 reports that she provides to you about the AAP?

329

1 paragraph. Okay. And the last paragraph, I think  
2 it's the second -- or, no, I'm sorry. It's the  
3 third sentence (As read:) Although the overall  
4 representation of women and minorities at Oracle is  
5 good, African-American, Latino, and female  
6 utilization in some job groups needs improvement.  
7 Do you know which job groups needs  
8 improvement in female utilization?  
9 **MR. SHWARTS:** As of January 2014?  
10 **BY MR. SONG:**  
11 **Q** Yes. As of -- yes, as of this report or  
12 this plan.  
13 **A** I don't know. I would have to speculate,  
14 but I don't know what she's referring to.  
15 **Q** Okay. Do you know if that's still true  
16 today, that there's -- female utilization is low in  
17 some job groups?  
18 **A** I would imagine it is, yes.  
19 **Q** Okay. And do you know what's being done to  
20 improve female utilization in those job groups?  
21 **A** Yes --  
22 **MR. SHWARTS:** Objection. Vague and  
23 overbroad.  
24 You may answer.  
25 **THE WITNESS:** I mean, again, we have lots of

331

1 **A** They're reports based on location and where  
2 we're deficient and where we're not deficient or  
3 we're good or we're average, and there's statistical  
4 numbers on our -- by location.  
5 **Q** Okay. Does she provide any reports  
6 regarding compensation?  
7 **A** I don't recall any reports on compensation  
8 kind of ever.  
9 **Q** Okay. And did you ever ask her about  
10 compensation?  
11 **A** No, I did not.  
12 **Q** Okay. Can you please turn to -- let's see  
13 page --  
14 **MR. SHWARTS:** Are you going back to  
15 Exhibit 69?  
16 **MR. SONG:** Yeah, Exhibit 69, page 11.  
17 **MR. SHWARTS:** Affirmative action plan.  
18 **THE WITNESS:** Oh, but I destroyed this whole  
19 thing.  
20 **BY MR. SONG:**  
21 **Q** Okay. If you look at --  
22 **THE WITNESS:** What page?  
23 **MR. SHWARTS:** Page 11.  
24 **BY MR. SONG:**  
25 **Q** Oh, yes. I'm sorry, page 11, the last

330

1 programs to promote and attract and recruit female  
2 populations to our company.  
3 **BY MR. SONG:**  
4 **Q** Okay. But do you have any -- any specific  
5 actions taken to address the specific job groups?  
6 So you said -- you spoke generally about  
7 attracting women to Oracle, but what about to the  
8 specific job groups?  
9 **A** Yeah. I mean -- okay. We'll go over it  
10 again.  
11 So we started a high school with STEM. Now,  
12 I know that's going to take 20-some years to get  
13 those kids into our system, but we're doing that.  
14 We have outreach programs. We do diversity  
15 everything every place we can. We are engaging the  
16 universities. We are engaging the deans to identify  
17 those hidden gems and recruit them before anybody  
18 else does.  
19 While the ones that we do have, we want to  
20 keep and retain them. We mentor them. We have  
21 programs between -- our OWL program is one of the  
22 most successful ones.  
23 We recruit -- routinely -- continue to  
24 recruit mentors, whether they're men, women, any  
25 color, anyplace to help our minorities and women

332

1 succeed at our company.  
2 Our college programs that are not  
3 development are equally -- pretty equally staff  
4 50/50 women as, again, the program is to retain  
5 them, hold onto them, not lose them. Don't let  
6 other companies just recruit them and take them away  
7 from us.  
8 Q In this identification of problem areas, it  
9 doesn't discuss any compensation issues. Do you  
10 know why that is?  
11 A I don't know why that is.  
12 Q So I think all those programs that you  
13 mentioned, you know, may -- may be used to attract  
14 more minorities or women to Oracle in general, but  
15 how about trying to fill those specific job groups  
16 or increasing female utilization specific job  
17 groups?  
18 MR. SHWARTS: Objection. Asked and  
19 answered.  
20 You can answer it again.  
21 THE WITNESS: I don't know what more I can  
22 add to that. I mean . . .  
23 BY MR. SONG:  
24 Q Okay. So you don't know of anything else  
25 that's being specifically done to increase female

333

1 A She -- it looks like she works directly with  
2 Shauna and that team.  
3 Q Okay.  
4 A Yeah.  
5 Q Do you know if she's specifically asked them  
6 questions about the AAP?  
7 A I don't know what they've discussed.  
8 Q Okay. And you don't know if -- you don't  
9 know if there are other versions of the AAP for  
10 Oracle other than this one --  
11 MR. SHWARTS: Charles, you asked it four  
12 times already. She said she doesn't know any other  
13 one besides this one. She's said it three times  
14 already -- four times.  
15 BY MR. SONG:  
16 Q Well, you can still answer.  
17 A I'm going to answer it the same way. I  
18 don't know.  
19 Q Okay. Do you know if the AAP has ever been  
20 revised?  
21 A I would assume so, but you don't have it  
22 here so, you know . . .  
23 Q Okay.  
24 A Yeah.  
25 Q And as far as you know, there aren't any

335

1 utilization in specific job groups?  
2 A I just covered that.  
3 Q Okay. So other than that, you don't know of  
4 anything else?  
5 A College, experience, retention, mentoring,  
6 keeping them, retaining them, cherishing them.  
7 Q So you've never sent Saf- -- I'm sorry,  
8 Ms. Catz reports on the AAP plans?  
9 A I would not send that. That would be Shauna  
10 or Vickie or whoever. That group has been led by  
11 different executives at different times. It would  
12 come from that group.  
13 Q Oh. So it would go directly to Ms. Catz  
14 from them?  
15 A If that was appropriate, it would go  
16 directly to Safra.  
17 Q Do you know if they've ever reported to  
18 Ms. Catz?  
19 A I don't know.  
20 Q Okay. And has Ms. Catz ever asked you about  
21 the AAP?  
22 A We have not specifically talked about the  
23 AAP.  
24 Q Okay. And so she hasn't asked you questions  
25 about how it's going?

334

1 affirmative action goals related to compensation  
2 from 2013 to the present?  
3 MR. SHWARTS: Asked and answered.  
4 Answer it again.  
5 THE WITNESS: You're just doing this because  
6 I'm tired.  
7 BY MR. SONG:  
8 Q I'm tired too. We're all tired. Is that a  
9 "yes" or a "no"?  
10 A That's a -- that's a no. I don't know.  
11 It's the same answer as before.  
12 Q Has anyone at Oracle been trained to do  
13 internal pay assessments by gender?  
14 A Has anyone at Oracle been trained to do pay  
15 assessments at Oracle -- I'm not aware of anyone  
16 being trained.  
17 Q Okay. Has anyone -- do you know if anyone  
18 at Oracle has been trained to do internal pay equity  
19 assessments based upon race?  
20 A I -- you would have to ask -- no. I am not  
21 aware of me sending anybody off to training to do  
22 that kind of work.  
23 Q Okay. And you earlier said that you  
24 couldn't recite the, you know, the chapter and verse  
25 of the OFCCP requirements, but can you tell me what

336

1 you do know about the OFC requirements?  
2 MR. SHWARTS: Objection to the extent it  
3 calls for a legal conclusion.  
4 You may answer.  
5 THE WITNESS: Okay. I know we have to abide  
6 by having a reflective population in all our  
7 locations. We have to track applicant tracking data  
8 so we're making sure we're inclusive of a diverse  
9 workforce and selection process as we are a federal  
10 contractor.  
11 BY MR. SONG:  
12 Q Okay. Anything else?  
13 A No.  
14 Q Okay. And do you think that you personally  
15 do anything to help promote a culture of fairness  
16 and pay equity at Oracle?  
17 MR. SHWARTS: He's asking about you  
18 personally.  
19 THE WITNESS: Personally. I believe I do.  
20 BY MR. SONG:  
21 Q Okay. And what -- what actions do you do?  
22 A Well, I mean, we hire the best qualified  
23 candidates, but we have a diverse, you know,  
24 workforce and don't practice in any discriminatory  
25 practice related to pay or how we treat people or --

337

1 Q And have you ever said that you can get four  
2 Indians for the price of one?  
3 A Oh, my God. No.  
4 Q And you've never heard that at Oracle?  
5 A No. American Indians or Indian -- anyway, I  
6 don't want to know. Okay.  
7 Q And to your knowledge, has Oracle ever done  
8 a pay adjustment based on an employee's pay -- pay  
9 with respect to gender imbalance?  
10 A Has Oracle ever done a pay adjustment based  
11 on a gender imbalance?  
12 MR. SHWARTS: A specific one?  
13 MR. SONG: Excuse me?  
14 MR. SHWARTS: Like, meaning a specific  
15 employee?  
16 BY MR. SONG:  
17 Q Yes, like that you know of.  
18 A Yes.  
19 Q Yes?  
20 A Yeah.  
21 Q Okay. Do you know how many times?  
22 A We talked about this earlier.  
23 Q It's that other --  
24 A Yeah, it's -- we, you know, recently -- I  
25 mentioned we had some people go forward for that,

339

1 I'm active in the programs. I'm an active  
2 mentor. I started the OWL program. I'm the  
3 executive director. I get on college campuses and  
4 help recruit. I kick off college programs when we  
5 celebrate them onboarding. I'm involved.  
6 Q Okay. And then would your answer be similar  
7 for HR, what HR does?  
8 A HR is very involved. HR runs the high  
9 school. HR runs all the -- I can't talk anymore --  
10 the diversity programs and enjoy doing it and are  
11 active doing it.  
12 Q Okay. And what about in terms of developing  
13 talented women at Oracle?  
14 A We -- you know, our -- we have mentorship  
15 programs for women. We -- we reach out and  
16 customize training programs for women and our guys  
17 and our minorities. And we support our gay and  
18 lesbian and transgender populations equally as well.  
19 Q Okay. And have you ever said that women  
20 should be hired because they will work harder, and  
21 you can pay them less?  
22 A No. That would be insulting to myself.  
23 Q All right. And have you ever -- have you  
24 ever heard that said at Oracle?  
25 A Never.

338

1 but I've had men come forward, too, so -- to be  
2 perfectly clear over the years that men felt they  
3 weren't paid fairly, so -- which Fair Pay Act is  
4 Fair Pay Act for all.  
5 Q Okay. But regarding women, how many times  
6 do you think that's happened?  
7 A Recently I had -- there was -- we had five  
8 particular cases. I think two or three of them came  
9 directly to me, and I turned them over to the  
10 investigative team to follow through with them.  
11 One I knew personally and the other two, I  
12 did not know.  
13 Q Okay. And do you know if Oracle has ever  
14 done a pay adjustment based on race?  
15 A I'm sure we have. I'm sure, you know, over  
16 the years.  
17 MR. SHWARTS: The question is do you know of  
18 one --  
19 THE WITNESS: Do I know one right off the --  
20 no, I don't know one right off the top of my head.  
21 MR. SONG: Okay.  
22 MR. SHWARTS: Counsel, you have five  
23 minutes. I've been following the clock. You have  
24 five minutes.  
25 MR. SONG: Is that correct? I have five

340

1 minutes left?  
2 THE VIDEOGRAPHER: I would have to  
3 recalculate. I think last time --  
4 MR. SHWARTS: When we were teed up again,  
5 you had 35 minutes left.  
6 MR. SONG: Can we go off the record for a  
7 second?  
8 THE VIDEOGRAPHER: Going off the record, and  
9 the time is approximately 5:54 p.m.  
10 (Off the record from 5:55 p.m. to 5:57 p.m.)  
11 THE VIDEOGRAPHER: Going back on the record,  
12 and the time is approximately 5:57 p.m.  
13 MR. SONG: So this is Exhibit 70?  
14 MR. SHWARTS: Yep.  
15 (Exhibit 70 was marked.)  
16 BY MR. SONG:  
17 Q After you've had a chance to review it, just  
18 look up, please.  
19 A Okay.  
20 Q Okay. Do you recognize this document?  
21 A I don't.  
22 Q Okay. You've never seen these complaints  
23 before?  
24 A No.  
25 Q Okay. Is Lisa Hanson somebody that works

341

1 THE VIDEOGRAPHER: Yes.  
2 MR. SONG: Let me just show you Exhibit 71.  
3 (Exhibit 71 was marked.)  
4 BY MR. SONG:  
5 Q Have you seen this document before?  
6 A I haven't seen this document before, no.  
7 Q Okay. Are you familiar with Oracle's  
8 placement goals?  
9 A In general, yeah.  
10 Q Okay.  
11 A I haven't seen the goal sheet, but --  
12 Q Okay. And do you understand what the  
13 information is in this chart?  
14 A This is a headquarter report on -- that  
15 these are four goals. Is that what it is?  
16 Q Yes. And do you know --  
17 A I can barely read it.  
18 Q Okay. And when it says "Goal Placement Rate  
19 Percentage," the 77.56 percent that's next to "A-1,  
20 Administrative Non-Exempt," does that mean that  
21 you've reached 77.5 -- .56 percent --  
22 A I've never seen the goal sheet.  
23 Q Okay.  
24 A So if you're telling me it means that we're  
25 at 77.56 of our goals for admin assistants at

343

1 under you?  
2 A Yes, she does.  
3 Q Okay. And what is her job?  
4 A Oracle human resources. I don't know what  
5 specifically she is. I don't know if she's a  
6 business partner. It looks like.  
7 Q Okay. And she handled this complaint -- she  
8 handled these complaints on her own?  
9 A She handled all of these?  
10 Q Yes. That's my understanding.  
11 MR. SHWARTS: He's asking you a question.  
12 THE WITNESS: Oh. I don't know if she  
13 handled all of these on her own.  
14 BY MR. SONG:  
15 Q Okay. But these never came to you?  
16 A No.  
17 Q Okay. And is this through the hotline  
18 procedure or --  
19 A It doesn't look like it. It looks like a  
20 direct e-mail to their HR person.  
21 Q Okay. And you don't know how these were  
22 handled?  
23 A No.  
24 Q Okay.  
25 MR. SONG: What do I have? Two minutes?

342

1 headquarters, that's what it means.  
2 Q Okay. But you don't know?  
3 A Right.  
4 MR. SONG: Okay. Thank you. Then no more  
5 further questions.  
6 THE WITNESS: Okay.  
7 MR. SONG: Thank you.  
8 THE VIDEOGRAPHER: This concludes the  
9 deposition of Joyce Westerdahl on May 30th, 2019.  
10 It consists of five digital media. We're going off  
11 the video record at approximately 6:01 p.m.  
12 (Proceedings concluded at 6:02 p.m.)  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

344

1 STATE OF CALIFORNIA )  
 ) SS.  
 2 COUNTY OF ORANGE )  
 3  
 4  
 5  
 6 I, the undersigned, say that I have read  
 7 the foregoing deposition, and I declare, under  
 8 penalty of perjury, that the foregoing is a true and  
 9 correct transcript of my testimony contained  
 10 therein.  
 11 \_\_\_\_\_ I have made corrections to my deposition.  
 12 \_\_\_\_\_ I have NOT made any changes to my deposition.  
 13  
 14 EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
 15 20\_\_ at \_\_\_\_\_, California.  
 16  
 17  
 18  
 19 \_\_\_\_\_  
 JOYCE WESTERDAHL  
 20  
 21  
 22  
 23  
 24  
 25

345

1 / / /  
 2 true record of the testimony given by the witness.  
 3 (Fed. R. Civ. P. 30(f)(1)).  
 4 Before completion of the deposition, review  
 5 of the transcript [ X ] was [ ] was not requested.  
 6 If requested, any changes made by the deponent (and  
 7 provided to the reporter) during the period allowed,  
 8 are appended hereto. (Fed. R. Civ. P. 30(e)).  
 9  
 10 Dated: \_\_\_\_\_  
 11  
 12  
 13  
 14 MICHAEL G. MCMORRAN, CSR No. 13735  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

347

1 DEPOSITION OFFICER'S CERTIFICATE  
 2  
 3 STATE OF CALIFORNIA )  
 ) SS.  
 4 COUNTY OF ORANGE )  
 5  
 6 I, Michael McMorran, hereby certify:  
 7 I am a duly qualified Certified Shorthand  
 8 Reporter in the state of California, holder of  
 9 Certificate Number CSR 13735 issued by the Court  
 10 Reporters Board of California and which is in full  
 11 force and effect. (Fed. R. Civ. P. 28(a)).  
 12 I am authorized to administer oaths or  
 13 affirmations pursuant to California Code of Civil  
 14 Procedure, Section 2093(b), and prior to being  
 15 examined, the witness was first duly sworn by me.  
 16 (Fed. R. Civ. P. 28(a), 30(f)(1)).  
 17 I am not a relative or employee or attorney  
 18 or counsel of any of the parties, nor am I a  
 19 relative or employee of such attorney or counsel,  
 20 nor am I financially interested in this action.  
 21 (Fed. R. Civ. P. 28).  
 22 I am the deposition officer that  
 23 stenographically recorded the testimony in the  
 24 foregoing deposition and the foregoing transcript is  
 25 a

346

1 ERRATA SHEET  
 2 Deposition of: JOYCE WESTERDAHL  
 3 Date taken: May 30, 2019  
 4 Case: OFCCP/DOL vs. Oracle America, Inc.  
 5 PAGE LINE  
 6 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 7 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 8 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 9 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 10 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 11 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 12 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 13 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 14 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 15 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 16 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 17 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 18 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 19 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 20 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 21 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 22 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 REASON: \_\_\_\_\_  
 23  
 24 Signed \_\_\_\_\_  
 Dated \_\_\_\_\_  
 25

348

<b>A</b>			
<b>A-1</b> 343:19	<b>activities</b> 12:20 304:18 307:10	<b>African-American</b> 331:5	<b>analyzed</b> 120:4 313:16
<b>A-n-j-e</b> 15:9	<b>activity</b> 14:16	<b>African-Americans</b> 300:5 300:16 326:22	<b>analyzes</b> 307:12
<b>a.m</b> 2:16 6:2,8 86:2,3,4,8	<b>Acts</b> 59:3	<b>age</b> 260:17	<b>analyzing</b> 162:19,20,21
<b>AA</b> 297:13	<b>actual</b> 34:20 78:12 101:6 114:9 211:5,6 286:18 310:4	<b>agencies</b> 304:20	<b>and/or</b> 287:23 288:19
<b>AAP</b> 329:25 334:8,21,23 335:6,9,19	<b>add</b> 325:17 333:22	<b>agency</b> 309:21	<b>Andy</b> 50:18
<b>abide</b> 337:5	<b>added</b> 45:12 257:25 285:5 285:23 286:7	<b>agent</b> 172:1	<b>Angeles</b> 3:6
<b>abilities</b> 297:9	<b>adding</b> 325:5	<b>agents</b> 34:12	<b>Anje</b> 15:9 30:25 91:6 274:9
<b>ability</b> 9:12	<b>addition</b> 142:2 150:7 204:14	<b>aggregate</b> 243:12	<b>anniversary</b> 157:22
<b>able</b> 23:8 103:17 143:10 147:24 213:14 215:16	<b>additional</b> 185:5 186:22 199:24 200:8,14 248:5	<b>ago</b> 19:2 20:21 44:6 52:22 52:22 53:13,19 159:14 170:17 171:11,13,14,19 203:25 206:23 207:15 223:8,9 273:23 286:8 302:7 310:14 314:4 319:17	<b>annual</b> 29:17 39:23 55:21 106:6 111:24 158:1 324:23
<b>absolutely</b> 54:1 205:21 252:4,12 258:1	<b>address</b> 180:10 211:15 276:5 298:11 301:15 332:5	<b>agree</b> 227:23,25 253:20	<b>anonymous</b> 265:3
<b>Academy</b> 12:21 14:12	<b>addressing</b> 166:17 312:17	<b>agreed</b> 78:20 251:18,19	<b>answer</b> 8:11 23:20 24:4,9 25:18 26:7 28:17 29:5,18 36:10 39:2,9 53:2 55:18 65:11,24 66:17 67:18 69:11,20 79:4 81:20 82:3 83:15 88:13 90:3 92:6 96:21 97:3,15 98:3,10 99:14 100:19 102:8 105:1 105:11 106:12 110:1,11 111:17 112:14 113:17 115:8 116:20 117:18 118:2 118:12,22 120:13 122:2,24 124:11 125:22 128:4,16,23 129:6 131:9 134:7,9 135:24 138:24,25 142:5,21 153:11 162:23 163:24 166:10 168:4 169:5,19 172:11 173:21 174:13,16 175:3 177:7,22 178:8 181:14 183:8 190:8 192:23 193:14 194:2 197:14,15 201:17 202:5,25 204:17,25 207:9,20 208:8 209:11,25 212:24 215:19 216:19 217:7 218:4 221:21,24 222:15 223:2 224:21,23 225:15,22 226:7 232:15,22 233:19 237:23 240:18 242:4,6,10,15 245:8 248:12,20 249:16 253:19 256:15,24 257:6 258:13 264:6 270:12 290:10 297:23 301:5 311:1 312:22 314:7 315:6 316:18 326:11 327:12,19 328:13,24 329:4 331:24 333:20 335:16,17 336:4,11 337:4 338:6
<b>acceptable</b> 193:18	<b>adjust</b> 142:8	<b>agreement</b> 292:8,10,13	<b>answered</b> 157:17 161:15 202:24 240:10,11 327:23 333:19 336:3
<b>access</b> 165:15,23,25 166:5 243:7,8,9,13,17,19 244:2,9 244:14,15,17,20 246:13,25 302:23 306:10 319:23 320:4,8,13,13,21,24 321:2 321:8	<b>adjusted</b> 143:16	<b>ahead</b> 7:21 48:15 155:1 234:9 291:1 292:16	<b>answering</b> 84:20,20 177:16 219:23 241:6 316:6,21
<b>accommodate</b> 89:12	<b>adjustment</b> 141:8 225:2 339:8,10 340:14	<b>AI</b> 262:15	<b>answers</b> 236:1,10 261:7
<b>accomplished</b> 16:11 180:7	<b>adjustments</b> 139:22 224:19 226:11 227:9,13,14 282:1	<b>Al</b> 262:15	<b>anybody</b> 35:20 53:12 54:22 70:20 114:9,17 266:3
<b>accomplishments</b> 180:12	<b>admin</b> 343:25	<b>Alain</b> 50:8	
<b>account</b> 96:9 102:12 180:21 180:25	<b>administer</b> 6:21 277:5 346:12	<b>alcohol</b> 185:9	
<b>accountant</b> 268:22	<b>administering</b> 100:17 297:22	<b>alcoholic</b> 185:7	
<b>accuracy</b> 215:11	<b>administration</b> 297:8	<b>alerts</b> 58:21	
<b>accurate</b> 16:19 17:2 95:25	<b>Administrative</b> 1:2 2:2 343:20	<b>alike</b> 182:9 202:12	
<b>accurately</b> 24:6 207:10	<b>admonition</b> 24:13	<b>Alison</b> 14:24 43:18 91:8	
<b>Ackerman</b> 15:4	<b>ADP</b> 196:18	<b>ALJ</b> 225:20	
<b>acquisition</b> 43:5 71:14,20 121:21,22 122:21 184:14 184:16 186:10,13 189:5 194:21 215:25	<b>advance</b> 267:10 296:2	<b>alleging</b> 310:18	
<b>acquisitions</b> 48:21 194:23 194:24	<b>advanced</b> 187:3 247:19	<b>allergies</b> 9:19 168:11,12,21	
<b>Act</b> 340:3,4	<b>advantage</b> 268:25	<b>allocating</b> 114:16	
<b>action</b> 5:7 38:11 64:5 87:9 222:8 231:24 233:5 270:7 293:22 295:9,11,13 296:15 298:10,10,12 299:8,16 300:2,22 301:9,13,21 304:2,3,17,19,22 305:5,13 306:6,17 307:20 308:2,9 308:14,23 309:3 310:21 313:9 321:24 322:6,10,19 324:25 326:16,18 327:8,15 330:17 336:1 346:20	<b>advantages</b> 280:15	<b>allow</b> 225:17	
<b>actions</b> 233:3 240:5 288:1 307:9 332:5 337:21	<b>AdvantageU</b> 267:23 268:2 269:4,4,20 272:15	<b>allowance</b> 72:5	
<b>active</b> 140:23 157:2,21 295:14 338:1,1,11	<b>advice</b> 224:22	<b>allowances</b> 69:3	
<b>actively</b> 216:3 298:17,19 303:6 324:13	<b>advisory</b> 266:18	<b>allowed</b> 347:7	
	<b>affect</b> 193:11	<b>allows</b> 104:9	
	<b>affinity</b> 14:20 42:4,5 295:14 298:16	<b>Amazon</b> 21:1	
	<b>affirmations</b> 346:13	<b>ambitious</b> 254:25	
	<b>affirmative</b> 5:7 38:11 64:5 87:8 270:7 293:22 295:9 295:10,12 296:15 298:9 299:7,16 300:1,22 301:9 301:21 304:1,3,16,19,22 305:5,12 306:5,17 307:20 308:2,9,14,23 309:3 310:21 313:9 321:24 322:6 322:9,19 324:25 326:17 327:8,14 330:17 336:1	<b>America</b> 1:8 2:8 5:8 6:5 33:24 42:24 133:7 137:25 348:3	
	<b>Africa</b> 238:19	<b>American</b> 339:5	
		<b>Americas</b> 91:6	
		<b>Americas'</b> 14:18 15:9 45:2	
		<b>amount</b> 58:15 110:9,10 143:14 148:5 205:23 247:20,20 308:12	
		<b>amounts</b> 172:15 188:15	
		<b>analogy</b> 191:25	
		<b>analysis</b> 5:10 120:9 136:19 160:16 161:20 224:3,3 313:13 314:23 315:4	
		<b>analysts</b> 34:12	
		<b>analytics</b> 44:23 45:13 201:7 262:11	
		<b>analyze</b> 119:23	

<p>289:3 317:5,5 332:17 336:21 <b>anymore</b> 71:22 286:5 338:9 <b>anyplace</b> 332:25 <b>anytime</b> 285:13,14 <b>anyway</b> 33:5 105:24 176:4 245:8 308:12 339:5 <b>anyways</b> 14:10 <b>apologies</b> 24:18 <b>apologize</b> 165:13 <b>appeal</b> 234:5,14,17,23 264:19 265:6 <b>appealing</b> 234:11 <b>APPEARANCES</b> 3:1 <b>appended</b> 5:13 347:8 <b>applicant</b> 130:13 175:6,7 196:24 297:1 303:5 310:8 337:7 <b>applicants</b> 169:11,17 173:13,19 174:6 302:20 <b>application</b> 78:9 126:14 188:7 225:13 <b>applications</b> 19:16 20:7 21:5 126:15 192:3 268:21 277:16 <b>applied</b> 118:9 130:6 191:18 192:18,20 196:22 197:11 197:17 <b>applies</b> 130:13 <b>apply</b> 128:6,10 192:25 197:2 266:15,16 <b>applying</b> 130:14,16 <b>Appraisals</b> 4:14 <b>appropriate</b> 37:18 65:10 119:13 125:16 178:19 334:15 <b>appropriately</b> 134:10 183:2 <b>approval</b> 21:14,16 77:18,20 81:16 84:2,21 89:11,14,16 90:18 92:9 108:1,9 131:11 132:5,8 136:22 143:6,11 149:12 184:9 255:17 <b>approvals</b> 21:5,15,15 80:8 84:4,4,17 88:23 165:18 185:22 186:7 262:17 <b>approve</b> 21:8,9 77:23 83:8 90:23 108:8 110:4,4,7,9,17 110:18,23 111:1,4,5,7 131:6,14 132:11,12 143:10 143:13,17 147:24 148:9 149:7,7 255:4,9,20 <b>approved</b> 28:11 78:1 79:16 80:6,10,11,18,20,24 84:23 85:13 89:8 90:16 113:18 147:13,21,22 279:20,24 <b>approves</b> 84:22 115:22</p>	<p>253:16 266:4 <b>approving</b> 144:19 <b>approximately</b> 6:8 31:16 76:19 86:1,8 158:23 159:5 210:10,13 239:23 240:3 280:20,23 292:2,5,23 293:3 308:3 319:12,15 341:9,12 344:11 <b>architect</b> 249:7 <b>area</b> 60:24 104:9 126:3,6,10 164:6,7,17 172:7,21 213:14 215:12 229:10 241:7 273:5 276:18,18 297:25 299:23 301:23 329:17 <b>areas</b> 164:25 165:4 210:2 300:17 325:20 333:8 <b>arena</b> 260:10 <b>Argentina</b> 285:9 <b>arrived</b> 135:21 <b>art</b> 213:5 <b>Asia</b> 14:24 44:3 91:8 281:17 <b>Asian</b> 300:5 <b>asked</b> 33:6 41:9 46:25 57:10 81:22 95:14 99:1 106:14 120:22,24 121:6,11 140:10 149:11 153:3 161:14 162:14 165:13 169:23,23 174:2 222:21 223:3 224:6 240:8 254:7 264:4,5 314:3 319:17 333:18 334:20,24 335:5,11 336:3 <b>asking</b> 46:8 47:12,21 58:1,2 60:20 65:17 70:1 87:8 99:21 100:15 106:10 111:19 115:9 124:12 137:9 137:11 144:15 149:5,21 163:15 168:5 170:10,21 177:25 178:2,4 179:13 181:16 214:9 219:13 220:5 222:7,9 223:21 230:12 233:9 241:2,23 245:25 248:21 254:8,12 256:17 263:25 265:8 276:20 288:4 289:5 293:13 294:6 305:10 314:10 315:16 316:6 317:21,24 318:10,11 327:14,25 328:3,4,5,8 337:17 342:11 <b>asks</b> 8:10 60:23 120:25 249:22 <b>aspect</b> 52:15 <b>assessment</b> 220:1 221:9,15 221:18 223:16 224:12 <b>assessments</b> 219:8 220:6 222:19,25 224:18 240:6,17</p>	<p>242:9 336:13,15,19 <b>assign</b> 191:9 230:20 235:17 <b>assigned</b> 74:5 118:8 130:17 130:20 191:18 192:18,21 193:10 197:10 237:1 <b>assigning</b> 190:15 <b>assignment</b> 117:23 121:12 191:9 192:7 256:17 <b>assignments</b> 190:13,16 195:6,13 254:22 272:3 283:4 <b>assistants</b> 343:25 <b>assisting</b> 113:4 <b>assume</b> 94:14 124:3 151:17 151:24 167:24 201:3,3 212:18 214:9 335:21 <b>assumes</b> 113:15 270:10 301:4 315:15 327:11 <b>assuming</b> 199:25 306:20 316:2 <b>assurance</b> 164:22 165:6 <b>Atlanta</b> 326:21,23,23,24 <b>attached</b> 149:9 279:11 <b>attachment</b> 323:7,13,14,17 <b>attend</b> 296:5 <b>attended</b> 37:7 <b>attention</b> 253:2 <b>attorney</b> 8:10 230:9 346:17 346:19 <b>attorney-client</b> 225:12 <b>attorneys</b> 8:10 9:9 95:4 <b>attract</b> 332:1 333:13 <b>attracting</b> 332:7 <b>attrition</b> 202:8 <b>audibly</b> 29:5 53:2 <b>audit</b> 221:5,20 222:2,10 225:9 228:25 231:16 241:15 303:24 309:21 <b>auditoriums</b> 63:17 <b>audits</b> 219:24 220:5 221:4 221:12 224:15 308:12 <b>Austin</b> 63:25 68:3 285:25 <b>author</b> 53:16 94:7 294:14 <b>authority</b> 111:4 131:24 <b>authorized</b> 346:12 <b>automatically</b> 141:8 <b>available</b> 64:1 86:23 246:16 246:18 268:14 309:7 <b>Avenue</b> 6:11 <b>average</b> 300:16 330:3 <b>awarded</b> 113:9,18 <b>awarding</b> 114:10 <b>awards</b> 109:22 <b>aware</b> 161:8,9 192:16 206:13 214:8 215:10,15 217:8 226:25 227:5,12</p>	<p>233:25 238:14 245:10 266:12 267:8,24 294:8,10 329:22 336:15,21</p> <hr/> <p style="text-align: center;"><b>B</b></p> <hr/> <p><b>B</b> 4:8 5:3 233:4 <b>baby</b> 56:18 <b>back</b> 24:3 30:13 31:2 44:13 44:21 48:19 79:17 80:10 86:7 112:25 113:25 129:8 135:1 140:15 159:4,7 187:24 192:6 210:12 212:16 230:25 240:2 260:6 260:6 263:13 275:11 280:22 283:18 284:7 286:13,16 292:4 293:2 307:4 319:14 330:14 341:11 <b>background</b> 32:24 57:24 117:6 149:17 174:3 176:3 180:11 <b>bad</b> 98:22 104:8 202:10 236:5,8 <b>bag</b> 158:8 <b>Baghdanian</b> 3:15 6:9 <b>Baker</b> 69:8 <b>balances</b> 215:2 <b>ballpark</b> 7:11 <b>band</b> 67:2 73:25 92:8,12,14 97:9 98:21 100:4 117:20 119:16 130:19 141:3,4,4 205:5,5,7 206:19,20 207:3 290:13 <b>bands</b> 67:2 72:16 74:17 98:16 203:4 204:13,15,20 205:9,11,13,15 206:8,11 206:16,17,22 <b>Banner</b> 59:9 <b>bar</b> 172:15 185:7 269:6 <b>barely</b> 343:17 <b>base</b> 72:5 91:20 100:21 176:23 <b>based</b> 44:9 77:3 97:4 113:17 116:12 117:10 119:14 133:22 135:25 136:1,4,14 139:22 203:1,2 224:17,17 233:3 245:25 246:2 271:6 271:7 289:23,24 299:12 326:16 330:1 336:19 339:8 339:10 340:14 <b>basic</b> 165:7 202:7 <b>basically</b> 80:12 113:2 268:9 279:11 <b>basis</b> 66:18 175:18 178:7,18 241:20 302:21 <b>Baxter</b> 229:23 230:16</p>
--	--	--	---

