

DOL vs ORACLE AMERICA

UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES  
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OFFICE OF FEDERAL CONTRACT OALJ Case No. 2017-OFC-00006  
COMPLIANCE PROGRAMS, UNITED  
STATES DEPARTMENT OF LABOR, OFCCP No. R00192699

Plaintiff,  
v.  
ORACLE AMERICA, INC.,  
Defendant.

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Deposition of  
LYNNE ANN CARRELLI  
Friday, MAY 24, 2019

REPORTED BY:  
TINA MARIE VELASQUEZ, CSR NO. 10072  
Job No.: 105036

**CERTIFIED  
TRANSCRIPT**

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| <p>1 EXHIBITS<br/>2 DEPOSITION OF LYNNE ANN CARRELLI<br/>3 FRIDAY, MAY 24, 2019<br/>4<br/>5<br/>6 Exhibit 44 Email thread. Top email to Brian L. Mikel from Min-Chih Yeh, dated February 12, 2015; 20 pgs. [DOL00040003-DOL000040022] Page 91<br/>7<br/>8 Exhibit 45 Email to kredwar_directs_ww from Lynne Carrelli, dated October 27, 2017; 3 pgs. [ORACLE_HQCA_0000381115-0000381117] 146<br/>9<br/>10 Exhibit 46 Document entitled "Oracle HR Learning Session US Pay Equity Laws and Salary History Bans October 18-19, 2017"; 20 pgs. [ORACLE_HQCA_0000381118-0000381137] 150<br/>11<br/>12<br/>13 Exhibit 47 Document entitled "Oracle Recruit &amp; Hire Guidance Role Checklist for a Successful Hire: New US Legislation"; 14 pgs. [ORACLE_HQCA_0000381101-0000381114] 156<br/>14<br/>15 Exhibit 48 iRecruitment IRC; 2 pgs. [ORACLE_HQCA_000027412-1; 000027412-2] 161<br/>16<br/>17 Exhibit 49 Email to Jayesh Patel from Todd Gorman, dated 5/13/2014; 5 pgs. 164<br/>18<br/>19 Exhibit 50 Oracle job advertisement; 4 pgs. 168<br/>20 Exhibit 51 Oracle Candidate Profile Summary; 2 pgs. [ORACLE_HQCA_0000029001; 0000033810] 171<br/>21<br/>22 Exhibit 52 Document entitled "Oracle Manager Training Compensation Process for Global Corporate Bonus &amp; Fusion Workforce Compensation"; 56 pgs. [ORACLE_HQCA_0000056242-1 - 0000056242-56] 195<br/>23<br/>24<br/>25 Page 5</p> | <p>1 BE IT REMEMBERED THAT, on Friday, May 24,<br/>2 2019, commencing at the hour of 9:04 a.m. in the offices<br/>3 of the U.S. Department of Labor, Office of the Solicitor,<br/>4 90 7th Street, Suite 3-700, San Francisco, California,<br/>5 before me, TINA MARIE VELASQUEZ, CSR NO. 10072, a<br/>6 Certified Shorthand Reporter in and for the State of<br/>7 California, personally appeared<br/>8 LYNNE ANN CARRELLI.<br/>9<br/>10 ---o0o---<br/>11<br/>12<br/>13<br/>14 THE VIDEOGRAPHER: Good morning. This is the<br/>15 videotaped deposition of Lynne Anna Carrelli in the<br/>16 matter of Office of Federal Contract Compliance Programs,<br/>17 United States Department of Labor v. Oracle America, Inc.<br/>18 Case number OALJ 2017-OFC-00006.<br/>19 This deposition is being held at 90 Seventh<br/>20 Street, Room B-140, San Francisco, California.<br/>21 Today's date is May 24th, 2019. The time on<br/>22 the video monitor is 9:04 a.m.<br/>23 My name is Marcus Majers, Certified Legal Video<br/>24 Specialist with Grodillis Court Reporters, located at 520<br/>25 North Central Avenue, Suite 720, Glendale, California Page 7</p> |
| <p>1 EXHIBITS<br/>2 DEPOSITION OF LYNNE ANN CARRELLI<br/>3 FRIDAY, MAY 24, 2019<br/>4<br/>5<br/>6<br/>7 Exhibit 53 Email to Wendy Lee, and other recipients, from Zenita Singh, dated 8/25/2016; 1 pg. [ORACLE_HQCA_0000380453] Page 234<br/>8<br/>9 Exhibit 54 Document entitled "Global Corporate Bonus Process and Fusion Workforce Compensation HR Training"; 42 pgs. [ORACLE_HQCA_000056247-1 - 000056247-42] 242<br/>10<br/>11 Exhibit 55 Document entitled "Oracle Affirmative Action at Oracle"; 40 pgs. 267<br/>12<br/>13<br/>14 Exhibit 56 Email thread. Top email from Vickie Thrasher, dated 9/17/2018; 4 pgs. [ORACLE_HQCA_0000417316-0000417319] 278<br/>15<br/>16 Exhibit 57 Global job classification; 2 pgs. [ORACLE_HQCA_381010-1 - 381010-2] 300<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25 Page 6</p>   | <p>1 91203.<br/>2 Would all counsel present please introduce<br/>3 themselves.<br/>4 MR. GARCIA: Norm Garcia for OFCCP.<br/>5 MR. ELIASOPH: Ian Eliasoph for OFCCP.<br/>6 MS. HERMOSILLO: Ana Hermosillo for OFCCP.<br/>7 MS. REYZIS: Yekaterina Reyzis for Oracle.<br/>8 MS. MANTOAN: Kathryn Mantoan from Orrick,<br/>9 Herrington &amp; Sutcliffe, counsel for Oracle.<br/>10 THE VIDEOGRAPHER: Would the court reporter<br/>11 please swear in the witness.<br/>12 LYNNE ANN CARRELLI,<br/>13 called as a witness for the Plaintiff, having been duly<br/>14 sworn, testified as follows:<br/>15 EXAMINATION<br/>16 BY MR. GARCIA:<br/>17 Q. Good morning, Ms. Carrelli. How are you?<br/>18 A. Good morning. I just want to make one<br/>19 correction. It's Lynne Ann Carrelli, not Anna.<br/>20 MR. GARCIA: Thank you.<br/>21 Q. So today you've been invited to take your<br/>22 deposition. I would ask you to state your full name for<br/>23 the record, but you already did so.<br/>24 What I'm going to do today is go over the rules<br/>25 of the deposition, go over a few definitions, and then go Page 8</p>                                      |

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1 into the actual questioning.  
2 Today, you've taken an oath, the same oath that  
3 you would take in a court of law; therefore, it's very  
4 important for you to give truthful testimony today.  
5 The court reporter will be taking down  
6 everything anyone here in the room states, so it's  
7 important that you give oral testimony, as opposed to  
8 nodding your head, as opposed to making sounds like  
9 "uh-huh," "uh-uh," because it's hard to interpret what  
10 those mean.  
11 It's also important that only one person speaks  
12 at a time. There will be times that you can anticipate  
13 what I'm going to say. I would ask you to wait till I  
14 finish asking the question and then please give your  
15 answer.  
16 This is not an endurance contest. We don't  
17 have bright lights shining down on you. If you need to  
18 take a break, we can take a break. The only exception  
19 would be if I'm in the middle of a question or a couple  
20 series of questions, I would wait for those to be  
21 finished before we take a break.  
22 Do you understand what I've told you thus far?  
23 A. Yes.  
24 Q. Can you do it?  
25 A. Yes.

1 Q. Thank you.  
2 I'm going to ask you some questions that are  
3 called for you to go remember what happened in the past.  
4 Nobody expects you to remember everything, unless you  
5 have a photographic memory.  
6 If you don't remember something exactly --  
7 like, I'll ask you what time or when did something occur,  
8 and you don't know the exact date, but you know it  
9 happened, like, in October of 2017, then I would ask you  
10 to give me your best estimate.  
11 I think the questions I ask are understandable,  
12 but you may not find them to be at times. And so if you  
13 don't understand the question, please let me know and  
14 I'll rephrase it.  
15 In giving me your answer, your best estimate,  
16 however, I don't want you to guess. I don't want you to  
17 speculate. I don't want you to tell me things that you  
18 think I want to hear, but you don't really know if that  
19 is truthful or not. I only want you to tell me what you  
20 know. Can you do that for me?  
21 A. Yes.  
22 Q. Now, your counsel sitting next to you may  
23 make objections. I would ask you to let her finish  
24 making the objections before you speak. But unless she  
25 instructs you not to answer the question, after she

1 finishes making the objections and the attorneys  
2 communicate, if they need to, then I would ask you to  
3 answer the question. Do you understand that?  
4 A. Yes.  
5 Q. Do you have any questions about any of the  
6 rules that I covered today?  
7 A. No.  
8 Q. Are you taking any medications or under the  
9 influence of any substance that will impair your ability  
10 to give truthful testimony today?  
11 A. No.  
12 Q. Do you have any mental, emotional, spiritual,  
13 physical condition that will impair your ability to give  
14 truthful testimony today?  
15 A. No.  
16 Q. Any time I state "OFCCP," I mean the Office  
17 of Federal Contract Compliance Programs. Do you  
18 understand that?  
19 A. Yes.  
20 Q. And any time I say "DOL," I mean the United  
21 States Department of Labor. Do you understand that?  
22 A. I'm sorry. I didn't catch what you just  
23 said.  
24 Q. Any time I say "DOL," I mean the United  
25 States Department of Labor. Do you understand that?

1 A. Yes.  
2 Q. And any time I say "Oracle," I mean Oracle  
3 America, Inc. Do you understand that?  
4 A. Yes.  
5 Q. So, now, we've gone through the rules; we've  
6 gone through the definitions. Now it's the fun part, the  
7 questions.  
8 So did you do anything to prepare for your  
9 deposition today?  
10 A. Yesterday, I met with counsel.  
11 Q. And how long did you meet with counsel?  
12 A. 9:30 we started, and we ended at 5:00.  
13 Q. Very long day.  
14 A. Very long, mm-hmm.  
15 Q. Did you communicate with anyone else, other  
16 than counsel, regarding your preparation for the  
17 deposition today?  
18 A. No.  
19 Q. Did you review any documents in preparation  
20 for your deposition today?  
21 MS. MANTOAN: I'm going to object that that  
22 question calls for -- invades attorney work product and  
23 attorney-client privilege, unless the question is limited  
24 to documents that may have refreshed her recollection.  
25 BY MR. GARCIA:

1 Q. Have any documents -- did you review any  
2 documents that refreshed your recollection?  
3 A. Yes.  
4 Q. What documents did you review that refreshed  
5 your recollection?  
6 A. An email, some presentations.  
7 Q. And what was particularly in the email that  
8 refreshed your recollection?  
9 A. It was just the fact that there was an email.  
10 Q. And what was the subject of the email?  
11 A. The email was having to do with tier one,  
12 Larry Lynn.  
13 Q. So it would be the salaries, ranges that  
14 would be paid to tier people who are graduating or  
15 graduated from tier one schools?  
16 MS. MANTOAN: Objection; assumes facts, lacks  
17 foundation.  
18 BY MR. GARCIA:  
19 Q. You can answer the question.  
20 Again, she's going to make objections. Unless  
21 she instructs you not to answer, you need to answer them.  
22 A. Okay. I'm not certain they were ranges on  
23 that email.  
24 Q. Did it have to do with compensation on that  
25 email?

1 A. My own.  
2 Q. Did you review any other deposition  
3 transcripts that refreshed your memory?  
4 A. No.  
5 Q. So when did you have your deposition taken  
6 before?  
7 A. The one I remember, it was 2009.  
8 Q. And what was the subject matter of that  
9 litigation that involved your deposition?  
10 A. I'm not certain that I remember the subject  
11 matter.  
12 Q. Did that involve your employment at Oracle?  
13 A. Yes.  
14 Q. Did it involve compensation regarding your  
15 employment at Oracle?  
16 MS. MANTOAN: Objection; vague.  
17 THE WITNESS: Can you be more specific?  
18 BY MR. GARCIA:  
19 Q. Well, you said you reviewed a deposition.  
20 What refreshed your memory from that review?  
21 A. That I, in fact, had that deposition.  
22 Q. And if it caused you to remember that you had  
23 the deposition, did you remember what you read in the  
24 deposition that refreshed your memory, since you don't  
25 remember taking it?

1 MS. MANTOAN: Objection; vague.  
2 THE WITNESS: Can you be more specific?  
3 BY MR. GARCIA:  
4 Q. Do you know what the word "compensation"  
5 means in terms of pay, monetary amounts given?  
6 A. Yes.  
7 Q. You said you reviewed presentations. What  
8 type of presentations did you review? What were the  
9 subjects?  
10 A. Managing pay was one of them. There were  
11 several -- I use the word "presentations" that Kate  
12 Waggoner developed, and I reviewed a few of those. Not  
13 in its entirety.  
14 Q. Did you review any presentations to help  
15 refresh your memory that Lisa Gordon did?  
16 A. There's one I suspected she did, but I don't  
17 know if she did.  
18 Q. Did you review any deposition transcripts?  
19 MS. MANTOAN: Objection. Again, limited to  
20 anything that would have refreshed your recollection.  
21 BY MR. GARCIA:  
22 Q. Did you review any deposition transcripts  
23 through your review that refreshed your memory?  
24 A. Yes.  
25 Q. Whose deposition transcript did you review?