**Bay** 213:13 301:23  
**beginning** 2:16 32:9 66:13  
 86:5 113:22 128:9 159:2  
 239:25 292:25  
**begins** 112:5  
**behalf** 2:15 6:15,18 65:11  
 147:22,23,25 223:19  
 314:15 322:1  
**behave** 39:12  
**believe** 10:16 38:9 54:6 64:4  
 66:5 74:16 86:24 133:12  
 133:12 149:1 154:4 163:19  
 164:3 166:7 191:15 201:25  
 205:16 213:4 227:12 228:5  
 253:12 278:25 284:24  
 298:5,5 304:5 307:8  
 311:15 315:7 323:14 324:4  
 337:19  
**believed** 323:20  
**ben** 43:22  
**bench** 197:6  
**benches** 191:24  
**benchmarking** 138:1  
**benefits** 12:19 14:15 33:23  
 42:23,24,24 56:19,25 57:1  
**best** 48:4 77:6 96:3,21 115:9  
 171:8,21,22 172:3 337:22  
**bet** 87:21 88:16 216:9  
**better** 45:16 72:23 114:20  
 293:10 297:5 300:15,18  
 326:24  
**beverages** 185:8  
**beyond** 200:24 207:13  
**big** 63:25 67:15 130:8  
 188:10 193:16 254:25  
 272:9 285:11 320:16  
 326:22  
**Bill** 209:2  
**bio** 16:15,21 17:6 31:2  
**biography** 4:10  
**bios** 149:19 150:12,13,15  
 173:5  
**bit** 12:23 16:11 34:7 67:1  
 72:1,24 108:6 129:21  
 138:15 159:7 213:4,5,25  
 232:21 240:13 277:7 314:5  
**Blanc** 50:8  
**blood** 312:1  
**board** 13:17,18 106:23  
 108:11 109:13 184:18  
 346:10  
**body** 210:5 323:7,9,17  
**bonus** 22:1 76:22 106:6,7  
 106:14,21,25 107:1,4,14  
 112:12,16,19,22,24 113:7  
 113:14,21 114:2 115:16,21

115:25 143:5 213:17 276:9  
 277:5 279:10,12,20  
**bonuses** 27:13 110:24  
 111:1,4,7 112:5 113:6,9,18  
 114:10,15,16,18 185:4  
 186:1 188:22 276:22  
**book** 15:6 62:12  
**bore** 7:23 48:3,5  
**boss** 68:8 248:23 265:18  
 281:21  
**bottom** 93:19 147:17 275:9  
 275:13 276:4,25 287:19  
**bought** 19:13 43:5 44:6 72:2  
 186:23 187:6,21 188:14  
 286:6,9  
**box** 103:18 176:21  
**boxes** 282:25  
**braces** 29:7 39:18  
**brag** 298:14  
**brain** 36:19 109:15 210:4  
 298:22 319:1  
**brainpower** 316:7  
**break** 8:13,16 56:4 64:10,13  
 64:20 65:1 73:5 84:13  
 85:20 158:19 168:20 210:4  
 210:7 239:19 260:11 261:9  
 261:10 280:11 292:17  
 319:9  
**bribes** 37:19 38:21  
**brief** 33:3 153:14  
**briefings** 308:10,13 309:16  
 309:18  
**brightest** 208:22  
**brilliant** 208:11 250:5  
**bring** 10:25 69:14 143:15  
 183:1 184:23 283:18  
**bringing** 68:2 187:13 191:2  
 204:3 311:23  
**brings** 226:18  
**broad** 55:7 71:18 206:1  
**broadcasts** 273:18  
**broke** 250:17  
**broken** 133:19,25  
**broker** 250:18  
**brought** 17:21 203:25 204:4  
 204:10 252:9 253:1 272:18  
 285:1  
**budget** 68:10,23 76:13,16  
 76:25 77:1,1,9,17,18 78:1  
 78:24 79:14,16 80:13,18  
 80:24 85:16 107:17 108:5  
 108:7,8,8 115:21 144:4  
**budgeting** 43:12  
**budgets** 77:22 79:13 80:19  
 143:21 282:7  
**build** 46:15 203:3

**building** 185:12 191:24  
 295:24 326:3  
**built** 33:11 165:18 203:24  
 204:6 295:24  
**bullet** 296:12 298:8 302:17  
**bunch** 253:8  
**Burke** 151:13  
**burn** 90:11  
**business** 15:10 17:21 18:10  
 20:18 21:12,20 33:1,12,15  
 33:16 34:8,16 43:7 44:23  
 55:18 85:17,18 90:25  
 98:14 105:3 129:11,12  
 131:2 132:17,18 136:17  
 155:14 158:10 185:25  
 186:11 189:8,14 201:6  
 218:11 244:3,12 247:25  
 262:11,11 268:5 272:16  
 286:7 342:6  
**businesses** 17:16  
**buy-in** 253:22  
**buying** 184:25 185:1,19  
 195:18

**C**

**C** 3:4  
**cabinets** 17:19  
**cadence** 55:8,17 155:14  
**calculate** 79:12  
**calculates** 79:7  
**calculation** 113:21  
**California** 1:16 2:16 3:6,11  
 6:1,12 182:13 183:4 245:6  
 258:18 345:1,15 346:3,8  
 346:10,13  
**call** 20:1,24 27:4,6 34:21  
 52:4 55:2 57:1 59:9 76:12  
 78:20 88:18 92:21,22  
 181:18 265:2  
**called** 14:25 48:18 58:12  
 59:9 74:19 78:4 133:4  
 187:21,25 188:14 287:21  
**calling** 174:11 216:13 278:2  
**calls** 39:1 120:11 153:9  
 214:22 248:18 249:14,24  
 253:17 290:8 297:20  
 310:25 337:3  
**campus** 295:20  
**campuses** 338:3  
**Canada** 52:18  
**candidate** 4:15 117:6 121:1  
 178:15 179:8,19 180:5,13  
 297:6  
**candidates** 118:4 268:12  
 299:1 311:23 337:23  
**capacity** 65:9 100:16 125:17

**capital** 27:8  
**caps** 91:10  
**capture** 57:21  
**capturing** 297:4  
**car** 72:5 272:11  
**care** 150:23 189:10 262:13  
**career** 34:25 35:10 69:23,24  
 96:11 97:12,18 99:9,22  
 100:2 103:23 129:4 207:11  
 257:4 260:20 268:17,19,24  
 269:19 272:22 290:7  
**careers** 71:11 267:11 268:5  
 271:10  
**careful** 245:2  
**Carrelli** 15:17  
**case** 1:4 2:4 6:6 9:15 11:13  
 121:21 126:8 208:25,25  
 228:12 348:3  
**cases** 188:13 254:6 340:8  
**cash** 195:21,24  
**Cassity** 295:19  
**catch** 313:2  
**catches** 266:6  
**categories** 125:4,7,24 206:1  
**category** 73:12 208:15  
 309:22 319:7  
**Catz** 13:15 14:2 149:11  
 244:2 294:23 324:17 334:8  
 334:13,18,20  
**Catz's** 48:12,17 281:8  
**caution** 246:6  
**CC** 147:13  
**cc'd** 149:2 281:6  
**cease** 112:9  
**ceiling** 92:4  
**celebrate** 338:5  
**cells** 319:1  
**center** 19:7,10,15 143:19,21  
 144:1 295:25  
**centers** 20:19 143:25 144:4  
 285:15  
**Central** 6:11  
**CEO** 13:17 49:20 217:24  
**certain** 58:14 63:22 94:21  
 102:21,24 107:6 110:9  
 133:6 141:6 143:14,16  
 148:5 155:14 166:18 200:7  
 238:24 269:16 297:4  
 310:20 311:4  
**certainly** 82:24 102:15  
 118:18 119:4 133:6,7  
 134:8 150:12 170:4 171:4  
 172:12 173:25 182:17  
 200:17 202:7 208:19 209:1  
 215:20,20 220:4 242:21  
 246:4 252:15 255:11 260:9

<p>260:20 262:10 265:16 300:16 305:22 308:11,13 309:15 312:11 <b>Certificate</b> 346:1,9 <b>certificates</b> 246:21 <b>certifications</b> 200:15 <b>certified</b> 2:18 199:23 200:7 346:7 <b>certify</b> 346:6 <b>cetera</b> 40:21 41:8 47:9 62:2 125:15 173:1 182:1 244:19 <b>CFO</b> 33:5 <b>chain</b> 35:19 45:22 136:22 214:5 253:14 265:21 <b>chair</b> 109:1 <b>challenge</b> 217:15,18,25 239:14 300:19 <b>challenged</b> 217:9,11 218:12 266:1 <b>challenges</b> 218:14 <b>challenging</b> 218:25 <b>chance</b> 9:8 93:13 147:3 148:20 167:10 176:13 274:22 341:17 <b>change</b> 20:18,19,19 46:22 53:7,9 59:2 72:5,6 88:21 89:2,11 110:13 112:9 134:22 138:2,17,18 143:19 143:20,25 171:10 181:20 189:2 227:24 256:13 257:1 257:3,18,18,22,25 262:25 281:19 286:20 348:4,5,7,8 348:10,11,13,14,16,17,19 348:20,22 <b>changed</b> 55:14 257:23 274:1,2,5 286:12,20 <b>changes</b> 9:8 20:23 89:13,20 89:25 90:8 107:23 225:6 226:2,20 227:25 278:17 281:10,14 282:4 345:12 347:6 <b>changing</b> 189:4 246:8 <b>channels</b> 192:5 <b>chapter</b> 310:6,9 336:24 <b>Charles</b> 3:4 6:15 240:19 335:11 <b>Charlie's</b> 94:17 <b>chart</b> 46:6,8,9 106:4 125:25 126:18,20,22,23 127:5,6,8 130:2 132:23 176:20 343:13 <b>charter</b> 295:20 <b>Cheadle</b> 281:11 <b>Cheadle's</b> 281:15 <b>cheating</b> 229:12,13 238:18 <b>check</b> 64:25 174:3 176:3,7</p>	<p>184:8 215:2 <b>cherishing</b> 334:6 <b>chief</b> 13:21 <b>childbearing</b> 260:3 <b>choice</b> 61:21 246:7 <b>Chris</b> 71:9 281:11,15 <b>Christie</b> 15:6 <b>Chuck</b> 281:19 <b>cited</b> 97:19 <b>City</b> 2:15 <b>Civ</b> 346:11,16,21 347:3,8 <b>Civil</b> 346:13 <b>claim</b> 226:18,18 <b>clarification</b> 182:10 <b>clarify</b> 24:20,21 65:18 97:8 212:16 <b>clarifying</b> 86:21 <b>class</b> 37:25 38:4,12,16 <b>classes</b> 250:4 268:23 326:1 <b>classroom</b> 63:24 295:25 <b>classrooms</b> 63:23 296:1 <b>clean</b> 286:3 <b>cleanup</b> 285:16 <b>clear</b> 26:21 40:23 76:1 86:10 95:13 189:19,24 195:18 275:10 340:2 <b>clearly</b> 35:17 90:12 153:17 296:3 <b>clerks</b> 18:8,9 <b>client</b> 37:19 <b>clock</b> 340:23 <b>close</b> 76:21 234:1 <b>closed</b> 239:5 <b>closest</b> 51:23 <b>cloud</b> 17:23 18:23 19:3,20 22:14 27:5 105:23,25 135:8,10 165:11 171:18,24 172:6 276:15 277:15,15,20 278:6 283:7,11 284:4 <b>cloud-based</b> 19:7 <b>co-CEO</b> 13:19 191:23 <b>Cochran</b> 15:8 <b>code</b> 18:2 86:25 92:14 100:2 101:9 130:4,10,14,17,21 130:21 131:1,5,7,12 136:25 137:3 145:3,5,7,12 145:12 212:19 228:15 236:24 262:15 265:2 306:21 346:13 <b>coded</b> 19:8 <b>codes</b> 75:12 97:18 123:23 131:15 136:25 <b>coffee</b> 64:18,23 90:13 <b>cohosting</b> 295:15 <b>collapse</b> 278:12 <b>colleagues</b> 47:2,5 244:18</p>	<p><b>collect</b> 246:23 296:21 <b>collecting</b> 284:15 <b>collects</b> 296:20 <b>Colleen</b> 295:19 <b>college</b> 67:25 68:5,13,16,18 73:21 91:15,23 200:24 209:3 216:4,5 248:7 268:19 301:17 325:25 326:3 333:2 334:5 338:3,4 <b>colleges</b> 299:1,4 <b>color</b> 161:5 162:6 300:11 301:22 302:9 332:25 <b>colored</b> 270:14 <b>combination</b> 68:21 129:9 193:7 <b>come</b> 11:18 12:4,6 21:7 23:4 33:6 60:15 66:21 71:20 72:3 104:17 109:1 132:13 162:4 193:4 194:4 197:23 198:9,11 202:21 203:13 205:10 227:2,4 230:25 240:18 245:18 255:24 312:24 317:16 324:4 326:13 334:12 340:1 <b>comes</b> 77:16,17 80:10 121:22 154:12 232:18 236:19 238:20 255:6 <b>comfortable</b> 120:16 <b>coming</b> 7:4 76:18 117:12 137:25 153:17 182:11 187:4 195:15 235:2 246:5 271:19 303:9 312:8,9 <b>command</b> 214:5 253:15 265:21 <b>commentary</b> 27:25 <b>committed</b> 296:2 <b>committee</b> 45:2 54:17 108:9 108:10,11 109:14,17,18,19 109:24 147:14 148:2,8 149:5,6,12 173:5 180:2 <b>committees</b> 150:20 200:19 <b>common</b> 89:24 <b>communicate</b> 233:20 249:3 <b>communicated</b> 59:4 137:1 227:15,23 233:23 235:11 263:11 266:24 <b>communicates</b> 238:22 <b>communicating</b> 40:2 298:9 <b>communication</b> 228:1 252:17,18 263:21,25 264:3 264:14,16 275:17 282:15 <b>communications</b> 14:21 40:6 42:9 59:17 76:17 222:8 228:3,6 239:4 275:18 <b>communities</b> 298:20 <b>community</b> 282:16,17</p>	<p><b>commutes</b> 100:3 <b>comp</b> 12:19 43:22 45:1,1 61:17,18,22 69:10 70:17 70:22,23 71:3,4 73:23 74:9 75:19 79:24 83:11,13 89:8 107:11 108:9,10 109:14,17 110:3 137:19 138:2,8,12 138:16 139:2,3,7,10,16,22 139:25 140:11 141:7,19,24 142:2 146:2 148:8 149:5,6 149:12 173:5 180:2 182:14 182:15,22,25 184:2 187:16 193:17 199:22 200:4,11,15 200:18,18 201:11,18 203:14 210:15,17,22 211:1 211:6,12 212:8,13,15,21 213:4,11 215:2,10,12 233:1 234:18 236:3 238:16 239:1,1,12 273:5 276:14 284:5,9 288:25 289:14 312:12 327:7 329:1 <b>compa</b> 137:7 165:25 183:5 187:11 <b>companies</b> 20:21 22:9 23:5 59:8 116:7 136:1 166:7 208:20,21 236:18 325:18 333:6 <b>company</b> 14:25 15:1 21:17 43:5,6,22,23,25 44:5 65:12 69:17 102:19 112:7,9,11 112:12,15,19 113:4,5,8,10 114:17 133:3,4 150:15 187:6,21,25 188:5,14 195:19 223:15,19,19 229:2 246:5 261:2 271:11 277:18 286:9 320:17 322:21 332:2 333:1 <b>company's</b> 113:14 <b>comparable</b> 47:8 287:24 <b>compare</b> 100:25 101:17 194:24 287:22 288:11,18 289:22,22 <b>compared</b> 125:6 155:10 184:22 276:23 <b>comparing</b> 288:3,8 289:7 290:14 <b>compensation</b> 14:17,18 27:10,14 45:2 52:6 61:3,4 61:5 65:5,6,21 66:4,9,11 78:5,8 87:13 88:20 89:19 90:8 96:8 97:25 98:8,12 99:11,25 100:7 102:5 106:5 107:21 109:17,19,24 124:4,9 144:6,9,17,20 145:16 147:14 148:1 160:16 161:13,20 162:19</p>
---	---	---	---

<p>162:20,21 163:9,18 168:6 176:22 186:4 193:12 198:8 201:9 213:23 214:7 215:14 226:3 230:7,7 233:6,10 238:12 276:9 277:4,4,8,12 277:13 278:3 283:21 284:1 284:22 286:11 287:20 321:23 322:5,6 327:4,5,9 327:14,15,18 330:6,7,10 333:9 336:1</p> <p><b>compensations</b> 201:5 <b>competencies</b> 67:3 162:4 198:10 200:2 271:6 <b>competency</b> 73:25 <b>competent</b> 136:8 270:20 <b>competing</b> 170:5,6 325:21 <b>competitive</b> 35:4 202:3 301:23 <b>competitors</b> 77:5 136:5 207:25 <b>complain</b> 264:22 <b>complaint</b> 62:6 166:16 227:20 229:1,18 230:6,7 230:20 232:9 233:15 236:19 237:21 238:8 239:13 250:10 342:7 <b>complaints</b> 88:15 227:9 228:7 233:1,2,3,5,8,10 235:16 236:21 237:8 264:23 341:22 342:8 <b>complete</b> 284:13 <b>completed</b> 9:6 152:7,20 284:23,24 285:2 <b>completely</b> 10:20 187:22 272:21 <b>completion</b> 153:1,4 347:4 <b>compliance</b> 1:4 2:4 36:15 37:4,5,9,12,16 38:16 42:10 63:6,7 297:13 307:13 <b>complicated</b> 116:4 163:7 212:12 <b>complied</b> 310:18 <b>component</b> 308:25 <b>compound</b> 25:17 28:16 251:11 253:18 <b>comprehensive</b> 21:19 <b>computer</b> 75:1 105:23 131:25 132:1,2 283:20 <b>computers</b> 11:19,19 <b>concerning</b> 211:8,9 <b>concerns</b> 226:4,11,19 <b>concierge</b> 173:25 <b>concluded</b> 344:12 <b>concludes</b> 292:20 344:8 <b>conclusion</b> 310:25 337:3 <b>conditions</b> 110:20</p>	<p><b>conduct</b> 86:25 142:3 223:16 228:16 236:24 265:2 306:16,21 310:3 <b>conducted</b> 36:20 116:14 155:13 220:3 221:8,14 222:2,10 224:18 273:24 308:15 313:3,8,13 314:23 315:4 <b>conducting</b> 220:1 224:12 <b>conducts</b> 221:5 <b>confidential</b> 5:10 242:12,16 <b>confidentiality</b> 242:19 292:8 292:10 <b>confirm</b> 241:25 <b>confuse</b> 71:12 <b>confused</b> 41:25 86:16,17,17 164:21 277:7,23 278:7 <b>confusing</b> 99:16 138:16 204:19 214:1 <b>conscious</b> 325:8 <b>consider</b> 140:3,25 161:16 162:1,2,9,11 163:17 164:1 164:3 201:24 210:22 261:19 267:25 269:20,25 270:19 318:18 319:6 <b>consideration</b> 172:5,8 <b>considerations</b> 169:7,10 287:20 <b>considered</b> 160:15,22 161:7 161:12,20 162:18,21 163:8 169:1 258:2,7,25 259:10 261:16 <b>considering</b> 163:14,21 164:4 261:4 269:21 270:23 <b>consistent</b> 119:25 <b>consists</b> 344:10 <b>constantly</b> 75:7 172:14 325:16 <b>constitute</b> 181:20 <b>consult</b> 25:23 26:9 <b>consultant</b> 26:19 <b>consultants</b> 223:15 <b>consulted</b> 26:23 59:21 61:16 92:1 152:3 <b>consulting</b> 33:12,15 106:25 <b>contact</b> 268:15 269:3 <b>contagious</b> 168:24 <b>contain</b> 241:14 <b>contained</b> 87:5 107:20 129:22 135:18 151:11 186:14 345:9 <b>content</b> 60:9,12 <b>contents</b> 167:15 168:13,15 <b>continual</b> 207:1 <b>continually</b> 327:2 <b>continue</b> 332:23</p>	<p><b>Continued</b> 5:1 <b>continuing</b> 86:6 159:3 200:21 240:1 293:1 <b>continuously</b> 17:11 <b>contract</b> 1:4 2:4 164:17 <b>contractor</b> 337:10 <b>contracts</b> 37:20 <b>contributing</b> 136:11 189:16 <b>contributor</b> 31:14 249:8 260:8 <b>contributors</b> 127:17 260:5 <b>control</b> 185:10 196:18 <b>controls</b> 36:17 <b>conversation</b> 103:21,25 156:13,15,16 193:1 195:17 228:2 250:18 263:15,18 265:18 266:17 283:1 329:19 <b>conversations</b> 140:16,23 222:8 324:13 <b>convert</b> 31:3 <b>converted</b> 19:20 295:25 <b>convey</b> 130:3 <b>convicted</b> 9:22 <b>convincing</b> 195:23 <b>copied</b> 287:6 <b>copies</b> 293:10 <b>copy</b> 9:7 86:24 151:3 185:11 <b>core</b> 54:12 283:5 285:14,15 <b>Core</b> 48:7,16 <b>corporate</b> 106:6,7,14,21 276:9 <b>correct</b> 12:2,4 14:3 17:7,10 18:22 25:13,16,19 27:2,4 27:12,18 28:3,4 30:1,2,18 45:4,5 51:20 75:21 77:14 81:1,2,5,6,13 82:12 89:15 94:4 95:10,16,25 96:4,25 101:3 107:19,22 108:2 111:10,14 112:2 115:23 121:24 127:20 131:5 132:25 141:17 143:8 147:19 151:23 158:15 166:21 182:2 191:15,19 195:7,10 199:6 200:23 203:8 222:17 230:10,12 244:7 246:14,15 252:4 256:3 263:22 276:1,6 277:6 279:25 281:18 282:3 284:16 305:13 319:23,24 320:6,7 329:20,21 340:25 345:9 <b>correcting</b> 321:5 <b>corrections</b> 345:11 <b>correctly</b> 215:5 230:5 325:1 <b>correspondence</b> 11:11</p>	<p><b>cortile</b> 136:14 210:24 <b>cost</b> 20:18 143:19,21,25 144:1,4 285:15 <b>cost-effective</b> 185:13 <b>counsel</b> 6:13 10:2,21 11:10 11:11 12:20 50:25 224:23 225:3 309:17 340:22 346:18,19 <b>counseling</b> 102:18 <b>counselors</b> 268:19 <b>count</b> 7:10 144:5 208:14,15 <b>counteroffer</b> 147:21 <b>counterproposal</b> 147:24 <b>countries</b> 17:18,19 23:12,16 33:16 63:23 79:12,13 80:3 133:9 137:24 184:1 284:14 284:18 <b>country</b> 18:1,4 23:7,8,17 24:8 25:11 52:14 75:13 76:13,16 77:4,9,11,12,22 78:2,24 134:2 199:8 267:6 269:18 285:4,4 <b>counts</b> 208:14 <b>COUNTY</b> 345:2 346:4 <b>couple</b> 17:5 68:11 284:25 303:15 <b>course</b> 141:11 207:2 237:25 245:12 300:18 326:2,24 <b>courses</b> 63:8 272:20 <b>coursework</b> 264:17 <b>court</b> 6:10,20 8:2 346:9 <b>courting</b> 196:2 <b>cover</b> 37:12 38:7,9 248:24 261:21 313:6 <b>covered</b> 73:17 203:5 208:1 233:18 334:2 <b>covering</b> 317:15 <b>covers</b> 37:17 111:21 <b>CPI</b> 77:3 <b>cradle</b> 22:3 <b>crafted</b> 272:21 <b>crazy</b> 73:7 <b>create</b> 166:4 205:12 <b>created</b> 124:21 152:16 <b>creates</b> 114:7 <b>crime</b> 9:23 <b>criteria</b> 113:8 248:2 <b>criticism</b> 300:6 <b>cry</b> 9:17 <b>crying</b> 168:10 <b>CSR</b> 1:24 346:9 347:13 <b>culture</b> 39:20 166:4 213:20 245:22 337:15 <b>curious</b> 170:25 283:25 289:21 <b>current</b> 12:14 32:18 94:20</p>
--	--	--	---

<p>219:17 220:7,16  <b>currently</b> 16:2 33:16 110:14  122:4 150:14 170:6 227:7  289:25  <b>curriculum</b> 199:25  <b>customer</b> 38:16 229:12  295:25  <b>customize</b> 338:16  <b>cut</b> 77:25  <b>cutoff</b> 11:15  <b>CVC</b> 295:24  <b>Cyberg</b> 43:18  <b>cycle</b> 146:3</p> <hr/> <p style="text-align: center;"><b>D</b></p> <p><b>D</b> 4:1 5:1  <b>Daley</b> 37:8  <b>data</b> 5:10 12:24 14:13 19:7,9  19:15 133:17 136:2 191:8  202:12,13 203:2 205:12  242:8 285:8,16,17,17,17  285:23 297:4 311:25  313:14,16 314:24 315:5  337:7  <b>database</b> 29:21,23 30:5  <b>databases</b> 30:8  <b>date</b> 6:7 94:22 117:11  157:22 223:3 283:14 348:2  <b>dated</b> 4:11,13,17,18,20,21  5:5,6 347:10 348:25  <b>Dave</b> 47:21 50:8  <b>Davidson</b> 43:1  <b>day</b> 142:14,16 311:14,22  317:22 318:11,11 326:19  345:14  <b>day-to-day</b> 66:18  <b>days</b> 20:20  <b>deal</b> 173:21 174:10 180:19  184:24  <b>deals</b> 66:10 185:23 187:18  <b>deans</b> 68:25 298:25 325:14  332:16  <b>debate</b> 130:8  <b>decide</b> 66:14 69:2 81:11  82:14  <b>decided</b> 70:8 143:23 247:7  268:20  <b>decides</b> 81:4 231:23 266:7  <b>deciding</b> 260:14 261:5,19  <b>decision</b> 82:17 130:25 146:2  180:22 184:6 193:3 216:14  232:9,23 234:5 238:9,10  238:22 239:1,13 250:9  263:4,7,11 264:19 265:6  265:25  <b>decisions</b> 83:5 114:14</p>	<p>145:24 185:17 188:8 189:6  193:6 217:16 218:25  231:25 235:11 237:21  259:25 262:22  <b>declare</b> 345:7  <b>deemed</b> 234:25 235:1  <b>deep</b> 83:18  <b>Defendant</b> 1:9 2:9 3:8  <b>deficiencies</b> 298:11 300:23  301:3,6,7  <b>deficient</b> 322:11 324:13  330:2,2  <b>Define</b> 115:17  <b>defined</b> 285:6  <b>definitely</b> 329:7  <b>degree</b> 208:12  <b>degrees</b> 60:7 117:9 200:5  200:12 201:2  <b>deliberately</b> 225:11  <b>deliver</b> 76:2  <b>delivered</b> 323:17  <b>delivering</b> 102:23  <b>delivers</b> 37:8  <b>demand</b> 55:12  <b>denials</b> 262:17  <b>Denise</b> 43:10  <b>deny</b> 219:1,1  <b>department</b> 1:1,5 2:1,5 3:3  40:14 49:11 57:11 60:1,22  61:1,15 69:7 73:15 74:3,13  77:10 83:4,22 94:12  119:12 121:11 124:2,4,9  136:23 139:7 151:23  152:25 157:10 201:9 229:8  289:10,15 290:3 315:3  328:18 329:1  <b>departments</b> 41:8,11 47:3  48:2 49:8  <b>depend</b> 23:9 70:5 150:18  195:15 238:11,13,24 239:2  <b>depending</b> 52:13 68:12 99:7  132:9 134:21 180:15  189:10 228:23 229:18  231:16 232:20 236:11  <b>depends</b> 28:18 55:17 61:2  75:2 105:2 182:8 258:10  303:16 324:12  <b>deponent</b> 347:6  <b>depose</b> 178:12  <b>deposed</b> 124:10,13 297:22  <b>deposition</b> 1:14 2:14 6:4 7:5  9:6,12,25 10:23 11:5 85:25  86:6 92:17 158:22 159:3  177:13 178:10 239:21  240:1 292:22 293:1 344:9  345:7,11,12 346:1,22,24</p>	<p>347:4 348:2  <b>depositions</b> 7:24 8:21,24  <b>describe</b> 65:6  <b>description</b> 4:9 5:4,14 136:9  165:22  <b>descriptions</b> 198:1,3,5,14  199:20,21  <b>deserve</b> 252:4  <b>deserves</b> 252:7  <b>design</b> 60:13 296:17  <b>designed</b> 113:3 297:12,17  298:3,13  <b>designing</b> 59:18 296:13  <b>desire</b> 299:5  <b>desperately</b> 241:8  <b>despite</b> 316:12 318:6  <b>destroyed</b> 330:18  <b>detail</b> 24:21 205:25  <b>detailed</b> 83:19,19  <b>determination</b> 129:4,8  184:4  <b>determinations</b> 136:16,21  218:1  <b>determine</b> 35:3 73:24 80:2  91:20 136:7 158:13 162:8  164:2 183:18 201:15  204:22 206:20 212:22  217:4 273:4 289:15 290:19  296:14 297:12  <b>determined</b> 70:8 71:16  79:16,22 113:8 127:25  130:15,22 137:1 182:20  184:15  <b>determines</b> 107:4  <b>determining</b> 66:21,23 67:5  67:14 78:11 96:7 99:24  144:13 160:21 161:13  162:10 163:9,18,22 169:1  172:5,9 187:15 189:16  195:5,13 196:5 201:13  203:7,10,19 206:16,17  207:17 208:2 209:6,20  261:16 262:2  <b>developed</b> 77:2 288:7  <b>developer</b> 197:17  <b>developers</b> 60:15 61:16  188:21 195:24  <b>developing</b> 25:21,24 80:13  338:12  <b>development</b> 25:25 26:10  26:17,23 34:1,14,24 41:23  42:1 47:9 50:14 60:5 70:25  91:16,17,19,24 99:6 101:5  105:6,9 107:3 135:5  151:18 154:14,15 156:20  158:6 164:21 181:10</p>	<p>198:12 201:6 217:22  274:14 276:18 278:16  279:10 299:2 325:12 333:3  <b>develops</b> 77:21  <b>devote</b> 32:19  <b>dial</b> 295:11  <b>dicey</b> 207:14  <b>died</b> 57:4  <b>diff-</b> 71:15  <b>difference</b> 127:13  <b>differences</b> 52:17 75:13,14  <b>different</b> 17:18 19:10 23:19  26:17 29:21,23 31:25 32:1  32:5,6,23 40:17 47:3 49:8  65:13 71:16 72:4 83:17,18  91:16 98:21 99:4,20  102:21,22 108:7 116:7  118:8 130:20 150:10  162:13,24 165:12 173:24  174:5 182:16,17,24 183:19  184:24 185:3 188:2 192:18  193:11,17,20,24 194:20  195:2 196:22 197:11  229:17 232:12 235:6 236:1  236:10 240:13 250:2,20  252:1 256:22 257:13,21  258:14 259:25 266:21  269:17,17 272:4 274:13  275:8 288:13 307:22  316:25 319:4 327:24  334:11,11  <b>differently</b> 19:8,9 186:10  187:10,20 189:1  <b>difficult</b> 32:4 41:13  <b>digital</b> 344:10  <b>direct</b> 13:1 40:24 41:7 42:17  42:18 45:20 81:7,8 91:5  103:1 157:18,19 247:3,4  250:25 259:12 263:17,19  267:22 281:21 300:10  320:9,13,25 321:3,7 322:5  342:20  <b>direction</b> 112:10 245:11  <b>directly</b> 27:1 34:8 45:25 83:9  91:4 105:11 132:10 216:8  238:15 250:13,15 324:3  334:13,16 335:1 340:9  <b>director</b> 192:9 256:13 321:6  321:7 338:3  <b>directors</b> 108:12  <b>directs</b> 39:22 102:24 247:20  254:19 324:8  <b>disability</b> 302:21  <b>disagreed</b> 252:20  <b>disagreement</b> 311:4  <b>disagreements</b> 235:8</p>
---	--	--	--

<p><b>disagrees</b> 264:18  <b>disaster</b> 12:25  <b>disclose</b> 241:1  <b>discover</b> 318:24  <b>discovery</b> 11:15 177:11  <b>discretion</b> 112:9 113:10  <b>discretionary</b> 112:6 113:3 257:1  <b>discrimination</b> 310:20  <b>discriminatory</b> 303:7,11 337:24  <b>discuss</b> 24:20 38:17 244:25 245:12,17,19 305:16 333:9  <b>discussed</b> 104:20 111:14 112:1 254:19 283:2 335:7  <b>discussing</b> 22:12 241:3 245:24  <b>discussion</b> 24:10 141:13 142:6 157:4 173:15 206:4 210:8 217:11 222:6,12 241:9 247:16 254:22 255:19 256:9 261:13  <b>discussions</b> 83:20 231:21 232:11 245:7 254:15,16  <b>disliked</b> 276:23  <b>disparities</b> 315:14,25 316:3 317:6,25 319:4,18  <b>disparity</b> 318:17,20 320:10  <b>dispute</b> 311:3  <b>disqualifier</b> 270:25  <b>disruption</b> 189:2  <b>dissertation</b> 185:16  <b>distribute</b> 79:14 306:13  <b>distributed</b> 78:5 79:6 306:7 306:8  <b>diverse</b> 299:1,6 337:8,23  <b>diversifying</b> 327:2  <b>diversity</b> 14:20 42:4,10 308:19 319:2 332:14 338:10  <b>divided</b> 79:1  <b>division</b> 44:20 181:17 268:24  <b>divisions</b> 90:21  <b>divorce</b> 189:3  <b>divorced</b> 56:24 57:4  <b>divvied</b> 228:23  <b>document</b> 5:10 11:4,8,25 12:7 16:12 93:15,16,17,18 93:22 94:19,22,25,25 95:3 95:10,15,24 100:16 106:9 111:13,20 112:14 116:17 119:18,22 121:19 122:7 123:6,16,18,20,25 124:2,4 124:14,19,20,22 125:1,11 125:13,17 132:24 148:22</p>	<p>151:8,11 152:1 167:12,15 167:17,18,19 176:15,18 177:2,2,3,7,10,15,19,23 178:1 179:23 205:17 274:24 279:6 281:4,6 282:12 283:22 287:10,17 287:20 291:20 293:19 297:21 303:20 341:20 343:5,6  <b>documentation</b> 206:10 218:18  <b>documented</b> 154:17 219:3 273:10  <b>documents</b> 10:6,8,12,14,22 10:25 11:8,12,18 30:14 94:11 95:4 116:5 132:6 177:16 178:17 179:3,6 201:23 205:18 240:16 241:1,4,5,14,19,22,24 242:1 287:9 306:2  <b>Dodson</b> 15:9 30:25 91:6 274:9  <b>doing</b> 21:4 33:16,21 73:8 77:5,8 103:16 104:1 114:18 120:16 140:21 144:21,22,22 146:10 162:20 202:15 207:25 215:5 228:13 239:16,16 242:2 251:25 257:12 263:19 274:6 276:21 284:3 287:7 288:24 297:24 313:24 318:18 325:9,10,17 325:18 327:20 329:2,10,16 329:22 332:13 336:5 338:10,11  <b>DOL</b> 6:5  <b>dollars</b> 89:7,9 107:15 140:15 144:4  <b>dominate</b> 300:7  <b>Donatelli</b> 47:21 50:8  <b>Dorian</b> 37:8 50:21,22,24  <b>double</b> 75:25  <b>double-negative</b> 95:20  <b>Doug</b> 48:8,16 189:9  <b>downstairs</b> 90:13  <b>drafted</b> 276:6  <b>drafting</b> 197:25  <b>drafts</b> 198:5  <b>draining</b> 312:2  <b>dramatic</b> 183:11  <b>dramatically</b> 134:23 135:11  <b>drew</b> 72:23  <b>Drive</b> 2:15  <b>dropped</b> 208:11 210:5  <b>dry</b> 211:14,16 256:8  <b>Dubai</b> 270:16</p>	<p><b>duly</b> 6:23 346:7,15  <b>duties</b> 12:17 31:22,25 32:1 118:5 257:19  <b>dying</b> 135:7</p> <hr/> <p style="text-align: center;"><b>E</b></p> <hr/> <p><b>E</b> 3:4 4:1,8 5:1,3  <b>E-M-E-A</b> 91:10  <b>e-mail</b> 4:11,12,16,18,19,21 5:5,6 58:21 59:7 147:9,17 149:2 186:12 263:13 264:25,25 275:2,23,25 276:4,4,5,25 281:8,9 287:9 323:5,8,18,19 342:20  <b>e-mailed</b> 266:25  <b>e-mails</b> 5:9 12:12 275:11,12 323:11,12 324:2  <b>EA</b> 15:8  <b>earlier</b> 8:18 11:13 102:10 145:6 146:2 153:22 191:17 199:12 210:16 236:14 250:14 265:14 302:6,15 316:13 323:20 336:23 339:22  <b>early</b> 155:23 272:10 295:22 295:22  <b>earn</b> 260:23  <b>ease</b> 297:7  <b>easier</b> 14:8 16:8 27:9 30:12 31:24 32:8 41:16 46:18 73:10  <b>easy</b> 22:23  <b>eat</b> 213:15  <b>eating</b> 127:1  <b>economics</b> 201:5  <b>edited</b> 54:10  <b>edits</b> 278:14  <b>educated</b> 200:17  <b>education</b> 117:7,7 174:4 199:24 200:8,14,22 207:1 208:14 296:3  <b>Edward</b> 50:18  <b>Edwards</b> 45:18 71:8 135:6 135:11 165:8  <b>EEOC</b> 87:9 306:23 308:25  <b>effect</b> 346:11  <b>effective</b> 325:1,7  <b>effectiveness</b> 304:1,3,18 305:4  <b>effort</b> 19:11  <b>effort</b> 161:4 318:2  <b>efforts</b> 315:13,24 316:10 317:24 318:3 319:18  <b>either</b> 57:11 69:23 76:3 84:24 85:13 106:25 114:23 114:25 135:14 156:16</p>	<p>214:10 220:16 227:2 250:14,17 251:18  <b>electronic</b> 51:13 131:20  <b>electronically</b> 56:6 132:15  <b>elements</b> 200:7  <b>eligibility</b> 23:22 25:8  <b>eligible</b> 106:25 152:16 253:13  <b>eliminate</b> 185:9  <b>Elizabeth</b> 14:6,12  <b>Ellison</b> 13:20,21 147:18 209:3 279:23 324:19  <b>Ellison's</b> 147:25  <b>EMEA</b> 14:23 91:8,10  <b>emergency</b> 12:24  <b>emerging</b> 103:15,17 104:7  <b>Emily</b> 231:25 232:3,5,22 233:13  <b>emotion</b> 326:12  <b>employee</b> 12:19 33:14,19,25 51:6 57:15 58:4,9,14,19,20 61:9 62:3,11 63:1 69:16 80:16 81:5,8,9 86:11,13,20 86:22 87:6,23 104:20 105:13 113:9 117:11 121:20 137:1 145:3 153:25 181:9,23 193:21 229:15 233:20,23 234:4,5 238:23 248:16,17 249:22 252:7,24 253:13 261:19 263:5,12,13 263:22 264:18 265:8,9,10 271:15 272:6 312:18 339:15 346:17,19  <b>employee's</b> 96:8 137:17 306:3 339:8  <b>employees</b> 12:25 22:4 23:11 35:21 46:21,22 51:25 55:24 56:3,5,14,15 59:4,19 61:24 62:22 63:11 79:2,11 79:13,21 80:12 82:1,15 86:23 96:12 100:10 101:1 102:10 103:14,14 104:23 106:22,24 113:3 136:10,19 142:15 152:6,16,21 153:7 153:12 154:2 157:16 165:15 166:5 178:14 182:3 182:4 186:18 190:16 192:17 196:21 197:10 221:15 227:15 234:11 235:12 239:8 243:7 244:15 244:24 245:16,23 246:13 248:10,13 249:2 253:13 263:25 266:12 267:16 268:3,25 272:12 275:24 292:7 302:21 306:7,9 308:22 319:23 320:1</p>
--	---	--	--

<p><b>employees'</b> 243:14  <b>employment</b> 44:24 64:3            164:18 232:7 304:17 305:8            305:16 306:2,22,25 307:13            308:22 309:11 313:11  <b>enabled</b> 21:8  <b>encompasses</b> 12:18 297:14  <b>encourage</b> 263:14,15  <b>encouraged</b> 245:16  <b>ended</b> 192:20  <b>ends</b> 42:16  <b>engagement</b> 44:24  <b>engaging</b> 332:15,16  <b>engine</b> 286:24  <b>engineer</b> 101:15,24 135:6,7            171:24 182:11,12 208:11  <b>engineering</b> 135:5,25            208:20,21 209:1,13 325:21  <b>engineers</b> 117:8 145:11            171:7 172:20  <b>enhanced</b> 53:8  <b>enhancements</b> 53:10  <b>enjoy</b> 338:10  <b>ensure</b> 112:10 202:2 297:17            298:4 302:2,19 303:7            311:10,11,14 312:5,8,21            314:24 320:9 327:21            328:16,20 329:10  <b>entail</b> 222:10  <b>entertaining</b> 37:19  <b>entire</b> 46:12 85:16,16            159:16 243:21 320:21            321:8  <b>entitled</b> 4:14 5:10 8:9  <b>entitlements</b> 113:6  <b>environment</b> 63:4,5 166:4  <b>equal</b> 38:17 64:3 304:17            305:8,16 306:1,21,25            307:13,13 308:22 309:10            313:11 326:1  <b>equally</b> 161:17 163:20 333:3            333:3 338:18  <b>equals</b> 100:4  <b>equity</b> 59:3 219:8 220:1,6            221:8,15,18 222:19,25            223:16 224:3,12,17 226:4            226:11,19 240:6,17 242:9            287:21 288:18 296:7            297:17 298:4 302:2 311:11            312:6,21 313:4,5 327:18            327:21 328:17,21 329:10            336:18 337:16  <b>ER</b> 15:10 33:14 43:21  <b>ERP</b> 17:22 19:2,4 20:9 26:14            26:15,16 31:5 53:10            135:12 165:7</p>	<p><b>ERRATA</b> 348:1  <b>especially</b> 63:21 133:17            217:10 248:6  <b>ESQ</b> 3:4,4,9,10  <b>essentially</b> 254:13 270:7  <b>establish</b> 136:3 175:15            178:16  <b>established</b> 125:9 183:12            201:12  <b>estate</b> 62:20 171:21  <b>estimate</b> 7:12 8:19,23,25            171:1  <b>et</b> 40:21 41:8 47:9 62:2            125:15 173:1 182:1 244:19  <b>ethics</b> 36:15 39:14 40:10            63:7  <b>ethnicity</b> 134:2  <b>European</b> 133:8  <b>evaluate</b> 102:20  <b>evaluated</b> 138:13,14  <b>evaluates</b> 304:1  <b>evaluation</b> 105:18 153:1  <b>evaluations</b> 103:4 104:19            104:24 105:13 152:20            153:5 154:25  <b>event</b> 56:23 78:12,14,14  <b>eventually</b> 33:24  <b>everybody</b> 188:5,12,17            321:16 326:4  <b>everyone's</b> 242:17 243:18            243:19  <b>evolves</b> 44:1  <b>EVP</b> 50:9 243:17  <b>EVPs</b> 99:1  <b>EX</b> 4:9 5:4  <b>ex-bartenders</b> 188:1  <b>ex-waitresses</b> 188:1  <b>exact</b> 107:12 181:16 183:5            212:18 213:9  <b>exactly</b> 69:11 75:10 170:13            170:21 171:3 192:11 253:6            286:5 302:9 304:12,25  <b>EXAMINATION</b> 4:3 7:1  <b>examine</b> 153:4  <b>examined</b> 153:1 313:16            346:15  <b>example</b> 22:22 23:10 28:8            41:9 47:6 57:15 60:14            69:13 81:11 82:1,10,16            98:23 101:2 105:5 107:2            121:19 127:22,24 156:19            162:8 164:15 166:19            192:19 196:24 197:23            208:10 209:4,5,23 217:3            254:9 259:6 270:17 320:11  <b>examples</b> 187:19</p>	<p><b>exchange</b> 4:11,12,16,18,19            5:6  <b>excluding</b> 215:12  <b>exclusively</b> 127:19 133:10  <b>excuse</b> 52:17 339:13  <b>execs</b> 197:4  <b>EXECUTED</b> 345:14  <b>executive</b> 4:10 12:16 14:17            15:4,6 16:15 17:6,8 31:2            45:1 47:10,11,13,19,22            48:8,9,25 49:22 50:25 99:6            110:3,8,17 111:1,2,3            120:25 150:1 171:4 172:20            173:20,24 174:25 179:25            180:1 188:17 195:17,22            200:18 203:22 242:22,25            254:5 257:23 298:9 310:10            310:12,16,19,22 311:7            338:3  <b>executives</b> 172:13 173:1            190:5 195:6,12 196:13,16            197:1,1 203:8 334:11  <b>exempt</b> 215:1  <b>exercise</b> 26:18 326:18  <b>exercises</b> 317:18  <b>exhibit</b> 5:15,16,17,18 16:5,6            92:16,17 116:9 123:5,5            129:15 144:17 146:9,24            148:11,13,14 150:25 151:1            151:3 166:21 167:2,4            168:13,16,18 176:10,11            274:18,20 278:24 280:24            281:1 282:10 283:16 287:1            287:4,8 290:23 293:5,5,8            306:6 330:15,16 341:13,15            343:2,3  <b>EXHIBITS</b> 5:13  <b>exist</b> 153:12  <b>existing</b> 186:18  <b>expand</b> 103:23 268:5 284:16            285:17  <b>expanded</b> 285:8  <b>expanding</b> 325:12  <b>expect</b> 137:2  <b>expects</b> 58:6  <b>expense</b> 229:13  <b>experience</b> 32:24 116:12            117:6,11,15 119:14 128:7            128:13,20,25 172:20            194:15 209:5,14,23 210:1            246:1,2 250:25 252:14            260:13,14,17 261:22            289:25 334:5  <b>experienced</b> 136:8,14 218:9            218:10  <b>expert</b> 101:13 191:7</p>	<p><b>experts</b> 54:8,15 60:13,24            198:24  <b>explain</b> 76:10 78:7 100:12            100:16 103:11 106:7            115:18 119:23 120:19,25            121:7,12 135:21 137:7            163:5 281:13  <b>explained</b> 10:19 120:5            265:14  <b>express</b> 268:17  <b>extensive</b> 36:18  <b>extent</b> 310:24 337:2  <b>external</b> 35:2 96:24 97:4,10            199:5 204:14 267:15            272:17</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>facilitate</b> 72:12  <b>facilitates</b> 266:22  <b>facilities</b> 62:20 101:18  <b>facility</b> 188:10  <b>fact</b> 187:5  <b>factor</b> 97:12,24 98:7,12            100:6,9,12 102:3,4 144:19            155:25 156:8 181:11 259:2  <b>factors</b> 77:6 96:9,13,15            99:24 144:12 156:10            183:13 207:17 208:2,3            209:6,20 258:2,7,24  <b>facts</b> 113:15 270:10 301:4            315:15 327:10,11  <b>fair</b> 39:10 289:19,19 340:3,4  <b>fairly</b> 7:13 161:11,17 162:5            162:12 166:15 170:23            206:9 215:3 313:17 314:25            315:5 320:2 340:3  <b>fairness</b> 337:15  <b>fairs</b> 325:10,11  <b>fall</b> 7:14 16:1  <b>falls</b> 67:2  <b>familiar</b> 20:14,25 148:23            156:23 167:15 168:13,15            214:2 287:6,16 310:12            311:6 343:7  <b>families</b> 284:16,17  <b>family</b> 184:20 213:15  <b>fancy</b> 79:24  <b>far</b> 81:16 132:8 170:3 215:15            283:12 297:15 306:15            335:25  <b>farmed</b> 229:16,17  <b>fashioned</b> 19:6,14 33:22            63:21  <b>faster</b> 73:11  <b>fault</b> 24:18  <b>Fed</b> 346:11,16,21 347:3,8</p>
--	--	---	---

<p><b>federal</b> 1:4 2:4 304:19 337:9  <b>feed</b> 213:15  <b>feedback</b> 224:9 276:22            278:8,10  <b>feeder</b> 301:18  <b>feeding</b> 189:10  <b>feel</b> 9:9 120:15 142:8 192:25            316:5 326:15 329:4  <b>feels</b> 142:14 207:6  <b>felt</b> 188:11 340:2  <b>female</b> 300:10 331:5,8,16,20            332:1 333:16,25  <b>fiance</b> 269:11  <b>Field</b> 151:14  <b>fields</b> 278:11  <b>fifth</b> 296:12  <b>Figuroa</b> 3:5  <b>figure</b> 45:9 58:3 70:18            179:12 251:7,10  <b>file</b> 88:15 236:7 264:23,25  <b>filing</b> 17:19 228:12 265:6  <b>fill</b> 56:25 174:1 204:7 269:9            299:5 333:15  <b>fills</b> 142:22  <b>final</b> 85:16 89:11,14,16            102:3 129:4,8 131:7 232:9  <b>finally</b> 89:7 90:16  <b>finance</b> 21:15 48:19 68:3,8            68:18,23 69:10 71:21,21            74:10 114:6,7 116:24            143:21 268:20 276:18  <b>financial</b> 36:17 44:5 106:19            115:1 268:21  <b>financially</b> 346:20  <b>financials</b> 21:13  <b>find</b> 25:1 56:11 61:12 62:3            62:10 87:9 106:3 109:6            113:13 177:18 205:24            269:15,15  <b>fine</b> 64:15,16,19 65:2 146:23            158:20 168:21 177:18            210:6 261:24,25  <b>finesse</b> 174:5  <b>fingers</b> 245:20  <b>finish</b> 209:3 237:17  <b>firm</b> 199:14 302:7,10  <b>firms</b> 202:13  <b>first</b> 6:23 17:24 52:21 63:13            65:6 78:8 88:1 93:21 96:6            106:5 107:4,5 116:9            136:14 159:19 160:5,6,8            160:13 161:22 210:24            219:16 238:14 247:14,17            247:23 248:4,17 254:17            255:11 264:15,17 268:1            269:14 275:1,12 277:1,1</p>	<p>283:6,10,10 284:1,12            307:21,24 313:17 320:12            326:5 327:22 346:15  <b>fit</b> 73:24,25 98:13 118:5            196:17,19 253:11  <b>fits</b> 205:5  <b>five</b> 19:2,19 31:17,18 80:16            80:17 82:15 84:11 85:10            102:10 171:10,13,14,19            186:23,24 187:7 227:1,6            229:24,24 273:23 296:11            321:14 340:7,22,24,25            344:10  <b>five-year</b> 207:8  <b>fix</b> 156:16  <b>flag</b> 141:5  <b>flexibility</b> 260:10  <b>flow</b> 248:24 275:15  <b>flows</b> 41:15  <b>fluid</b> 254:22  <b>focal</b> 21:25 29:14,18,22,25            29:25 61:8 66:6 75:8,9            76:12,13,18,18,22 77:1,1,9            77:17,22 78:1,14,24 79:16            80:13,18,24 87:15 102:17            107:8,13 111:12,13,25            139:2,5,17,18 142:4,11            143:4 155:24 205:22            312:11 317:17 318:19,23            319:19,22 320:23  <b>focal-based</b> 111:25  <b>focus</b> 41:2 116:18 238:25            325:25  <b>focused</b> 204:2  <b>folks</b> 68:21 69:5 110:22            184:5,7 185:14 254:23            290:15 324:14  <b>follow</b> 213:21 289:16 340:10  <b>follow-up</b> 164:5 210:15  <b>followed</b> 224:11 237:1  <b>following</b> 58:22 96:8 196:6            340:23  <b>follows</b> 6:24  <b>food</b> 35:19 45:22  <b>football</b> 172:1  <b>force</b> 346:11  <b>forcing</b> 255:17  <b>foregoing</b> 345:7,8 346:24,24  <b>forever</b> 41:18 204:2  <b>forget</b> 7:20  <b>forgot</b> 84:14 106:13 209:17  <b>form</b> 10:9 51:15 142:22            143:4 149:14 174:1 186:12            231:22 297:19  <b>formal</b> 150:19 218:24 219:2            265:5 308:12</p>	<p><b>formalized</b> 250:10  <b>formally</b> 234:22 329:16  <b>format</b> 149:16,22  <b>forms</b> 56:25 173:18  <b>formula</b> 106:20  <b>formulating</b> 132:3  <b>forth</b> 44:13,21 69:3  <b>forward</b> 226:18 324:17            339:25 340:1  <b>found</b> 211:25 227:23  <b>foundation</b> 12:21 14:13            21:12 65:14,15 69:19            96:17 97:2,14 98:2 99:13            100:13 101:11 102:7            111:16 113:16 117:17            118:1,11 120:12 121:25            122:19,23 125:9,22 134:16            135:23 177:1,4,8 178:8            208:7 209:10  <b>four</b> 10:4 93:21 108:18,18            202:17 268:23 296:11            321:13,17,18 335:11,14            339:1 343:15  <b>four-year</b> 208:23  <b>fourth</b> 102:3  <b>frame</b> 32:17  <b>framework</b> 284:9  <b>France</b> 52:17 137:25 269:10  <b>Francisco</b> 3:11 98:22  <b>frankly</b> 178:20  <b>free</b> 172:1 225:5,20 258:16            265:3  <b>freedom</b> 302:20  <b>frequently</b> 57:10  <b>front</b> 177:19 214:13 286:15            297:7  <b>frozen</b> 88:22  <b>fuels</b> 21:12  <b>full</b> 83:20 112:5 185:7 277:2            346:10  <b>fuller</b> 134:9  <b>fully</b> 44:9 136:7  <b>fun</b> 14:21  <b>function</b> 17:17 126:10 145:9  <b>functions</b> 32:7 48:20  <b>funded</b> 107:5 113:7  <b>funds</b> 106:21,24  <b>funneled</b> 230:8  <b>funny</b> 235:3  <b>further</b> 80:8 250:19 285:6            344:5  <b>Fusion</b> 20:1,2,12 24:1,7,22            25:2,2,5,16,21,24 26:3,14            26:20,24 27:4,4,10,16 28:7            28:14,23 29:11,16 30:4,15            53:10 56:6,8 78:17,18,20</p>	<p>262:18 276:9,13 277:2,3,9            277:11,11 282:20 283:8  <b>future</b> 43:7  <b>FY15</b> 4:14</p> <hr/> <p style="text-align: center;"><b>G</b></p> <hr/> <p><b>G</b> 2:18 347:13  <b>G-l-e-u-c-k</b> 49:2  <b>gain</b> 187:5 259:13  <b>gal</b> 43:11 203:14 274:11            295:18  <b>gaps</b> 251:20 252:17  <b>Garcia</b> 3:4 6:16,16 92:24            166:25 240:21,25 275:21            280:15  <b>Gates</b> 209:2  <b>gay</b> 298:20 338:17  <b>gems</b> 332:17  <b>gender</b> 59:2 133:25 134:2            141:20 154:20 160:16,22            161:7,10,13 162:18 163:8            163:17,21 269:20 270:3,19            296:7 297:17 302:2 311:11            312:5 319:3 320:10 336:13            339:9,11  <b>general</b> 15:4 29:13,14,18,20            50:25 66:19 87:7,10            120:14 122:10 133:3,16            134:19 144:24 210:25            230:18,18,19 238:17            242:19 314:6 322:11            333:14 343:9  <b>generally</b> 65:6 109:22 133:1            232:16 247:13,22 332:6  <b>generates</b> 132:6  <b>generation</b> 26:15  <b>generational</b> 246:8  <b>Geo</b> 285:22  <b>geographical</b> 75:13  <b>geographies</b> 32:3  <b>geography</b> 133:23 134:22            203:5  <b>GeoPay</b> 285:6 286:15  <b>George</b> 109:1,7,12  <b>Geraffo</b> 47:20 50:6  <b>getting</b> 16:10 28:2 41:25            56:23 84:1,19 102:16            113:19 130:10 152:14            183:12 202:15 264:7,8,12            279:20 284:5 314:9 317:21            325:11  <b>gifts</b> 37:17  <b>girl</b> 45:19  <b>give</b> 14:8,9 22:22 24:12 49:7            63:8 67:18 73:6 80:2 81:4            82:14 93:7 102:18 104:14</p>
--	---	--	--

<p>104:15 105:6 107:14 123:10 134:9 146:21 147:2 148:12 151:5 171:1 187:17 187:18 188:21,22,23 196:23 197:16,23 211:4 224:9 232:14 240:16 241:4 242:1,8 250:8 259:11 261:3 276:22 299:4 310:9 328:24 <b>given</b> 32:17 41:1 83:12 86:22,24 88:25 96:14 104:23 105:13 154:2,25 172:23 187:11 196:21 201:23 208:3 224:22 236:6 241:1,15,19,24 253:8 263:5,5,8 328:25 347:2 <b>gives</b> 130:11 203:2 <b>giving</b> 71:7 146:2 177:13 185:5 211:18 250:22 252:13,13 <b>GL</b> 21:13 <b>Glendale</b> 6:11 <b>global</b> 14:15 17:16 35:10 42:23 96:11 97:11,18,21 98:13,17,25 99:8,16,22 100:1 125:15 129:4 165:17 276:9,14 284:3,14 287:10 287:11 <b>globally</b> 49:18 <b>gloss</b> 7:18 <b>Glueck</b> 48:25 <b>go</b> 7:21 9:19 24:3 31:2 32:9 33:3 34:3 43:22 48:15 55:10 56:21,24 57:5,17,19 57:22 60:11,18,23 61:25 62:3 64:22 71:22 73:7,11 75:9 81:14,15,16 84:5,17 87:14 90:17 92:8 103:24 112:6,25 121:4 132:8,17 135:1 146:4,5 148:1,6 149:4,14,16 153:16 155:1 155:24 159:7 167:3 176:21 185:18 187:23 189:10 192:5 193:9 194:12 199:23 200:8,19 209:15 214:25 215:6 223:24 226:13 230:21,24 234:8 235:9 236:23 247:17 249:6 250:14,15 258:9 259:19 261:6,10 265:20 268:17 269:5 272:22 278:12 280:6 280:8,17 284:4,5,7,11 285:4,13,14 286:17 287:19 291:1,23,24 292:16 296:11 298:7 299:12 302:17 304:13 307:3 317:17 324:8</p>	<p>332:9 334:13,15 339:25 341:6 <b>goal</b> 105:12,15 185:13 301:25 343:11,18,22 <b>goals</b> 5:10 40:3,9 113:5 115:1 296:15 298:10,11 299:8 300:2,12 301:15 321:24 322:6,10,13 336:1 343:8,15,25 <b>God</b> 339:3 <b>God's</b> 257:15 <b>goes</b> 77:4,19,22 80:8 107:11 130:11 131:10 132:5,7 136:22 143:5,7 184:8 253:7 255:13 281:25 317:8 <b>going</b> 9:17 13:8 14:10 16:5 32:13 37:14 41:17 42:12 48:3,5,23 64:9,17 65:7 66:25 68:4 70:6 72:6 73:7 78:20 80:2 81:22 82:14 84:14 86:1 88:23 94:14 115:10 118:5 123:4,14 127:25 128:8 135:12 137:15 143:23,25 144:1 158:23 162:5 166:8 171:6 177:7 182:8,12 183:23,23 205:21,25 210:9,12 220:20 221:19,21 222:5,6,12 224:20,24 225:15,17 230:23 233:12 239:22 240:19 250:8 251:24,25 257:11 260:7 262:13 270:15 271:4,20 273:25 274:17 278:22 280:19,22 286:20 291:19 292:1,4,22 293:4 301:18 303:6 310:15 313:2 314:8 316:21 317:14 319:11,14 322:20 325:13 330:14 332:12 334:25 335:17 341:8,11 344:10 <b>golden</b> 196:4 <b>good</b> 6:3 43:16 47:15 49:3 61:21 80:16 119:19 146:12 158:18 166:22 191:14 207:12 208:10 258:17 260:7 265:1 270:17,25 283:18 285:18 292:19 299:24 300:10 307:9 330:3 331:5 <b>Google</b> 105:24 217:23 218:20 <b>gotten</b> 57:3,4 185:10 <b>Government</b> 59:12 <b>Government's</b> 94:25 <b>grade</b> 92:13 130:19 165:14 165:16</p>	<p><b>Gradillas</b> 6:10 <b>graduates</b> 248:7 <b>Graham</b> 3:10 6:18 <b>grandfathered</b> 188:18 <b>grant</b> 110:19 147:8 281:20 <b>granted</b> 148:7 271:15 <b>grants</b> 110:9 111:5 <b>grave</b> 22:4 <b>great</b> 8:20 9:2 22:7 51:3 73:2 158:16 243:24 302:4 <b>ground</b> 204:8 251:1 303:10 <b>grounds</b> 221:22 222:16 224:14,21 <b>group</b> 33:1,21 34:25 42:11 44:23 45:12 54:6,12,19 60:18 69:1 70:22,23 72:11 72:19 77:12,17,21 87:22 88:12 91:15 94:17 104:17 131:4 136:24 140:7 149:19 151:18 183:19,20,25 189:7 189:9 198:10,16,16 201:18 209:16 212:3 219:23 228:11,14 232:7 234:7 238:5 250:20 251:13 252:14 255:19 258:5 266:18,22,22 267:7,23 271:20 277:19 287:15 288:22,23 290:14 295:17 300:20 320:15 321:14 325:2,4 334:10,12 <b>groups</b> 12:24,25 14:21 42:5 43:9 54:16 60:7 63:22 188:9 201:19 254:21 257:21 295:15 298:16,18 319:25 331:6,7,17,20 332:5,8 333:15,17 334:1 <b>grow</b> 268:24 301:24 <b>growing</b> 271:9 <b>grown</b> 45:12 <b>growth</b> 104:10 <b>guess</b> 23:2,2 34:17 35:18 39:3 59:1 65:5 66:9 69:25 92:7,9 106:2 112:4 114:3 115:4,14,14 116:1 122:10 127:22 139:5 142:5 161:7 168:5,17 179:14 191:24 194:18 202:17 205:1 218:5 219:1 234:13 247:4 250:11 255:6 264:22 276:12 291:14 295:21 315:10 <b>guessed</b> 198:18 <b>guesses</b> 8:21 <b>guessing</b> 27:3 214:17 <b>guidance</b> 198:20 199:2 <b>guide</b> 51:7,11,16,21,24 52:9 52:11,13,19,21 53:5,21</p>	<p>55:1,4,21,23 56:2,12,13 58:7,9,16 74:19 86:15 87:23 <b>guideline</b> 205:9 <b>guidelines</b> 18:3 54:23 56:13 56:19 74:15 87:9 198:21 199:2 224:11 274:1,2,5 287:10,12 296:13 302:18 <b>guides</b> 52:10 <b>guru</b> 246:22 249:7 259:10 259:18 <b>guy</b> 300:21 <b>guys</b> 19:19 55:3,3,20 59:15 64:25 65:1 115:2 122:12 134:13 146:10 177:11 202:21 283:19 310:14 313:3 338:16</p> <hr/> <p style="text-align: center;"><b>H</b></p> <p><b>H</b> 4:8 5:3 124:3 <b>half</b> 18:18 <b>hallway</b> 218:17 <b>hallways</b> 218:21 <b>hand</b> 290:25 <b>hand-holding</b> 248:5 <b>handbook</b> 51:5,6 86:11,14 86:20,22 87:1,6,18,23 104:20 153:25 272:6,9 305:21 <b>handing</b> 178:14 <b>handle</b> 231:1 239:10 <b>handled</b> 33:1 158:10 182:3 182:6 342:7,8,9,13,22 <b>handwritten</b> 323:3 <b>Hanson</b> 341:25 <b>happen</b> 57:1 71:1,3 72:1 76:24 83:17 118:13 128:17 142:19 191:21 192:24 197:7,8 211:19 219:7 225:10 235:10 250:22 251:24 265:13 303:12 <b>happened</b> 57:3 89:5 118:17 118:19 119:8 120:1,21 121:14 196:24 197:4 206:14 211:22 223:8 226:24 233:4 251:18 252:8 252:15 266:9,10 340:6 <b>happening</b> 55:17 56:24 68:23 136:4 140:17 303:17 309:20 <b>happens</b> 107:8 119:9 135:2 142:16,16 192:8,14 196:23 215:7 230:17 248:25 249:23 260:10 265:16 303:13,13 311:22 <b>happy</b> 203:15,16</p>
---	--	--	--