1 MS. MANTOAN: Objection; vague, ambiguous,  
2 compound.  
3 BY MR. GARCIA:  
4 Q. Go ahead and answer. Can you answer the  
5 question?  
6 A. Can you repeat it?  
7 MR. GARCIA: Court Reporter, please repeat the  
8 question.  
9 THE REPORTER: "Q. And if it caused you to  
10 remember that you had the deposition, did you remember  
11 what you read in the deposition that refreshed your  
12 memory, since you don't remember taking it?"  
13 MS. MANTOAN: Same objections.  
14 THE WITNESS: Yeah, you have to be more  
15 specific.  
16 BY MR. GARCIA:  
17 Q. Do you remember anything about that  
18 deposition, other than you previously took it?  
19 MS. MANTOAN: Objection. Are you asking her  
20 what she remembered prior to --  
21 BY MR. GARCIA:  
22 Q. I'm asking you -- you said you read a  
23 deposition that refreshed your memory. I'm asking you,  
24 is there anything else that it refreshed, other than you  
25 taking the deposition?

1 MS. MANTOAN: Same objections.  
 2 THE WITNESS: I'm going to say "no," because I  
 3 can't answer it.  
 4 BY MR. GARCIA:  
 5 Q. Okay. Did you talk to anyone besides counsel  
 6 in terms of preparing for the deposition today?  
 7 MS. MANTOAN: Objection; asked and answered.  
 8 BY MR. GARCIA:  
 9 Q. Go ahead and answer.  
 10 A. Can you rephrase?  
 11 Q. Did you talk to anyone else regarding  
 12 preparing for today's deposition, other than counsel?  
 13 A. No.  
 14 MS. MANTOAN: Same objection.  
 15 BY MR. GARCIA:  
 16 Q. Besides the one deposition that we just  
 17 referenced, have you taken any other depositions?  
 18 A. Yes.  
 19 Q. And were they related to Oracle?  
 20 A. Yes.  
 21 Q. How many depositions have you taken related  
 22 to Oracle?  
 23 A. Two.  
 24 Q. When was the last time you took a deposition  
 25 related to Oracle?

1 A. 2012.  
 2 Q. And what was the subject matter of that  
 3 litigation?  
 4 MS. MANTOAN: Objection; vague, calls for  
 5 speculation. If you know.  
 6 THE WITNESS: That's the deposition I actually  
 7 didn't even remember taking until it refreshed my memory  
 8 that I took it.  
 9 BY MR. GARCIA:  
 10 Q. What was the other deposition you took  
 11 regarding Oracle?  
 12 A. I don't know the subject matter.  
 13 Q. When was the deposition taken?  
 14 A. That was 2012 that I just referenced, and --  
 15 Q. You said there were --  
 16 A. -- the other one was 2009.  
 17 Q. And my understanding through your testimony  
 18 here today is that you don't remember what the subject  
 19 matter of either one of those depositions was, correct?  
 20 MS. MANTOAN: Objection. That misstates the  
 21 testimony.  
 22 THE WITNESS: Yeah, I don't know which  
 23 deposition referred to which subject matter, so it....  
 24 BY MR. GARCIA:  
 25 Q. And I understand from your testimony --

1 A. I'd say that's correct.  
 2 Q. Okay, thank you.  
 3 I understand from your testimony today that  
 4 other than refreshing your memory that you took the  
 5 depositions, you don't know if it refreshed your memory  
 6 in any other way, correct?  
 7 A. Correct.  
 8 Q. Thank you.  
 9 Who's your present employer?  
 10 A. Oracle America, Inc.  
 11 Q. And when did you start working for Oracle?  
 12 A. As a regular employee, back in 1998.  
 13 Q. And what do you mean by "a regular employee"?  
 14 A. A full-time, regular employee working 40  
 15 hours.  
 16 Q. Did you ever work for Oracle before that date  
 17 in any capacity?  
 18 A. Yes.  
 19 Q. And in what capacity did you work for Oracle?  
 20 A. As an H.R. generalist, or what we refer to as  
 21 H.R. business partner, back in 1994 as a temporary  
 22 employee.  
 23 Q. And did you work as a temporary employee from  
 24 1994 to 1998 for Oracle?  
 25 A. No.

1 Q. How long did you work as a temporary employee  
 2 for Oracle?  
 3 A. Six months.  
 4 Q. What is your current position at Oracle?  
 5 A. Compensation analyst.  
 6 Q. And what is your global career level?  
 7 A. IC4.  
 8 Q. How long have you had that global career  
 9 level?  
 10 A. Approximately eight years.  
 11 Q. Who's your current supervisor?  
 12 A. I don't have a supervisor.  
 13 Q. You don't report to anyone?  
 14 A. I have a manager.  
 15 Q. Who is your current manager?  
 16 A. Kris Edwards.  
 17 Q. And how long has she been your manager?  
 18 A. Approximately two years.  
 19 Q. And did you have a manager before that at  
 20 Oracle?  
 21 A. Yes.  
 22 Q. And who was that?  
 23 A. Lisa Gordon.  
 24 Q. And how long was she your manager?  
 25 Approximately.

1 A. Approximately three years.  
 2 Q. And who was your manager before that?  
 3 A. Susan Charlie.  
 4 Q. Was she a VP at the time? A vice president?  
 5 A. Yes.  
 6 Q. Do you know what your current job function  
 7 is?  
 8 MS. MANTOAN: Objection; vague.  
 9 BY MR. GARCIA:  
 10 Q. Go ahead and answer.  
 11 A. Yes.  
 12 Q. What is it?  
 13 A. The function is H.R.  
 14 Q. Do you have a job specialty?  
 15 A. Yeah.  
 16 MS. MANTOAN: Objection; vague.  
 17 BY MR. GARCIA:  
 18 Q. What is your job specialty?  
 19 A. Compensation and benefits.  
 20 Q. What are your current duties and  
 21 responsibilities?  
 22 A. Administration of base pay, variable pay,  
 23 equity.  
 24 Q. What do you mean by "variable pay"?  
 25 A. Variable pay, meaning -- at Oracle, we have

1 corporate bonus. That would be variable pay.  
 2 Q. Would sales -- would sales be involved in  
 3 variable pay?  
 4 A. Not my responsibility.  
 5 Q. Okay. Thank you.  
 6 Now, you say "equity." What do you mean by  
 7 "equity"?  
 8 A. "Equity" means stock.  
 9 Q. So we'll start with base pay. What are your  
 10 duties and responsibilities regarding base pay?  
 11 MS. MANTOAN: Objection. It's vague.  
 12 THE WITNESS: Very vague. You have to be more  
 13 specific.  
 14 BY MR. GARCIA:  
 15 Q. I asked you if you had duties and  
 16 responsibilities. You said you have duties and  
 17 responsibilities for base pay, variable pay, and stock.  
 18 A. Mm-hmm.  
 19 Q. So what do you do? What are you responsible  
 20 for in terms of base pay?  
 21 A. Administration of base pay.  
 22 Q. And what do you mean by "administration"?  
 23 A. I'll give you an example of annual base pay:  
 24 processes.  
 25 Q. Do those annual base pay processes have a

1 name that Oracle refers to?  
 2 A. The focal process.  
 3 Q. And are you only involved in the annual focal  
 4 process, or are you involved in any other process  
 5 regarding base pay?  
 6 A. I wouldn't say there's any other process  
 7 regarding base pay.  
 8 Q. I've heard the term "off-cycle pay." Are you  
 9 familiar with that term?  
 10 A. Yes.  
 11 Q. What does that mean?  
 12 MS. MANTOAN: Objection; calls for speculation  
 13 to the extent you're asking what anyone else means by  
 14 that term.  
 15 BY MR. GARCIA:  
 16 Q. What does "off-cycle" mean to you?  
 17 A. Outside the focal process.  
 18 Q. Are you involved in any pay, base pay,  
 19 outside the focal process?  
 20 A. Could be.  
 21 Q. Have you been?  
 22 A. Yes.  
 23 Q. Now, in your involvement with the base pay,  
 24 the variable pay, and equity, are you currently involved  
 25 with those now?

1 MS. MANTOAN: I'm going to object that this  
 2 question and, I guess, the ones preceding, they're vague  
 3 as to which employees you're talking about her having  
 4 responsibility and whether there's any in this -- at  
 5 issue in this case.  
 6 BY MR. GARCIA:  
 7 Q. Go ahead and answer.  
 8 A. I'm sorry. Can you --  
 9 Q. So you've mentioned that your -- I asked you  
 10 what your current duties and responsibilities are, and  
 11 you said, "base pay, variable pay, and equity," correct?  
 12 A. Correct.  
 13 Q. How long have you been involved with those  
 14 responsibilities?  
 15 A. Those responsibilities, in some form or  
 16 another, could be on a semiannual basis. It could be on  
 17 an annual basis. It all depends.  
 18 Q. How long have you personally been involved  
 19 with responsibilities for those three areas?  
 20 MS. MANTOAN: Same objection that it's  
 21 overbroad to the extent that you're claiming that's for  
 22 all base-pay decisions for all of Oracle.  
 23 THE WITNESS: Yeah.  
 24 BY MR. GARCIA:  
 25 Q. Go ahead and answer the question.

1 A. I can't answer the question, as you've asked  
2 it.  
3 Q. Okay. You said you've been involved with  
4 base pay and variable pay and stock. So do you know what  
5 job functions you've been involved with those for?  
6 A. Yes.  
7 Q. What are they?  
8 A. Administration. And I'm going to give you  
9 broad, because what I can't tell you is whether each  
10 component affected each function. So, broadly, in  
11 general terms, administration, facilities, finance, H.R.,  
12 legal, manufacturing.  
13 Q. Have you ever been involved with the product  
14 development job function?  
15 A. No.  
16 Q. Ever been involved with the information  
17 technology job function?  
18 A. No.  
19 Q. Ever been involved with the support job  
20 function?  
21 A. No.  
22 Q. Now, you said you reviewed presentations,  
23 correct?  
24 A. Mm-hmm. Yes.  
25 Q. And in those presentations, were they

1 would be done would apply to both the job functions that  
2 you mentioned, as well as the job functions that I  
3 mentioned?  
4 MS. MANTOAN: Objection. It's compound. It  
5 lacks foundation that she knows who they apply to. It  
6 calls for speculation.  
7 BY MR. GARCIA:  
8 Q. Go ahead and answer the question.  
9 A. I don't think what you're asking exists.  
10 Q. Okay. So if Lisa -- so you said you looked  
11 at a presentation by Kate Waggoner, right?  
12 MS. MANTOAN: Objection; misstates testimony.  
13 THE WITNESS: Yeah. I knew that Kate authored  
14 a presentation.  
15 BY MR. GARCIA:  
16 Q. And do you know who the scope of the audience  
17 was for that presentation?  
18 MS. MANTOAN: Objection; lacks foundation,  
19 calls for speculation.  
20 THE WITNESS: I do not.  
21 BY MR. GARCIA:  
22 Q. The presentation -- you said you worked for  
23 Lisa Gordon, right?  
24 A. Yes.  
25 Q. For three years, right?

1 applicable to those job functions that I just mentioned  
2 of product development, information technology, and  
3 support?  
4 MS. MANTOAN: Objection; calls for speculation,  
5 lacks foundation.  
6 THE WITNESS: Only in general terms.  
7 BY MR. GARCIA:  
8 Q. General terms in terms of what the processes,  
9 correct?  
10 MS. MANTOAN: Same objections.  
11 BY MR. GARCIA:  
12 Q. So what do you mean --  
13 A. It depends.  
14 Q. -- by "in general terms"?  
15 MS. MANTOAN: I'm going to object that it lacks  
16 foundation, because she's told you she didn't have  
17 responsibilities specific to those three functions.  
18 BY MR. GARCIA:  
19 Q. Okay. So you just mentioned that -- in  
20 general terms. What did you mean by that?  
21 MS. MANTOAN: Same objection.  
22 THE WITNESS: In that a presentation was not  
23 specific to the functional areas that you're mentioning.  
24 BY MR. GARCIA:  
25 Q. So the presentation for how a focal review

1 A. Approximately.  
2 Q. Did you help her create presentations for  
3 focal processes?  
4 A. No.  
5 Q. Have you had any input whatsoever in her  
6 presentations?  
7 A. No.  
8 Q. Did she review the presen- -- did you make  
9 any -- contribute to any presentations for any job  
10 functions for focal review?  
11 MS. MANTOAN: Objection; vague, lacks  
12 foundation.  
13 THE WITNESS: No.  
14 BY MR. GARCIA:  
15 Q. So when you say you administer focal reviews,  
16 what do you mean by that?  
17 MS. MANTOAN: Objection; misstates testimony.  
18 It's compound.  
19 THE WITNESS: Can you...  
20 BY MR. GARCIA:  
21 Q. You said before that you administrated focal  
22 reviews, correct?  
23 MS. MANTOAN: Objection; misstates testimony.  
24 THE WITNESS: I don't recall what I said.  
25 BY MR. GARCIA:

1 Q. Okay. Your responsibilities -- you  
 2 identified your responsibilities of being base pay,  
 3 variable pay, and equity, correct?  
 4 THE WITNESS: Can you read back what I said?  
 5 BY MR. GARCIA:  
 6 Q. I'm asking you a question. Can you answer  
 7 the question?  
 8 MS. MANTOAN: The question is about what she  
 9 said previously. Do you have a question --  
 10 THE WITNESS: I want to know what I said,  
 11 because you're referencing what I said.  
 12 BY MR. GARCIA:  
 13 Q. I'm asking you a new question.  
 14 A. New question.  
 15 Q. Okay. Did you have base pay  
 16 responsibilities?  
 17 MS. MANTOAN: Objection; vague, compound.  
 18 THE WITNESS: What do you mean by "base pay  
 19 responsibilities"?  
 20 BY MR. GARCIA:  
 21 Q. Did you use the word "base pay" today?  
 22 A. Yes.  
 23 Q. Okay. And why did you use the term "base  
 24 pay" today?  
 25 MS. MANTOAN: Objection; vague.