<p><b>harassment</b> 36:15,22 62:6 235:6 238:15 <b>harassment-free</b> 63:5 <b>hard</b> 86:24 116:3,6 208:9 232:14 258:13 <b>harder</b> 338:20 <b>hardware</b> 286:9,10 <b>HCM</b> 13:5 27:8,9 72:7 78:3,4 78:19,20,22 126:15 142:23 164:16 186:5 228:7 235:19 262:18 267:13 277:9 283:5 297:14 298:6 <b>head</b> 8:4 43:15 49:14 85:17 132:17,18 144:5 178:9,13 178:13 186:10 192:2 202:18 241:12 312:2 314:9 340:20 <b>headhunters</b> 204:7 <b>headquarter</b> 343:14 <b>headquarters</b> 63:25 91:19 182:13 212:21 344:1 <b>hear</b> 8:9 234:20 299:24 <b>heard</b> 103:12 214:20 338:24 339:4 <b>hearing</b> 316:24,25 323:23 <b>heavily</b> 20:18 295:10 298:21 <b>held</b> 97:21 210:8 231:9 261:13 <b>help</b> 13:8 14:9 21:22 26:11 35:3 46:5 51:24 52:3,4 53:12 71:3 115:11 183:22 204:22 226:14 249:5 250:19 268:5,6,23 290:19 294:17 301:25 329:6 332:25 337:15 338:4 <b>helped</b> 294:16,19 <b>helpful</b> 32:12 41:14 272:16 <b>helping</b> 67:1 189:14 218:11 <b>helps</b> 42:6 43:6 78:10,10 183:21 266:19 <b>hereto</b> 347:8 <b>Herrington</b> 3:9 6:18 <b>hidden</b> 332:17 <b>hierarchy</b> 41:6 282:2,5 287:23 288:19 <b>high</b> 12:21 14:13 35:18 103:9 138:7 178:21 295:19 295:23 296:3 298:15 332:11 338:8 <b>high-performing</b> 259:3 <b>higher</b> 138:4 173:1 176:5 186:24 187:8 216:3 266:6 322:12 <b>highest</b> 100:18 254:4 <b>highlighted</b> 293:17 <b>highlighting</b> 312:15</p>	<p><b>highlights</b> 36:19 <b>highly</b> 156:17 194:15 262:12 301:23 <b>hire</b> 22:2 52:1 55:12 63:22 67:15 68:6 71:15 110:17 110:18,20 116:11 121:22 122:21 186:13 194:21 203:12 268:20 271:10 289:13,13 300:21 301:24 326:22 337:22 <b>hired</b> 18:4 23:1 121:20 130:15 338:20 <b>hires</b> 21:9,22,23 67:25 68:13 68:17 91:15,19,23 172:18 180:17 184:14,16 189:5 197:9 203:11 204:3 215:21 216:1 <b>hiring</b> 23:1 52:5 66:19,20 67:20,22 70:16 73:23 74:10 116:23 129:9 131:3 132:10 145:24 172:12 180:21,22,24 181:3 184:2 217:18 328:23 <b>Hispanics</b> 300:5 <b>history</b> 180:14 181:1 <b>hit</b> 80:6 148:7,7 149:4 205:22 258:19 305:1 <b>hitting</b> 256:4 <b>hold</b> 140:15 144:4 175:11 196:8 209:9 333:5 <b>holder</b> 346:8 <b>holes</b> 192:10 285:8,9 <b>holiday</b> 56:3 87:8 <b>holidays</b> 58:10 <b>holistically</b> 212:14 <b>Holman-Harries</b> 16:1 41:10 214:4 294:23 329:9 <b>Holmes</b> 42:11 <b>honest</b> 168:4 <b>honestly</b> 166:17 <b>hope</b> 163:14 172:3 205:5 <b>hopefully</b> 139:18 266:16 <b>hot</b> 134:21,22,25 170:14,15 171:6 195:25 <b>hotline</b> 88:17 227:2 230:8 250:14 265:2 342:17 <b>hotlines</b> 228:16 <b>hour</b> 64:10 <b>hours</b> 10:4 37:15 258:19 314:4 <b>house</b> 279:16 280:5 <b>Howard</b> 3:10 <b>HR</b> 12:18 13:9 14:23,24 17:12,15,17 20:14,16,17 20:17 21:8,10,12 23:18,25 31:3 34:8,16 40:13 46:10</p>	<p>46:12 47:7 48:20 49:11 55:2 56:22 57:12,19,22 60:1,22 62:1 66:21 67:13 67:20 70:17 71:22 72:10 72:18,19,21 74:13 75:6 83:2 91:22 94:13 116:23 119:12,15,22 121:11 124:1 129:9,12 131:2 136:17 139:14 143:7 146:7 151:23 152:25 154:13 155:20 156:2,4 158:11,12 160:11 160:12,13 162:17,18,20 163:8,8 164:1,1 167:20,24 168:3 178:9,14 180:20 184:1,8 188:14 189:7,12 189:20,21,22,25 190:19,21 190:22 191:7,8 193:8 197:22 198:5 201:7,14 205:6,6,14 206:7 210:20 214:25 215:2,2,10 219:12 219:15 220:15,15,16 228:21 229:1,8,10,19 230:9 235:22 236:7,22 237:3 239:12 240:5,16 241:12 242:8 243:17 246:19 247:5,16 249:18,23 250:11,15,17 251:3,12 252:3,6,11,24 254:2,3,4,9 254:11 255:5 257:22 258:4 258:7 264:22 265:9 272:15 282:16,17 285:14 289:3,11 300:2,7,7 301:1,2,14 302:1 302:25 307:21,25 308:1 313:18 314:10,10 315:19 317:11,18 318:4,6,7,12 320:22 338:7,7,8,8,9 342:20 <b>HR's</b> 66:23 <b>HR-manager</b> 307:23 <b>HR-related</b> 236:21 238:8 <b>HRIS</b> 19:21 <b>hub</b> 63:25 <b>human</b> 12:16 13:12 27:8 33:6,7 38:23,24 60:14 90:24 299:22 342:4 <b>hung</b> 84:1,19 <b>hunger</b> 146:11 <b>hungry</b> 146:13 <b>Hurd</b> 49:16,17 157:5,7 159:15 160:7 191:23 244:6 274:4 324:19 <b>hurt</b> 29:7 <b>hurting</b> 90:12 <b>hypothetical</b> 212:17,23 270:11</p>	<p style="text-align: center;"><b>I</b></p> <p><b>IBM</b> 19:13,16 <b>IC</b> 127:14,16 128:1,1,21,25 192:19 259:19,22 <b>IC-1</b> 99:9,11 101:5 257:9,10 257:15 <b>IC-2</b> 194:13 257:16 <b>IC-3</b> 192:21 194:12,15 <b>IC-4</b> 192:20 <b>IC-5</b> 259:9,17 <b>IC4</b> 192:25 <b>idea</b> 8:22 12:10 32:24 34:5,6 53:22 90:7 121:15 124:5 167:22 250:5 265:2 <b>identification</b> 333:8 <b>identified</b> 140:9,10 233:2,2 <b>identify</b> 93:19 312:25,25 315:13,25 316:11 317:6,25 318:2 319:18 320:10 332:16 <b>ignorance</b> 78:15 <b>ignore</b> 106:9 112:13 116:16 <b>ignoring</b> 318:7,7 <b>imagine</b> 88:16 154:1 201:21 206:3 215:7 216:6 229:14 232:17 234:10 235:4,4 247:5 294:3 296:19 305:21 306:4 313:7 331:18 <b>imbalance</b> 339:9,11 <b>immigration</b> 14:14 24:7,22 24:23 30:13 43:10 183:25 <b>impact</b> 320:16 <b>impair</b> 9:11 <b>implement</b> 296:18 318:11 <b>implementation</b> 294:22 296:12 304:14 <b>implementations</b> 13:4 <b>implemented</b> 17:11,25 145:25 297:12,17 298:4,13 <b>implementing</b> 295:9 296:14 <b>impolite</b> 246:10 <b>important</b> 7:19,25 35:16 39:14 130:9 137:5 208:4 208:19 262:2,9 326:2 <b>improper</b> 175:17 177:5,9 178:7,22 <b>improve</b> 331:20 <b>improved</b> 297:8 <b>improvement</b> 331:6,8 <b>in-classroom</b> 63:21 <b>inappropriate</b> 37:19,20 125:12 140:11 174:16 210:17 230:23 <b>inappropriately</b> 312:14 <b>include</b> 27:13,16,19 51:22 52:5 64:2 87:12 180:13,14</p>
--	--	--	---

<p>231:18 290:6 304:16 319:3 325:13 <b>included</b> 11:8 17:14 28:7,22 29:16 78:17 150:8 153:25 201:25 272:6 <b>includes</b> 215:14 <b>including</b> 42:6 77:14 113:5 302:21 316:12 <b>inclusive</b> 337:8 <b>Incomplete</b> 270:11 <b>Incorporation</b> 6:5 <b>increase</b> 28:3,7,10,25 61:6 78:13 81:4 83:9,22 164:2,4 211:15,18 255:25 256:1 281:15 333:25 <b>increases</b> 27:17,20,21 29:1 29:10 52:6 76:6 77:15 78:11 79:15,22 80:25 81:12 82:15 83:6 90:15 107:16 142:10,13,18 143:11,17 144:13,19 156:1 156:9 160:22 <b>increasing</b> 333:16 <b>incumbents</b> 219:17 288:12 289:20 <b>independent</b> 260:8 <b>India</b> 44:10,17 182:4,12,15 182:22 183:11,23 199:16 199:17 212:17 213:8,13 <b>Indian</b> 339:5 <b>Indians</b> 339:2,5 <b>indicator</b> 212:14 213:1 <b>individual</b> 31:14 80:14 100:23 104:10 113:8 127:17 142:7 249:7 260:5 265:19 294:22 <b>individual's</b> 102:4 <b>individually</b> 306:14 <b>individuals</b> 138:18 140:16 302:23 <b>industry</b> 133:18 <b>inequity</b> 270:4 <b>inexperienced</b> 301:24 <b>inflationary</b> 77:14 <b>inform</b> 233:25 238:18 <b>information</b> 5:22 24:22,23 25:14,16 27:17,19 28:6,14 29:11,15,22,25 30:3,15 57:16 61:12 64:3 87:11,12 88:15 126:21,23 129:22 135:17 138:6 151:10 153:24 165:15 166:6 173:10,10,13 174:7,8 175:9,10,23 176:17 178:5 178:19,24 186:13 235:24 243:8,10,12 262:16 292:12</p>	<p>321:8 329:8 343:13 <b>infrequent</b> 227:2 <b>initial</b> 190:12 192:2 196:5 <b>initially</b> 183:10 192:12 <b>initiated</b> 248:9 <b>initiative</b> 284:1,22 285:20 286:12 298:16 <b>initiatives</b> 17:12 <b>input</b> 68:8,9,25 69:1 203:15 <b>inquire</b> 11:16 <b>insane</b> 172:15 <b>insanely</b> 188:15 <b>insanity</b> 171:20 <b>insightful</b> 285:23 <b>instance</b> 17:25 <b>instances</b> 227:16,18 <b>instituted</b> 214:4 218:15 <b>instruct</b> 175:18 221:21 222:6 224:13,20,24 242:10 <b>instructed</b> 180:24 244:24 <b>instructing</b> 222:14 225:21 242:3,5 314:7 <b>instruction</b> 225:2 <b>instructor</b> 107:1 <b>instructs</b> 8:11 <b>insulting</b> 338:22 <b>intact</b> 284:9 <b>integrates</b> 43:6 <b>Intel</b> 19:18 <b>interested</b> 18:14 41:21 269:10 272:14 346:20 <b>intern</b> 301:16 <b>internal</b> 13:2 15:3,10 33:9 37:11 51:10 96:25 204:13 204:15,20 205:7,8,11 206:8 219:8 220:1 221:4,5 221:8,15,17 228:25 240:6 240:17 242:9 249:19 267:15,16,16,25 268:9,13 268:16,16 269:14 287:21 288:17 302:10,11 315:11 316:14 336:13,18 <b>internally</b> 194:6 195:1 261:2 <b>international</b> 14:14 137:23 183:20 213:6 <b>internet</b> 51:8 <b>interrupt</b> 275:15 <b>interruption</b> 24:11 173:16 206:5 256:10 <b>interview</b> 110:21,22 193:9 194:13 209:15 230:25 <b>interviewed</b> 119:4 <b>interviewing</b> 118:4 128:7 130:9 303:5 <b>intranet</b> 57:8 <b>invade</b> 225:12,13 241:8,21</p>	<p><b>investigate</b> 210:18 226:19 <b>investigated</b> 227:20 228:25 <b>investigating</b> 234:1 <b>investigation</b> 141:16 166:16 166:19 227:3 228:11,12,14 229:11 231:4 236:4,13 250:12 <b>investigations</b> 12:19 228:18 228:20,23,24 229:5,9,13 230:9 232:6 237:4 <b>investigative</b> 238:21 340:10 <b>investigator</b> 235:7 <b>investigators</b> 229:18,19,21 230:10 <b>involve</b> 116:22 181:24 256:12,22 266:20 <b>involved</b> 18:2 25:21 27:14 53:25 59:18 68:5,16 73:16 74:11,13 75:20,25 91:22 91:25 95:9,14 144:12 151:25 172:25 189:12 190:2,4 195:13 196:14 203:14,19 216:5 221:17 229:8 239:6 287:25 288:1 288:2,5,17,20 289:7,11 295:8,10 296:6 298:21 338:5,8 <b>iRec</b> 267:3,12 <b>iRecruit</b> 297:3 <b>issue</b> 32:17 100:15 <b>issued</b> 346:9 <b>issues</b> 26:9 216:13 235:6 237:3 245:6,6 333:9</p> <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <p><b>Jan</b> 15:4 <b>January</b> 5:8 331:9 <b>Japan</b> 14:24 43:23,25 44:1,1 <b>Java</b> 197:18 <b>JD</b> 135:6,11 165:8 208:16 <b>Jenish</b> 14:17 15:15,16 44:22 133:21 150:4 <b>job</b> 1:25 12:17 18:2 31:22,25 32:1,18 45:8 55:15 70:5 72:13,16 74:16,17 75:12 92:14 97:5,16,17,22 98:13 98:17,20,20 99:16 100:2,3 100:10,22 101:1,4,6,9,23 116:12 117:20,23,23 118:3 118:9 119:15,15 120:19 121:7,23 122:17 123:23 125:15 128:6,9 130:1,4,10 130:12,13,14,17,19,21,21 130:21,24 131:1,5,7,12,14 131:18 136:9,25,25 137:3 137:18 145:3,9 181:17,25</p>	<p>183:4 184:20 189:2 190:12 190:16 191:18 192:12,18 192:20,21,25 193:11,17 195:6,13,25 196:5,22 197:18,25 198:3,5,13 199:20,20 203:4 212:19 213:10 244:18 256:21,22 257:18 260:24 266:14,15 267:1,24 271:4 274:13 284:8,15,16 286:3 289:23 290:6,13 325:10,11 328:1 328:1 331:6,7,17,20 332:5 332:8 333:15,16 334:1 342:3 <b>job's</b> 96:23 <b>jobs</b> 20:19 32:5,6,23 34:2 133:17 189:4 198:11 204:7 209:2 267:14,14,17,18 302:23 <b>join</b> 86:25 186:1,16 <b>joined</b> 71:25 159:15 <b>Jonn</b> 14:6 15:2 <b>Joyce</b> 1:14 2:14 4:2 6:4,22 26:5 35:23 85:25 86:7 140:3 158:22 159:4 160:24 177:13 195:9 239:22 240:2 276:3 281:10 292:22 293:2 314:9 328:10 344:9 345:19 348:2 <b>Joyce's</b> 282:2 <b>Juan</b> 50:19 <b>JUDGES</b> 1:2 2:2 <b>judgment</b> 107:14 183:9 <b>July</b> 283:23 <b>jump</b> 183:11 247:23 260:5,6 <b>justification</b> 28:25 143:3 263:2,16,18,20 264:11 <b>Justin</b> 151:14</p> <hr/> <p style="text-align: center;"><b>K</b></p> <hr/> <p><b>Kaiser</b> 43:11 <b>Kate</b> 15:14,15,20,21 41:10 45:4,7,16,19,24 46:2 61:20 61:21 83:13 133:22 134:8 134:18 140:10 168:7 201:11 281:9 <b>Kathi</b> 69:8 <b>Kearney</b> 14:23 <b>keep</b> 48:23 57:23 64:17 70:3 71:13 93:4,4 122:11,16 184:19,25 185:2 188:19,20 200:9 234:14 271:11 272:3 300:15 316:21,21 317:15 332:20 <b>keeping</b> 334:6 <b>keeps</b> 54:8 87:22</p>
--	--	--	--

<p><b>Kehring</b> 48:8,16 189:9  <b>Ken</b> 48:25  <b>kept</b> 16:22 242:12  <b>key</b> 113:4 172:19 184:25  185:2 188:21 210:1  <b>kick</b> 9:20 184:11 338:4  <b>kicked</b> 160:5  <b>kidding</b> 13:11  <b>kids</b> 295:24 332:13  <b>Kill</b> 123:10  <b>kind</b> 7:18 12:11 19:1,12  22:20 26:9 30:13 36:18  38:12 44:25 46:6 49:8  54:21 56:13 58:8 60:3 61:4  79:24 83:11 88:17 131:12  135:7 136:18 138:21 151:2  157:18 162:3 170:25  181:17 182:23 183:19,20  186:6 188:19 192:8 194:11  194:15 197:6 198:24 200:1  200:9 206:1 208:24 209:13  214:15 235:18 244:15  246:20 247:15,22 258:14  259:18 272:1,9 277:1  279:19 300:14 301:25  330:8 336:22  <b>kinds</b> 14:19 36:8  <b>Kirstin</b> 54:6,7,11,11,22,24  87:25 88:8,9,10,11 275:3  <b>kit</b> 87:4  <b>kitchen</b> 185:7  <b>Kleenex</b> 9:15  <b>knew</b> 246:9 340:11  <b>know</b> 7:15 8:3,14 9:4 11:23  12:9 16:16,21 20:15,22  22:3 23:3,17 25:2,7,14  26:10 28:8,11 30:17,18,21  30:21,25 32:16,19 35:4,11  35:16 45:7,11,13,20,24  46:1,4,5,19 52:12 54:21  54:25 55:2,25 56:1,1,18  57:24 58:4,5,9 59:9 60:7  61:9,10,11,22 62:14,20  63:4 65:21 66:1,3 67:2  68:2 69:12 70:1,23 71:5,9  71:9 72:9 74:2,4,13,18,21  75:10 81:20,21 82:15,23  82:23 83:3 85:6 87:5,10,17  87:22 88:1,4 89:21,22,24  90:4 91:25 92:1,1 94:5,7,8  94:9,17,18,19 97:20  102:17,22 104:8,14,21,22  105:6 106:3 108:13,19  110:10,12 112:21 113:13  114:1,19 115:15,24 116:5  116:6,20 117:8 118:17</p>	<p>119:3,7 120:1,3 121:11,18  122:3,8 123:16,23,24  124:1,11,12,15,17,20  125:10,14 126:3,14 127:3  130:10,19 131:3 133:15,24  136:10 137:2,3 139:21  140:7 143:17 144:18 145:2  145:4,12,19 149:18 150:18  151:13,16,19,21 152:5,6,9  152:12,19 153:7,12 154:10  154:16,18,19 155:2,4,6,8,8  155:9,19,19 156:19,22  157:7,12,13,15,21,23  158:2,4,7 159:24 161:4,10  161:23 162:18 163:7,9  165:17 167:14,16,19 168:1  168:2,5,8,10 169:20,21  171:2,5,8 172:22 173:6  174:11,17 175:22,23,25  176:2,4,24 177:1,3,17  178:22 179:6,11,14,17,19  179:21,22 180:10,20,23  182:3 183:2,13 185:19  186:7 187:12 188:3,6,20  188:22 189:1,2,3,13  190:21 191:25 192:14,17  193:15,16,22 194:8 198:7  198:10,11,13,15,23 199:1  199:16,17,18,19,22,24  200:1,7,16 201:10,11  202:7 203:5,15,24 205:6  205:20,22,22,24,25 206:10  206:25 207:10 208:16,24  211:7,21 213:14,16,17  214:14,14,15 217:9,18,19  218:12 219:7,19,22,24  220:8 222:19,22 223:6,7,7  223:11,13,15,23 224:2,5  224:11,18,25 225:16 226:2  226:10,15,24 227:8,19,20  228:12,15 229:2,4,7,22,23  230:22,24 231:8,20,20  232:19,21 234:6,20 235:1  235:2,7,13,18 236:16,19  236:24,25 237:12 238:5,6  238:7,19,20 239:6,7,8  242:21,22 243:16,24 245:4  245:23 246:3,4,7 247:14  248:22 250:2 251:7 252:8  252:11 253:9 256:4 258:24  259:11,13,24 260:1,1,22  261:1 262:9 264:25 265:1  266:3,10 268:14 269:6,7,7  270:3,5,13 271:3,10,14,21  271:22 272:17 273:7,9,16  273:23 279:15 286:3,5,8</p>	<p>287:14 288:11,16 289:3,5  289:22 291:13,15 293:25  294:5,12,19 295:4,8  296:17,22 297:2,23,24  298:2,2,12 299:7,11,12  300:6,9 301:15,18,20  302:7 304:4,11,12,21,25  305:7,8,11,14 306:1,5,10  306:11,14,15,15,15,22,24  306:24 307:11,16 308:21  309:10,23 310:7,10,17,19  310:22 311:22 312:12,22  312:23,23 313:23 314:23  315:6 316:18 317:21 322:2  322:4,9 326:17,21 327:7  327:13,19 329:5,15 331:7  331:13,14,15,19 332:12  333:10,11,13,21,24 334:3  334:17,19 335:5,7,8,9,12  335:18,19,22,25 336:10,17  336:24 337:1,5,23 338:14  339:6,17,21,24 340:12,13  340:15,17,19,20 342:4,5  342:12,21 343:16 344:2  <b>knowledge</b> 65:15,18 96:3  113:18 124:16 137:12  155:12 175:15,16 214:10  223:22 226:16 245:13  305:17,18 307:2 311:10  313:19 314:14,14 315:17  315:18 321:25 329:11,12  329:14 339:7  <b>known</b> 21:16  <b>knows</b> 59:24 124:16 125:10  125:15 131:4 178:17  314:11  <b>Kris</b> 45:18 71:8  <b>Kristen</b> 88:7  <b>Kurian</b> 185:19 217:17,20</p> <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <p><b>L-1</b> 44:15  <b>LABOR</b> 1:1,5 2:1,5 3:3  <b>lack</b> 69:18 97:1,13 98:1  99:12 100:13 101:10 102:7  117:16,25 118:10 120:12  122:18,22 125:8 134:15  135:22 208:6  <b>Lacks</b> 96:16 111:15 113:16  121:25 209:10  <b>laid</b> 177:9  <b>languages</b> 116:7 269:12,16  <b>Lara</b> 3:10 6:17  <b>large</b> 63:17,22 123:6 278:11  319:25  <b>largest</b> 199:15</p>	<p><b>Larry</b> 77:19,23 84:24 85:15  89:16 108:8 110:3 147:18  147:22 209:3  <b>late</b> 10:4 155:23 312:3  317:22  <b>lateral</b> 69:23 71:16 181:6,18  181:19 195:4 268:7  <b>laterally</b> 181:9  <b>latest</b> 16:16 94:22  <b>Latin</b> 33:24 133:7  <b>Latino</b> 331:5  <b>launch</b> 75:8 283:7  <b>launched</b> 159:14  <b>launching</b> 61:8 153:18  <b>law</b> 1:2 2:2 63:1,2 88:17  126:25 164:18,18 170:3,9  170:23 232:7 245:6,6,13  302:7,10  <b>lawsuit</b> 310:17  <b>lawyer</b> 164:17,19 208:15  229:6,17 231:9,10,11  232:2,5,25 233:11 292:13  <b>lawyers</b> 11:18 12:4,6 36:23  230:1  <b>lay</b> 22:3 65:13,15 125:21  <b>laying</b> 177:4  <b>leader</b> 85:17,18  <b>leaders</b> 105:9 189:8 323:16  <b>leadership</b> 42:7 295:17  299:3  <b>learn</b> 75:16 192:11 200:20  255:17 272:13  <b>learned</b> 31:3  <b>learning</b> 136:11  <b>leave</b> 185:11 195:21 292:7  <b>leaving</b> 173:11  <b>led</b> 334:10  <b>left</b> 188:16 217:23 237:15  291:21 341:1,5  <b>legal</b> 37:11,11 48:20 200:2,3  221:4,6,8,11,14 222:1,10  228:22 235:25 237:5,11  240:16 241:4,15,19,24  242:1,8 310:25 315:2,3,11  316:14,18,20 317:2,5  318:3,7 337:3  <b>legal's</b> 241:5  <b>Leon</b> 108:21 109:7,10  <b>lesbian</b> 298:20 338:18  <b>let's</b> 47:15,18 48:7 58:25  61:3,5,7,23 62:24 64:17  66:15 68:13 69:13 74:8  78:25 79:7 80:15 81:14,25  82:10 92:16 98:18 99:9  101:22 105:5 127:21,21  135:4,13 146:8 155:20</p>
--	---	---	--

<p>161:2 175:2,7,8 182:24 194:11 209:4 212:18 220:15 226:13 229:11 230:6 238:12 239:18 247:23 250:5,7 252:2,3 257:16 266:3 280:8 292:16 296:11 320:19 321:6 322:22 330:12 <b>letter</b> 132:12 236:7,7,9 264:8 <b>letters</b> 18:4 131:18 132:3 <b>level</b> 35:10 42:15 47:3,23 48:1 82:12 96:12 97:12,18 98:13,17 99:9,16,22 100:2 100:18 101:17,18 110:18 116:12 117:14 118:18 119:9,13,24 120:6,7,10,19 128:1,1,2,21,25 129:4 145:15,23 146:4 162:15 165:18 173:1 174:18,20,22 175:1 176:4,5 178:21 179:25 180:1 181:17,25 190:3,7 191:22 192:9,18 193:2,2,11,17 194:17 195:6 196:6 201:2 215:21 217:12 244:17 251:1,24 253:1,4 256:13,19 257:4 258:10 259:15,18,22 289:23 290:7 320:20 321:12 <b>levels</b> 82:19 83:3 84:2 85:10 110:21 118:20 119:4 127:14,14 171:4 192:15 195:14 203:21 248:3 255:15,17,22 258:14 265:21 <b>LGE</b> 147:18 <b>lie</b> 140:24 <b>life</b> 57:3 188:4 252:13 259:25 <b>life-changing</b> 56:23 <b>liked</b> 276:23 <b>limit</b> 99:10 226:13 229:15 <b>limits</b> 302:22 <b>line</b> 15:10 17:16 26:18 33:12 39:12,13 42:15 43:7 86:18 105:3 135:8 152:13 155:14 158:10 178:3 186:11 189:11 244:12 247:23 248:4,4 254:17 255:11 264:15,17 268:4 286:7 312:12 348:3 <b>lines</b> 20:6 254:9,10,11 <b>lion's</b> 325:24 <b>Lisa</b> 43:11 341:25 <b>list</b> 14:4 32:22 40:24 63:13</p>	<p>149:17,18 273:16 <b>listed</b> 111:12 <b>listened</b> 278:16 <b>lists</b> 96:11 99:22 139:3 294:23 <b>little</b> 64:20 67:1 72:24 77:1 108:6 116:4 129:21 138:15 157:21 159:7 176:20 182:24 207:14 212:12 213:25 232:21 240:13 277:7 314:5 <b>live</b> 37:2 154:8 273:18 284:11 285:14,14 308:21 308:24 309:5 <b>lived</b> 285:24,24 <b>lives</b> 235:9 <b>LLP</b> 3:9 <b>load</b> 284:9 <b>loaded</b> 78:3 186:15,17 <b>Loaiza</b> 50:19 <b>local</b> 183:2,3 199:8 304:20 <b>located</b> 6:10 <b>location</b> 100:11,22 101:2 285:7 287:24 288:19 289:23 299:12,21 330:1,4 <b>locations</b> 99:4 309:7 337:7 <b>log</b> 236:19 240:22,24,25 241:22 <b>logic</b> 248:24 <b>logs</b> 241:13 <b>long</b> 10:3 14:4 20:21 31:12 37:14 87:16,16 127:9 138:3 151:2 198:4 206:23 207:2,15 239:9 280:13 284:18 291:11 293:12 309:10 <b>longer</b> 18:14 <b>look</b> 16:17 24:3 55:13 72:4 82:24 83:2,4,19 90:11 95:24 100:21 110:19,19 112:4 117:13 119:18 137:18 139:3,6,7,10,12,15 139:16,17 146:14 155:9 163:11 182:13,14,21,25 183:10 191:8 192:3 202:9 205:8 210:23,25 212:13 213:18 250:19 252:21 269:14 302:8 311:24 312:8 312:12 313:5 325:8 329:2 330:21 341:18 342:19 <b>looked</b> 35:2 117:20 141:19 141:24 152:23 154:19 155:4 187:13,16 243:25 279:22 296:8 302:3,5 <b>looking</b> 41:3 84:21 118:6 134:12 162:9 163:19 170:5</p>	<p>170:7 180:11 191:10 192:2 211:1 212:8,10,15 251:22 260:13 262:14 267:10 270:20 275:7,13 288:17 296:6 303:5,14 312:13,23 319:25 320:2 325:5,8,16 326:20 329:4,7 <b>looks</b> 17:2 82:24 96:4 147:17,20 235:3 294:13 317:9 335:1 342:6,19 <b>Los</b> 3:6 <b>lose</b> 187:4 333:5 <b>losing</b> 202:8 <b>lost</b> 217:13 261:8 316:7 <b>lot</b> 23:11,11,14,15,16 32:7 33:2 61:22 68:11 82:9 117:8 183:13 185:22 189:10 192:1 217:19 235:1 239:8 249:20 252:9 257:20 260:9 278:13 297:9 327:3 <b>lots</b> 201:19 202:6 229:12 236:10,10 278:13 331:25 <b>low</b> 139:22,25 140:3,11,20 140:20,24,25 141:3,4,7,18 156:12 210:16,22 211:12 257:11 321:12 331:16 <b>lower</b> 118:20 120:10 146:3 176:4 190:7 192:14 203:21 255:22 275:24 320:20 <b>lower-level</b> 172:18 180:17 203:11,12 244:8 <b>lowest</b> 82:11 320:20 <b>Lucky</b> 131:19 <b>Luddite</b> 20:15 <b>lunch</b> 127:1 152:14 158:18 <b>Lynn</b> 15:18,20 37:5</p> <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <p><b>M</b> 35:13 81:25 <b>M-1</b> 51:19 81:14 82:1,10,20 97:19 98:18,18 100:5 320:20 321:3,13 <b>M-10</b> 127:11 <b>M-2</b> 97:19 <b>M-3</b> 97:19 <b>M-7</b> 127:11 <b>M-8</b> 35:14 99:2 <b>M-8s</b> 99:3,7 <b>M-9</b> 35:14 <b>M&amp;A</b> 14:15 43:4,6 72:11 143:14,15 189:9 246:4 <b>machine</b> 19:13 <b>machines</b> 19:17,17,17,18 <b>magic</b> 73:6 325:19 <b>mail</b> 59:5 287:5 <b>main</b> 20:6 127:13</p>	<p><b>maintain</b> 13:4 256:18 <b>majority</b> 199:7 237:2 <b>making</b> 90:13 136:15 161:10 170:6 180:22 183:3,13 189:5 211:2 227:24,25 296:20 303:11 337:8 <b>man</b> 21:16 312:15 <b>manage</b> 21:22,24 42:6 43:7 54:23 104:18 127:16 227:1 259:9 260:6,6,11,12 271:5 <b>managed</b> 54:10 <b>management</b> 21:24 27:8 31:4 34:25 82:11 103:20 113:10 128:7,13,13,20,25 153:19 198:12 249:6 255:1 259:20 260:4,18 262:14 279:14 298:9 317:8 <b>manager</b> 28:8 29:19 52:13 57:19,22 62:25 63:2 66:20 67:20,23 70:16 73:23 74:10 78:6 80:23 81:4,7 86:14 87:23 102:12 103:2 107:17,17 116:23,23 119:23 120:15,18 121:7,12 127:14 128:1,9 129:9 131:3,4 136:17 139:6 142:22 184:1,3 192:19 193:8 202:10 212:4 217:18 233:25,25 247:15,17,23 248:4,5 249:13,22 250:3,4 250:7,16,17,18 252:3,6,16 252:20,23 253:12,21 263:14,17,19 264:15,17 265:9 266:4,17 267:22 272:15 320:20,20,21,24 321:13 <b>manager's</b> 82:17 253:22 <b>managers</b> 20:19 51:7,11,15 51:17,21,24 52:19,21 53:5 53:20 54:25 55:1,4,21 56:12 58:7 74:19 75:6 80:14,24 83:5,18 88:20 89:25 102:21 104:15 107:12,23 127:18 180:21 180:25 202:17 209:16 243:13,16 244:8 247:2 249:3 254:17 255:9 260:2 266:4 267:7 273:4 277:3 281:24 306:14 312:13 319:22 <b>managers'</b> 243:16 <b>manages</b> 15:1 21:19 42:3 78:14 <b>managing</b> 62:25 63:2 98:14 103:20 127:15,19 129:1 143:21 144:17 312:9</p>
---	--	---	---