1 BY MR. GARCIA:  
 2 Q. Was it in description of what your  
 3 responsibilities were?  
 4 A. I would need it to be read back to me.  
 5 Q. Okay. So you're saying that you can't  
 6 remember that?  
 7 A. I'm asking for you to read back the  
 8 statement.  
 9 Q. Right. And I want to ask you a question.  
 10 What are your current responsibilities?  
 11 A. I work within the compensation department.  
 12 Q. And what do you do in the compensation  
 13 department?  
 14 A. That would vary on a daily basis, but it  
 15 would -- the job tasks and responsibilities --  
 16 Q. Say that again, please.  
 17 A. Job tasks and responsibilities --  
 18 Q. You said, "task"? T-a-s-k?  
 19 A. Yes.  
 20 Q. Okay. Thank you.  
 21 A. It's my Boston accent.  
 22 -- have to do with total cash compensation.  
 23 Q. What do you do regarding focal reviews, if  
 24 anything?  
 25 A. Are you referencing the process of focal

1 reviews?  
 2 Q. I'm just as wide as possible. What, if  
 3 anything, do you do regarding focal reviews?  
 4 A. Okay. Answer questions that may come up.  
 5 Q. Anything else?  
 6 A. Test the -- what we refer to as the module,  
 7 having to do with I.T. testing of the module before we  
 8 roll it out.  
 9 Q. Anything else?  
 10 A. That's such a broad question. H.R. business  
 11 partner, any testing, answering questions, providing  
 12 guidelines.  
 13 Q. How do you provide guidelines?  
 14 A. Some of the presentations that you have  
 15 referenced in general terms, not the same presentations,  
 16 may be provided to H.R. as guidelines.  
 17 Q. Do you draft any part of those presentations?  
 18 A. No.  
 19 MS. MANTOAN: Objection; asked and answered.  
 20 BY MR. GARCIA:  
 21 Q. So these guideline presentations, who do you  
 22 receive them from?  
 23 A. Global compensation.  
 24 Q. Who particularly -- so the organization,  
 25 global compensation? Is that what you're referring to?

1 A. No.  
 2 Q. So when you say "global compensation," who  
 3 are you referring to?  
 4 A. I'm referring to Kate Waggoner and her team.  
 5 Q. So you're referring to the global  
 6 compensation team?  
 7 A. Team, correct.  
 8 Q. And who specifically within that team do you  
 9 receive these from?  
 10 MS. MANTOAN: Objection. That's compound.  
 11 It's vague as to time and as to the presentation.  
 12 THE WITNESS: I don't know who posts them. I  
 13 do not.  
 14 BY MR. GARCIA:  
 15 Q. And so what you were describing, is that  
 16 what's currently in process that you do?  
 17 MS. MANTOAN: Objection; vague, overbroad.  
 18 BY MR. GARCIA:  
 19 Q. You described that you receive compensation  
 20 guidelines from Kate Waggoner's team. How long have you  
 21 been receiving them?  
 22 MS. MANTOAN: Objection; misstates testimony,  
 23 compound.  
 24 THE WITNESS: You have to be more specific.  
 25 BY MR. GARCIA:

1 Q. You just said that you receive guidelines for  
 2 presentations from Kate Waggoner's team, correct?  
 3 A. That's not correct.  
 4 Q. Okay. What's not correct about it?  
 5 A. What I stated was, they were posted.  
 6 Q. Okay. And so they're posted and you access  
 7 them?  
 8 A. I could access them, yes.  
 9 Q. Okay. And how long have they been posted for  
 10 you to access?  
 11 MS. MANTOAN: Objection; calls for speculation.  
 12 THE WITNESS: They're only posted during the  
 13 process --  
 14 BY MR. GARCIA:  
 15 Q. So how many --  
 16 A. -- specific --  
 17 Q. So during the process --  
 18 A. -- period.  
 19 Q. -- of the focal review, they're posted? Is  
 20 that a correct understanding?  
 21 A. In general terms, yeah.  
 22 Q. I don't know what you mean by "general  
 23 terms." To me, they're either posted or they're not  
 24 posted. So what do you mean by "general terms"?  
 25 MS. MANTOAN: Well, objection. The question is  
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1 compound. You're talking about unnamed, unspecified,  
 2 multiple presentations. So it's not quite clear what  
 3 you're talking about, so...  
 4 BY MR. GARCIA:  
 5 Q. I'm trying to understand the process. So  
 6 you're telling me that Kate Waggoner's team posts  
 7 compensation guidelines that someone can access, correct?  
 8 A. That someone can access.  
 9 Q. And do you know how long Kate Waggoner's team  
 10 has been posting them for someone to access?  
 11 A. It's only as part of the process.  
 12 Q. I understand, but --  
 13 A. Well, I don't understand --  
 14 Q. -- how many years have they been posting  
 15 things for you to access as part of the process?  
 16 MS. MANTOAN: Objection; vague.  
 17 THE WITNESS: When a process is happening.  
 18 BY MR. GARCIA:  
 19 Q. So I understand a process, what you said is  
 20 it could happen every year, correct, the focal review?  
 21 A. It may.  
 22 Q. Right. It may happen.  
 23 A. I used the word "may."  
 24 Q. Okay. So -- and you talked about it's posted  
 25 during the process. So what I'm trying to understand is  
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1 how many years, different years, has a guideline been  
 2 posted that someone can access?  
 3 MS. MANTOAN: Objection. It calls for  
 4 speculation.  
 5 THE WITNESS: I don't know.  
 6 BY MR. GARCIA:  
 7 Q. Do you know?  
 8 A. I don't know.  
 9 Q. When was the last time you accessed it?  
 10 MS. MANTOAN: Objection; vague as to "it."  
 11 BY MR. GARCIA:  
 12 Q. You say they were presentations for the focal  
 13 review that you accessed -- that someone could access; is  
 14 that correct?  
 15 A. Somebody could access.  
 16 Q. Have you ever accessed them?  
 17 A. Are you speaking this year?  
 18 Q. I'm asking you any time. Did you ever access  
 19 them?  
 20 A. What specifically are you asking that I  
 21 accessed?  
 22 Q. You said they were presentations for focal  
 23 reviews that Kate Waggoner's team posted that someone can  
 24 access, correct?  
 25 A. That H.R. could access.  
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1 Q. And I asked you, "Did you access them?" And  
 2 I had thought you said, "yes." Is that correct?  
 3 A. No, I didn't answer it "yes."  
 4 Q. Have you ever accessed any of the guidelines  
 5 that Kate Waggoner's compensation team has posted?  
 6 A. I may have.  
 7 Q. Do you know whether you did?  
 8 A. I can't tell you with certainty.  
 9 Q. Can you tell me --  
 10 A. As part of a process.  
 11 Q. High probability, can you tell me?  
 12 MS. MANTOAN: Objection. It's asked and  
 13 answered.  
 14 BY MR. GARCIA:  
 15 Q. Okay. So what you're saying is, they're  
 16 posted, but you can't remember whether you accessed them;  
 17 is that correct?  
 18 A. You're asking me to be very specific, and I'm  
 19 telling you I don't know.  
 20 Q. And I'm just confirming that you don't know  
 21 whether you accessed the guidelines that Kate Waggoner's  
 22 compensation team posted. Is that a correct  
 23 understanding?  
 24 MS. MANTOAN: Objection. It misstates  
 25 testimony. This topic is asked and answered. I think  
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1 we've covered it.  
2 THE WITNESS: Could I take a break?  
3 MS. MANTOAN: There's a question pending.  
4 THE WITNESS: There's a question? Okay.  
5 Sorry. That's all right.  
6 BY MR. GARCIA:  
7 Q. Can you answer the question?  
8 A. Why don't you -- one more time.  
9 Q. My understanding of your testimony here today  
10 is that you do not recall if you ever accessed the  
11 compensation -- any compensation guidelines that Kate  
12 Waggoner's team posted. Is that a correct understanding?  
13 A. Okay. Now you're changing the question on  
14 me --  
15 Q. Well --  
16 A. Any -- now you're indicating "any."  
17 MS. MANTOAN: Please don't interrupt the  
18 witness.  
19 Is your answer finished?  
20 BY MR. GARCIA:  
21 Q. Well, I'm a little confused, because you  
22 said --  
23 A. I am, too.  
24 Q. So I'm -- can you answer that question? Can  
25 you answer the question, is it your testimony here today

1 that any guidelines that Kate Waggoner posted, you cannot  
2 remember if you accessed them?  
3 MS. MANTOAN: Objection. It's vague. Are you  
4 asking if she can remember --  
5 THE WITNESS: I don't know what you're asking.  
6 MS. MANTOAN: -- accessing them all or any of  
7 them?  
8 MR. GARCIA: I'll try to take it in parts.  
9 Q. So I'm talking about the compensation  
10 guidelines that Kate Waggoner's team posted. Do you  
11 understand that part of it?  
12 A. That they post.  
13 Q. Okay. And that someone could access. So do  
14 you understand what I'm referring to?  
15 A. That someone, being H.R., could access.  
16 Q. Right. And what I'm asking simply is, those  
17 compensation guidelines, did you ever access them  
18 personally?  
19 A. I may have or I may not have.  
20 Q. And you don't remember whether you did --  
21 A. It would depend on need.  
22 MS. MANTOAN: Objection. It's asked and  
23 answered at this point. I think the witness has  
24 requested a break. Can we take one, if there's no  
25 question pending?

1 MR. GARCIA: Yes. Five-minute break. Is that  
2 fine for you?  
3 THE WITNESS: I have to go to the bathroom.  
4 MS. MANTOAN: Thank you.  
5 MR. GARCIA: Thank you.  
6 THE VIDEOGRAPHER: This marks the end of media  
7 file labeled number one. Off the record at 9:40 a.m.  
8 (Recess from 9:40 a.m. to 9:50 a.m.)  
9 THE VIDEOGRAPHER: This marks the beginning of  
10 media file labeled number two. Back on the record at  
11 9:50 a.m.  
12 BY MR. GARCIA:  
13 Q. Ms. Carrelli, you mentioned you were  
14 previously involved with focal reviews, correct?  
15 A. Correct.  
16 Q. And what is your role in terms of focal  
17 reviews?  
18 MS. MANTOAN: Objection; asked and answered.  
19 THE WITNESS: As previously stated, I may  
20 answer questions from the H.R. business partners --  
21 BY MR. GARCIA:  
22 Q. Anything else?  
23 A. -- as an example.  
24 MS. MANTOAN: Let her finish the answer.  
25 MR. GARCIA: Well, I thought she was done

1 because she paused. I'm sorry.  
2 THE WITNESS: The H.R. business partners.  
3 Those questions may have to do with eligibility. Those  
4 questions may have to do with providing guidelines or  
5 telling them where they can find guidelines, UAT testing.  
6 BY MR. GARCIA:  
7 Q. That's the module testing?  
8 A. That's the module -- that's all the pre-work  
9 that's done.  
10 Q. Anything else?  
11 A. Just managing the process.  
12 Q. And what do you do when you manage the  
13 process?  
14 A. I will look periodically to see, as an  
15 example, if an LOB head has allocated their budget, has  
16 the LOB head made progress with regards to their  
17 recommendations, ensuring through the H.R. business  
18 partners that the timeline is communicated and that the  
19 business meets their deadlines.  
20 Q. And "LOB," does that mean "line of business"?  
21 A. Line of business.  
22 Q. Thank you.  
23 Now, do you actually read the guidelines for  
24 the focal review that provides instructions for them how  
25 to execute the process?

DOL vs ORACLE AMERICA

1 MS. MANTOAN: Objection; vague. Are you asking  
2 if she reads them herself or if she reads them to them?  
3 BY MR. GARCIA:  
4 Q. Reads them yourself.  
5 A. I may familiarize myself to any changes that  
6 may have occurred.  
7 Q. So --  
8 A. Example: eligibility.  
9 Q. So is it correct to say that you've read the  
10 guidelines?  
11 A. Yes.  
12 Q. And then from your understanding of the  
13 guidelines, then you provide -- or answer questions to  
14 H.R. business partner?  
15 MS. MANTOAN: Objection; vague. I don't  
16 understand the question.  
17 THE WITNESS: Can you repeat what you just  
18 said?  
19 BY MR. GARCIA:  
20 Q. Well, let me -- you read the guidelines, the  
21 compensation guidelines, for the focal review, correct?  
22 A. I may familiarize myself, correct.  
23 Q. And we previously established, when you say  
24 familiarize yourself, you actually read them, correct?  
25 A. I would have to read the written word.

1 Q. And then if an H.R. business partner has a  
2 question about what those guidelines mean, do you answer  
3 those questions?  
4 MS. MANTOAN: Objection; lacks foundation,  
5 assumes facts, vague.  
6 THE WITNESS: That's very vague.  
7 BY MR. GARCIA:  
8 Q. You said the H.R. business partner -- you  
9 answer questions, correct?  
10 A. Correct.  
11 Q. What questions do you answer?  
12 MS. MANTOAN: Objection; vague, overbroad.  
13 THE WITNESS: Yeah. I mean, I could give you  
14 an example: Is the country of Belgium eligible?  
15 BY MR. GARCIA:  
16 Q. So let's confine our -- do you answer  
17 questions regarding Redwood Shores for the focal review  
18 from an H.R. business partner?  
19 MS. MANTOAN: Objection; assumes facts.  
20 THE WITNESS: I'm sorry. I didn't hear what  
21 you said.  
22 MS. MANTOAN: The objection was assumes facts.  
23 BY MR. GARCIA:  
24 Q. I'm just asking, for the job functions that  
25 you serve, have you ever answered any questions from an

1 H.R. business partner for someone at the Redwood Shores  
2 facility?  
3 MS. MANTOAN: I'm going to object that it's  
4 vague. It's also irrelevant, since those functions  
5 aren't at issue in the case.  
6 BY MR. GARCIA:  
7 Q. Go ahead and answer.  
8 A. I may have. I don't know specifically what  
9 you're asking. HQ.  
10 Q. Yeah, did you --  
11 A. Clearly, we have headquarters.  
12 Q. At Redwood Shores, correct?  
13 A. Correct.  
14 Q. And so have you answered questions about  
15 compensation related to the focal review for someone who  
16 worked at headquarters?  
17 MS. MANTOAN: Objection. It's vague.  
18 THE WITNESS: Yeah, that's very vague. You're  
19 asking me to speculate one way or another.  
20 BY MR. GARCIA:  
21 Q. I'm just asking you if you answered any  
22 questions from someone at HQ about someone's pay at  
23 Redwood Shores head- -- Oracle's Redwood Shores  
24 headquarter regarding the focal review.  
25 MS. MANTOAN: You're asking if she's ever

1 answered a question from a manager at HQ that related to  
2 an employee at HQ?  
3 MR. GARCIA: Regarding --  
4 MS. MANTOAN: Whether or not they're in this  
5 case? Is that what you're asking? Is that the question?  
6 MR. GARCIA: Counsel, you're making speaking  
7 objections, and I would ask you to refrain. You know  
8 you're not allowed to do that.  
9 Q. I'm asking you, have you ever at any time  
10 answered a question related to the focal review from an  
11 H.R. business partner regarding someone who works at  
12 Redwood Shores?  
13 A. I may have. You're asking me to speculate.  
14 Q. Okay.  
15 A. I can't say one way or another.  
16 Q. Okay. Thank you.  
17 And all you can tell me is that you answer  
18 questions, but you don't -- you know you answer  
19 questions, but you don't know if it's anyone from Redwood  
20 Shores, correct?  
21 A. You're asking me to be specific. In general  
22 terms, I would think.  
23 Q. So you think that you would answer questions,  
24 but you don't remember answering or responding to any  
25 questions? Is that a correct understanding?

1 A. That's a correct understanding.  
 2 Q. Thank you.  
 3 Now, you also mentioned that you were involved  
 4 with variable pay, which you described as bonuses,  
 5 correct?  
 6 A. Correct.  
 7 Q. What is your involvement there?  
 8 A. Similar process.  
 9 Q. So what you just described for the focal  
 10 review of checking the module, making sure it works,  
 11 answering questions, would be the same?  
 12 A. It's a process.  
 13 Q. Would your involvement -- what you described  
 14 for your involvement in focal reviews, would you have the  
 15 same involvement for the variable pay?  
 16 A. In general terms.  
 17 Q. So when you say --  
 18 A. It's a process.  
 19 Q. So when you say, "it's a process," you  
 20 described the process for focal review. So what I'm  
 21 trying to understand is, the process that you described  
 22 for focal review, other than it being different types of  
 23 pay, base salary and bonuses --  
 24 A. Right.  
 25 Q. -- is the process any different?

1 that's different in the processes?  
 2 MS. MANTOAN: Objection; assumes facts,  
 3 misstates testimony, calls for speculation.  
 4 THE WITNESS: They're apples and oranges,  
 5 so....  
 6 BY MR. GARCIA:  
 7 Q. Okay. So please explain to me what your  
 8 specific involvement is with variable pay, since they're  
 9 apples and oranges.  
 10 A. Right. If the bonus program is held, global  
 11 compensation would publish a guideline. We would  
 12 implement the process. We would speak to our business  
 13 partners that we support, as far as LOBs. I could go on  
 14 and on. I need --  
 15 Q. I want you to tell me the process -- the  
 16 duties that you do. So you say, if it occurs, the  
 17 guidelines are published, then you said you would  
 18 implement the process, and you talked to the H.R.  
 19 business partners and LOBs. What else do you do?  
 20 MS. MANTOAN: Objection. It's asked and  
 21 answered.  
 22 THE WITNESS: In general terms, I pretty much  
 23 ensure that the process is held and the process completes  
 24 on time.  
 25 BY MR. GARCIA:

1 MS. MANTOAN: Objection; calls for speculation  
 2 if you're asking for anything outside of her own  
 3 knowledge.  
 4 BY MR. GARCIA:  
 5 Q. I'm asking you about your own knowledge and  
 6 what you do. Is what you do for the focal reviews any  
 7 different than what you do for the variable pay?  
 8 A. It's a process.  
 9 Q. And can you --  
 10 A. There are going to be differences.  
 11 Q. What are the differences?  
 12 A. You're going to have differences with regards  
 13 to eligibility.  
 14 Q. Anything else?  
 15 A. The population that may be eligible.  
 16 Q. Okay. Anything else?  
 17 A. You're going to have differences with regards  
 18 to budgets.  
 19 Q. Okay. Anything else?  
 20 A. You're going to have differences in whether  
 21 or not it's held.  
 22 Q. Okay. But given that they're different pay,  
 23 one's a bonus pool, and one is a base salary pool, and  
 24 given that they're held at different times and given that  
 25 there's different eligibility, is there anything else

1 Q. And what do you do to ensure that?  
 2 MS. MANTOAN: Objection. Other than what she's  
 3 testified to? Is that what you're asking?  
 4 THE WITNESS: Right.  
 5 BY MR. GARCIA:  
 6 Q. Right.  
 7 A. I've answered it.  
 8 Q. You said, "several things," and then you  
 9 said, "in general terms." And I'm asking, is there  
 10 anything else that you do to support your statement of  
 11 ensuring the process is done than what you've already  
 12 testified to?  
 13 A. There may be.  
 14 Q. But you don't know?  
 15 MS. MANTOAN: Objection; misstates testimony.  
 16 It's argumentative.  
 17 BY MR. GARCIA:  
 18 Q. Go ahead.  
 19 A. You got to be more specific. You're too  
 20 vague.  
 21 Q. I'm asking you do you do anything else than  
 22 you otherwise stated? Can you tell me whether you do?  
 23 MS. MANTOAN: Objection. It's asked and  
 24 answered. It's argumentative.  
 25 BY MR. GARCIA:

1 Q. Can you answer the question?  
 2 A. I've answered the question.  
 3 Q. My question to you is, can you tell me  
 4 anything else? It's a yes-or-no answer.  
 5 MS. MANTOAN: Same objections.  
 6 THE WITNESS: I've answered the question.  
 7 BY MR. GARCIA:  
 8 Q. So I'll ask it one more time, and if you  
 9 refuse to answer the question again -- it's a yes-or-no  
 10 answer. Can you tell me anything else?  
 11 MS. MANTOAN: Counsel, this is argumentative.  
 12 She's telling you she's answered the question to her best  
 13 of her ability, and it's argumentative to continue asking  
 14 her, "Is that right? What else? What else? What else?"  
 15 She's told you she's answered the question. I believe  
 16 it's becoming harassing and argumentative. But she's not  
 17 refusing to answer your question. She's answered it.  
 18 BY MR. GARCIA:  
 19 Q. So my understanding is, based on what your  
 20 counsel just stated, is that you can't provide me any  
 21 other example of what you do. Is that a correct  
 22 understanding?  
 23 MS. MANTOAN: Objection. That's not what I  
 24 said, Mr. Garcia.  
 25 BY MR. GARCIA:

1 Q. Can you answer if there's anything else?  
 2 That's what I'm trying to understand.  
 3 MS. MANTOAN: Same objections.  
 4 BY MR. GARCIA:  
 5 Q. Can you tell me anything else that you do  
 6 that you haven't already testified to regarding variable  
 7 pay?  
 8 MS. MANTOAN: Same objections.  
 9 THE WITNESS: I've answered. I mean -- I've  
 10 answered the question.  
 11 BY MR. GARCIA:  
 12 Q. Okay.  
 13 A. I need you to be more specific.  
 14 Q. I see. So you also said that you're involved  
 15 with equity, right? Can you tell me what your  
 16 involvement with equity is?  
 17 A. As an example, equity this year was rolled  
 18 out with the focal salary increases process.  
 19 Q. So what do you do for the -- in terms of  
 20 process for equity?  
 21 A. It was rolled out at the same time as focal.  
 22 So those components of focal, H.R. business partners had  
 23 both focal and equity to manage. So my same answers.  
 24 Okay. I am a resource for questions. I support H.R.  
 25 business partners with any issues they may have. They

1 may have a system issue. They may not understand how to  
 2 attach a form. So I provide guidance.  
 3 There also is a budget that's allocated. I'm  
 4 ensuring that managers allocate their budget, that  
 5 they're making progress as the timeline moves on, that  
 6 they complete their process on time. I'm doing all this  
 7 through the H.R. business partners.  
 8 Q. Do you ever review the amounts that the lines  
 9 of business allocate to different employees?  
 10 MS. MANTOAN: Objection. That's compound,  
 11 vague as to time.  
 12 THE WITNESS: Can you restate?  
 13 BY MR. GARCIA:  
 14 Q. Do you, for any individual employee, look --  
 15 do any type of a review regarding any allocation for that  
 16 employee?  
 17 MS. MANTOAN: Objection. It's vague as to  
 18 "review."  
 19 BY MR. GARCIA:  
 20 Q. What I'm trying to determine is, is your  
 21 review just at a macro level, where you look at to see if  
 22 the budgets are exceeded, or do you do -- so when you say  
 23 you review, what are you reviewing?  
 24 MS. MANTOAN: I'd like to object to the  
 25 question to the extent it suggests that she testified

1 anything about budgets being exceeded. I don't believe  
 2 that's part of her testimony. Object to the question as  
 3 vague.  
 4 BY MR. GARCIA:  
 5 Q. So you say that you review what the line --  
 6 what managers in the line of business have done, correct?  
 7 MS. MANTOAN: Objection; vague, misstates  
 8 testimony. It's vague as to "review."  
 9 THE WITNESS: I would ensure that managers have  
 10 allocated their budgets, as I stated previously.  
 11 BY MR. GARCIA:  
 12 Q. So are you just -- do you just look at  
 13 whether they allocated it? Do you ever look at how they  
 14 allocated it?  
 15 A. I may note that they've made a recommendation  
 16 at an employee level.  
 17 Q. And other than observing that, do you do  
 18 anything besides observing recommendations at the  
 19 employee level?  
 20 MS. MANTOAN: Objection. It's vague.  
 21 THE WITNESS: You got to be more specific.  
 22 BY MR. GARCIA:  
 23 Q. You said you may observe an allocation to a  
 24 specific employee is what I understood you to say. So  
 25 what I'm trying to understand now and ask you is, do you

1 do anything else other than an allocation to an  
 2 individual employee other than to simply observe it?  
 3 MS. MANTOAN: Objection. It misstates her  
 4 testimony.  
 5 BY MR. GARCIA:  
 6 Q. Go ahead and answer.  
 7 A. I never used the word "observe."  
 8 Q. You used the word "note." What did you mean  
 9 by "note"?  
 10 A. I mean note that an allocated -- allocation  
 11 was made to an employee.  
 12 Q. And what do you mean by the word "note"?  
 13 A. That the allocation was made.  
 14 Q. So "note" means you observed it? You saw it,  
 15 right?  
 16 A. Those are your words.  
 17 Q. I'm asking you what you mean by "note" so it  
 18 could be in your words. You used the word "note." What  
 19 did you mean when you used the word "note"?  
 20 A. That I noted that an allocation was made.  
 21 Q. So you have knowledge that an allocation was  
 22 made? Is that what you mean?  
 23 MS. MANTOAN: Objection. It's asked and  
 24 answered several times.  
 25 BY MR. GARCIA:

1 Q. Go ahead and answer.  
 2 A. I have noted that an allocation has been made  
 3 to a specific employee at the employee level.  
 4 Q. After you note that an allocation has been  
 5 made, do you do anything else after noting it?  
 6 MS. MANTOAN: Objection; vague.  
 7 THE WITNESS: You got to be more specific.  
 8 BY MR. GARCIA:  
 9 Q. Why would you take it upon yourself to note  
 10 whether an allocation had been made to a specific  
 11 employee?  
 12 MS. MANTOAN: Objection. It misstates  
 13 testimony. It assumes facts.  
 14 THE WITNESS: That is misstating.  
 15 BY MR. GARCIA:  
 16 Q. You stated that you note that an allocation  
 17 has made to an individual employee.  
 18 A. At the employee level, not at a specific  
 19 employee.  
 20 Q. And why do you do that?  
 21 A. Because I need to ensure that managers are  
 22 spending their budget.  
 23 Q. Do you ever look at the allocation for an  
 24 individual employee?  
 25 MS. MANTOAN: Objection. It's asked and