**mandatory** 36:25  
**manner** 302:22  
**manual** 19:1 31:4 33:22  
 36:25 297:10  
**manually** 20:22  
**map** 198:11  
**maps** 119:15 299:17  
**Mark** 49:16,17 77:19,23  
 84:24 85:13 89:17 108:7  
 110:3 157:5,7,17 159:15  
 160:7 191:23 195:17 244:6  
 274:4 281:15,19 298:18,20  
 298:24  
**Mark's** 90:19 159:18,18  
 195:16  
**marked** 5:13 16:6 92:17  
 123:5 146:24 148:13,17  
 151:1 176:11 274:20  
 278:24 281:1 282:10  
 283:16 287:1 290:22 293:8  
 341:15 343:3  
**marker** 73:6  
**market** 68:22,23 77:4 97:5,5  
 97:10 117:13,19 133:2,17  
 134:12 136:2,5 169:15  
 171:6,18,19,21 183:2,3  
 188:11 195:25 196:20  
 198:24 199:5 202:12,13  
 203:2 204:2,14 205:12  
 207:24 285:8 286:1 311:25  
**marketing** 47:8 49:18  
**marketplace** 35:3  
**markets** 170:15 199:9  
**married** 57:3  
**mass** 204:1 205:23  
**masses** 119:3 173:21  
**massive** 46:20  
**master's** 199:24 200:5,6,11  
 200:13,16 201:1  
**mat** 36:24,25  
**matched** 192:12  
**matches** 131:12  
**matching** 128:9  
**material** 123:19,22,24  
 125:20  
**materials** 104:14,17 322:7  
**math** 166:21  
**matrix** 84:21 90:18 184:9  
 255:18  
**matrixes** 21:14  
**Matt** 282:2  
**matter** 6:5 54:8,15 117:7  
 161:17 162:3 170:15  
 172:14 270:21  
**Mayerson's** 282:2  
**MBA** 33:8

**MBO** 279:10,13  
**MBOs** 102:21 279:11  
**McMorran** 1:24 2:18 346:6  
 347:13  
**mean** 7:10 10:16 17:13 22:8  
 32:4,15,18 34:13,13 49:4  
 49:10 50:4 56:2 57:20  
 65:25 66:5,7,25 71:18  
 74:16 75:2,3 82:23 88:24  
 92:7 97:11 104:7,23  
 115:17 127:7 129:24 130:1  
 130:5 147:13 149:13  
 156:10,21 160:11 161:23  
 161:24 162:11 167:16  
 169:20 172:2 184:11 185:6  
 193:22 194:8,18,22 197:21  
 198:15,23 199:8 201:18  
 203:12 204:5 205:1,19,22  
 208:9 209:2 212:4,11,25  
 213:17 216:6 217:8 218:5  
 219:1,12 226:17,25 229:7  
 229:12 232:10,11,17  
 233:24 234:10,18,19 235:5  
 236:15 237:24 239:3,7  
 242:16 245:18,19 248:21  
 248:24 250:1,2 251:2,17  
 251:17 252:8,9 254:2  
 256:16 257:3 258:10,13,15  
 259:2 260:16 262:10  
 263:13 264:24 269:22,23  
 270:9,13,15,24,24,24  
 275:14 286:19 288:24,24  
 290:11,12 294:15 298:14  
 298:15 300:3,14,14,19  
 301:21 306:13 307:3,8  
 308:10,10,17 311:3,21  
 313:15 314:6,9 315:21  
 323:3,3 331:25 332:9  
 333:22 337:22 343:20  
**meaning** 75:24 95:14 110:3  
 140:2 141:9 144:21 160:17  
 160:23 190:19 339:14  
**meaningful** 286:4  
**means** 60:18 109:17 112:20  
 112:23 145:20 176:24  
 177:6,20 178:3 224:25  
 322:4,4 343:24 344:1  
**meant** 149:14  
**measurable** 157:20  
**measure** 209:7,19,20  
**measured** 99:1 102:25  
**measuring** 304:2  
**mechanics** 75:11  
**media** 84:11 85:25 86:1,6  
 158:22 159:3 239:21 240:1  
 292:21 293:1 344:10

**meet** 106:20,20  
**meeting** 10:21 113:4  
**meetings** 39:24  
**member** 108:20 109:9,13,13  
**members** 67:13 68:15  
 108:13,18  
**memo** 149:6,14 150:1,19  
**memories** 283:18  
**memory** 47:15  
**men** 155:10 161:5 260:10,11  
 260:12 270:5 302:8,8  
 315:14,25 317:7,25 320:1  
 332:24 340:1,2  
**Mendelsohn** 50:18  
**mentioned** 49:15 50:11,22  
 62:1,21 144:6 197:8  
 199:11 210:16 236:12  
 261:22,23 293:23 318:20  
 319:18 333:13 339:25  
**mentioning** 138:16  
**mentions** 281:9  
**mentor** 249:4 332:20 338:2  
**mentoring** 334:5  
**mentors** 332:24  
**mentorship** 338:14  
**mergers** 48:20  
**messed** 311:15  
**met** 289:14 296:16  
**metric** 106:19 159:8  
**Michael** 1:24 2:18 346:6  
 347:13  
**MICROS** 187:21,25 286:6  
**middle** 106:4 119:5 139:1  
 254:18  
**midpoint** 135:21  
**midrange** 134:13,19  
**Mike** 43:2,9  
**millennials** 271:11  
**mind** 89:2 167:3 197:24  
 217:13  
**mine** 144:2  
**minimum** 141:2  
**minor** 282:1  
**minorities** 315:5 326:4  
 331:4 332:25 333:14  
 338:17  
**minority** 44:8 325:13  
**minute** 147:2 148:12 280:4  
**minutes** 84:11 123:11 151:5  
 196:1 237:16 319:17  
 340:23,24 341:1,5 342:25  
**Miranda** 50:16  
**mirror** 300:4,4  
**miscellaneous** 43:13  
**misleading** 218:3  
**missed** 207:23

**missing** 12:22 15:2 34:2  
 36:17  
**mission** 307:5  
**misspoke** 159:13  
**misstates** 170:11,18 327:10  
**mistaken** 217:21  
**MIT** 208:11  
**mix** 70:18  
**mixed** 158:8  
**Mmm-hmm** 22:6 53:1 82:21  
 100:8 148:21,23 159:12  
 262:20 305:3 313:12  
**mobile** 21:6  
**mobility** 249:19  
**model** 153:15  
**modern** 280:15  
**modernization** 17:12  
**modified** 53:8 203:4  
**money** 80:25 172:15 188:15  
 218:13 246:10  
**monitor** 6:8 310:11  
**monitoring** 304:16,21  
**month** 187:6  
**monthly** 282:15  
**morning** 6:3 21:4 272:8  
 281:10  
**mother-in-law** 67:24  
**mothers** 216:12,13  
**move** 33:6 48:7,7 69:23  
 71:10 115:6 138:20 140:21  
 143:23 186:7 192:10 193:4  
 225:24 240:20 247:22  
 248:2 249:20 250:19  
 253:14 254:20 255:1 256:3  
 259:14 268:3,6 269:19  
 270:20  
**moved** 18:7 19:2 33:7  
 153:13,14 276:13,15,16  
 282:7 285:6 307:25  
**moves** 100:2 185:22,24  
**moving** 69:3,23,24 70:15,15  
 71:2 72:16 143:20 197:6  
 213:17,20 247:14 248:6,7  
 254:5,17 271:12 281:16  
 295:11  
**multi-year** 284:25  
**multiple** 17:18 30:8 52:10  
 53:6,7

---

**N**

---

**N** 4:1 5:1  
**name** 6:9 14:9 19:25 45:10  
 50:23 108:21,23 109:15  
 159:9 305:25  
**names** 49:7  
**Naomi** 108:25 109:7,11

**national** 300:16  
**nature** 228:24 237:8  
**navigate** 266:19  
**near** 99:5  
**necessarily** 13:23 44:16  
 53:8 85:10 181:20,24  
 187:13 213:10 253:24  
 260:25 263:10 264:13  
 301:21  
**necessary** 9:9 173:6 260:25  
**necessitate** 225:1  
**need** 8:3,6,13 9:15 23:9  
 44:21 53:2 57:13 64:14  
 65:1 83:8,21 90:16,17  
 103:23 123:14 124:12  
 140:21 142:8 148:1 168:18  
 168:20 190:8 191:2,6,6  
 210:4 211:15 253:22 255:4  
 255:20 262:11 268:22  
 280:2,2,4 284:7,16,17,17  
 291:17 296:20 301:23  
 326:21  
**needed** 52:3 284:3 326:15  
**needs** 60:16 85:13 98:13  
 146:22 189:14 270:6 331:6  
 331:7  
**negative** 75:25 227:22  
 269:22  
**negotiate** 215:17 216:3,7,9  
**never** 10:17 90:13 103:12  
 130:1 151:7 167:3 168:19  
 177:6,8,23 178:15 180:24  
 205:4 219:25,25 245:18  
 246:9,9 253:1 255:18  
 257:23 259:8 289:14 334:7  
 338:25 339:4 341:22  
 342:15 343:22  
**new** 26:18 29:6 33:5 55:9  
 59:3 67:16 70:5,18,18  
 72:16 75:5,6 104:6 108:20  
 109:9,13,13 121:20 172:15  
 190:16 212:12 271:12  
 276:13,15,16,23 277:20,25  
 278:4 284:5,10,11 286:7  
 303:4,5,9,14 324:14  
**new-hire** 63:12,20 66:14  
 69:15,22 73:13,16,20 87:4  
 92:3,4 119:12 127:22,23  
 127:23 130:6 150:13 175:8  
 175:17 305:23 309:1  
**new-hire's** 116:10,15 117:2  
 117:23  
**new-hires** 73:21 103:16  
 116:22 118:8 132:16 174:6  
 174:10 175:24 195:4  
 215:16 288:11 309:6

**newly** 140:19  
**news** 283:24  
**newsletter** 282:15 283:23  
**nine** 282:25  
**nodding** 8:4  
**Nolitt** 14:6 15:3  
**Non-Exempt** 343:20  
**non-important** 7:20  
**nonexecutive** 111:6,8 243:5  
**nonexempt** 215:1  
**noon** 146:15  
**normal** 217:4  
**Norman** 3:4 6:16  
**North** 6:11  
**note** 297:20  
**notepad** 78:21  
**notes** 231:4  
**notice** 11:5 131:17  
**noticed** 195:25  
**notices** 270:3  
**notification** 59:15  
**notified** 267:20  
**number** 28:10 32:6 93:20  
 100:3 148:14 149:1 150:10  
 150:11 201:3 211:5 228:13  
 228:15 235:18 236:15  
 237:1 238:17 260:2 264:17  
 304:2 308:18 346:9  
**numbers** 73:21 330:4

---

**O**

**OALJ** 1:4 2:4  
**oath** 6:21 8:1,1  
**oaths** 346:12  
**object** 11:10 36:9 65:7  
 214:22 226:6 297:19  
**objection** 10:9 22:21 25:17  
 28:15 30:16 38:25 39:8  
 65:23 66:16 69:18 79:3  
 81:17 90:1 92:5 96:1,16  
 97:1,13 98:1,9 99:12  
 100:13 101:7,25,25 102:6  
 104:25 106:11 109:21  
 111:15 113:15 114:11  
 117:16,25 118:10,21  
 120:11 121:25 122:18,22  
 125:8 128:3,15,22 129:5  
 131:8 134:6,15 135:22  
 138:23 140:2 142:20 144:8  
 145:17 153:9 154:22  
 160:18 161:14 162:22  
 169:3,18 170:11,18 172:10  
 174:9 176:25 181:12 183:7  
 190:17 192:22 193:13  
 194:1 196:8 197:13 201:16  
 202:4 204:16,23 207:19

208:6 209:9,24 212:23  
 215:18 216:18 218:2  
 220:11 221:19 223:17  
 224:4,13 230:11 237:22  
 242:13 247:8 248:11,18  
 249:14,24 251:11 253:17  
 256:14,23 257:5 258:4  
 270:10 290:8 299:10 301:4  
 307:1 310:24 315:15  
 326:10 327:10,22 331:22  
 333:18 337:2  
**objections** 8:8  
**objectives** 113:5 279:14  
 296:15  
**obvious** 312:24  
**obviously** 7:25 8:8,20 96:10  
 131:20 152:24 243:7  
**occasion** 44:13 59:16  
 251:17  
**occur** 142:13  
**occurs** 139:18  
**OFC** 337:1  
**OFCCP** 1:5 2:5 6:15,16 38:7  
 309:14,23 310:11,17  
 336:25  
**OFCCP/DOL** 348:3  
**off-cycle** 28:24 29:12  
 142:18,24 143:10  
**Off-the-record** 210:8 261:13  
**offer** 18:4 130:23 131:18  
 132:12 171:8,21,23 172:3  
 174:2 287:20,22  
**offered** 173:4  
**office** 1:2,4 2:2,4 3:3 48:19  
 187:24 239:3 286:13,16  
**officer** 13:22 346:22  
**OFFICER'S** 346:1  
**officially** 234:23  
**OFSS** 14:25 43:21 44:4,11  
 44:17,20  
**oh** 7:15 13:2 15:2 35:11 37:5  
 38:4,5 44:18 46:16 47:11  
 48:15 50:7 53:13,22 54:1  
 55:14 59:20 61:2 64:24  
 66:8 72:20 81:3 84:11  
 88:16 91:3 93:2 123:12  
 152:17 160:1,5 167:1,3  
 179:16 191:1 194:16  
 195:24 209:19 217:25  
 229:6 252:3 261:8 269:24  
 269:25 270:15 278:9  
 286:20 290:24 293:10  
 298:23 299:23 303:19  
 326:21 330:18,25 334:13  
 339:3 342:12  
**okay** 7:7,12,15,18,20,22 8:2

8:12,17,18 9:1,2,14,16,18  
 9:21 10:3,6,8,14,21,25  
 11:7,22,25 12:6,9,11,14,17  
 13:6,14,16,20,23 14:1,4,6  
 14:11 15:14,16,21,23 16:4  
 16:14,17,21,24 17:1,2,5,10  
 18:12,14,16,25 19:4,19,25  
 20:2,5,8,11,17 21:18,21  
 22:11,17,20,25 23:7,10,21  
 24:1,5 25:1,7,7,11,14,23  
 26:2,9 27:1,3,10,13,16,19  
 28:5,21 29:1,4,10,14,21  
 30:3,6,10,23 31:1,1,9,11  
 31:18,20 32:10,11,25 34:3  
 34:6,11,18,21,23,24 35:1,8  
 35:9,13,15 36:6,20 37:3,10  
 37:16,24 38:2,7,11,14,17  
 38:23 39:6,10,17,19 40:1,4  
 40:7,13,17,18,18,22 41:20  
 41:23 42:2,8,14,19,21 43:3  
 43:8,16,24 44:4,7,14,22  
 45:3,6,15,18 46:1,4,16  
 47:10,15,15,25 48:6,15,22  
 48:25 49:4,10,17,19,24  
 50:6,7,10,13,15,17,20 51:3  
 51:4,9,12,18,21 52:5,9  
 53:5,12,14,18,23 54:2,4,4  
 54:10,13,17,21,25 55:3,6  
 55:16,20,23 56:9 57:15  
 58:25 59:6,18,21 60:9,14  
 61:3,15 62:21,24 63:1,10  
 63:16 64:2,5,7,7,22 65:1,4  
 66:3 67:5,13,17 68:13,14  
 68:20 69:6,13 70:3,7,14,20  
 71:4,14,19,24 72:9,15,18  
 72:22 73:12,14,20 74:2,6  
 74:18,24 75:15,20,23 76:5  
 76:10,15 77:8,12,21,25  
 78:7,10,15,23,23 79:10,15  
 79:21 80:1,5,7,9,21,23  
 81:3,7,11,14,19,25 82:4,8  
 82:10,19 83:1,3,8,14,21,25  
 84:3,6,10,10 85:2,18,18,19  
 85:22 86:12,20 87:2,5,12  
 87:17,20 88:1,4,7,14,19,24  
 89:4,13,18,24 90:7,10,22  
 90:24 91:5,7,9,22 92:3,11  
 92:15,15 93:2,3,7,13 94:2  
 94:8,12,19,24 95:3,7,12  
 96:6,20,23 97:8,8,11,24  
 98:19,24 99:8,19,21 100:6  
 100:9,25 101:4,20,20  
 102:14,20 103:3,6,11,13  
 104:2,12,19,22 105:5,10  
 105:15,20,21 106:4 107:2  
 107:7,10,23 108:3,10,13

<p>108:19 109:3,17,20 110:6 110:10,16,23 111:2,6,10 111:12,21 112:3,21,25 113:20,25 114:5,9 115:13 115:18,18,24 116:2,8,19 117:13,22 118:15,20 119:2 119:11,17 120:3,9,18 121:3,6,9,15,18,18 122:6,9 122:12,16 123:2,3,4,8,21 124:1,5,8,24 125:24 126:2 126:5,7,9,17,17,21,24 127:5,10,13,18,21 129:11 129:14,16,19 130:4,13,18 130:25 131:6,14,17 132:7 132:14,16,19 133:1,5,10 133:15,19,25 134:5,12,25 135:9,13,17,20 136:7,15 136:18,21,25 137:4,7,10 137:19 138:12 139:10,14 139:16,19,21,24 140:14,25 141:6,15,18,24 142:2,10 142:13,18 143:2,7,9,22 144:3,12 145:2,7,13 146:8 146:8,17,19 147:3,7,9,12 147:20,23 148:10,11,20,24 149:2,8,11,15,24 150:2,5,7 150:21,23,24 151:8,13,20 151:22,25 152:3,5,9,11,17 152:23 153:3,7,21,24 154:2,6,10,14,16,19 155:1 155:4,7,11,17,19,22,25 156:19,23 157:7,12,24 158:2,6,9,16,20 159:16,23 160:4,7,9,15 161:6,12,19 161:23 162:7,14,14,16 163:2,7,13,16,21,25 164:5 164:12,14,20 165:5,13,13 165:20 166:8,20,20 167:10 167:12,14,19,25 168:2,7,9 168:12,17,17 169:9,16,25 170:8,23 171:14,22 172:8 172:18,22,25 173:8,12,23 174:6 175:7,22 176:1,5,8 176:15,20 179:8,15,24 180:3,9,13,20,24 181:5,8 181:22 182:19 183:16 184:4,6 186:13,20 187:15 189:12,16 190:7,12,14 191:6,13,20,25 192:14,17 193:6,10,20 194:10,25 195:12 196:21,25 197:4,20 199:1 202:6 204:4,10 205:10,14 206:21,24 209:12,22 210:3,6 211:10 211:19 212:2,8,15 213:3,8 213:21,24 214:18,20</p>	<p>215:16,25 216:20 217:15 217:25 218:14,18 219:21 220:10,18,24 221:14 222:14,25 223:5,5 224:8,8 225:10,18 226:6,22 227:5 228:3,14,20 229:19 230:1 230:3,5,6,15,19 231:3,6,10 231:13,23 232:8,21 233:14 234:22 235:21 236:1,12,21 237:7,17 238:3,22 239:17 240:15 242:25 243:5,7,15 243:23 244:1,5,14,21,24 245:10,16,22 246:25 247:3 247:6 248:16 249:12,22 250:24 251:6,14 252:2,23 253:6,10,12,24 255:4,8,24 257:11,17 258:8 259:5,16 259:19 263:1,4,11,24,24 264:13,21 265:5,13,20,23 266:23 267:19 269:3 270:19,22 271:2,18 272:5 272:23 273:3,7,9,19,22,24 274:7,15,17 275:5,20 276:3,8,19,25 277:7,11,14 277:17,21,22 278:2,18,22 279:8,13,22 280:1,8,11,14 281:2,4,6,22,25 282:8,12 282:14,17,20,23 283:8,12 283:25 285:3,19 286:14,18 286:23 287:2,4,8,14,16,19 288:16 289:3,6 290:2,4,17 290:21,22,24 291:5,7,8,13 291:17,18 292:16,18 293:4 293:7,23 294:2,12,14,17 294:21 295:6,8,12 296:6 296:10,22,25 297:11,16 298:2,7 299:7,15,19,22 300:12 301:9,11 302:1,5 302:14 303:12,18,23 304:7 304:9,11,13,24 305:2,7,15 306:1,5,12,16,24 307:7,19 307:24 308:3,8,21 309:2,5 309:10,18,23 310:10 311:6 311:9,18 312:20 313:3,8 313:11,13,23 314:16,18,20 315:2,4,9,24 316:8,10 317:2,3,4,10,13,14,20,20 318:21,22 319:3,8,8,17 320:8,19 321:12,19,23 322:9,18,25 323:2,7,11,13 323:19 324:2,5,10,16,21 324:23 326:7,15 327:20 328:16,22 329:3,8,9,24 330:5,9,12,21 331:1,15,19 332:4,9 333:24 334:3,20 334:24 335:3,8,19,23</p>	<p>336:17,23 337:5,12,14,21 338:6,12,19 339:6,21 340:5,13,21 341:19,20,22 341:25 342:3,7,15,17,21 342:24 343:7,10,12,18,23 344:2,4,6 <b>old</b> 19:6,14 33:22 63:21 94:8 94:9 135:12 149:22 260:17 276:14,24 277:18 278:4 <b>olden</b> 20:20 <b>On-Premise</b> 19:3,6,12,14 20:10 31:7 277:14,16,19 <b>onboarded</b> 292:11 <b>onboarding</b> 14:16 72:13 305:24 338:5 <b>once</b> 9:6 43:4,4 77:16,21 79:23,23 80:10,23 107:8 114:14 115:10 139:18 155:21 184:6,8 186:5 187:12 233:22 248:16 255:11,12 260:23 284:15 300:20 324:7 <b>one-size-fits-all</b> 232:14 <b>ones</b> 7:19,21 24:13,14 29:12 41:21 157:1 158:3 227:12 238:13 275:8 332:19,22 <b>ongoing</b> 75:3 157:14,18 311:21 312:7 <b>online</b> 36:24 37:1 63:18,19 64:1 74:25 86:14,23 154:6 154:8 309:8 <b>open</b> 245:23 267:9 295:21 <b>opened</b> 295:21,22 <b>openly</b> 246:5 <b>operations</b> 33:1,21 <b>opinion</b> 39:1 194:18 <b>opportunities</b> 261:3 266:13 266:24 267:20 269:17 271:12 <b>opportunity</b> 38:18 64:3 252:21 304:17,17 305:8,16 306:2,25 307:14 308:23 309:11 313:11 <b>opposed</b> 32:1 <b>opposite</b> 174:23,24 252:2 <b>options</b> 108:3 110:24 148:7 176:23 281:11,12,16 <b>Oracle</b> 1:8 2:8 4:15 5:7 6:5 6:19 11:17 12:15,21,21,21 13:7,12,19 14:12 16:12 20:3 23:11 28:3 32:5,7,25 34:7,19 35:21 37:11 40:4 42:5 44:1,5,11,17,17 46:6 46:9 51:5 57:9 58:5,5,13 58:18 59:19 61:12,23,24 62:11 66:3,10,14 72:3,6</p>	<p>94:2 96:25 97:9 100:10 112:21,23,24 114:1 115:15 115:20,25 117:3 121:20,22 145:23 151:16,17 159:17 165:8 168:25,25 169:12,17 174:8 175:9,12,19 181:9 181:22 187:5 188:3 192:11 194:5,14 203:19 204:8 224:2,19 226:2,10 239:8 242:12 244:25 245:22 246:16 247:7 249:4 252:22 260:21 267:16 268:13 270:3 292:7 294:6 296:7 297:12 299:8 303:25 304:4 304:21 305:9,16 306:3,16 307:11,12 308:21 310:1,3 310:11,18 311:9,10,20 312:5,6,20 313:8,13,16,23 314:11,12,15,15,23 315:4 315:13,24 317:4,6 321:23 322:1,10 327:7,21 328:5 328:17,18,19,20,21 329:10 331:4 332:7 333:14 335:10 336:12,14,15,18 337:16 338:13,24 339:4,7,10 340:13 342:4 348:3 <b>Oracle's</b> 16:24 17:1 42:7 56:14 65:10,21 205:6 295:17 296:14 306:25 327:17 343:7 <b>Oracles</b> 100:21 <b>orally</b> 190:9 <b>Orange</b> 1:16 2:16 6:1 345:2 346:4 <b>order</b> 310:11,13,16,19,22 311:7,19 <b>org</b> 46:8,9 48:7 143:14 266:9 <b>organization</b> 30:24 35:21 37:9,10 39:11 41:6 42:9,20 43:13 46:13,20 48:13,17 49:23 50:9,12 54:7 60:19 68:19 70:9,11,13 83:11 84:24 87:25 89:1 104:17 132:10 140:8 151:18,19 154:12,14,15 156:24 157:6 159:17,19,20 160:12 161:21 162:12,17,18 163:25 190:24 198:6,12 203:13,25 204:5,6 205:19 210:19 211:23,25 243:21 247:19,21,25 251:2 254:24 260:1 262:4 265:11 266:20 267:8,10 268:10 270:4 276:17 282:18 288:25 300:8,13,24 302:8 313:19</p>
---	---	--	--

<p>313:20,21 315:17 320:5,14 320:22 321:3,9,17 322:21 322:22,24 323:16,21 324:14,22 326:25 <b>organizational</b> 34:14 42:1 201:6 274:14 <b>organizations</b> 49:8 103:1 320:3,18 324:9 <b>organized</b> 40:14 46:7 <b>orgs</b> 266:11 <b>orientation</b> 63:20 308:24 309:1,5 <b>origin</b> 23:7,8,18 25:11 134:3 <b>original</b> 94:7 <b>originally</b> 94:18 <b>Orrick</b> 3:9 6:18 36:23 <b>ourself</b> 301:17 <b>out-of-cycle</b> 147:8 148:25 <b>outcome</b> 227:21,22 <b>outreach</b> 332:14 <b>outreaching</b> 325:14 <b>outside</b> 10:21 20:3 146:3 191:3 204:11,12 214:5 221:14 224:2 268:11 309:16 311:23 317:5 318:3 <b>overall</b> 85:14 278:18 331:3 <b>overbroad</b> 22:21 28:15 39:1 65:23 66:16 69:19 79:3 90:1 92:5 96:2,16 98:1 99:13 100:14 101:7 102:7 104:25 106:11 109:21 111:15 117:16,25 118:10 122:1,23 128:3,15 129:5 131:8 134:6 135:22 138:23 142:20 144:8 145:18 160:19 169:3 172:10 181:13 183:7 190:17 192:22 193:13 194:1 197:13 201:16 202:4 204:16,23 207:19 208:6 209:10 215:18 242:14 247:8,10 248:11,19 249:25 253:18 256:14,23 257:5 258:4 331:23 <b>overengineered</b> 278:21 <b>overperforming</b> 102:11 <b>overrule</b> 239:13 <b>oversee</b> 34:8 110:2 <b>oversight</b> 82:16 85:5,8 <b>overtitled</b> 184:22 <b>overtuned</b> 216:15,21,24 <b>overturning</b> 218:24 <b>overtuns</b> 217:5 <b>overview</b> 294:15 <b>OWL</b> 42:6 295:16,16 332:21 338:2</p>	<p><b>owner</b> 44:8</p> <hr/> <p style="text-align: center;"><b>P</b></p> <hr/> <p><b>P</b> 346:11,16,21 347:3,8 <b>p.m</b> 2:17 158:24,25 159:1,5 210:10,11,11,13 239:23,24 239:24 240:3 280:20,21,21 280:23 292:2,3,3,5,23,24 292:24 293:3 319:12,13,13 319:15 341:9,10,10,12 344:11,12 <b>PAC</b> 14:24 44:3 91:8 281:17 <b>package</b> 96:8 99:25 149:25 <b>Packet</b> 4:14 <b>page</b> 4:3,9 5:4,14 59:19 61:13,24 62:11 93:22 106:5 112:3 116:8,17 124:18 125:1,10,25 126:24 129:14,17,17,20,23 132:20 135:13,20 137:16 246:17 246:20 275:12 294:21 296:10 303:18,22,24 306:3 330:13,16,22,23,25 348:3 <b>pages</b> 93:22 123:15 135:15 273:11 <b>paid</b> 99:3,5,6 106:5,21 135:10 156:17 161:11 163:10 188:1,9,15 213:10 215:3 259:14 302:9 312:14 313:17 314:24 315:5 320:1 340:3 <b>Palmer</b> 15:18 <b>pamphlet</b> 87:1 <b>Panetta</b> 108:21,24,25 109:7 109:10 <b>paper</b> 18:21 51:15 59:16 <b>paperwork</b> 18:8,10 305:23 <b>paragraph</b> 96:11 112:5,7 113:1 116:9 277:2 331:1,1 <b>parallel</b> 49:9,10 <b>parents</b> 216:9 246:9 <b>part</b> 21:11 74:19 78:17,19 78:22 108:14 199:25 238:9 241:5 267:13 277:8,9 286:1,6 295:5 <b>participated</b> 222:4 289:4 <b>participates</b> 298:17 <b>particular</b> 54:16 60:11 70:20 126:8 130:24 133:17 137:25 202:9 203:4 212:3 223:8 239:3,4 252:10 266:15 267:10 286:1 287:5 340:8 <b>particularly</b> 26:6 <b>parties</b> 346:18 <b>partner</b> 129:11,12 131:2</p>	<p>136:17 158:11,12 252:11 342:6 <b>partners</b> 34:9,16 37:18 38:15 90:25 272:16 <b>parts</b> 133:20 266:19 269:17 317:4 <b>passed</b> 149:23 <b>password</b> 62:14 <b>patents</b> 246:23 <b>patience</b> 208:23 <b>pattern</b> 196:6 251:7 <b>pay</b> 59:1,2,3 74:1 75:13 87:10 92:4 100:22 119:24 120:4,19 133:22,23 141:8 161:4,24,24 162:5 163:19 171:5,6,23 172:4,9 181:11 181:20 182:3,6 183:2 209:22 216:15,21 217:19 218:13 219:9,10,11,16,17 219:18,19,20,24 220:2,17 224:19 225:1 226:10 227:9 227:13,14 285:7 287:21 288:18 289:15,18,19 296:7 297:17 298:4 302:2 311:11 312:5,21 313:4,5,14,16 314:24 315:5,14,25 317:7 318:1 320:10 327:18,21 328:17,21 329:2,10 336:13 336:14,18 337:16,25 338:21 339:8,8,8,10 340:3 340:4,14 <b>paying</b> 120:5,6 134:10 161:16 162:11 172:15 188:6,11 202:11,14,16 204:7 217:2,13 <b>payroll</b> 18:9,9 57:12,13 <b>peer</b> 209:16,16 <b>peers</b> 47:12,21 183:3 287:23 287:24 288:3,9,18 289:8 289:23 <b>penalty</b> 345:8 <b>pending</b> 220:23 <b>people</b> 18:5 20:18 21:14,20 21:20 23:15,15 28:11 34:17 35:2,5,16 40:3,20 41:11 42:16 43:9 45:12 46:1 47:4 50:11 54:19 60:2 60:4,4,6,18 62:1 63:22 67:16 68:3,11,12,24 69:2,6 70:22,24,25,25 71:10 72:10,12 74:12 75:16,19 80:3 83:2,20 89:6 102:23 102:24 103:9,15,25 116:6 119:4 120:15 127:15,16,19 129:1 131:4 134:10 138:3 139:3,12 140:7,8,9,24</p>	<p>143:15 149:1 150:14 151:23 161:5,5 163:19 164:23 166:13,15 168:2 169:22,23 172:13 178:11 183:20 184:8 185:1,1,25 187:25 188:9,20 189:7 190:6,16 191:17 195:19 197:2 198:16,17,23 199:19 199:23 200:4,11 201:8,11 201:14 202:8,11,15 204:12 208:13,22 209:16 212:1 213:18 214:25 215:2,10 220:17 229:4,22,23,24,25 230:25 232:1 234:2,14,17 234:20 238:14,21 244:1,3 244:14,21 245:11 246:3 247:5,20 251:4 254:17,21 255:8 259:9,24 260:12,12 260:21 261:3 266:19 267:9 268:1,12,18 269:5,13,16 269:21 270:21 271:9,20,25 273:5 275:18 278:18 279:9 279:21,22 281:23 282:6,7 282:17 286:10 288:25 289:10,12,13,25 294:16 301:22 302:9 303:10 307:10 312:8,13,13 317:16 320:5 321:4,14,17,18,19 321:20 328:23 337:25 339:25 <b>people's</b> 62:19 <b>PeopleSoft</b> 135:7,11 144:22 165:8 197:17,17 <b>percent</b> 119:9,10 152:12,20 197:9 270:5 343:19,21 <b>percentage</b> 143:16 152:6 343:19 <b>perfectly</b> 340:2 <b>perform</b> 107:5 <b>performance</b> 4:14 21:24 102:4,12,20 104:19,24 105:7,12,18,18 113:7 117:10 140:18,19 152:6,16 152:20 153:1,4,8,16,24 154:3,5,20,23,24 155:5,10 155:12 156:1,8,11,21,23 157:4,8,19,25 158:9 159:25 246:13 247:1 259:1 259:2 261:22 282:25 283:1 <b>performed</b> 219:9 <b>period</b> 138:3 207:8 347:7 <b>periodically</b> 302:19 303:1 307:12 322:23 <b>periods</b> 188:21 <b>perjury</b> 345:8 <b>permitted</b> 8:8</p>
---	---	--	--