1 answered several times.  
 2 THE WITNESS: I have noted that an allocation  
 3 has been made.  
 4 BY MR. GARCIA:  
 5 Q. What I understand you to say is, you've noted  
 6 allocation has been made for employees to see if the  
 7 budget has been distributed. Is that a correct  
 8 understanding?  
 9 A. That's correct.  
 10 Q. Do you ever look at the allocation to an  
 11 individual employee for any other reason?  
 12 MS. MANTOAN: Objection. It misstates  
 13 testimony.  
 14 THE WITNESS: I am very confused.  
 15 BY MR. GARCIA:  
 16 Q. You said that you noted whether the  
 17 allocation had been made to individual employees to learn  
 18 whether the budget has been distributed. You just  
 19 confirmed that. So what I'm asking you is, have you ever  
 20 looked at an allocation of the budget to an individual  
 21 employee for any other reason?  
 22 A. You are asking me such broad questions that I  
 23 don't feel I can answer.  
 24 Q. And I don't understand why -- I'm just simply  
 25 asking. It's a foundational question. Have you looked

1 at the pay of an individual employee and the allocation  
 2 of that, the recommendation for the allocation, for any  
 3 other reason other than what you have testified today to?  
 4 A. I don't have knowledge -- if I'm looking at a  
 5 spreadsheet and I see that \$3,000 was allocated to an  
 6 employee, I don't know the employee specifically, but I'm  
 7 recognizing 3,000 has been allocated.  
 8 Q. So other than noting that allocations have  
 9 been made, is there any other reason why you look at the  
 10 allocations for a specific employee?  
 11 MS. MANTOAN: Objection. It's asked and asked  
 12 and asked and answered.  
 13 THE WITNESS: I don't know how to answer that.  
 14 BY MR. GARCIA:  
 15 Q. Okay. Have you had any other name in the  
 16 last ten years, other than the current name you  
 17 identified at the beginning of the deposition?  
 18 A. Yes.  
 19 Q. What other names have you gone by?  
 20 A. Last name of Palmer.  
 21 Q. Any other names besides Palmer?  
 22 A. My current name.  
 23 Q. When did you change from Palmer to your  
 24 current name?  
 25 A. In 2012. I think.

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1 Q. What is your highest level of education?  
2 A. Hold on. That's not right.  
3 MS. MANTOAN: I'm going to tell your husband  
4 you forgot.  
5 BY MR. GARCIA:  
6 Q. It's okay.  
7 A. It's after 2012. Excuse me.  
8 Q. Fair enough. I won't ask any more questions.  
9 I'm just trying to get a feel.  
10 What's your highest level of education?  
11 A. A bachelor's.  
12 Q. And when did you receive the bachelor degree?  
13 A. 1986.  
14 Q. From where?  
15 A. Northeastern University.  
16 Q. Is that a bachelor of science?  
17 A. Yes.  
18 Q. In what field?  
19 A. H.R.  
20 Q. Have you ever heard the term "U.S.  
21 compensation team" before?  
22 A. Yes.  
23 Q. Are you part of that team?  
24 A. Yes.  
25 Q. How long have you been part of that team?

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1 A. It was about a year after Kris Edwards  
2 joined.  
3 Q. And when did Kris Edwards join?  
4 A. I stated I had worked for her for three  
5 years. I don't have a specific date.  
6 Q. So did she join in 2017?  
7 A. I don't have a specific date. I don't know.  
8 Q. So I'm asking a year, as opposed to a  
9 specific date. See, I think of date, like --  
10 A. I don't know.  
11 Q. You don't know?  
12 A. I don't know.  
13 Q. You don't know. Did she join last year?  
14 A. No.  
15 Q. Did she join before last year?  
16 A. Before last year.  
17 Q. So she was at least there in 2017, right?  
18 A. Now you're going back two years. I would be  
19 speculating.  
20 Q. Okay. But you know she joined before last  
21 year, right?  
22 A. Yeah. She's been on board over a year.  
23 Q. And you worked for her for three years?  
24 A. Approximately.  
25 Q. Approximately three years.

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1 So what caused you to join the U.S.  
2 compensation team?  
3 A. There was a reorganization.  
4 Q. And when did this reorganization occur?  
5 A. About a year after Kris joined.  
6 Q. And does the U.S. compensation team have any  
7 responsibilities?  
8 A. Yes.  
9 Q. What are they?  
10 A. The administration and implementation of  
11 total cash compensation and total direct compensation.  
12 Q. What does "direct compensation" mean?  
13 A. That includes equity.  
14 Q. Does it include anything else?  
15 A. In addition to variable pay and base pay.  
16 Q. Does it include anything else?  
17 A. Not in the U.S.  
18 Q. Okay. And the other major area you said  
19 besides direct compensation is cash compensation?  
20 A. Total cash compensation.  
21 Q. What does that --  
22 A. Excludes equity.  
23 Q. Does it include base pay and variable pay?  
24 A. Yes.  
25 Q. Include anything else?

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1 A. Not in the U.S.  
2 Q. Does the U.S. compensation team have a  
3 manager in charge of it?  
4 A. A senior director. Yes.  
5 Q. What is that person's name?  
6 A. That's Kris Edwards.  
7 Q. And did she -- did the U.S. compensation team  
8 exist before she was supervising you?  
9 A. Not in name, no. No.  
10 Q. Did your responsibilities change after the  
11 formation of the U.S. compensation team?  
12 A. Yes.  
13 Q. How so?  
14 A. You asked that. We've become more  
15 strategic --  
16 Q. What does that mean?  
17 A. -- in nature. That we're assisting H.R.  
18 business partners in more of a strategic way.  
19 Q. Can you explain what you mean by "strategic  
20 way"?  
21 A. It would be less tactical, meaning less  
22 administration.  
23 Q. So can you give me an example of what you  
24 mean by "strategic way," what would be included  
25 underneath that?

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1 A. An example may be publishing -- I use the  
2 word "publishing" loosely. Reporting. Publishing total  
3 direct compensation reports, providing them to the H.R.  
4 business partners to allow management better insight into  
5 the allocation of their budgets.

6 Q. So in terms of the allocations of the  
7 budgets, in terms of increases from year to year, if, in  
8 fact, an increase occurs to the base-pay budget, is that,  
9 like, based on a percent salary increase -- let me strike  
10 that.

11 Is it based on percent increase to the salaries  
12 of that base budget?

13 MS. MANTOAN: Objection; vague, compound, vague  
14 as to time, and vague as to which employees or lines of  
15 business you're talking about, especially given what this  
16 witness has said.

17 BY MR. GARCIA:

18 Q. I'm just talking about in general framework.  
19 Does the way it works is that a line of business has a  
20 certain salary, and then that salary gets increased by a  
21 certain percentage, and then they have to allocate that  
22 budget? Is that how it works?

23 MS. MANTOAN: Objection; vague, calls for  
24 speculation as to areas outside of her responsibility.

25 BY MR. GARCIA:

1 Q. Can you answer the question?

2 A. I can answer it in general terms. So there  
3 is a budget.

4 Q. Right.

5 A. It's discretionary at the upper level. It's  
6 distributed to the lines of business. It's a percent of  
7 the total population's eligible salaries.

8 Q. Okay. Now, you mentioned that you, now with  
9 the U.S. compensation team, provide reports to the H.R.  
10 business partners. Are these reoccurring reports with  
11 the same information?

12 MS. MANTOAN: Objection; misstates testimony.  
13 It's vague.

14 THE WITNESS: I provide them. I don't develop  
15 them.

16 BY MR. GARCIA:

17 Q. And by "development," you mean you don't --  
18 A. I don't author them.

19 Q. So you run the reports and the criteria that  
20 produces --  
21 A. I don't run them, either.

22 Q. So when you say you provide them, are they  
23 run by someone else?  
24 A. They are developed by other team members.

25 Q. So when you say "developed," what do you mean

1 by "developed"?

2 A. Authored.

3 Q. By "authored," do you mean the different  
4 fields that are created and populated in terms of the  
5 report?

6 MS. MANTOAN: Objection. It calls for  
7 speculation.

8 BY MR. GARCIA:

9 Q. I don't know what you mean by "authored."  
10 MS. MANTOAN: Objection. It calls for  
11 speculation as to what someone else did.

12 THE WITNESS: Right.

13 BY MR. GARCIA:

14 Q. Okay. So you provide the reports. Do you  
15 know what's in the reports?

16 A. Yes.

17 Q. What's in the reports?  
18 A. It speaks to the employee's name, their  
19 country, their management hierarchy, their base pay,  
20 where they fall within the salary range, their past  
21 history, their variable compensation, their equity, their  
22 work location, their region, employee email address,  
23 manager email address, their compa ratio, their position  
24 and range. That's generally it.

25 Q. As you probably expect, I have to ask the

1 question. Is there anything else that you remember?

2 A. That's pretty much the spreadsheet.

3 Q. Does the spreadsheet indicate a person's  
4 race?

5 A. No.

6 Q. Does the spreadsheet indicate a person's  
7 gender?

8 A. No, other than if you can assume by name.

9 Q. Right, but someone would have to make that  
10 assumption, correct?

11 A. Correct.

12 Q. And the spreadsheet in this report, is that  
13 -- do members of the U.S. compensation team -- is this a  
14 report that's generated for all members of the U.S.  
15 compensation team to provide to their H.R. business  
16 partners?

17 MS. MANTOAN: Objection; calls for speculation.

18 BY MR. GARCIA:

19 Q. Do you know?  
20 A. I receive it. And if you're a U.S. comp  
21 consultant with an LOB, they would receive something  
22 specific to their clients.

23 Q. Do you know who authored the report?  
24 A. Yes.

25 Q. Can you tell me?

1 A. Monica Kanuck would be one.  
 2 Q. Okay. Who else?  
 3 A. Do you want me to try to spell that?  
 4 Q. Yes, if you could. Thank you.  
 5 A. K-a-n-u-c-k.  
 6 Q. And are there any other people who authored  
 7 it?  
 8 A. There are others that would have contributed.  
 9 Q. And who are they?  
 10 A. Katie Beckner.  
 11 Q. Who else?  
 12 A. And the other individual — more technical,  
 13 not comp — Shawn De Valle.  
 14 Q. Now, Monica Kanuck, is she part of the U.S.  
 15 compensation team?  
 16 A. Yes.  
 17 Q. Is Katie Beckner part of the U.S.  
 18 compensation team?  
 19 A. Yes.  
 20 Q. What are the roles in the U.S. compensation  
 21 team?  
 22 A. They also are U.S. compensation consultants.  
 23 Q. Do you know what lines of business they  
 24 support?  
 25 MS. MANTOAN: Objection; assumes facts, lacks  
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1 foundation.  
 2 BY MR. GARCIA:  
 3 Q. Do they support lines of business?  
 4 A. Yes.  
 5 Q. Do you know which lines of business they  
 6 support?  
 7 A. Generally, yes.  
 8 Q. Can you tell me?  
 9 A. Katie has marketing and consulting.  
 10 Q. And what does Monica have?  
 11 A. She has a portion of product development.  
 12 Q. What portion of product development does she  
 13 have?  
 14 A. When I say "a portion," I'm speaking of a  
 15 select group of managers.  
 16 Q. Okay. And that's from the product  
 17 development line of business?  
 18 A. Correct.  
 19 Q. Do you know who the compensation consultant  
 20 is for the other part of the product development line of  
 21 business?  
 22 A. We just hired a Jocelyn. I don't know her  
 23 last name.  
 24 Q. When you say "just hired," can you give me a  
 25 timeframe? Beginning this year? Late last year?  
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1 A. Three months ago.  
 2 Q. Now, before the hiring of Jocelyn, did Monica  
 3 have all product development?  
 4 A. No.  
 5 Q. Did Jocelyn assume part of product  
 6 development from some other person?  
 7 A. Yes.  
 8 Q. Who is that other person?  
 9 A. Kris Edwards.  
 10 Q. And is this Kris Edwards different than  
 11 Kristina Edwards, or are they one and the same?  
 12 A. I don't know if it's Kristina, but my boss.  
 13 Q. Now, you mentioned before when you talked  
 14 about focal reviews and what you did. Is the role  
 15 that -- your duties, responsibilities role that you  
 16 describe, the focal reviews, do you know if the other  
 17 compensation consultants had the same duties,  
 18 responsibilities, and roles?  
 19 MS. MANTOAN: Objection; calls for speculation.  
 20 THE WITNESS: In the broad sense of the word.  
 21 I can't speak to their client groups or their client  
 22 issues.  
 23 BY MR. GARCIA:  
 24 Q. Would you say that they answer questions of  
 25 their H.R. business partners? Would they do that?  
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1 MS. MANTOAN: Objection; calls for speculation.  
 2 It's asked and answered.  
 3 THE WITNESS: I don't know what they do on a  
 4 day-to-day basis. Each day is very different.  
 5 BY MR. GARCIA:  
 6 Q. So you talked about your boss. I'm going to  
 7 call her Kris Edwards. Okay?  
 8 A. Okay.  
 9 Q. Is that Kris with a "K"?  
 10 A. "K."  
 11 Q. Thank you.  
 12 So when the time of a focal review comes and  
 13 Kate Waggoner's global compensation team puts it out,  
 14 someone can access it, do you receive instructions from  
 15 Kris Edwards on what to do with it, how to roll it out,  
 16 how to implement it? Anything like that?  
 17 MS. MANTOAN: Objection; compound, vague and  
 18 ambiguous.  
 19 THE WITNESS: Can you take that one at a time?  
 20 BY MR. GARCIA:  
 21 Q. So what instructions, if any, does Kris  
 22 Edwards provide when the guidelines are posted for  
 23 someone to access for a focal review?  
 24 MS. MANTOAN: Objection; vague.  
 25 THE WITNESS: She's going -- her role is to  
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1 communicate to us information that's been provided by  
 2 global comp, having to do with the process.  
 3 BY MR. GARCIA:  
 4 Q. Okay. So you said there was a focal review  
 5 in April of 2019?  
 6 MS. MANTOAN: Objection; misstates testimony.  
 7 MR. GARCIA: Let's strike that.  
 8 Q. When was the last focal review?  
 9 A. We just completed one.  
 10 Q. When did it start?  
 11 A. And what do you mean by "start"?  
 12 Q. Do you know -- you said you just completed  
 13 one.  
 14 A. Right.  
 15 Q. So what do you mean by "just completed"?  
 16 What date? What timeframe?  
 17 A. Last Friday.  
 18 Q. I would agree that you just completed it.  
 19 A. Yeah.  
 20 Q. So when did you -- for that focal review that  
 21 was completed last Friday, when did you start the process  
 22 for that focal review?  
 23 MS. MANTOAN: Objection; vague: You. Are you  
 24 asking when she started working on it?  
 25 BY MR. GARCIA:

1 Q. When did you learn of this focal review that  
 2 ended last Friday? When did you first learn of it?  
 3 A. About the third week of March.  
 4 Q. And how did you learn of it?  
 5 A. Through Kris.  
 6 Q. And what did Kris tell you about it?  
 7 A. That it was happening.  
 8 Q. She tell you anything else?  
 9 A. That it was happening, and eventually, she  
 10 would have shared with us the timeline for it.  
 11 Q. Did your manager, Kris Edwards, provide you  
 12 any other information regarding this focal review, other  
 13 than it's happening and the timeline?  
 14 MS. MANTOAN: Objection; vague.  
 15 THE WITNESS: Yeah, I'm sure she did.  
 16 BY MR. GARCIA:  
 17 Q. Do you remember her providing you any other  
 18 information regarding this focal review, other than the  
 19 timeline and it's happening?  
 20 A. She would communicate what Kate's team would  
 21 roll out so we would be made aware of eligibility, that  
 22 there's a timeline, which functions are involved, any  
 23 training that's going to occur.  
 24 Q. Anything else?  
 25 A. I think in general terms, that's....

1 Q. When you say "functions," what do you mean by  
 2 "functions"? Is that job functions? Is that lines of  
 3 business? What?  
 4 A. That would be, in this case, job functions.  
 5 Q. Do you know what job functions were involved?  
 6 A. Yes.  
 7 MS. MANTOAN: Objection; vague and ambiguous as  
 8 to "job functions."  
 9 BY MR. GARCIA:  
 10 Q. I'm talking about job functions for the focal  
 11 review that we've been talking about. Which job  
 12 functions were involved?  
 13 MS. MANTOAN: Objection; vague and ambiguous as  
 14 to "job functions."  
 15 BY MR. GARCIA:  
 16 Q. Go ahead and answer.  
 17 A. It would exclude sales and presales.  
 18 Q. So everything but sales and presales was  
 19 involved in the last focal review?  
 20 A. Yes.  
 21 Q. And was there training for this last focal  
 22 review?  
 23 A. Yes.  
 24 Q. And what form was this training? Videos,  
 25 Internet, webinars, PowerPoints, emails? What was the

1 training?  
 2 MS. MANTOAN: I'm going to object on the record  
 3 to this line of questioning, given that the parties have  
 4 agreed to the discovery cutoff for documents in this case  
 5 and questioning of.  
 6 MR. GARCIA: I think the parties agreed for  
 7 document cutoff, but parties are not agreeing on  
 8 questions after that.  
 9 Q. Go ahead.  
 10 A. I'm sorry. Can you restate the question?  
 11 Q. So you said there was training. I want to  
 12 know what form the training took. Was it  
 13 person-to-person training? Was it a webinar training?  
 14 Was it training that was on the PowerPoint? Did someone  
 15 with access via the Internet. What form did this  
 16 training take?  
 17 MS. MANTOAN: Objection; calls for speculation.  
 18 THE WITNESS: So we would have held conference  
 19 calls.  
 20 BY MR. GARCIA:  
 21 Q. And so by -- you're saying, "we have held."  
 22 Do you mean the compensation consultants?  
 23 A. The compensation team and H.R. business  
 24 partners.  
 25 Q. So it would be between the compensation team

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1 and the H.R. business partners? Would it include anyone  
2 else?  
3 MS. MANTOAN: Objection; calls for speculation.  
4 THE WITNESS: I'm just trying to think if, at  
5 any point, Kate's team was involved. We, for the most  
6 part -- we implement. So I'm going to say, in general  
7 terms, U.S. comp and H.R. business partners.  
8 BY MR. GARCIA:  
9 Q. Would -- and so is it -- when you implement,  
10 you inform the H.R. business partners, and then the H.R.  
11 business partners have the responsibility to inform their  
12 managers? Is that how it generally works?  
13 MS. MANTOAN: Objection; calls for speculation,  
14 vague as to "responsibility," assumes facts.  
15 BY MR. GARCIA:  
16 Q. I'm just trying to understand. When you're  
17 doing the training, you trained the H.R. business  
18 partners is what -- the compensation consultants train  
19 the H.R. business partners? Is that what I'm  
20 understanding you to say?  
21 MS. MANTOAN: Objection; misstates testimony,  
22 vague.  
23 THE WITNESS: What do you mean by "train"?  
24 BY MR. GARCIA:  
25 Q. You said there was training, and I asked you

1 what form the training took, and you said, "conference  
2 calls."  
3 A. Right.  
4 Q. And I asked you who attended, and you said  
5 U.S. compensation team, consultants, and the H.R.  
6 business partners. So are you training the H.R. business  
7 partners on that conference calls?  
8 A. We are providing guidelines and timelines for  
9 the process.  
10 Q. And how do you provide the guidelines?  
11 A. We had the conference call, and then we would  
12 have a webinar.  
13 Q. With whom?  
14 A. U.S. compensation.  
15 Q. Who else would attend the webinar?  
16 A. And the H.R. business partners.  
17 Q. Those two entities would lead the webinar,  
18 give the webinar?  
19 A. U.S. compensation would facilitate the  
20 webinar.  
21 Q. By "facilitating," you mean you would go  
22 over --  
23 A. Communicate.  
24 Q. -- what the guidelines were?  
25 A. The process. The process, the guidelines,

1 the eligibility.  
2 Q. Got you.  
3 Now, would the H.R. business partners do any  
4 facilitating during that webinar?  
5 A. Facilitating, no.  
6 Q. And who's the audience of the webinar? Is it  
7 the H.R. business partners?  
8 A. H.R. business partners.  
9 Q. And their staffs, correct?  
10 A. Yes.  
11 Q. Are there any other people that usually  
12 attend those webinars?  
13 A. Just open to H.R.  
14 MS. MANTOAN: Counsel, we've been going about  
15 another hour. Can we take a break when you're at a  
16 stopping point?  
17 MR. GARCIA: I think we're at a stopping point  
18 now. We can take a break.  
19 MS. MANTOAN: Thank you.  
20 THE VIDEOGRAPHER: This marks the end of media  
21 file labeled number two. Off the record at 10:44 a.m.  
22 (Recess from 10:44 a.m. to 10:55 a.m.)  
23 THE VIDEOGRAPHER: This marks the beginning of  
24 media file labeled number three. Back on the record at  
25 10:55 a.m.

1 BY MR. GARCIA:  
2 Q. So these webinar trainings that we talked  
3 about before the break that you attended, who else was  
4 on -- from the U.S. compensation team was at that  
5 webinar?  
6 MS. MANTOAN: Objection; compound, at least in  
7 part of the question.  
8 BY MR. GARCIA:  
9 Q. So I'm talking about the webinar trainings  
10 that you attended and when rolling out the focal review,  
11 the last focal review. Who else besides yourself from  
12 the U.S. compensation team was in attendance?  
13 A. Generally, it would be my peers, the other  
14 members of the U.S. compensation team.  
15 Q. So these webinars, did it include all the  
16 members of the U.S. compensation team and all the H.R.  
17 business partners?  
18 A. It would include whoever could make it on  
19 that specific day and time.  
20 Q. So the training that the U.S. compensation  
21 team provided in the webinars was the same training given  
22 across the company to the different lines of business and  
23 H.R. business partners, correct?  
24 A. Our audience was the H.R. business partners.  
25 Q. Right.

1 So the training that the U.S. compensation team  
 2 gave to the H.R. business partners didn't depend on the  
 3 LOBs of the H.R. business partners, right? It was the  
 4 same training?  
 5 A. I'm not sure I'm understanding you when you  
 6 say, "the same training." We gave training -- I'll just  
 7 arbitrarily say we provided three sessions. The audience  
 8 was the H.R. business partners.  
 9 Q. So what I'm understanding you to say is, the  
 10 U.S. compensation team would provide three webinars?  
 11 A. (Nods head.)  
 12 Q. And the H.R. business partners could decide  
 13 which of the webinars they wanted to attend?  
 14 A. Correct.  
 15 Q. And the training given was the same at each  
 16 webinar, correct?  
 17 A. Correct.  
 18 Q. Okay. Thank you.  
 19 Before, we were talking about accessing  
 20 whatever the global compensation team put. In what form  
 21 did they put it on for you to access? Was it a video, a  
 22 PowerPoint?  
 23 MS. MANTOAN: Objection. That's compound. Are  
 24 you asking if there's ever been a video or a PowerPoint  
 25 or --

1 BY MR. GARCIA:  
 2 Q. I'm talking about when the compensation team  
 3 posts, where do they post it to?  
 4 MS. MANTOAN: Objection; compound.  
 5 THE WITNESS: Do you have two questions there?  
 6 BY MR. GARCIA:  
 7 Q. No. My question is, you said earlier that  
 8 the U.S. compensation team posts that people can access.  
 9 So I'm asking, where do they post it to?  
 10 MS. MANTOAN: Objection. It's compound to the  
 11 extent you're talking about multiple, different types of  
 12 material, but the question presumes that it's posted in a  
 13 single place, in a single format, always.  
 14 BY MR. GARCIA:  
 15 Q. Okay. Does the U.S. global -- strike that.  
 16 Does the global compensation team post to  
 17 numerous places?  
 18 MS. MANTOAN: Objection; calls for speculation.  
 19 BY MR. GARCIA:  
 20 Q. Do you know?  
 21 A. I'm thinking. I don't think I can speak to  
 22 the numerous places that they would post.  
 23 Q. Where did the U.S. compensation --  
 24 correction. Where did the global compensation team post  
 25 the guidelines for the focal review that was conducted in

1 2019?  
 2 A. They posted them on an internal website.  
 3 Q. And what did they post for that focal review  
 4 on the internal website?  
 5 A. They posted documents having to do with focal  
 6 and equity.  
 7 Q. Did they post any videos relating to that  
 8 focal review and equity?  
 9 A. I don't believe so.  
 10 Q. Okay. So was there a focal review in 2018?  
 11 A. Yes.  
 12 Q. Did they post it at the same place in 2018?  
 13 A. Yes.  
 14 Q. Was there a focal review in 2017?  
 15 A. I'm not sure.  
 16 Q. Was there a focal review in 2016?  
 17 A. I don't know.  
 18 Q. Do you know if there was a focal review in  
 19 2015?  
 20 A. I don't know.  
 21 Q. Do you know if there was a focal review in  
 22 2014?  
 23 A. I don't know the history of the dates.  
 24 Q. I'm asking --  
 25 A. It doesn't always occur.

1 Q. I'm just asking if you know if it occurred  
 2 during those years.  
 3 A. I can't answer it.  
 4 Q. Fine.  
 5 Okay. So you identified there were focal  
 6 reviews in 2018 and 2017. Did the webinar --  
 7 A. I identified there were focal reviews in 2018  
 8 and 2019.  
 9 Q. Okay. Thank you.  
 10 The webinar that you discussed that was for the  
 11 last focal review in 2019, was there also a similar  
 12 webinar for rolling out the focal review in 2018?  
 13 A. In general terms, there would have been a  
 14 webinar. There would have been differences.  
 15 Q. Other than the differences associated with  
 16 the amount of the pay and things like that --  
 17 A. Right.  
 18 Q. -- was the general training that the U.S.  
 19 compensation team provided to the H.R. business partners  
 20 the same, whether it would be multiple training sessions  
 21 that they could attend?  
 22 MS. MANTOAN: Objection; vague.  
 23 THE WITNESS: It would be multiple training  
 24 sessions.  
 25 BY MR. GARCIA:

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1 Q. And then the H.R. business partner could  
2 choose which session they wanted to attend, correct?  
3 A. Correct.  
4 Q. And the U.S. compensation team would be in  
5 attendance at those different webinars, correct?  
6 A. Based on schedule, correct.  
7 Q. And then the training that was rolled out  
8 during the webinar would be the same at each one of the  
9 sessions, correct?  
10 A. At each session, correct.  
11 Q. Earlier, you were talking about a report that  
12 you didn't author but that you would provide to the H.R.  
13 business partners. Do you recall that?  
14 A. Yes.  
15 Q. Do you know -- did that report have a name?  
16 A. I think I referred to it as total direct  
17 compensation.  
18 Q. Thank you.  
19 And did that -- strike that.  
20 When did that report start to be distributed to  
21 the H.R. business partners?  
22 MS. MANTOAN: Objection; calls for speculation.  
23 To the extent you know.  
24 BY MR. GARCIA:  
25 Q. When did you distribute the report to your

1 H.R. business partners?  
2 A. In general, it's been in existence. It's  
3 still a pilot. Say two years. It's a fairly new report.  
4 Q. How often is this report run?  
5 MS. MANTOAN: Objection; calls for speculation.  
6 BY MR. GARCIA:  
7 Q. How often do you provide the report to your  
8 H.R. business partners?  
9 A. I believe only once or twice a year. That  
10 would vary.  
11 Q. Is there a certain event that causes the  
12 report -- for you to provide it to an H.R. business  
13 partner?  
14 A. In general, it would be provided before a  
15 process was to occur.  
16 Q. And by "process," you mean a focal review  
17 process, an equity process, and a variable pay process?  
18 A. Correct.  
19 Q. Now, you stated earlier that you would make  
20 notes of whether allocations had been made to employees.  
21 Do you remember that?  
22 MS. MANTOAN: Objection. That misstates  
23 testimony.  
24 BY MR. GARCIA:  
25 Q. Before, you said you made note of if they

1 occurred, correct?  
2 MS. MANTOAN: Same objections. She didn't  
3 testify that she put pen to paper and took notes. She  
4 used the verb "to note."  
5 BY MR. GARCIA:  
6 Q. I'm using the same verb: to note. You noted  
7 that they occurred, correct?  
8 A. I noted that an allocation occurred.  
9 Q. Did you personally document anything when you  
10 noted it had occurred?  
11 A. No. I just visually noted it had occurred.  
12 Q. Did you ever make any notes regarding any of  
13 the allocations?  
14 MS. MANTOAN: Objection; vague.  
15 BY MR. GARCIA:  
16 Q. For any allocations in terms of the  
17 processes, did you ever make notes?  
18 MS. MANTOAN: Objection; vague.  
19 THE WITNESS: Are you speaking of the written  
20 word?  
21 BY MR. GARCIA:  
22 Q. I'm speaking of did you document anything  
23 regarding the allocations at any time?  
24 MS. MANTOAN: Objection; vague and ambiguous.  
25 THE WITNESS: I don't know what you mean by

1 "document."  
2 BY MR. GARCIA:  
3 Q. Did you take notes? Did you write something  
4 on a piece of paper? Did you send an email? Did you put  
5 in written form any of your observations regarding the  
6 allocation that were made?  
7 MS. MANTOAN: Objection. It assumes facts,  
8 lacks foundation, and it's vague and ambiguous.  
9 THE WITNESS: I may have or I may not have.  
10 BY MR. GARCIA:  
11 Q. Now, the training that you were talking about  
12 that the U.S. compensation team provides to the H.R.  
13 business partners, you said it was a webinar. Was there  
14 any, like, PowerPoints part of that webinar?  
15 MS. MANTOAN: Objection; vague. Are you  
16 talking about 2018, 2019?  
17 MR. GARCIA: I'm talking about both years.  
18 MS. MANTOAN: Objection. It's compound.  
19 THE WITNESS: 2019.  
20 BY MR. GARCIA:  
21 Q. Was a PowerPoint part of the webinar?  
22 A. It would have been a PowerPoint when I say  
23 "webinar."  
24 Q. And in terms of the PowerPoint, who created  
25 that PowerPoint?

1 MS. MANTOAN: Objection; calls for speculation.  
 2 You can answer if you know.  
 3 THE WITNESS: I can't answer.  
 4 BY MR. GARCIA:  
 5 Q. Did the U.S. -- any member of the U.S.  
 6 compensation team create that PowerPoint?  
 7 MS. MANTOAN: Objection; asked and answered,  
 8 calls for speculation.  
 9 THE WITNESS: I don't know the author.  
 10 BY MR. GARCIA:  
 11 Q. Was the PowerPoint from one of the things  
 12 that the global compensation team posted?  
 13 MS. MANTOAN: Objection; vague and ambiguous.  
 14 THE WITNESS: I don't know who created it.  
 15 BY MR. GARCIA:  
 16 Q. Did you have any part in the creation of it?  
 17 A. No.  
 18 Q. Did you have any input into what was created?  
 19 A. No.  
 20 Q. Did anybody solicit you for anything related  
 21 to the training?  
 22 MS. MANTOAN: Objection; vague.  
 23 THE WITNESS: No.  
 24 BY MR. GARCIA:  
 25 Q. What was your role during the webinar

1 training of 2019, other than attending?  
 2 A. Attending.  
 3 Q. Any other role besides attending?  
 4 A. Attending.  
 5 Q. Who led the webinar in 2019?  
 6 A. I believe it was Kris Edwards.  
 7 Q. Who led the webinar in 2018?  
 8 A. I don't recall for certain.  
 9 Q. Can you estimate --  
 10 A. I'm going to estimate it was Kris again.  
 11 Q. Did you have any role in the 2018 webinar?  
 12 A. No.  
 13 Q. Did you at all contribute to any part of the  
 14 2018 webinar?  
 15 A. No.  
 16 Q. Are the H.R. business partners your clients?  
 17 MS. MANTOAN: Objection; vague.  
 18 BY MR. GARCIA:  
 19 Q. Do you consider the H.R. business partners to  
 20 be your client?  
 21 MS. MANTOAN: Same objection.  
 22 BY MR. GARCIA:  
 23 Q. Go ahead.  
 24 A. Not all of them are my clients.  
 25 Q. Which ones are -- okay. So for the different

1 entities that you mentioned before, like finance, would  
 2 the H.R. business partner, the entities that you  
 3 mentioned, be your clients?  
 4 MS. MANTOAN: Objection. It's vague and  
 5 ambiguous.  
 6 THE WITNESS: My clients would be an H.R.  
 7 business partner who supports a direct report of Safra  
 8 Catz.  
 9 BY MR. GARCIA:  
 10 Q. Do you have any other clients?  
 11 MS. MANTOAN: Objection; vague.  
 12 THE WITNESS: Are you speaking in terms of H.R.  
 13 business partners?  
 14 BY MR. GARCIA:  
 15 Q. No. Who are your clients?  
 16 MS. MANTOAN: Objection; asked and answered,  
 17 and it's vague.  
 18 BY MR. GARCIA:  
 19 Q. Besides the ones that you just identified.  
 20 Are there any other clients you have?  
 21 A. If you're asking in terms of H.R. business  
 22 partners...  
 23 Q. Do you have any clients who are not H.R.  
 24 business partners?  
 25 MS. MANTOAN: Objection; vague.

1 THE WITNESS: I guess when I say, "H.R.  
 2 business partners," they're my direct clients, then they  
 3 have H.R. reps that support them, but I'm not interacting  
 4 with the H.R. reps in general.  
 5 BY MR. GARCIA:  
 6 Q. So your main focus is the H.R. business  
 7 partners themselves?  
 8 A. Correct.  
 9 Q. Do you have any other major focus, other than  
 10 the H.R. business partners that you interact with?  
 11 MS. MANTOAN: Objection; vague.  
 12 THE WITNESS: My primary focus is the H.R.  
 13 business partners.  
 14 BY MR. GARCIA:  
 15 Q. Okay. Do you know when the global  
 16 compensation team was formed?  
 17 A. It was formed around the time that Kris  
 18 Edwards joined. Maybe a year after she joined.  
 19 Q. So that would be, like, two or three years  
 20 ago?  
 21 A. Yeah, because I think I stated she -- I  
 22 worked for her for about three years.  
 23 Q. Did you know what Kate Waggoner did before  
 24 she assumed leadership of the global compensation team?  
 25 A. Yes.

1 Q. What did she do?  
 2 A. She was a member of corporate compensation.  
 3 Q. Was Lisa Gordon a member of corporate  
 4 compensation team, too?  
 5 A. Yes.  
 6 Q. And in terms of Kate Waggoner's clients, was  
 7 she responsible for sales and consulting in that role?  
 8 MS. MANTOAN: Objection; vague.  
 9 BY MR. GARCIA:  
 10 Q. I'm talking about couple of years ago, before  
 11 she took the global compensation team.  
 12 MS. MANTOAN: Same objection.  
 13 THE WITNESS: She never had sales.  
 14 BY MR. GARCIA:  
 15 Q. Kate Waggoner never had sales?  
 16 A. Not that I recall.  
 17 Q. Do you recall what functions that Lisa Gordon  
 18 had?  
 19 MS. MANTOAN: Objection; vague as to  
 20 "functions."  
 21 BY MR. GARCIA:  
 22 Q. What parts of the business that Lisa Gordon  
 23 had?  
 24 A. We would have been broken up by lines of  
 25 business.

1 A. The leader is -- technically, the definition  
 2 is an LOB, right, a line of business.  
 3 Q. Is a leader --  
 4 A. Is a leader. But a leader would have more  
 5 than, just as an example, product development, just so  
 6 that you're clear.  
 7 Q. Right.  
 8 A. Okay?  
 9 Q. Is product development, at the time, both a  
 10 job function and a line of business?  
 11 A. It was referred to in that capacity, but in  
 12 the definition of the word, in the true sense of the  
 13 word, no.  
 14 Q. Okay. Do you know someone named Thomas  
 15 Kurian?  
 16 A. Yes.  
 17 Q. What was his line of business called?  
 18 A. Product development.  
 19 Q. Now, have you -- strike that.  
 20 So, Court Reporter, we have previously marked  
 21 exhibits, and so I am going to give you the next number  
 22 in the sequence and ask you to mark the next document as  
 23 Exhibit 44.  
 24 (Plaintiff's Exhibit 44 was marked for  
 25 identification.)

1 Q. Do you know what lines of business Lisa  
 2 Gordon had?  
 3 MS. MANTOAN: Objection; vague as to time.  
 4 THE WITNESS: Yeah.  
 5 BY MR. GARCIA:  
 6 Q. I'm talking about when Lisa Gordon was there.  
 7 A. I know you are, but I don't want to guess.  
 8 Q. Can you make an estimate?  
 9 A. You're asking me to guess.  
 10 Q. I don't want you to guess. Did she support  
 11 product development?  
 12 MS. MANTOAN: Objection; vague as to "product  
 13 development." Asked and answered. She's told you she  
 14 doesn't remember.  
 15 THE WITNESS: She would have supported an LOB,  
 16 as we all are responsible for an LOB. Okay?  
 17 BY MR. GARCIA:  
 18 Q. Okay.  
 19 A. When you state "functional area," I refer to  
 20 functional area as a function on the job table.  
 21 Q. Like a job function?  
 22 A. But that's not -- just to clarify, that's not  
 23 how we're broken out. We're broken out by leader.  
 24 Q. And a leader has a line of business; is that  
 25 correct?

1 BY MR. GARCIA:  
 2 Q. So what I'm giving you is an email that  
 3 Shauna Holman-Harries sent, and attached to the emails is  
 4 Lisa Gordon's interview. Are you familiar with who  
 5 Shauna Holman-Harries is?  
 6 A. Yes.  
 7 Q. And do you know that she's the -- at one  
 8 time, she was director of diversity compliance?  
 9 A. Yes.  
 10 Q. And now she's a senior director of diversity  
 11 compliance. Do you know that?  
 12 A. I know that now.  
 13 Q. So I recognize -- or let me just ask. Have  
 14 you ever seen Lisa Gordon's interview before?  
 15 MS. MANTOAN: Objection. It misstates the  
 16 document. The document speaks for itself. Are you  
 17 asking if she's ever seen this document before?  
 18 BY MR. GARCIA:  
 19 Q. I'm asking -- this document consists of two  
 20 parts, and the attachment of Lisa Gordon's interview to  
 21 it. I'm asking you if you have ever saw Lisa Gordon's  
 22 interview before.  
 23 MS. MANTOAN: Object that that mischaracterizes  
 24 the document. The document speaks for itself.  
 25 BY MR. GARCIA:

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1 Q. I'm going to ask you questions about  
2 different parts of it. I'm just asking, in general, have  
3 you ever seen Lisa Gordon's interview before?  
4 MS. MANTOAN: Objection. It misstates the  
5 document. The document speaks for itself.  
6 BY MR. GARCIA:  
7 Q. Okay. So I --  
8 MS. MANTOAN: She didn't answer the question,  
9 did she?  
10 THE WITNESS: No, I haven't.  
11 BY MS. MANTOAN:  
12 Q. Okay.  
13 A. I've never seen this document.  
14 Q. Okay. And this document consists of Lisa  
15 Gordon's signed interview and an email?  
16 MS. MANTOAN: Objection; misstates the  
17 document. The document speaks for itself. Calls for  
18 speculation.  
19 MR. GARCIA: The Bates stamp numbers for this  
20 document, Exhibit 44, is DOL40003 up to DOL40022.  
21 Q. So have you ever seen Lisa Gordon's signature  
22 before?  
23 A. Her signature?  
24 Q. Yeah.  
25 A. No.