<p><b>person</b> 13:12 14:2 28:9 37:2 37:2 42:25 45:16 66:21 67:2 68:9 71:3,4,21 74:9 77:7 83:11,13 96:21 101:18 103:22 109:8 114:6 114:6 116:24 119:15 135:10 140:20 165:9 177:18 178:22 183:14 184:2 213:14 217:10,13 235:3 237:14 239:7 247:16 251:19 252:6,18 253:21 254:4,20 256:2 259:3,8,18 265:9 297:21 326:23 342:20</p> <p><b>person's</b> 169:1 180:21,25</p> <p><b>personal</b> 57:16 65:8,14,18 100:16 113:17 124:16 125:17 127:11 137:11 139:20 140:4 162:15 175:14,16 178:23 223:22 246:1,2,7 307:2</p> <p><b>personally</b> 36:3 83:21 95:18 95:19 120:4,23,24 121:6 131:14 139:10,17 141:10 141:11,21,22 152:24,25 157:13 161:2,3,22 175:22 190:2 196:12,15 205:3 216:17 219:21 221:17 224:19 239:7 271:14 287:25 288:2 289:6 298:15 298:25 307:11 337:14,18 337:19 340:11</p> <p><b>personnel</b> 302:19,25</p> <p><b>perspective</b> 25:25</p> <p><b>Peter</b> 14:15 30:24 42:22,23 43:10,11 72:12,21 185:15</p> <p><b>Ph.D</b> 201:10</p> <p><b>Ph.D.s</b> 201:4</p> <p><b>phase</b> 284:1,12</p> <p><b>phases</b> 285:3</p> <p><b>Phil</b> 14:17 15:15,16 44:22 45:21,25 77:6,16 79:5 133:21 150:4,22,23</p> <p><b>Phil's</b> 76:13 77:12,16,21 287:15</p> <p><b>Philippines</b> 100:5 101:2,14 101:16 188:11</p> <p><b>philosophy</b> 38:23 39:4,21 191:24</p> <p><b>phone</b> 21:4,5</p> <p><b>physical</b> 295:23</p> <p><b>PIA</b> 292:12</p> <p><b>pick</b> 321:6,6</p> <p><b>picked</b> 41:14</p> <p><b>picking</b> 213:12,13,13</p> <p><b>picture</b> 46:19</p>	<p><b>piece</b> 15:10</p> <p><b>pieces</b> 33:20 40:10 130:11 284:8</p> <p><b>pilot</b> 276:10 277:19 278:8</p> <p><b>pipelines</b> 299:4</p> <p><b>place</b> 30:1 56:20 57:9 63:16 74:22 136:19 142:23 155:20 171:3,10 246:23 292:19 332:15</p> <p><b>placed</b> 116:11 117:24 119:12 128:1,13,21</p> <p><b>placement</b> 5:10 120:19 121:7,12 343:8,18</p> <p><b>places</b> 305:24</p> <p><b>Plaintiff</b> 1:6 2:6,15 3:2</p> <p><b>plan</b> 5:7 72:6 112:8,9,10,12 112:16,19,22,24 113:7,11 113:12,14,23 114:2,7,23 115:1,16,25 189:3 279:20 293:22 294:22 295:9,13 297:13,22 304:19 305:5,13 306:6,17 307:20 327:15 330:17 331:12</p> <p><b>planning</b> 155:24 296:15</p> <p><b>plans</b> 279:10 304:22 306:13 310:21 327:8 334:8</p> <p><b>play</b> 78:2 195:5 221:23</p> <p><b>played</b> 197:25 203:7,10 219:25 221:20</p> <p><b>players</b> 68:7 172:1</p> <p><b>please</b> 6:13,21 26:13,13 32:10 39:6 53:3 59:20 73:19 76:11 93:11 96:14 100:12 126:5 137:7 149:12 191:15 240:19,20 279:8 302:13 315:22 330:12 341:18</p> <p><b>plus</b> 176:23</p> <p><b>point</b> 13:22 17:22 33:7,14 33:19,23 66:10 81:3 87:19 88:22 93:24 133:13 153:18 170:1 180:15 200:3 225:6 259:20 296:12 298:8 302:17 311:3 329:1</p> <p><b>pointing</b> 78:21 275:8,9,14 275:22,24</p> <p><b>points</b> 39:25 40:1,5 307:22 311:4 312:18 317:19</p> <p><b>policies</b> 56:14 62:4,11 64:5 65:5,6,11,22 66:4 87:22 305:15 307:14</p> <p><b>policy</b> 58:10,25 59:3 173:3 234:13 242:20,23 245:11 251:8 305:9 306:25</p> <p><b>pool</b> 107:9 269:13,14</p> <p><b>population</b> 66:19 296:4</p>	<p>299:17 300:4 337:6</p> <p><b>populations</b> 298:19 299:6 332:2 338:18</p> <p><b>portion</b> 300:10 309:11</p> <p><b>position</b> 14:9 70:16,16 127:11 128:14 130:16 182:9,23,25 244:19 247:15 251:21,23 260:23</p> <p><b>positions</b> 120:10 203:18</p> <p><b>positive</b> 206:9 227:21 269:24,25 271:1 278:18</p> <p><b>possible</b> 128:19 185:14 193:23 257:17</p> <p><b>post</b> 55:15 137:6 243:6 267:14,14</p> <p><b>posted</b> 118:3 267:18,25</p> <p><b>posting</b> 266:14 267:1,15</p> <p><b>potential</b> 103:10</p> <p><b>power</b> 261:9</p> <p><b>powerful</b> 244:1</p> <p><b>PowerPoints</b> 273:13</p> <p><b>Powers</b> 216:25</p> <p><b>practice</b> 66:9 169:22 170:1 170:2 190:15 192:16 196:6 199:2 251:8 254:15 337:24 337:25</p> <p><b>practices</b> 18:3 74:15 226:3 226:3 303:8</p> <p><b>pre-2000</b> 32:20</p> <p><b>pre-sales</b> 70:15</p> <p><b>preachy</b> 166:9</p> <p><b>premarked</b> 166:25 167:2</p> <p><b>prepare</b> 9:25 10:22 149:12 149:24 150:3,6</p> <p><b>prepared</b> 178:18 179:8</p> <p><b>prepares</b> 179:6</p> <p><b>preparing</b> 152:1</p> <p><b>presence</b> 326:23</p> <p><b>present</b> 3:14 173:9 336:2</p> <p><b>presentation</b> 274:3</p> <p><b>presented</b> 124:19,20 173:4</p> <p><b>presenting</b> 150:19 173:7 180:16</p> <p><b>presently</b> 108:15,17</p> <p><b>president</b> 12:16 17:8 31:10 31:11,12 47:10,11 48:8,9 49:1 51:1 99:6 110:18 188:17,18 191:22,23 192:9 196:19 203:23 217:22 254:6 257:12,14,24 258:11 300:9</p> <p><b>presidents</b> 47:7,13,19,22 49:22 110:8 254:7,18</p> <p><b>press</b> 36:16</p> <p><b>pressure</b> 207:24</p> <p><b>pretty</b> 7:15 22:9 35:18 43:16</p>	<p>68:1 142:16 183:11 188:3 207:12 299:23 333:3</p> <p><b>previous</b> 23:5 69:16 197:5 203:18</p> <p><b>previously</b> 5:13 26:22 112:1 164:7 290:22,24</p> <p><b>price</b> 339:2</p> <p><b>primarily</b> 133:14 199:13 271:7</p> <p><b>primary</b> 53:16</p> <p><b>printed</b> 123:7</p> <p><b>prior</b> 11:12 31:1,2 59:1,2 152:9 169:1,16 170:10,12 170:19 171:23 172:4,9,23 173:2,12,19 174:7,8,25 175:9,10,23 180:14,22,25 201:12 346:14</p> <p><b>priority</b> 329:18</p> <p><b>privacy</b> 12:24 14:13 23:19 23:24 57:16 58:10 59:1 191:7,8</p> <p><b>privilege</b> 221:22 222:16 224:14,21 225:12,14 240:22,23,25 241:6,8,13 241:21,22</p> <p><b>privileged</b> 221:11,12,20 222:3,5 224:23 225:9,10 233:12 241:7,18</p> <p><b>privy</b> 238:16</p> <p><b>proactive</b> 316:13 319:1</p> <p><b>probably</b> 7:11 8:9 23:23 27:9,15 32:8 33:13 44:6 51:23 52:8,11,22 53:6,13 53:15 54:3,19 57:19 59:12 66:20 70:17 71:2 77:6 82:22 99:5 100:1 102:17 109:6 134:18,18 137:2 160:5,6,8,10 165:9 167:24 168:4,6 182:15 184:1 186:12 193:8 198:8,24 210:17 214:2,3 223:9 229:24 232:19 250:23 252:19 253:9 260:21 265:1 270:23 281:17 285:12 290:6 300:19 305:22 308:25 310:6 318:25</p> <p><b>problem</b> 140:18,19 202:10 238:11 318:15,16 333:8</p> <p><b>procedure</b> 230:21 234:23 237:20,25 238:3 265:5 342:18 346:14</p> <p><b>proceed</b> 11:16</p> <p><b>Proceedings</b> 344:12</p> <p><b>process</b> 11:20 28:2,6 31:5 61:7,8,11 66:9,19 76:8,10 76:18 77:18 78:2 81:16</p>
---	---	---	--

<p>91:21 102:17 104:18 106:8 107:13 114:10,15,21,22 116:22 119:5 128:10 131:11 139:15 143:6 157:18 158:1 159:10,11 173:25 193:9 194:20 195:2 196:2 215:9 217:4 218:19 218:24 219:2 228:1 232:19 232:19 233:22 247:12,18 251:9 253:7,9 265:15 271:8 276:20 279:20 285:6 285:10,22 286:2,12,16,18 288:7,8 297:10 311:21,24 312:7,10 316:14 318:19,23 319:19,22 320:24 337:9</p> <p><b>processed</b> 18:9 <b>processes</b> 78:12 225:7 302:19,25 <b>processing</b> 18:8 21:25 22:1 22:1 31:4 <b>produced</b> 95:5 122:8 124:2 124:4 167:20,22 168:3 177:11 <b>producing</b> 94:24 <b>product</b> 10:12 13:10 17:21 17:22 18:1 20:6,9 25:6,6 26:18,20 47:8 78:3,3,4 88:22 91:16,17,18,24 101:5 105:5,9 106:1 107:2 126:6,15 135:7 142:23 144:7,10,18,19 145:2,4 153:18 156:20,20 158:6 164:8,16,21 165:1 181:6 181:10,10,23 185:1 188:14 189:11 233:12 276:13,14 276:15,15,16,23,24 277:19 277:20 278:1,4 283:5,6 296:19 297:7 <b>production</b> 11:12 <b>products</b> 55:10 144:17 165:7,7,9 197:11 <b>profile</b> 4:15 178:15 179:9,19 180:5,14 269:9 <b>profitability</b> 113:6 <b>program</b> 27:7 33:8,9 68:18 69:2 75:8 157:2 197:6 198:10,11 208:23 249:19 267:5 268:3,8,15,16 269:1 269:7,20 270:8 278:8,14 282:22 295:17 298:25 301:17,19 304:2,3 318:19 322:19 325:12 332:21 333:4 338:2 <b>programmatic</b> 329:1 <b>programmer</b> 135:6 <b>programs</b> 1:4 2:4 14:19,20</p>	<p>15:3,5,7 42:5 68:5,25 69:5 198:9 200:6,19 249:4 274:13 298:10,12 301:14 317:11,13 318:8,9,11,24 319:2 324:25 325:6,6,25 326:3 327:3 329:16 332:1 332:14,21 333:2,12 338:1 338:4,10,15,16 <b>progress</b> 327:8,18 <b>progressive</b> 17:12 <b>project</b> 33:2 66:25 73:3 248:22 296:20 <b>project-based</b> 209:14 <b>projects</b> 102:24,25 197:11 <b>promises</b> 37:20 <b>promote</b> 39:20 211:17 261:5 265:17,19 268:4 271:20 272:4 332:1 337:15 <b>promoted</b> 140:19 214:25 248:14 249:2,6 251:5,19 253:21 257:20 260:18,23 260:25 261:2 262:23 263:16 264:5,7,8,10,12,14 267:5 268:7 317:17 <b>promotes</b> 298:19 <b>promoting</b> 281:16 <b>promotion</b> 142:25 143:2 145:23 182:23 211:14,16 215:4 248:17,23 249:23 250:8 252:5,7,25 253:14 254:10,11 255:5,21,24 256:8,12,21 257:3,9,12,15 257:18 259:4 260:15 261:20 262:2,16,19,22 263:5,6,8,8 264:19 265:6 265:10,25 266:5,8,21 271:16 272:1,13 286:21 <b>promotional</b> 266:13,24 267:20 <b>promotions</b> 214:6 247:7,7 248:9 250:25 251:8 255:9 255:14,16 257:24 258:3,9 258:25 261:16 264:1 271:14 272:5,5,24 273:4 273:20 283:3 <b>pronounce</b> 108:22 <b>proposal</b> 148:25 216:21 <b>propose</b> 143:4 <b>proposed</b> 149:19 <b>proprietary</b> 292:12 <b>protected</b> 57:17 302:22 <b>provide</b> 169:11 174:7 201:14,20 205:14,14 263:20 273:3 298:10,13 301:14 329:24 330:5 <b>provided</b> 104:13 175:6,9</p>	<p>272:23 347:7 <b>provides</b> 201:19 329:25 <b>public</b> 36:16 <b>publicly</b> 243:2,3,4,6 <b>publish</b> 56:2 <b>pull</b> 36:19 109:14 196:3 199:12 318:25 <b>pulled</b> 238:6 <b>purchase</b> 21:7 <b>purchasing</b> 21:9,13,15 58:20 <b>purposes</b> 32:17 <b>pursuant</b> 346:13 <b>push</b> 58:19 59:13 <b>put</b> 18:5 28:19,22 29:6,19 41:2 72:4 79:6,13 100:1 115:19 131:5 132:11 136:12,13 142:24 143:3,3 146:17 149:21 171:21,22 172:2 174:3 186:9 197:18 215:5 230:24 235:6 263:16 270:16 271:4 307:9 <b>puts</b> 69:12 <b>putting</b> 51:25 72:13 178:18 214:12 228:12 262:10 271:4 295:19</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>QA</b> 165:9,10,11 <b>qualified</b> 130:23 251:21 260:22 302:24 337:22 346:7 <b>quality</b> 164:22 165:6 215:11 <b>quarter</b> 157:23 <b>query</b> 269:13 <b>question</b> 8:15,15 9:4,5,22 23:20 24:4,9 26:4 41:2,3 55:8 56:20,21 57:12,16,23 58:1 60:17 67:7,15 71:18 83:15 91:13 93:10 95:14 96:6 98:5 106:10,13 111:18,22 112:14 116:18 116:25 139:1,23,24 163:5 164:6 166:10 174:14,16 175:3,4,17 178:8,21 179:16,16 190:9 195:8 198:18 209:17 210:15 213:22 214:14 220:23,25 222:13,21 223:3 224:21 225:8,11 236:2 240:7 241:7,21 245:9 258:8 260:17 261:15 276:8 282:20 307:15 312:1 314:3 314:6,17,21 315:20,21 316:6,22,25 327:23 328:13 328:14 340:17 342:11</p>	<p><b>questionable</b> 156:13 <b>questioning</b> 86:18 140:1 <b>questions</b> 17:6 57:10 60:15 87:7 88:13,19 124:11 125:12 163:8 173:22 177:5 177:7,16 219:5 225:16 291:9,18,19 323:23 334:24 335:6 344:5 <b>quick</b> 259:6 319:9 <b>quickly</b> 16:18 <b>quite</b> 8:9 12:23 16:11 34:7 72:1 87:3 232:20 270:14</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>R</b> 346:11,16,21 347:3,8 <b>R00192699</b> 1:6 2:6 <b>race</b> 141:25 155:5 161:19,20 162:2,6,9,13,21 164:1,3 270:23 336:19 340:14 <b>races</b> 298:4 <b>racial</b> 312:21 319:4 <b>Radford</b> 133:4,11,14,15 199:6,7,13,14,15,18 202:12 203:2 <b>railroad</b> 186:7 <b>raise</b> 28:18,22 61:10 102:18 146:3 147:8 188:12,23 215:6 <b>raises</b> 61:11 80:17 138:20 <b>ran</b> 32:3 33:10 274:13 <b>range</b> 96:11,24,25 99:10,17 119:15 123:24 134:14 136:13 137:18,25 138:5 140:12,20,21 156:12 165:23 182:22 183:1,4 210:24,25 211:13 256:2,4 256:4,5 312:15 <b>ranges</b> 25:15 35:4 74:17 75:12 132:22 136:3 193:16 202:20,21,22 203:3 285:23 <b>ranking</b> 104:6,11 <b>ranks</b> 248:2 299:5 <b>rate</b> 98:20 117:14,19 156:18 186:25 343:18 <b>rated</b> 156:17 <b>rates</b> 153:1,4 <b>rating</b> 103:8,9 104:12 <b>ratings</b> 154:25 <b>ratio</b> 137:7,17 138:2,8,8 139:3,22,25 140:11 141:7 182:14,16,22 183:1,6 187:11,16 210:17,22 211:1 211:6,12 212:13,22 213:11 <b>ratios</b> 137:19 138:12,17 139:11,16 141:19,25 142:3 166:1 186:4 210:15 212:9</p>
---	--	---	--

<p>212:15  <b>reach</b> 254:10 338:15  <b>reached</b> 343:21  <b>reaches</b> 54:7  <b>reaction</b> 326:20  <b>read</b> 16:8 59:10,14 79:17,18  87:16 93:8 96:7 112:7  113:1,2 116:10 121:20  123:14 124:18 129:20  137:8,20,22 147:2 152:13  152:17 272:7 277:3 279:4  281:10,25 291:1,11 296:13  298:8 302:18 303:25  304:15 312:12 331:3  343:17 345:6  <b>reading</b> 272:11  <b>ready</b> 192:4 250:3 260:5  284:5 293:15  <b>real</b> 62:20 171:20 177:2  208:16 232:18,18 252:13  259:6  <b>reality</b> 82:22  <b>realizes</b> 193:8  <b>reallocate</b> 89:7  <b>reallocated</b> 89:9  <b>really</b> 22:5 31:19 58:2 80:16  92:7 98:11 103:9 105:2,17  111:3 116:3 131:22 160:2  163:23 170:15 172:13  187:22 195:20,25 197:15  204:2 207:9 245:18 250:2  258:14 308:5 318:9 321:12  325:9,10 329:2  <b>reaping</b> 325:9  <b>Reask</b> 220:25  <b>reason</b> 142:9 241:9 348:4,6  348:7,9,10,12,13,15,16,18  348:19,21,22  <b>reasons</b> 23:19,24 28:12  119:24  <b>rec</b> 236:15  <b>recalculate</b> 341:3  <b>recall</b> 42:14 281:13 283:12  330:7  <b>receive</b> 11:4 36:6,8 199:20  206:21 322:18  <b>received</b> 206:15 207:8  273:19 307:19,22 308:15  309:13 310:14  <b>receiving</b> 324:23  <b>recite</b> 336:24  <b>recognize</b> 16:12 93:15,16  93:21 94:2 123:16,18,19  123:19,21 125:24 126:18  126:19,19,21 127:5,6  129:17,22,25 132:23</p>	<p>135:14,17 147:5 148:22  151:10 167:12 176:15,17  274:24 279:6 281:4 282:12  283:22 287:4,5,11 291:9  293:19 341:20  <b>recognized</b> 125:19  <b>recollection</b> 10:11,15  <b>recommend</b> 80:14,17  252:24 265:9  <b>recommendation</b> 28:9  231:19,22  <b>recommendations</b> 26:3  27:21 88:21 89:14 107:18  115:21 277:5  <b>record</b> 76:1 79:18 86:1,3,7  95:13 158:23,25 159:4  210:9,11,12 239:22,24  240:2 261:11,12 262:25  275:10,21 280:7,8,18,19  280:21,22 291:23,25 292:2  292:3,4,23,24 293:2  319:11,13,14 341:6,8,10  341:11 344:11 347:2  <b>recorded</b> 346:23  <b>recording</b> 218:20 303:25  304:18  <b>records</b> 235:15  <b>recruit</b> 197:2,5 218:11 269:5  269:21 332:1,17,23,24  333:6 338:4  <b>recruited</b> 18:5 130:7 192:12  <b>recruiter</b> 34:21 66:20 67:3  67:19,22 73:23 74:4,5,9  116:23 129:9 131:3 136:17  193:7 268:10  <b>recruiters</b> 34:13,17,22 42:4  75:5 171:2 202:13 268:18  272:16,17  <b>recruiting</b> 13:5 15:5,6 33:9  55:9 69:4,9 203:14,25  204:1,5,6 216:6 268:9,16  324:14  <b>recruitment</b> 15:3  <b>recruits</b> 216:4  <b>recs</b> 21:7  <b>red</b> 59:9 141:5  <b>redo</b> 286:9  <b>reduced</b> 281:20  <b>Redwood</b> 101:24 107:3  182:5,16 183:12 299:15  <b>reevaluated</b> 138:22  <b>reexamined</b> 138:21  <b>referred</b> 56:19 203:13  230:16  <b>referring</b> 196:10 232:2  256:6 331:14</p>	<p><b>refers</b> 57:11  <b>reflect</b> 224:22 275:21  <b>reflective</b> 337:6  <b>reflects</b> 299:18  <b>refresh</b> 10:14 284:4,12,13  285:11,15  <b>refreshed</b> 10:11  <b>regarding</b> 29:25 90:15 158:9  164:6 201:13 210:15  213:22 230:6,7 240:16  242:20 298:4 301:9 319:5  330:6 340:5  <b>regardless</b> 162:5 163:20  <b>region</b> 44:2 133:19  <b>regionals</b> 274:4  <b>regions</b> 202:9  <b>regular</b> 63:1 149:22  <b>regularly</b> 112:8 113:10  <b>regulations</b> 309:14,24  <b>rehire</b> 287:10,11,22 288:6  288:22,23,24 289:7,13  290:19  <b>rehired</b> 289:12  <b>reinforcing</b> 40:3  <b>reject</b> 219:4  <b>rejected</b> 28:11  <b>related</b> 36:16 164:8,25  234:18,19 296:19 327:15  336:1 337:25  <b>relates</b> 11:14 109:22 126:10  <b>relating</b> 11:12  <b>relations</b> 12:19 33:14,19,25  36:16  <b>relationship</b> 230:23  <b>relative</b> 346:17,19  <b>relevant</b> 232:25 233:5  <b>reliefs</b> 12:25  <b>relocation</b> 183:22  <b>rely</b> 54:15  <b>remark</b> 92:20  <b>remember</b> 14:10 31:23 37:3  37:13 43:14,17 45:10 50:5  93:17,17,23 94:24 143:12  165:14 170:9,13,20 207:4  273:24 274:7 282:4 308:3  308:15,18,20  <b>remembering</b> 49:6  <b>remind</b> 308:6  <b>rep</b> 56:20,22 57:2,13 126:14  164:15 188:7  <b>repeat</b> 9:4 63:14 234:21  307:5 314:20  <b>repeated</b> 295:16  <b>rephrase</b> 9:5 10:10  <b>report</b> 13:14,23 14:2 45:20  46:25 90:25 91:1,2,4,5</p>	<p>140:17 217:21 229:13  230:3 310:7 321:8 322:24  322:25 323:6,15,18 326:21  331:11 343:14  <b>report-driven</b> 326:18  <b>reported</b> 1:23 17:15 334:17  <b>reporter</b> 2:19 6:20 24:10  65:2 91:11 146:19,23  166:24 173:15 182:10  206:4 256:9 274:19 293:6  346:8 347:7  <b>Reporters</b> 6:10 346:10  <b>reporting</b> 285:18 296:21  305:4 310:20  <b>reports</b> 13:1,16 14:5,5 22:17  22:20,25 27:11 40:24 41:7  42:11,17,18,25 43:11 45:6  47:1 157:19,19 244:9,21  259:12 300:10 320:2,9,13  320:25 321:4,14 322:18  323:2,11 324:6,11,17,24  326:7,9,16 329:25 330:1,5  330:7 334:8  <b>reports'</b> 81:12  <b>representation</b> 331:4  <b>request</b> 11:4,9,14 12:7 95:1  119:23 173:12 241:5  262:19 271:15,21 281:23  <b>requested</b> 5:22 120:18  169:17 272:1 282:2,5  347:5,6  <b>requesting</b> 173:2  <b>requests</b> 12:1 95:3 262:17  <b>require</b> 176:2 309:24  <b>required</b> 29:17 54:25 58:14  58:21,23 59:10,14 62:22  62:25 63:3,6,9 136:12  155:17 169:11 180:20  236:18 247:16 304:19  <b>requirements</b> 38:8,20 258:8  258:9 309:19,20 310:4,21  336:25 337:1  <b>requires</b> 310:11,12,23  <b>resign</b> 89:6 282:6  <b>resolved</b> 233:15 253:3  <b>resource</b> 60:14 86:14 87:23  <b>resourced</b> 60:6  <b>resources</b> 12:16 13:12 33:6  33:7 38:24,24 51:24 62:1  90:24 299:22 342:4  <b>respect</b> 11:12 86:10 174:11  233:1,1 339:9  <b>respond</b> 8:15 12:3 222:12  269:15 291:17  <b>response</b> 8:7,10 94:25  <b>responses</b> 8:3 86:10</p>
---	---	--	--

**responsibilities** 257:21,25  
259:13 290:13 294:24  
304:16  
**responsibility** 304:14 328:1  
328:2  
**responsible** 44:2 58:17  
91:18 100:17 212:5 244:13  
247:24 294:22 297:21  
320:17  
**rest** 113:1 234:15 235:9  
277:18 309:8  
**restamp** 93:1  
**restating** 288:13  
**restaurants** 187:23,24  
**result** 121:21 193:20 225:9  
226:4,11 227:13 233:20  
240:6 286:12  
**resulted** 227:9,11  
**results** 233:8 285:19 325:11  
**resume** 131:12 180:7  
289:24  
**retail** 187:22  
**retain** 185:13 332:20 333:4  
**retained** 262:17  
**retaining** 326:2 334:6  
**reteach** 55:11  
**retention** 185:4 187:9  
188:22,24 334:5  
**revamping** 18:2  
**revenue** 247:25  
**review** 10:6,8,22 29:22  
81:16 82:16 83:4,22 93:13  
111:13,25 112:12,15,19  
113:14,23 114:4,9,17,25  
115:17,24 116:14 117:3,5  
117:5,22 119:12 123:11,12  
123:15 131:11 140:10  
141:15 142:4,11,24 145:15  
145:23 146:4,7 147:3  
148:12,20 149:6 151:5  
152:7 154:5,5 156:8 159:8  
159:11 167:10 176:13  
184:7 198:3 210:18 215:9  
237:20,25 238:3 250:9,11  
254:7,14,16 265:15 271:8  
274:22 282:21,22 283:1,2  
283:9 284:3,14 287:24  
302:19 303:6 311:24 313:1  
319:19,22 320:23 341:17  
347:4  
**reviewed** 28:10 116:10  
117:3 184:4,5 185:17  
200:2 302:25  
**reviewing** 219:9  
**reviews** 27:20 29:15,25  
104:24 105:7 112:8,21,24

113:11 114:2,8,14 115:15  
115:20,22 142:3,5 153:8  
153:16,25 154:3 155:13  
156:1,11,21,24 157:8,19  
157:25 158:9 198:13 200:3  
213:22 214:5,21,24 246:14  
247:1 317:18 324:15  
**revised** 53:6 335:20  
**revision** 53:20,25 88:5  
**reward** 113:3  
**rewards** 325:9  
**Rhonda** 43:1  
**Rich** 47:20 50:6  
**Richard** 281:12,20  
**rid** 102:16 204:12  
**right** 8:6 14:11 15:25 16:22  
24:6 30:11 32:13 35:24  
36:19 37:22 42:21 43:14  
46:23 49:3,12,13,15 59:2  
64:16 75:9 78:21 81:19  
85:19 92:24 93:9,19 98:16  
106:1 109:15 112:2,13  
115:16 116:11,16 117:4  
121:15 122:13 130:10,11  
132:19 146:7 155:23,23  
156:14 164:23 165:6  
166:23 170:24 171:16  
175:2 178:6,11 181:5  
182:1 186:3 193:3 200:25  
202:18,20 204:9 206:13  
210:18 214:11 215:4  
221:10 225:21 232:24  
233:7,11,16 234:5 237:14  
239:18 241:14 247:20,20  
258:21 264:10 271:9,19  
273:15 274:18 277:23  
278:5 279:17 281:8 282:9  
307:3 316:16 319:1,19,21  
320:16 321:15 326:19  
328:12 338:23 340:19,20  
344:3  
**rigor** 306:15 307:16  
**road** 7:16 314:1  
**roadmap** 17:11  
**Rob** 143:24,24  
**Rob's** 144:1  
**Robert** 3:9 6:17  
**robust** 278:20  
**role** 66:23 67:5,11,14 70:6  
70:18 119:5 136:11 138:3  
138:9 195:5 197:25 203:7  
203:10 212:12 220:1,3  
221:20,23 276:21 287:23  
288:12,19 290:1 299:3  
**roles** 72:17  
**roll** 76:16

**rolling** 33:15  
**rotate** 71:10 192:6  
**rotated** 32:6  
**rotates** 274:12  
**rotation** 254:21  
**rotational** 272:2  
**routinely** 170:14 255:2  
303:8 332:23  
**rule** 7:21 143:13  
**rules** 7:15  
**run** 12:18,20 13:2,3 15:12  
17:17 19:9 22:17 27:10  
33:13 38:24 39:10 54:20  
57:14 68:19 189:15 192:5  
237:9 238:5 262:11 325:1  
327:3  
**runaway** 171:20  
**running** 32:3 33:8,24,25  
**runs** 14:19,23,24 15:3,4,6,9  
42:23 43:4,21,23 44:2,23  
45:1 48:19 49:18 189:9  
274:11 316:15 338:8,9  
**runway** 15:12

---

**S**

---

**S** 3:9 4:8 5:3  
**Sac** 48:11  
**Saf-** 334:7  
**Safra** 13:15,16 14:2 48:13  
50:25 77:19,22 84:7,8,24  
85:15 89:16 90:16 108:7  
110:3 114:8,14 115:21,22  
132:12 136:22 143:7,9  
146:6 147:22,24 149:3  
159:22 244:2 255:20  
279:23 294:23 295:1,4,5  
298:14,23 299:3 300:9  
334:16  
**Safra's** 48:7 50:12 84:9,10  
84:17 90:19 136:24 143:11  
159:20  
**sake** 257:16  
**salaries** 35:4 67:6,14 68:22  
91:23 100:10 101:1 110:24  
111:2,10 172:23 201:13,15  
202:2 216:3 242:22,24  
243:1,5,8,9,14,18 244:2,9  
245:12,19 246:4 320:5,21  
321:15  
**salary** 25:15,15 27:17,20,21  
28:3,6,9 29:1,10 52:6 61:5  
66:14,24 68:1,16 69:5 70:3  
70:7 71:16 73:16 74:14  
76:5 78:11 79:15,21 82:14  
83:5,9,22 90:15 91:14,20  
92:12,14 96:11,23,24 97:9

98:16 99:16 107:16 111:12  
111:25 116:10,12,15 117:2  
117:4,4 120:19 121:7,13  
121:23 122:17 123:23,23  
132:22 136:12 137:17,18  
142:3,5,6,10,13,18,24  
143:11 144:13,19 156:1,9  
160:21,21 162:8,10,10  
163:22 164:2,2,4 165:14  
165:16,23 169:1,2,16  
170:10 172:5,9 173:2,12  
173:19 174:7,8,25 175:9  
175:10,17,23 176:23  
180:22 181:24 182:13,17  
182:19 183:17,18 184:15  
187:15 189:6,17 201:24  
202:20,21 203:8,11,15,20  
204:13,15,20,22 205:4,5,7  
205:8,11,11,15 206:8,11  
206:16,17,19,20 207:3  
207:18 208:3 209:6,21  
212:22 215:17 216:10  
217:5 218:1,25 220:7,7,9  
242:12,17,20 243:10,12,19  
244:25 245:7,17,24 255:25  
256:1 290:19  
**sales** 33:18 47:8,18,20 48:6  
49:11,14,18 50:9 68:18  
70:16,24 71:2,2,4 74:8,9  
91:15 106:25 126:14 157:5  
164:15 188:7 192:3 195:16  
**salespeople** 68:4 157:20  
188:2  
**salesperson** 72:2 188:3  
**sample** 177:2  
**San** 3:11 98:22  
**Sarbanes-Oxley** 236:25  
**Sarwal** 281:12  
**Sarwal's** 281:20  
**sat** 274:2,5  
**satisfied** 234:4 327:6,17  
**save** 293:13  
**savvy** 198:25  
**saw** 205:16 206:12  
**saying** 18:20 25:4 58:21  
161:12 200:4,13,13 214:13  
227:24 234:10,13 264:8,14  
277:2 314:15  
**says** 17:10 31:3,13 57:20  
59:10 67:19 80:11 96:7,23  
106:6 111:24 113:2 116:10  
119:17,18,22 121:19 130:9  
147:12 176:22 242:23  
250:7 252:3 284:25 294:21  
296:13 298:8 302:18  
303:25 304:15 314:10

<p>343:18  <b>scale</b> 104:3  <b>scan</b> 11:18 12:4,6  <b>scanned</b> 283:20  <b>scenario</b> 28:21 252:2 288:6  <b>scenarios</b> 250:22 253:9  <b>schedule</b> 56:3,4  <b>schedules</b> 87:8  <b>school</b> 12:22 14:13 126:25  295:19,20,23 296:3 298:16  332:11 338:9  <b>schools</b> 23:1,4 68:24 325:13  <b>science</b> 213:5  <b>sciences</b> 201:7  <b>scope</b> 251:23 258:12 261:23  <b>score</b> 156:13 299:23  <b>scores</b> 154:20,23 155:5,10  <b>scream</b> 202:14  <b>screen</b> 278:11  <b>Screven</b> 50:18  <b>se</b> 126:20  <b>search</b> 11:3,7,17,23 12:12  56:16,17 57:6,10 58:13  74:7 173:24 192:2  <b>searched</b> 95:4  <b>searches</b> 192:1 202:15  <b>seasoned</b> 104:9  <b>second</b> 17:23 93:7 96:10  112:3,5 113:25 142:14  145:15,23 146:4 215:9  248:4 276:4 280:7,9,10  287:9 304:13 331:2 341:7  <b>second-level</b> 213:22 214:5  214:21,24  <b>secondary</b> 133:13  <b>seconds</b> 196:1,1  <b>secret</b> 62:13,14  <b>secrets</b> 292:14  <b>section</b> 304:14 346:14  <b>sections</b> 54:9  <b>see</b> 13:1 20:11 24:3,15  61:23 62:24 64:12 80:13  83:15 84:21 92:16 93:9  96:10 97:20 115:13 123:16  144:16 146:8 149:10 160:1  202:9 211:11 252:16  255:18 256:1 267:3,17  270:2 286:23 291:18  296:11 313:6 316:3 318:12  318:19 320:1 321:7,15,16  321:20 324:7 330:12  <b>seek</b> 225:11  <b>seeking</b> 225:12  <b>seen</b> 10:17,18,18,19 11:25  46:13 93:23 116:17 119:20  121:18 122:7 123:20,25</p>	<p>125:11,18 127:8,9 130:2  151:7,8 167:17 168:19  177:6,8,23 178:15 179:3  179:22 201:22,22 216:14  216:16,20 266:1 271:18  291:1 293:12,24 341:22  343:5,6,11,22  <b>sees</b> 178:16  <b>selected</b> 130:4  <b>selecting</b> 118:4  <b>selection</b> 297:6 337:9  <b>selects</b> 129:3  <b>self-service</b> 20:25  <b>Seligman</b> 108:25 109:11,12  <b>sell</b> 13:8,9,9 126:14,14,15  145:14 187:25 268:21  <b>selling</b> 56:8 72:2,7,7 188:7  <b>seminars</b> 200:19  <b>send</b> 59:5 132:4 264:7,25  287:5 324:3,16 334:9  <b>sending</b> 336:21  <b>sends</b> 324:2  <b>senior</b> 17:8 42:24 47:6  110:17,21 114:6 118:18  119:4,9 120:6,7 172:13,20  190:5,5 191:22,22 192:9  195:6,12 197:2,9 204:3  217:10 254:6 257:12,13  258:11 279:9,9,21,22  307:10  <b>sense</b> 51:12 58:8 72:24  106:2 211:3,4  <b>sent</b> 58:21 59:11 132:15  263:22 276:6 281:10 299:1  323:15 326:8 334:7  <b>sentence</b> 112:7 116:9  189:20 277:1 304:15 331:3  <b>separate</b> 43:25  <b>Series</b> 5:9  <b>serious</b> 234:25  <b>Seriously</b> 37:14 207:9  <b>service</b> 173:25  <b>set</b> 60:12 68:1,21 69:3 76:13  103:1 108:5,7 113:21  114:22 203:14  <b>setting</b> 68:16 73:16 74:13  91:14,23 172:14  <b>setup</b> 19:10 21:14 106:19  <b>setups</b> 234:19  <b>seven</b> 31:17,18 33:13 37:15  159:14 160:6 258:19  <b>seventh</b> 298:8  <b>sexual</b> 62:6 230:23 238:15  <b>shade</b> 165:12  <b>shaking</b> 8:4  <b>shape</b> 302:4</p>	<p><b>share</b> 39:6 123:8 242:17,22  242:23,25 246:3,4 292:14  325:23,24  <b>shared</b> 19:7  <b>Shauna</b> 15:25 41:10 42:10  214:4 294:13,23 297:25  305:1,2 322:19 323:1,21  324:2,24 326:7 329:9  334:9 335:2  <b>Shauna's</b> 304:8  <b>sheet</b> 343:11,22 348:1  <b>Sheryl</b> 15:8,21  <b>shit</b> 179:16  <b>shooting</b> 134:13,19  <b>shopped</b> 21:1  <b>Shores</b> 101:24 107:3 182:5  182:16 183:12 299:15  <b>short</b> 18:13 64:10 149:18  239:19  <b>shorten</b> 291:12  <b>Shorthand</b> 2:18 346:7  <b>shortly</b> 52:25  <b>Shott</b> 14:15 42:22,23 72:12  72:21 185:15  <b>Shott's</b> 30:24  <b>shoulder</b> 267:24 268:13  272:2  <b>show</b> 16:5 92:15 123:4  133:16 146:8 150:24  166:20 176:9 274:17 293:4  343:2  <b>shown</b> 10:12  <b>shows</b> 262:25  <b>shut</b> 33:8  <b>Shwartz</b> 3:9 6:17,17 10:9  11:10 14:7 22:21 24:12  25:17 26:4 28:15 29:5  30:16 32:16 35:22 36:9  37:15 38:25 39:8 40:15,23  41:1,12 45:8 46:10 48:4,12  49:2 50:21,23 53:2 60:17  62:5 64:9,15,17,20 65:7,23  66:16 67:7 69:18 70:9,12  73:8 75:24 79:3 81:17,21  84:12,16 85:23 86:9 89:21  90:1 91:10 92:5,20,25  93:10,18 95:12,20 96:1,16  97:1,13 98:1,9 99:12  100:13 101:7,10,25 102:6  104:25 106:9,14 108:15,24  109:10,21 110:1,11 111:15  111:19 112:13 113:15  114:11 115:2,10 116:16,20  117:16,25 118:10,21  120:11,22 121:25 122:18  122:22 124:10 125:8,21</p>	<p>127:1 128:3,15,22 129:5  131:8 134:6,15 135:22  137:9,11,21 138:23 140:2  141:9 142:20 144:8,21  145:17 146:12,21 148:15  148:17 153:9 154:22 155:1  156:2 158:20 160:11,18,23  161:14 162:22 163:4  166:10 167:4,7 169:3,18  170:11,18 172:10 174:9,15  174:21 175:11 176:25  177:12,15,23 178:2,6,11  178:25 179:13 181:12  183:7 189:19,23 190:8,17  190:24 192:22 193:13  194:1 195:8 196:8 197:13  201:16 202:4,24 204:16,23  207:19 208:6 209:9,24  212:23 214:9,17,22 215:18  216:18 217:6 218:2 219:12  220:11,23,25 221:10,19,25  222:9,16,21 223:3,6,17,24  224:4,7,13,20 225:5,19,23  225:25 226:6,15 227:16  230:11,18 232:2,24 233:7  233:11,16,19 237:22  238:25 240:9,11,18 241:3  241:11,16,20 242:2,5,10  242:13 245:2,5,25 247:8  248:11,18 249:14,24  251:11 253:17 254:8  256:14,23 257:5 258:4,19  261:12 262:4 270:10 275:7  276:1 279:1,17 280:2,6,17  288:4,22 290:8 291:14  293:15 297:19 299:10  301:4 302:12 305:17 307:1  307:15 310:24 311:12  313:18,25 314:3,8,17  315:6,15 316:2,16,18,23  318:10 321:25 322:14  323:24 325:2 326:10  327:10,22 328:5,10,12  329:11 330:14,17,23 331:9  331:22 333:18 335:11  336:3 337:2,17 339:12,14  340:17,22 341:4,14 342:11  <b>Sibree</b> 14:24 43:19,20  <b>side</b> 14:16 299:2  <b>sign</b> 131:24 186:1,11 236:15  272:19 292:8,11,12,14  <b>sign-off</b> 85:17 184:10  <b>sign-on</b> 186:1  <b>sign-ons</b> 69:3  <b>signature</b> 131:17,21  <b>signed</b> 185:18 298:23</p>
--	--	---	---

<p>348:24  <b>signs</b> 131:25 185:20  <b>Silicon</b> 285:24  <b>silly</b> 67:24 185:6 235:9  <b>similar</b> 55:23 107:16 108:5  183:6 224:7 240:13 338:6  <b>simple</b> 24:13 93:5  <b>simplified</b> 285:16  <b>simplistic</b> 191:11  <b>Simultaneous</b> 24:10 173:15  206:4 256:9  <b>single</b> 17:25 67:19 68:6  <b>sit</b> 283:2 327:1  <b>site</b> 56:16 57:6,6,18 58:12  61:24 62:12,13  <b>sites</b> 60:13 267:15  <b>situation</b> 120:4 213:7,9  231:1 232:11,20 236:11  250:1 252:10 301:23  <b>situations</b> 191:20 238:24  271:25  <b>six</b> 85:10 229:24  <b>size</b> 253:11 258:12 261:23  281:20  <b>skill</b> 117:14  <b>skilled</b> 262:12  <b>skills</b> 67:4 73:25 116:13,25  134:21,22,25 163:11 261:4  261:5,15,23 262:14 271:6  <b>skim</b> 123:13  <b>skin</b> 297:5  <b>skinny</b> 278:21  <b>skip</b> 278:22 282:8  <b>skipped</b> 24:15  <b>sky</b> 235:2  <b>sky's</b> 229:15  <b>sleeping</b> 229:14  <b>slides</b> 313:6  <b>slightly</b> 102:22  <b>small</b> 129:21 301:17 320:15  321:14  <b>snack</b> 185:7  <b>Snyder</b> 14:6,12  <b>software</b> 13:3,5,5 19:21  20:2,12 21:3,21 22:7,8,13  22:18 26:10,14,15,24 27:4  133:18 135:5 145:11,11  209:1 267:13  <b>sold</b> 20:3,10  <b>sole</b> 112:8  <b>solicit</b> 268:12  <b>soliciting</b> 268:11,12  <b>SOLICITOR</b> 3:3  <b>solid</b> 299:4  <b>solutions</b> 298:11,13 301:14  <b>somebody</b> 47:7 57:4 83:4</p>	<p>89:10 94:12 117:14 128:12  128:20 131:6 163:10 217:1  217:5 238:18 239:9 252:24  260:14 261:5 266:5,6  267:23 280:5 341:25  <b>someone's</b> 68:8  <b>somewhat</b> 167:16  <b>Song</b> 3:4 4:4 6:15,15 7:2  10:13 11:21 15:13 16:5,9  22:24 24:14,17 25:20 26:8  26:12 28:20 29:9 30:20  32:21 36:1,13 37:23 39:5  39:16 40:16,19,25 41:4,19  45:14 46:11 48:10,14 49:5  51:2 53:4 60:21 62:8,9  64:11,24 65:3,17,20 66:2  66:22 67:9 70:2,10,19 73:9  76:4 79:9,20 81:18,24  84:11 85:1,7,19 86:9,12,19  89:23 90:6,14 91:12 92:10  92:15,22 93:2,4,6,12 94:1  95:17,23 96:5,19 97:7,23  98:6,15 99:18 100:24  101:8,19 102:2,13 105:4  106:17 108:16 109:2,16,23  110:5,15 111:23 112:17  113:24 114:12 115:5,12  117:1,21 118:7,14 119:1  120:17 121:2 122:5,20  123:1,4,9 124:15,23  125:19,23 127:4 128:11,18  129:2,10 131:13 134:11,24  136:6 137:14 138:11 139:9  140:4,13 141:11,14 143:1  144:11 145:1,21 146:10,15  146:19 147:1 148:11,14,16  148:18,19 150:24 151:2,4  153:20 154:24 155:3 156:5  158:17 159:6 160:14,20  161:1,18 163:1,6 166:20  167:1,9 168:23 169:8,24  170:16,22 172:17 173:17  174:13,19 175:2,5,21  176:9,12 177:10,14,21,25  178:4,9,23 179:1,2,18  181:21 182:18 183:15  184:13 189:21 190:1,11,20  191:4 193:5,19 194:3  195:11 196:11 197:19  202:1,19 203:6 204:18  205:2 206:6 207:22 208:17  209:18 210:3,6,14 213:2  214:19 215:13,22 216:22  217:14 218:7 219:14  220:14 221:1,13,23 222:7  222:14,18,24 223:10,21</p>	<p>224:1,10,16,25 225:18,21  225:24 226:1,9,21 227:17  230:14 231:2 232:4 233:6  233:9,14,17,21 237:15,17  237:19 238:2 239:11,18  240:4,12,23 241:10,13,18  241:25 242:3,7,11,18  245:15 246:2,12 247:11  248:15 249:11,21 250:6  251:15 253:23 254:13  255:3 256:11,20 257:2,8  258:6,22 261:10,14 262:6  270:18 274:17,21 275:19  276:2 278:22,25 279:2,3  279:18 280:8,11,14,24  281:3 282:8,11 283:15,17  287:3 288:8,15 289:2  290:16,22 291:3,16,21,24  292:6,16,19 293:4,7,9,18  294:7 298:1 299:14 301:8  302:16 305:19 307:6,18  311:5,17 313:22 314:5,13  314:19 315:8,18,23 316:4  316:9 317:1 318:14 319:9  319:16 322:8,15,17 324:1  325:3 326:14 327:16 328:3  328:8,11,15 329:13 330:16  330:20,24 331:10 332:3  333:23 335:15 336:7  337:11,20 339:13,16  340:21,25 341:6,13,16  342:14,25 343:2,4 344:4,7  <b>sorry</b> 9:21 13:11 19:4 27:3  29:6,8 30:13 39:17,18 40:1  41:12 44:4,22 47:11 48:11  48:15 59:6 64:24 66:7  67:10 77:17,25 78:15  90:12 95:12,22 104:23  108:17 112:2 132:20  138:15 151:2 152:13  157:10 167:1 175:2 184:11  196:12 210:1 217:20  220:20 224:8 226:6,8  234:8 254:12 261:8,9  274:10 275:14 279:13  288:4 291:24 292:21 293:9  310:2 311:16 312:1 330:25  331:2 334:7  <b>sort</b> 119:14 184:17,24  185:20 188:6,25 263:21  268:19 281:5 300:3  <b>sound</b> 237:12  <b>sounds</b> 12:23 16:11 22:7  115:14  <b>sources</b> 133:24  <b>South</b> 2:16 3:5 238:19</p>	<p><b>Southern</b> 258:18  <b>space</b> 187:22 191:7,8  199:15  <b>span</b> 196:18 251:22  <b>speak</b> 29:20 65:14 90:5  91:20 118:23 120:20  150:17 180:18 215:24  216:2,8 230:18 248:25  251:12,12 253:5 269:11,16  299:20 307:1  <b>speaker</b> 295:15,16  <b>speaking</b> 179:24 232:16  288:6  <b>spearheaded</b> 295:18 298:15  <b>special</b> 71:6 126:2,6,9  188:25 256:17 325:19  <b>specialist</b> 259:10  <b>specialize</b> 70:23,24,24,25  <b>specialized</b> 133:8  <b>specialty</b> 125:5,7 126:3,3,10  126:16 145:5,7,12 164:6,7  164:17,25 165:10,11  <b>specific</b> 19:20 39:19 60:24  69:6 72:10 123:15 130:14  168:2 196:9 197:16 199:1  212:9 242:23 248:1 258:23  282:20 288:5,6,8 298:3  299:13 300:12 301:13  306:18,22 318:12 322:13  323:15 332:4,5,8 333:15  333:16 334:1 339:12,14  <b>specifically</b> 18:20 41:21  55:19 66:6 119:3 120:20  182:5 201:20 213:11  215:24 216:2 225:8 248:25  269:4 288:17 297:1,16,25  299:20 310:19 313:5  317:21,24 333:25 334:22  335:5 342:5  <b>speculate</b> 174:12 214:23  331:13  <b>speculation</b> 120:12 153:10  248:19 249:15,25 253:18  290:9 297:20  <b>speculative</b> 250:21  <b>spend</b> 10:3 326:5  <b>spent</b> 10:2 21:4  <b>sphere</b> 226:16  <b>spoke</b> 25:25 332:6  <b>spoken</b> 212:6  <b>sponsorship</b> 295:15  <b>sports</b> 191:25  <b>spouses</b> 216:11  <b>spreadsheet</b> 79:24 149:9,22  150:8 185:23,24 186:12  <b>spreadsheet's</b> 80:11</p>
--	--	--	---

<p><b>square</b> 103:10,13 104:2  <b>squeezed</b> 68:9  <b>squished</b> 131:22  <b>SS</b> 345:1 346:3  <b>stack</b> 104:5,10  <b>staff</b> 42:25 111:6,8 119:22  120:9 252:24 333:3  <b>stamp</b> 146:22  <b>stamped</b> 283:14  <b>standard</b> 9:21 22:9 184:9  227:19  <b>start</b> 32:8 41:20 47:15,18  62:24 66:12,15 68:13 69:4  76:17,19 140:1 141:15  159:10,21 160:4 161:2  166:8 213:1 220:15 276:20  283:14 301:18 307:25  314:9 315:18 322:22  <b>started</b> 31:12,14 32:4 33:9  33:11 52:25 68:24 159:14  159:18 283:13 307:24  332:11 338:2  <b>starting</b> 9:19 25:15 26:18  66:14,23 67:6,14 68:16,22  69:2 74:14 91:14,23  162:10 169:2 184:15 185:8  189:6,17 201:13,15,24  202:2 203:8,11,19 204:22  207:18 208:2 209:21,22  215:17 216:10,14,21 217:3  217:4 218:25 219:9,10,11  219:16,18,19,20,24 220:2  220:7,9,17 298:23 301:16  328:23  <b>starts</b> 63:12 76:12 130:5  <b>state</b> 144:14 245:6 304:20  345:1 346:3,8  <b>stated</b> 194:22 307:4 322:6  <b>statement</b> 57:20 122:10  307:5  <b>statements</b> 306:2  <b>states</b> 1:1,5 2:1,5 3:3 44:19  44:20 138:8 199:10  <b>statistical</b> 330:3  <b>status</b> 302:22 309:21  <b>stay</b> 195:20,23 196:3 260:7  <b>stayed</b> 260:4 293:16  <b>steal</b> 326:4  <b>STEM</b> 296:2 332:11  <b>stenographically</b> 346:23  <b>step</b> 230:16 256:18 259:16  283:11 317:18  <b>stepped</b> 260:3,4  <b>steps</b> 260:24 311:9,10,13  312:9  <b>stereotyping</b> 302:20</p>	<p><b>Steve</b> 50:16 209:2  <b>stick</b> 177:19  <b>sticker</b> 92:25  <b>stock</b> 22:1 76:22 108:3  109:22 110:9,19,23 111:5  143:5 147:8 148:3,4  155:24 173:9 176:23 185:5  188:23 195:19  <b>stocks</b> 27:14  <b>stop</b> 170:1 211:2 221:10  237:18 239:18 292:19  316:16  <b>stopped</b> 54:5 169:21,25  170:3,8,9,21 173:3  <b>stored</b> 16:22 19:8 22:13,15  23:18,18,23,24 24:4,24  25:5,10 28:14 30:3,15  57:25 228:9 235:16,22,24  236:4,22 237:8  <b>strategic</b> 112:10 113:4  <b>strategies</b> 185:3  <b>street</b> 3:5,10 289:14  <b>strong</b> 172:8 252:12  <b>structure</b> 72:14 97:16 188:2  196:20 286:22  <b>stubs</b> 87:10  <b>stuck</b> 114:3  <b>stuff</b> 14:22 22:10 33:3,22  37:2 44:25 60:3 62:19  63:21,24 75:16 88:18  125:15 153:23 202:7 207:1  235:1,2 286:13 316:13  <b>subheading</b> 287:21  <b>subject</b> 11:11 54:8,15 64:8  310:17  <b>subparts</b> 40:20  <b>subsections</b> 52:13  <b>subset</b> 25:6 108:11  <b>succeed</b> 333:1  <b>successful</b> 183:14 213:19  332:22  <b>suddenly</b> 168:10 187:7  286:10  <b>Sue</b> 94:17  <b>suggesting</b> 264:16  <b>suggests</b> 211:14  <b>suite</b> 3:5 6:11 78:22  <b>Sullivan</b> 232:3,5 233:13  <b>summaries</b> 83:12 231:12  <b>summary</b> 4:15 178:15 179:9  179:19 180:5,14 230:25  231:3,7,7,8,10,18  <b>summer</b> 298:24  <b>sun</b> 19:17 237:3 286:8  <b>supervise</b> 54:23 82:2  <b>supervisor</b> 81:8 193:21</p>	<p>212:5 247:4 249:13  <b>supervisors</b> 247:3 329:20  <b>support</b> 70:25 71:2 157:2,24  158:2 183:21,22 249:9  307:8 338:17  <b>supported</b> 33:12 112:11  252:19  <b>supports</b> 247:19  <b>supposed</b> 85:4  <b>sure</b> 11:6 15:2 17:15 21:2  23:24 24:24 25:5,9,10  29:18 31:19 34:19 42:12  52:19 57:21 58:2 59:15  71:12 75:6 76:7 87:3,14  88:14 94:6,9,10,15,16,16  112:20,23 116:11 119:24  120:2,21 121:14 125:4  129:7 131:11 134:9 144:15  146:16 161:10 163:15,23  165:19 168:11 171:16  181:15 183:13 191:16  196:23 205:8 206:25  208:18 214:2,16 215:3,4,4  215:5 231:5,21,22 232:13  234:24 237:7 239:15,16  241:11 245:19 247:18  248:13 249:9 251:5 253:6  259:7,21 270:14 284:8,20  294:15,16 296:20 301:6  303:11 304:23 305:10,24  307:12 312:13 313:17  315:5,21 319:10 322:5  323:16 324:25 328:24  337:8 340:15,15  <b>survey</b> 44:24 133:13 134:13  134:14  <b>surveys</b> 133:2,8,16 134:5  199:5,8 204:14  <b>suspect</b> 62:16 272:7  <b>Sutcliffe</b> 3:9 6:18  <b>SVP</b> 196:17 247:23,24  255:16 259:12 274:1  <b>swiping</b> 187:23  <b>switch</b> 247:6  <b>sworn</b> 6:23 346:15  <b>system</b> 17:17 18:6,7,21 19:2  19:5,14 20:9,10 21:8,19  23:18,19,23 51:10 52:3  55:9 78:6 97:18,21,22  103:8,20 104:11 105:17,19  132:6,13 165:22 182:12  184:22 185:21,22,22 186:3  186:5,6,9,19 194:14  196:17 219:6 228:11  235:17,18 236:4,13,17  237:10,11 246:19 248:8</p>	<p>250:12 255:12,12 263:16  264:11 266:14 267:1,3,12  284:10,11 285:18 297:3,14  298:6 301:25 303:5,9,25  332:13  <b>systems</b> 12:5,7 13:2,2,4  15:11 17:18 18:2 19:1,3,6  19:7,12 20:20 22:15 44:5  53:7 101:15,24 135:6,12  182:11 187:24 267:21  286:13,22 296:14,18  297:11,16 298:3</p> <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <p><b>T</b> 4:8 5:3  <b>table</b> 23:25 125:15,25 162:4  173:11 327:1  <b>tables</b> 284:8 286:10  <b>take</b> 8:2,13,16 9:12 11:19,24  30:1 32:13 36:25 38:4  41:18 55:14 56:5,7 58:22  59:1 62:22,25 63:3,7,9,11  63:13,16 64:10,13,20  69:13 74:21 78:25 81:25  82:10 84:12 85:20 92:18  92:18 102:12 105:5 107:2  113:20 124:12 127:22  137:15 150:23 155:20  174:3 180:2,21,25 188:16  195:21 196:3 210:6 225:19  230:6 231:24 239:19 250:4  252:2 255:1 261:9,10  264:16 268:22,25 280:9,10  280:11,13 292:16 319:9  320:19 326:15 332:12  333:6  <b>taken</b> 2:15 7:5,14 8:1,22  96:9 108:9 233:3 240:5  311:10 332:5 348:2  <b>takes</b> 284:18 298:18  <b>talent</b> 21:24 34:11,12,12,14  34:16,24 41:25,25 103:8  103:11,15,17,21 104:7,9  104:12,16,23 105:17,22  153:15,18,23 154:5,15  157:3 159:8,8,11 160:2  172:16 184:25 198:12  254:14,15,16 265:14  266:18 267:4 268:15 269:8  271:7 282:21,22 283:2,9  324:15 325:22 327:1,2  <b>talented</b> 103:18 338:13  <b>talents</b> 103:22  <b>Taleo</b> 72:2,8 144:22 188:13  188:14  <b>talk</b> 39:22,23 40:11 57:13</p>
--	--	--	--

<p>65:4 76:5,25 80:12 92:11 96:13 104:16 114:22 116:6 126:13 135:1,4 168:18 172:24 181:5 185:15 190:12 218:17 234:2,21 246:10 247:12 249:19 250:15 251:25 252:18 254:20 258:23 263:17 265:19 283:3 305:6,22 309:2 325:18 327:1,2 338:9 <b>talked</b> 47:24 80:4 91:14 97:17 102:9 116:21 139:1 145:5 146:1 153:22 157:3 207:18,21,24 212:6 222:2 222:11 235:14 236:14 250:13 269:6 288:10 302:6 302:14 312:11 316:13 334:22 339:22 <b>talking</b> 22:12 31:5 38:21 40:2 62:5 83:10 96:24 101:5,12 102:16 113:12 114:13,21 115:2 123:24 130:1 156:2 159:7 166:8 166:12,12,14 186:4 200:21 211:2 214:1,16 220:18,19 220:21,22 221:2,11 224:14 234:14 236:3 237:13,14 240:14 241:11 271:8 272:25 317:13 321:5 <b>talks</b> 87:15 153:17 305:23 <b>tap</b> 267:23 268:13 <b>tape</b> 85:21 158:17 291:22 <b>tapped</b> 272:1 <b>tapping</b> 272:3 <b>target</b> 212:9 <b>targeted</b> 306:23 <b>taught</b> 36:22 172:2 <b>teach</b> 52:2 <b>teachers</b> 200:9 <b>team</b> 26:1,25 27:1 43:5,6,9 68:15 69:12 76:14 79:6 134:18 139:12 150:6 230:17 231:15 232:1 262:11 303:7,8,10 304:6,7 304:8 317:8 335:2 340:10 <b>tech</b> 199:15 295:20 <b>technical</b> 52:15 59:17 78:6 164:22 172:13 209:15 259:8 <b>technically</b> 24:25 83:10 84:23 <b>technology</b> 13:22 18:11 33:20 53:11 135:2 136:1 208:20 246:22 274:11 280:16</p>	<p><b>teed</b> 341:4 <b>telephone</b> 218:16 <b>tell</b> 20:11 24:25 25:4 40:13 68:5 85:4 108:20 110:14 116:14 124:21 126:2,5 137:22 140:6 152:14 171:3 177:20 198:16 245:11 276:11 282:14 284:2 323:18 336:25 <b>telling</b> 174:15 207:12 343:24 <b>tempt</b> 73:6 <b>ten</b> 7:8,9 8:19,25 285:12 286:8 <b>tenure</b> 34:7 138:4 186:22,22 234:15 <b>term</b> 34:20 40:4,6 <b>terminate</b> 22:2 52:1 <b>terminated</b> 236:9 <b>termination</b> 52:6 145:24 <b>terminology</b> 277:24 <b>terms</b> 10:12 41:2 47:2 110:20 146:10 310:19 315:16 327:4,5,18,25 338:12 <b>territory</b> 234:19 <b>test</b> 47:15 71:7 160:13 285:17 <b>tested</b> 160:8 276:17 <b>testified</b> 6:24 30:16 164:7 174:9,17,19,22,24,24 191:17 214:4,10 <b>testifies</b> 125:11 <b>testify</b> 174:21 175:14,19 302:12 314:12,14 322:1 <b>testifying</b> 175:12 223:18 314:13 <b>testimony</b> 170:12,19 197:5 201:12 214:12 345:9 346:23 347:2 <b>testing</b> 276:17 <b>Texas</b> 285:25 <b>thank</b> 7:3,12 9:2 43:16 51:3 65:2 83:16 85:23 125:2 167:8 189:23 191:14 225:25 344:4,7 <b>thanks</b> 86:21 91:11 <b>theirs</b> 57:17 <b>theory</b> 252:13 <b>they'd</b> 155:8 <b>thing</b> 8:14 51:23 54:14 105:22 107:11,13 108:5 123:12 125:4 146:18 159:9 236:25 262:1 291:2 298:6 330:19 <b>things</b> 8:4 12:22 23:13 27:15 35:4 36:17 38:22</p>	<p>39:19,24 42:13 43:13,22 52:3,7 56:2,4,15 58:11 59:25 60:8 71:10 87:24 99:20 110:4,6 150:10 166:18 185:6,11 186:21 187:5,19 200:1,2,3,10,20 213:18 214:6 217:12 234:11,15 235:9 238:6,16 246:24 255:1 259:13 272:4 273:13 286:4 308:11 310:8 317:15 329:21 <b>think</b> 7:11 15:12,20,22 19:13 23:3,11 31:7 32:5 35:1 40:6 46:13 47:18 49:4,14 56:2,12,16 60:18 61:14 68:24 70:22,24 79:24 81:21,22 84:1,19 85:3,5,9 86:16,16 87:7 88:7 103:18 105:25,25 106:1 129:8 131:25 132:2 133:13 142:17 146:17 152:15 154:8 158:18 159:13 163:11,11,15,23 164:6 165:17,19,24 166:2 168:24 169:6 171:12 174:16 176:3 176:9 178:23 189:23 191:16 194:9,9,16 197:8 198:15,22,22 199:11 202:24 203:5 205:16 207:9 207:13,25 208:10,14 211:25 213:25 214:15 219:3 224:6 231:4,25 235:17 236:3,15,18 246:7 248:13 252:7 254:8 255:16 256:25 257:7 261:15,18,24 262:8,8 273:11 274:9,18 281:7,16 282:6 284:24 285:1 286:20 289:5 295:22 297:14 306:8 307:4,9 311:21 312:7,17,17,22 322:4 323:1,9,15 324:7 326:17 329:19 331:1 333:12 337:14 340:6,8 341:3 <b>thinking</b> 46:18 82:11 102:15 325:17 <b>third</b> 100:9 116:9 147:17 331:3 <b>Thomas</b> 149:3 150:16 185:19 217:17,20 <b>thought</b> 26:22 73:17 206:12 207:12 217:12 277:8 291:11 293:11 303:19 <b>Thrasher</b> 14:19 16:2,3 41:22 41:23 230:4 <b>three</b> 50:2,3 67:23 68:7</p>	<p>88:25 90:20 188:24 211:25 223:9 250:4 271:19,20,22 296:11 302:7 314:3 327:23 335:13 340:8 <b>three-quarters</b> 176:21 <b>threshold</b> 148:8 149:4 <b>threw</b> 171:18 <b>throw</b> 188:24 <b>Thursday</b> 2:17 6:1 <b>ticket</b> 195:21 196:4 <b>tie</b> 225:8 <b>tied</b> 144:7,9 <b>tier</b> 187:2 <b>Tim</b> 151:13 <b>time</b> 6:7 10:2 32:17,19 33:5 33:17 36:9 38:2 55:13 59:17 67:19 75:4 76:23 87:16 110:13,13 124:12 127:9 135:2,3 138:2,3,19 142:7 155:22 158:18 169:4 169:18 180:16 184:19 188:21 195:9 198:4 206:23 206:24 207:2,11 210:10,13 216:18 217:6 225:6 227:4 227:4 237:15 239:9 248:14 249:1 274:12,16 280:20,23 284:11,18 291:21 292:2,5 293:13 299:10 316:6 319:12,15 341:3,9,12 <b>timeline</b> 58:23,24 88:25 89:2 <b>timeliness</b> 11:14 <b>times</b> 7:7 53:6,7 89:2 119:7 121:16 149:18 154:9 211:21 226:24 227:1,6 271:18 297:9 328:25 334:11 335:12,13,14 339:21 340:5 <b>Timi</b> 229:23 230:16 <b>Timi's</b> 231:15 <b>tiny</b> 108:6 <b>tired</b> 336:6,8,8 <b>title</b> 12:14 31:9 100:3 101:6 101:23 137:5 196:22 212:19,19 244:18 256:21 256:22 257:1,22,25 259:12 <b>titles</b> 110:8 184:21,21 188:18 286:3 <b>today</b> 7:4 9:12 10:1 11:1 17:22 20:21 40:15 65:12 71:7 127:2 135:1 201:23 278:14 288:11 322:14,15 331:16 <b>Today's</b> 6:7 <b>toes</b> 71:13 <b>token</b> 270:22 <b>Tokyo</b> 98:20,21</p>
--	--	---	--

**told** 50:6 80:24 220:22  
230:22 251:19 264:12  
**tolerate** 234:16  
**tool** 79:6,7,12,14 138:10  
213:1  
**tools** 183:22 260:19  
**top** 13:12 19:16 81:15 103:8  
103:11,22 104:4,9,12  
105:17,22 147:10 153:23  
156:12 157:3 185:24  
259:18,22 267:4 268:15  
269:8 275:8,14,23 303:24  
340:20  
**topic** 237:18 245:14  
**topics** 247:6 309:21  
**total** 96:8  
**touch** 39:25 40:1,4 312:18  
317:19  
**touched** 54:3  
**touches** 21:11  
**tough** 208:24  
**tour** 33:23  
**track** 23:2,3,4,5,6,8 89:19  
249:8 337:7  
**tracking** 297:1,6,8 310:8  
337:7  
**tracks** 234:21 249:5  
**trade** 292:14  
**traditional** 105:18  
**train** 104:15 206:7 273:5  
**trained** 74:15,17 206:7  
336:12,14,16,18  
**training** 14:21 36:15,16,22  
36:24 37:1,4,6,9,12,16,24  
38:3 41:24 51:25 55:4,11  
55:12,14,21 56:7 58:15,16  
58:22 63:6,7,8 74:18 75:3  
75:3,7,9,11 76:3 124:19,21  
124:22 154:4,6,7 199:20  
201:19,20,25 205:21,23  
206:1,15,21 207:2,11  
246:21 247:17,19 248:5  
249:5 250:4 260:19 268:6  
272:19,20,20 273:17 274:8  
274:14 303:10 306:16,18  
306:19,20,21,23 307:19,22  
307:23 308:2,9,13,14,16  
308:19,19 309:9,11,13,15  
313:3 326:6 336:21 338:16  
**trainings** 35:20 36:3,6,8,20  
56:5 62:21,22 63:10,13,14  
63:16,20 64:2 74:21,25  
75:18,21 154:2,11,16  
201:14 205:15 206:11  
207:8 272:23 273:3,9,12  
273:19 308:22 313:8

**trains** 205:19,20,20,20,20  
**transaction** 20:18 29:20  
219:4,5 312:19  
**transactional** 18:7  
**transactions** 22:12  
**transcript** 5:13 9:7,7 345:9  
346:24 347:5  
**transexual** 298:20  
**transfer** 44:16,21 52:2,16  
69:14,14,21 70:8 71:17,23  
181:19,19 182:4 194:4  
212:17 213:8,19 266:21  
267:6,9 317:16  
**transferred** 18:21 181:9,23  
212:20 213:9 267:7  
**transferring** 181:16,25  
**transfers** 44:11 71:1 137:24  
181:6,6 193:25 195:4  
213:6 215:23 268:7 283:3  
**transformation** 17:23  
**transformed** 17:20 18:10  
**transgender** 338:18  
**transition** 71:3  
**translate** 182:15 322:3  
**transparent** 39:11 166:4,13  
166:19  
**treat** 69:15,15 313:1 337:25  
**treated** 69:21,22,25 71:22  
186:10 187:9 188:25  
**treating** 166:15  
**trees** 123:10  
**tricky** 232:22  
**tries** 216:7  
**trouble** 49:6 297:4  
**true** 122:3,4 134:20 137:23  
143:12 160:2 194:7 215:23  
215:25 244:5 255:14  
331:15 345:8 347:2  
**try** 33:2 39:20 46:19 76:20  
76:22 81:23 115:19 122:11  
122:16 137:15 171:9  
184:22 196:7,16,19 215:20  
216:9 225:13 237:17 241:8  
241:21 267:25 329:6  
**trying** 13:1 24:24 25:1 27:24  
27:25 31:23 32:23 41:13  
56:11 58:3 62:10 66:8 85:5  
85:6,9 113:13 115:9,18  
116:4 129:24 130:3 162:7  
162:8 164:1 166:3 205:24  
241:8 251:6,9 322:3  
333:15  
**Tuesday** 258:15  
**turn** 112:3 116:8 121:4  
124:24 126:17,24 129:14  
132:19 135:13 238:20

296:10 303:18 330:12  
**Turn-on** 22:23,25  
**turned** 340:9  
**tweak** 284:17 325:15  
**tweaking** 325:6  
**twice** 254:16 265:15,16  
**two** 18:18 38:4,5 47:19  
49:25 50:1 55:10 58:15  
63:14,14 99:20 137:24  
138:22 192:6 196:1,1,1  
227:12,16,18 255:14,16  
265:21 271:12,25 275:7,11  
275:11 281:10 287:8  
293:10 296:11 326:5 340:8  
340:11 342:25  
**two-prong** 301:25  
**two-thirds** 176:21 271:10  
**type** 25:15 30:14 58:25  
166:5 178:17  
**types** 29:1,10 74:24 179:3  
**typical** 103:19 279:19  
**typically** 44:14 76:21 120:25  
121:4 122:16 130:16 138:4  
154:12 160:13 192:8 197:2  
204:1 218:10 249:12  
271:24,25 273:18 290:12  
323:5

**U**

**U.S** 44:12 52:12 61:5 78:25  
101:23 107:3 133:10,20  
182:4 194:5,6 212:20  
213:10,20 285:20 286:11  
300:4  
**Uh-huh** 171:15  
**Uh-oh** 298:22  
**Uh-uh** 29:3  
**ultimately** 113:9 231:23  
**umbrella** 229:16  
**underneath** 139:13 321:4  
**undersigned** 345:6  
**understand** 9:3 24:20 28:1  
41:5 65:17 66:8 115:9  
116:5 125:3 126:23 127:7  
127:7 129:24 130:2 163:4  
171:9 230:5 311:3 343:12  
**understanding** 34:15 35:1  
66:13 115:20 145:22  
311:12 342:10  
**understands** 41:3  
**understood** 129:25 189:24  
**unfortunately** 21:11 325:20  
**unhappy** 326:9,12  
**union** 12:20  
**unique** 194:23  
**unit** 156:24 198:7 228:17,20

229:5,9 237:4 270:4  
**United** 1:1,4 2:1,4 3:3 44:19  
44:20 199:10  
**universities** 325:14 332:16  
**university** 91:19 103:20  
298:24  
**unlimited** 187:1  
**up-to-date** 54:9 87:24  
**updated** 94:6,11  
**upgrade** 26:16,19  
**upgraded** 297:3,5  
**uplift** 188:6  
**uploaded** 186:18  
**use** 60:3,4 73:1 103:8  
127:23 133:3,4,7 134:5,9  
137:19,23 157:4 159:22,24  
159:25 160:2,3 167:5  
174:20,25 183:5,10 199:8  
199:10 204:20 212:21  
218:16 229:1,2 236:17  
277:3  
**useful** 326:5  
**user** 25:25 60:4,11,12  
**user-design** 60:4  
**users** 160:6  
**uses** 157:5 159:24  
**usual** 279:20  
**usually** 28:24 59:5 60:5  
121:22 126:10 195:22  
211:13 218:16 253:3  
**utility** 32:19  
**utilization** 331:6,8,16,20  
333:16 334:1

**V**

**vacation** 187:1,1,2,3,7  
**vague** 36:9 38:25 81:17 90:2  
92:5 96:1 101:10 102:6  
114:11 145:17 154:22  
160:18 162:22 169:18  
172:10 181:12 190:18  
204:24 216:18 217:6 218:2  
237:22 242:13 247:9  
299:10 326:10 331:22  
**Valley** 170:4 285:24  
**valuable** 138:5  
**valuation** 97:6,10  
**value** 97:5  
**values** 39:23 40:3,10  
**Vance** 14:23 91:8  
**variable** 72:4  
**varied** 82:3 232:20  
**varies** 134:21  
**variety** 36:24 43:12 110:4  
213:18 216:13 309:21  
310:8

**various** 39:24 48:1 154:9  
201:7 245:5  
**vary** 134:22  
**vendor** 199:12 238:18  
308:20  
**vendors** 37:17 38:15 224:2  
**verbal** 8:3,7 37:20 40:7  
103:6,7 105:16 218:15  
264:3  
**verified** 175:23  
**verify** 174:8 175:10  
**versa** 183:24 215:1  
**verse** 310:6,9 336:24  
**version** 16:15,16 18:13,15  
149:18 277:20,25 278:4  
284:5  
**versions** 305:12 335:9  
**versus** 6:5 122:13,13 135:8  
144:2,22 149:22 164:18  
188:2 192:19 204:7 268:22  
297:9  
**vested** 195:19  
**vesting** 173:10 186:24 187:8  
**veteran** 302:22  
**veterans** 298:18,19  
**vice** 12:16 17:8 31:10,11,12  
47:7,10,11,13,19,22 48:8,9  
49:1,22 51:1 99:6 110:8,18  
183:23 188:17 191:22,23  
192:9 196:19 203:23 215:1  
254:6,7,18 257:12,13,24  
258:11  
**Vickie** 14:19 16:2 41:22,23  
42:11 230:4 303:6 304:8  
305:2 322:18 324:3,4  
334:10  
**Victoria** 16:3  
**video** 6:4,8 8:5 55:13 85:25  
86:7 158:22 159:4 239:21  
239:22 240:2 258:20  
292:21 293:2 344:11  
**Videographer** 3:15 6:3,20  
85:24 86:5 158:21 159:2  
210:9,12 237:16 239:20,25  
261:8 280:19,22 291:23  
292:1,4,20,25 319:11,14  
341:2,8,11 343:1 344:8  
**VIDEOTAPED** 1:14 2:14  
**view** 33:14 66:10 139:20  
329:1  
**views** 202:17  
**visa** 23:21 30:14 44:21  
**visas** 23:12 44:15  
**visit** 295:25  
**voice** 252:19  
**voice-identify** 6:13

**VP** 31:22 256:13  
**VPs** 274:4  
**vs** 1:7 2:7 348:3

---

**W**

---

**W-2** 176:23  
**wag** 245:20  
**Waggoner** 15:14,15 41:10  
45:4,7 92:17 93:1 124:10  
124:13 133:22 134:8 168:7  
281:9  
**wait** 157:17 189:19 191:2  
216:20 240:7 293:9  
**walk** 57:2 196:4  
**want** 7:22 8:20 23:5 24:19  
25:2 48:23 58:4 59:24  
64:10,18 65:13 71:21,22  
92:15,20,21 93:1 97:8  
123:12 124:15 132:22  
136:13 146:15 155:15,15  
158:13 166:9,20 167:5  
178:12 184:19 188:9,19,20  
189:15 190:12 192:4  
195:20,20 208:15 213:14  
218:6 225:19 234:15  
241:25 245:2 247:6,18  
249:6,6,7 250:3 251:23  
255:1 259:6,9 261:3  
264:24 265:17 268:17,21  
269:16 270:1 272:21 280:6  
291:1 298:14 299:5 308:6  
314:20 325:22,23 329:5  
332:19 339:6  
**wanted** 17:5 24:19 26:3 34:6  
41:5 64:7,12,13 65:4 81:23  
86:10 89:3,6,10 92:8  
144:18 159:7 185:4 189:24  
194:4 212:16 213:21  
234:22 243:20 248:22  
265:18 281:15 288:16  
295:5  
**wanting** 267:5,6  
**wants** 61:9 258:11  
**Ward** 54:11,22,24 88:11  
275:3  
**Ward's** 54:7 87:25  
**warning** 236:6,6,9  
**wasn't** 10:18 17:16 26:19  
91:18 125:4 173:5 185:12  
187:13 204:10 251:21  
252:17 260:22  
**watch** 41:11 207:25  
**way** 14:7,9 30:11 31:8,24  
33:20 51:19 53:11 71:15  
76:24 79:25 81:15,22 84:5  
84:18 90:17 95:13 98:13

103:25 107:6 114:19,19,20  
115:19 129:25 132:17  
143:9,21 144:14 146:5  
150:19 162:24 176:22  
228:13 255:6,13 256:2  
257:11 265:3 267:19,21  
268:24 269:16,18,22,24,25  
270:14 303:11 307:21  
308:1 311:14 317:19  
335:17  
**ways** 202:7 249:20 325:17  
327:24  
**we'll** 64:20,22 73:17 81:25  
84:12 85:19 93:4 123:8  
126:13 127:23 135:1  
188:21,22,23,23 192:6  
237:18 268:23 315:18  
320:19 332:9  
**we're** 17:22 41:24 44:8 61:7  
68:2 75:2 83:10 84:1,19  
85:20 98:25 99:3,7 101:14  
101:22 114:18 120:5,6  
134:19 139:1 146:2 158:17  
158:23 163:19 164:3 185:8  
185:20 192:2,4 202:16  
213:19 215:5 217:1,13  
221:11,19 222:4 227:24,25  
233:12 236:3 240:14,19  
241:1 256:17 261:1 271:4  
274:18 276:20 284:4,12  
286:20 288:24 292:1  
300:15 301:18 303:4,9  
311:3 312:17,23 314:8  
317:14 318:18 321:5  
322:11 324:12 325:5,8,9  
325:12,13,16,16,17 329:2  
330:2,2,3,3 332:13 336:8  
337:8,8 343:24 344:10  
**we've** 17:23 45:13 64:9  
119:4 143:23 174:2 184:17  
201:12 203:5,24 208:1  
211:25 219:24 230:22  
233:1,2,18 235:5 236:5  
288:14 297:8 308:1,17  
313:25 318:6  
**website** 16:25 17:1 56:25  
109:5  
**week** 76:23 205:21  
**weeks** 63:14 89:1 187:7  
**weigh** 262:9  
**weight** 96:14 172:22 208:4  
**weighting** 208:24  
**went** 18:8 19:1,15 33:5,18  
55:9 89:8 119:5 140:5,6  
148:8 188:8 203:17 260:20  
277:15 285:21,22 298:21

**weren't** 95:9 151:25 171:25  
173:6 188:11 203:22  
207:15 267:24 277:15  
286:4 340:3  
**West** 48:8,16  
**Westerdahl** 1:14 2:14 4:2  
6:4,22 7:3 11:13 26:5  
35:23 65:8 67:8,10 85:25  
86:7,9 140:3 158:22 159:4  
160:24 177:13 195:9  
239:22 240:2,5 275:12  
276:3 292:22 293:2 328:10  
344:9 345:19 348:2  
**Westerdahl's** 4:10  
**whack** 286:4  
**white** 300:21  
**wild** 8:20 106:2  
**win** 172:3  
**wind** 266:6  
**winter** 56:3 155:23  
**wish** 265:4  
**witness** 4:2 6:23 11:17  
14:11 16:7 22:23 24:15  
25:19 26:6,11 28:18 29:6  
30:18 35:24 36:11 37:16  
39:3,10 40:17 41:17 45:11  
48:5 49:3 50:22,24 53:3  
64:14,16,18,22 65:9,25  
66:18 69:21 70:14 76:2  
79:5,17,19 84:14,19 85:4  
85:22 86:13 89:22 90:4,11  
92:7,18 93:3,21 95:16,22  
96:3,18 97:4,16 98:4,11  
99:15 100:15,20 101:12  
102:1,9 105:2 106:13,16  
108:22,25 109:12 110:2,12  
111:18,21 112:15 113:20  
115:4,8 116:19,21 117:19  
118:3,13,23 120:14,24  
122:3,25 123:8 124:17  
125:11,16 127:3 128:5,17  
128:24 129:7 131:10 134:8  
134:17 135:25 137:10,13  
137:22 138:25 140:5  
141:12 142:22 144:9,24  
145:19 146:13,17 153:12  
155:2 156:4 160:12 161:16  
162:24 166:11 167:3,5  
168:22 169:6,20 170:13,20  
172:12 175:4,12 177:12,20  
178:20 179:15 181:15  
182:11 183:9 184:11  
189:22,25 190:10 191:1  
192:24 193:15 195:10  
197:15 201:18 202:6 203:1  
205:1 207:21 208:9 209:12

<p>210:1,4 212:25 214:15,18 214:22,24 215:20 216:20 217:8 218:5 220:13,24 222:23 223:2,5,7,18,23,25 224:5,8 225:15 226:8,17 230:13,19 232:3 233:18 237:24 239:2 240:10 241:17,23 242:16 245:4,10 246:3 247:10 248:13,21 249:17 250:1 251:14 253:20 254:14 256:16,25 257:7 258:21 262:5 270:13 275:16 279:15 280:4,9,13 281:2 287:2 288:10,23 290:11,24 291:15 292:18 293:12,16 294:5 297:24 299:11 301:6 302:14 305:18 307:3,16 311:2,13 313:20 314:2,16,18 315:7 315:20 316:5,17,20,24 319:10 322:3,16 323:22 326:12 327:13 328:6,14 329:12 330:18,22 331:25 333:21 336:5 337:5,19 340:19 342:12 344:6 346:15 347:2 <b>witnesses</b> 230:24 <b>woman</b> 270:1,16 271:4,5 312:14,25 <b>women</b> 155:10 161:5,11 260:2,9 270:6,16 300:7,11 301:22 302:8 313:17 314:24 315:14 320:1 325:20 326:4 331:4 332:7 332:24,25 333:4,14 338:13 338:15,16,19 340:5 <b>women's</b> 42:7 295:17 315:25 317:7 318:1 <b>wondering</b> 28:5,13 29:24 <b>word</b> 39:11,12 141:3 283:21 <b>words</b> 224:9 <b>work</b> 10:11 23:21 25:8 33:2 34:16 37:18 44:24 61:11 69:7 70:17 72:3,10 76:14 77:4 89:1 102:23 103:12 103:24 106:16,18 108:4 143:24,24 145:4 149:20 151:16,17,21 198:23,24 199:4 201:22 205:12 227:3 233:12 234:12 246:24 249:2,18 251:9,25 252:16 268:8 294:6 310:3 336:22 338:20 <b>Workbench</b> 78:5,8 79:24 88:20 89:19 90:8 107:11 107:21 139:2 277:4,8,13</p>	<p>278:3 284:6 <b>worked</b> 33:1 208:21 209:14 <b>worker</b> 12:20 <b>workforce</b> 63:3 276:9 277:3 277:12 337:9,24 <b>working</b> 38:15 54:5,5 63:4 67:3 74:3,7 166:14 184:2 189:8 198:20 269:10 <b>workplace</b> 117:8 <b>works</b> 15:15,20 16:2 20:13 45:21,24,25 50:24 75:11 106:8 145:3 265:24 285:18 295:18 298:25 335:1 341:25 <b>world</b> 18:1 21:10 32:20 46:23 52:16 76:17 79:7 84:9,10,17,18 90:19,19 95:6 170:7 179:21,22,24 180:6 195:16 209:2 212:1 237:12 251:24 269:18 285:7 <b>worldwide</b> 300:7 <b>worse</b> 327:13 <b>wouldn't</b> 23:15 56:7 69:25 90:7 101:17 102:17 106:3 127:16 136:12 144:14 174:1,11 175:8,13,20 181:19,24 187:4 194:23 213:10 228:8 234:6 240:21 248:23 257:7 262:9 265:1 289:9 309:15 <b>Wow</b> 243:23 <b>wrap</b> 76:23 <b>wrapping</b> 76:20 <b>write</b> 53:12 54:14 61:17 100:17 147:9 275:1,3,16 294:16,17,19 <b>writer</b> 164:22 <b>writing</b> 54:23 95:9,15 104:13 173:13 199:19,20 218:15 228:4 235:12 <b>written</b> 37:20 40:7,10,11 52:20,21 62:2 75:17 88:2 94:18 103:4 104:13 105:16 124:6 136:18 151:22 158:3 158:4 231:3 263:4,7,21,25 264:6,14,23 275:17,23 323:2 <b>wrong</b> 141:3 152:17 191:16 323:22 <b>wrote</b> 87:17 94:5,13 275:3 275:22 276:7 286:5 287:14 291:13 294:12</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p><b>X</b> 4:1,8 5:1,3 248:1 347:5</p>	<hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>Y</b> 248:1 <b>yeah</b> 7:17 13:10 15:24 18:19 22:15,16 23:3 27:2 29:24 30:5 31:21 32:16 34:6 35:1 36:11 38:6,9,10 39:3,22 40:16 41:17 44:19 45:22 46:9,12,17,18 47:6,23 48:24 50:24,24 51:11 52:18,24 53:24 56:10 58:3 60:12,22,23 61:9,14,19 62:8,8,14 64:6,12,24 65:18 66:5,5 67:10 70:11 72:24 73:1,2,4 76:2,3 79:5 80:22 82:5 92:14 95:8 96:21 98:11 99:15,23 100:1,20 101:3,12,21 105:2,25 106:18 109:4,6 111:24 115:4 117:19,19 118:16,18 118:23 121:10 122:7,11,15 122:25 123:23 124:15 125:21 128:5 129:21 130:24 131:22,23 132:2,18 132:20 137:13,18 138:18 138:19,20,25 139:20 140:5 141:11 145:8 146:21 151:24 154:15,24 156:6 158:15 159:12,13 160:8 161:7,16 162:2 163:12,14 164:20 166:11 167:4 169:20 170:20 171:13 172:6 174:19 175:4,4 176:14 177:14 180:4 189:18 190:21 194:11 195:3 197:15,21 201:18 202:23 203:1,22,24 204:9 204:19 205:4,19 208:19 209:20 210:20 211:7,9,12 213:12 215:15 216:12 217:8 218:5,6,23 220:5,13 220:24 221:7 223:25 226:8 226:17,23 227:7,10,19 230:13 231:11,12 232:3,3 232:16,17 233:24 234:2,18 235:14 236:23 237:24,24 239:15 240:9,23 244:23 245:4,10 247:4 248:21 249:17,17 250:1 251:3,4 251:17 252:3 253:2,20 254:13 255:6 259:18 262:7 267:2 269:2 270:2,7,9,13 270:15,20,25 271:9 272:10 273:2,13 278:20 283:10,24 284:21 286:15,19 290:5,11 290:12,12,18 291:17,24 292:15 294:3,15 295:7</p>	<p>299:11,25 301:10 302:15 303:21 305:14,14 311:8 312:3,4 313:25 314:2 316:4,5,8,17,23 317:23 318:5 320:4 321:21 322:13 323:4,9 327:17 330:16 332:9 335:4,24 339:20,24 343:9 <b>year</b> 30:1 36:11 38:1 58:15 63:11 67:16 69:4 73:21 76:21 103:24 108:6 113:21 113:22 114:7,20,23,24 122:8 138:22 139:5,6,18 142:7 148:6 152:5,9 155:21 170:17 207:13 211:21 254:16 265:15,16 295:2,21 308:6 324:7 <b>years</b> 7:10 18:18 19:2,19 31:17,18 32:7 33:13,13 36:12 38:4,5 44:6 52:22,22 52:23 53:13,19 54:3 58:15 63:15 94:7,11 117:6,11 119:14 138:9,22 154:9 159:14 171:10,13,14,19 186:23,24 188:24 192:6 203:25 206:25 207:10 209:14 223:8,9 234:12,21 252:11 260:3 261:2 271:12 273:21,23 284:25 285:12 286:8 302:7 303:15 308:13 308:19 309:16 310:14 326:5,8 332:12 340:2,16 <b>yep</b> 198:19 274:25 287:13 304:6 341:14 <b>yes-or-no</b> 307:15 314:17 315:6 <b>yesterday</b> 10:2,4,22</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>Z</b> 22:5 248:1 <b>Zaven</b> 3:15 6:9</p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p><b>01/01/14</b> 5:10 <b>01/06/14</b> 4:13 <b>02/17/14</b> 4:18 <b>03/03/15</b> 4:11 <b>06/10/14</b> 4:20 <b>07/01/16</b> 5:5 <b>07/09/14</b> 4:17 <b>08/31/13</b> 4:21 <b>09/17/18</b> 5:6</p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>1</b> 85:25 104:3 294:21 <b>1:15</b> 159:5</p>
---	--	--	--

<p>1:16 159:1 10 44:6 119:9 126:24 197:8 10:31 86:2 10:33 86:3 10:49 86:8 10:50 86:3 11 330:16,23,25 12 44:6 12:20 158:24 12:22 158:25 123 5:16 13 5:17 167:2,4 283:6 297:3 13- 140:8 130 187:18 130-plus 184:17 187:19 135,000 46:21 13735 1:24 2:19 346:9 347:13 14 276:12 278:15 293:14 295:2 297:2,2 303:22,24 140,000 23:15 46:22 142:15 178:14 140,000-employee 178:13 1400 140:8 146 4:11 148 4:12 15 32:5 119:10 138:9 197:9 269:11 297:2 1500 140:8 212:1 151 4:14 16 4:10 283:23 16- 212:1 167 5:17 17 82:9 285:1 295:22 176 4:15 18 67:25 285:1 18- 67:16 73:20 19 295:22 190530RCR 1:25 1990 31:12 1999 31:3 1s 97:20</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p>2 86:6 158:22 182:11,12 2:17 210:10 2:19 210:11 2:32 210:13 2:33 210:11 20 79:12 234:11 345:15 20-some 332:12 200,000 281:12 2000 17:8,13 18:24 31:2,9 32:18 257:20 2012 176:23 2013 36:14 38:2 226:13,13</p>	<p>283:13,14 336:2 2014 5:8 281:17 293:25 295:3 331:9 2015 148:6 151:19 152:12 152:19 257:22 2017-OFC-00006 1:4 2:4 6:6 2019 1:15 2:18 6:1,7 145:24 344:9 348:2 2093(b) 346:14 213 3:6 22,000 67:16 73:21 25 54:3 129:14,17,23 250,000 148:7 26 129:14,17,20 27 132:20,20 274 4:16 278 4:18 28 5:18 52:22,23 132:21 290:23 346:21 28(a) 346:16 28(a)) 346:11 281 4:19 282 4:21 283 5:5 287 5:6 29 135:13,20 290 5:18 293 5:7 2s 97:20</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p>3 97:20 159:3 239:21 3,000 215:6 3:07 239:23 3:09 239:24 3:17 240:3 3:18 239:24 30 1:15 32:5 36:12 52:22 80:3 135:14,20 207:10 348:2 30(b)(6) 65:9,16 175:11 223:18 328:6 30(e)) 347:8 30(f)(1)) 346:16 347:3 30,000 215:6 300 79:11 30th 2:17 6:1,7 344:9 31st 76:21 34 140:9,16 341 5:9 343 5:10 35 341:5 350 3:5 370 3:5 380594 94:2 380597 94:3</p>	<p style="text-align: center;"><b>4</b></p> <hr/> <p>4 97:20 240:1 279:1 292:21 4:07 280:20 4:08 280:21,23 4:09 280:21 4:25 292:2 4:27 292:3,5 4:28 292:3,23 4:29 292:24 4:35 293:3 4:36 292:24 400,000 281:11 401(k) 186:25 187:8 405 3:10 415 3:11</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p>5 5:15 92:17 93:1 97:20 104:3,4 124:25 125:1 211:8 212:10 293:1 5:12 319:12 5:14 319:13 5:25 319:15 5:26 319:13 5:54 341:9 5:55 341:10 5:57 341:10,12 50 152:20 50/50 326:1 333:4 520 6:10 56 343:21 56234-5 124:24 125:25 56234-9 126:17 58 4:10 16:5,6 59 4:11 146:24</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p>6 97:20 212:10 259:17 296:10 6:01 344:11 6:02 2:17 344:12 60 4:12 148:13,15,16,17,18 600 171:2 600,000 215:8 61 4:14 151:1,3 62 4:15 166:21,23 176:10,11 63 4:16 274:18,20 278:25 64 4:18 278:24 279:2 65 4:19 280:24 281:1 66 4:21 282:9,10 67 5:5 283:15,16 68 5:6 287:1 293:5 69 5:7 293:6,7,8 306:6 330:15,16</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/>	<p>7 4:4 5:16 92:22 93:4 123:5 212:10 70 5:9 341:13,15 70,000 176:22 71 5:10 343:2,3 720 6:11 77.5 343:21 77.56 343:19,25 770 2:15 773-5760 3:11 78 152:12</p> <hr/> <p style="text-align: center;"><b>8</b></p> <hr/> <p>8 35:11 800 228:15 238:17 894-5365 3:6</p> <hr/> <p style="text-align: center;"><b>9</b></p> <hr/> <p>9 35:11 269:6 9-box 103:10,13 104:2 153:22 157:5,5 159:8 160:3 282:22,24 9-Square 269:7 9:00 6:8 9:01 2:16 6:2 90 270:5 90071-1202 3:6 90s 206:23 207:5,15 91203 6:12 92 5:15 94105-2669 3:11</p>
--	--	--	---