1 Q. Then I will not ask you if you recognize her  
2 signature, since you've never, ever seen her signature  
3 before.  
4 A. Yeah, no.  
5 Q. So I'm going to ask you various questions  
6 about this document. So towards the top of page 2 -- or  
7 strike that.  
8 If you look at these, you see the document has  
9 little numbers in the right-hand corner?  
10 A. Mm-hmm.  
11 Q. Those are called Bates stamp numbers. So if  
12 you go to the one that has 40021, which is essentially  
13 the last page, second-to-the-last page -- okay. So that  
14 -- there's a signature by Lisa Gordon on that document.  
15 I'm not asking you to authenticate. Just asking you if  
16 you see it. Correct?  
17 MS. MANTOAN: Objection. The document speaks  
18 for itself. Standing objection any time you characterize  
19 what the document is, that that is her signature, that  
20 this is an interview. So standing objection to  
21 mischaracterizing the document.  
22 BY MR. GARCIA:  
23 Q. So I want to make sure that you see things.  
24 That's why I ask you if you see things to make sure we're  
25 on the same page. So do you see a signature on that

1 page?  
2 A. I see a signature.  
3 Q. And the signature -- I'm not asking you to  
4 authenticate what it actually is, but the signature says,  
5 "Lisa Gordon," right?  
6 A. Signature is written "Lisa Gordon."  
7 Q. Right. And if you look at the first page,  
8 the very first page...  
9 A. This page?  
10 Q. Yes. The email. And you see it's an email  
11 from Shauna Holman-Harries, correct?  
12 MS. MANTOAN: Objection. It calls for  
13 speculation. She told you she's never seen this document  
14 before. You're asking her to read it?  
15 BY MR. GARCIA:  
16 Q. Do you see that the email is from Shauna  
17 Holman-Harries? I'm just asking you if you see that.  
18 A. I see that right here.  
19 Q. Right. And let the record reflect that  
20 you're pointing to the "from" where it says, "Shauna  
21 Holman-Harries."  
22 And in the body of the email -- again, I'm not  
23 asking you to authenticate. Just asking if you see that  
24 it says, "Attached is Lisa's interview form." Do you see  
25 that?

1 MS. MANTOAN: Objection; calls for speculation.  
2 BY MR. GARCIA:  
3 Q. I'm asking you if you see it. I'm not asking  
4 you to authenticate it's true and correct.  
5 A. I see those words.  
6 Q. Okay. Thank you.  
7 Now, I want you to turn to Bates stamp 40005.  
8 So when you worked with Lisa Gordon, did she  
9 manage two -- so I'm looking at the second paragraph.  
10 Did she manage two corporate compensation programs:  
11 corporate bonus program and non-sales salary increase  
12 program?  
13 MS. MANTOAN: Objection; vague, calls for  
14 speculation.  
15 BY MR. GARCIA:  
16 Q. I'm asking you if you know if that's a true  
17 statement, that that's what Lisa Gordon managed --  
18 A. Is that written here?  
19 Q. Yeah. You see -- I want you to look -- see  
20 the second paragraph that begins with "in my role"?  
21 A. Mm-hmm.  
22 Q. And then you see there's an exclamation point  
23 in the second line of that, and it says, quote, "I manage  
24 two compensation programs: corporate bonus program and  
25 non-sales salary increase program," unquote?

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1 Did I read that correctly?  
2 A. You read that correctly.  
3 Q. Do you know if Lisa Gordon managed those two  
4 compensation programs?  
5 A. I do not.  
6 Q. It also says on that page, if you go down to  
7 item number two, that paragraph, Lisa Gordon -- I'm going  
8 to read it: Quote, "I have a counterpart that handles  
9 compensation for sales and consulting," unquote.  
10 Did I read that correctly?  
11 A. I'm sorry. Where are you?  
12 Q. You see the number two on that page?  
13 A. Mm-hmm.  
14 Q. You see the paragraph underneath it?  
15 A. Yes.  
16 Q. Okay. The first line, it says, quote, "I  
17 have a counterpart that handles compensation for sales  
18 and consulting" --  
19 A. Right.  
20 Q. -- unquote.  
21 Did I read that correctly?  
22 A. Yes.  
23 Q. Did Kate Waggoner handle sales and  
24 consulting?  
25 MS. MANTOAN: Objection. It's asked and  
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1 answered. You already asked her that.  
2 MR. GARCIA: I'm seeing if this refreshes her  
3 memory.  
4 THE WITNESS: To my recollection, Kate has  
5 never had sales. She was responsible for consulting, but  
6 that's what I recall.  
7 BY MR. GARCIA:  
8 Q. I understand what you recall, and that's what  
9 I'm trying to understand. I'm using this, in part, to  
10 try to refresh your memory.  
11 Do you know what else Kate had, if anything?  
12 MS. MANTOAN: Objection. It's asked and  
13 answered.  
14 THE WITNESS: To my recollection, she had  
15 consulting.  
16 BY MR. GARCIA:  
17 Q. Okay. Did Kate Waggoner manage the stock  
18 program, the equity program?  
19 A. Kate -- yes.  
20 Q. So at that time, she managed the equity?  
21 A. Yes.  
22 Q. And Lisa Gordon's group at that time only  
23 managed the base pay and variable pay, correct?  
24 A. Well, if you're going back to the corporate  
25 bonus program and non-salary increase program --  
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1 Q. Yes.  
2 A. -- when she states "manage"...  
3 Q. So that's what she did, correct?  
4 A. So I'm going to make a correction here. So  
5 she would have overseen the programs.  
6 Q. And that's base pay and variable pay is what  
7 you're referring to as programs, right?  
8 A. That's base -- corporate bonus. That would  
9 be a portion of variable pay. That excludes sales.  
10 Q. Thank you.  
11 So, now, I'm going to have you turn to the next  
12 page, 4006. So I'm going to have you look at item number  
13 five. Do you see that?  
14 A. Yes.  
15 Q. I'm going to read item number five: Quote,  
16 "Are there any written policies or guidelines the company  
17 uses in making compensation decisions in addition to  
18 what's been provided to us which was Oracle's  
19 compensation guidelines, Oracle's" -- correction --  
20 "Oracle's compensation guidelines, Global compensation  
21 training, and compensation review and oversight? If so,  
22 please provide copies of the policies," end quote.  
23 Did I read that correctly?  
24 A. Yes.  
25 Q. And the answer underneath it says, quote,  
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1 "This looks like a complete list of Oracle's compensation  
2 guidelines and policy," unquote.  
3 Did I read that correctly?  
4 A. You read that.  
5 Q. Is that a true statement?  
6 MS. MANTOAN: Objection to asking this witness  
7 to speculate as to a document she's never seen and knows  
8 nothing about -- let me finish the objection -- which  
9 also necessarily appears to reference other documents,  
10 which you're not putting in front of her.  
11 MR. GARCIA: Your objection is improper,  
12 because you're giving a speaking objection.  
13 MS. MANTOAN: Your questions are improper.  
14 MR. GARCIA: And I would ask you not -- as I  
15 did before, not to give speaking questions.  
16 Q. Now, just to be clear on this document,  
17 Ms. Carrelli, I'm not asking you if Lisa Gordon actually  
18 said that. I'm just reading a question and reading a  
19 statement and asking you if that statement is true to  
20 that question. Do you understand that?  
21 A. I don't know.  
22 MS. MANTOAN: Objection. The question is vague  
23 and ambiguous, and it calls for speculation.  
24 BY MR. GARCIA:  
25 Q. Do you understand what I just said? I read a  
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1 question, I read a statement, then I ask you if that  
 2 statement is true. And are you saying that you don't  
 3 know if it's true or not?  
 4 MS. MANTOAN: Objection; vague and ambiguous.  
 5 It calls for speculation.  
 6 THE WITNESS: I don't know, because in the  
 7 context, I have no idea what you're referring to here.  
 8 BY MR. GARCIA:  
 9 Q. Well, I was referring to the global  
 10 compensation -- Oracle's compensation guidelines, the  
 11 global compensation training, and the compensation review  
 12 and oversight. That's what it's referring to.  
 13 A. But it's not stating that. It says, "a  
 14 complete list of Oracle's compensation guidelines and  
 15 policies." And I have no idea.  
 16 Q. Okay. That's all I'm asking.  
 17 Do you know if Oracle's compensation policies  
 18 and guidelines has changed from 2011 to the 2019 focal  
 19 review?  
 20 MS. MANTOAN: Objection; assumes facts.  
 21 BY MR. GARCIA:  
 22 Q. I'm asking you do you know if they've  
 23 changed?  
 24 MS. MANTOAN: Assumes facts that there are  
 25 policies and guidelines.

1 BY MR. GARCIA:  
 2 Q. Go ahead.  
 3 A. There are guidelines and processes.  
 4 Q. Does Oracle have any compensation policies  
 5 currently?  
 6 MS. MANTOAN: Objection; vague and ambiguous.  
 7 THE WITNESS: In terms of what?  
 8 BY MR. GARCIA:  
 9 Q. I'm asking you in the very broadest of terms,  
 10 does Oracle currently have any compensation policies?  
 11 MS. MANTOAN: Objection; vague and ambiguous.  
 12 THE WITNESS: So if you're asking me for an  
 13 example --  
 14 BY MR. GARCIA:  
 15 Q. Okay --  
 16 A. -- Oracle has guidelines and processes. I'm  
 17 not going to use the word "policy."  
 18 Q. Okay.  
 19 A. An example would be our compensation  
 20 philosophy.  
 21 Q. Okay. So my question is particular about  
 22 compensation policies. Do you know if Oracle, as of  
 23 today, has any compensation policy whatsoever?  
 24 MS. MANTOAN: Objection; vague and ambiguous,  
 25 asked and answered.

1 THE WITNESS: We have compensation guidelines  
 2 and processes, and we have a compensation philosophy.  
 3 BY MR. GARCIA:  
 4 Q. Your answer is nonresponsive to my question.  
 5 I understand and I hear you when you say you have  
 6 compensation guidelines, processes, and philosophies.  
 7 What I'm also trying to understand is, does Oracle, in  
 8 addition to those, have any compensation policy  
 9 whatsoever that's in effect today for Redwood Shores?  
 10 MS. MANTOAN: Objection; vague and ambiguous,  
 11 asked and answered.  
 12 THE WITNESS: When I think of a policy, I think  
 13 of a rule. We have guidelines. We don't have rules.  
 14 BY MR. GARCIA:  
 15 Q. Does Oracle have any compensation rules in  
 16 effect today at Redwood Shores?  
 17 MS. MANTOAN: Objection. It's asked and  
 18 answered. It's vague and ambiguous. But she's answered  
 19 it.  
 20 THE WITNESS: We have guidelines, we have a  
 21 compensation philosophy, and we have compensation  
 22 processes.  
 23 BY MR. GARCIA:  
 24 Q. Okay. Are you saying that Oracle only has  
 25 that and no policy?

1 MS. MANTOAN: Objection. It's asked and  
 2 answered.  
 3 MR. GARCIA: No, it isn't answered --  
 4 MS. MANTOAN: She did answer the question.  
 5 MR. GARCIA: Counsel, it's a yes-or-no  
 6 question. That's all it is. She's given me -- telling  
 7 me what Oracle has and is not responding to the question.  
 8 MS. MANTOAN: I don't think that's accurate if  
 9 you look back at the transcript.  
 10 BY MR. GARCIA:  
 11 Q. Can you answer the question, yes or no? Does  
 12 Oracle currently have any compensation policies in effect  
 13 as of today at Redwood Shores?  
 14 MS. MANTOAN: Objection; asked and answered,  
 15 vague and ambiguous.  
 16 THE WITNESS: I can't answer that.  
 17 BY MR. GARCIA:  
 18 Q. So you don't know?  
 19 MS. MANTOAN: Objection; misstates testimony,  
 20 asked and answered, vague and ambiguous.  
 21 THE WITNESS: I need you to be specific.  
 22 BY MR. GARCIA:  
 23 Q. I can't be specific if I don't know all of  
 24 what Oracle has. So I'm relying on your knowledge to  
 25 know whether Oracle has any compensation policies

1 whatsoever in effect at Redwood Shores today. Can you  
 2 give me a yes-or-no answer to that question?  
 3 MS. MANTOAN: Objection. It's asked and  
 4 answered. It's vague and ambiguous. She's given you an  
 5 answer, Counsel. If you don't like the answer, that's  
 6 one thing, but she's answered you with respect to your  
 7 word "policies." She's answered it.  
 8 BY MR. GARCIA:  
 9 Q. Can you give me a yes-or-no answer to that?  
 10 MS. MANTOAN: Same objections, Counsel.  
 11 MR. GARCIA: Counsel, you have a standing  
 12 objection.  
 13 THE WITNESS: I don't know. I don't know how  
 14 to answer your question.  
 15 BY MR. GARCIA:  
 16 Q. Okay. When you worked for Lisa Gordon, do  
 17 you know what factors, if any, Oracle considered for  
 18 starting pay?  
 19 MS. MANTOAN: Objection; vague and ambiguous  
 20 and compound to the extent you're asking about every  
 21 single starting pay decision.  
 22 THE WITNESS: So you're asking about a U.S. new  
 23 hire?  
 24 BY MR. GARCIA:  
 25 Q. At Redwood Shores.

1 A. Okay. Specifically...  
 2 Q. Who would work in the product development  
 3 information technology --  
 4 A. I can't speak to product development.  
 5 Q. Do you know what factors that Oracle  
 6 considered just for a new hire?  
 7 MS. MANTOAN: Not including product  
 8 development, I.T., and support, which she just told you  
 9 she doesn't know?  
 10 BY MR. GARCIA:  
 11 Q. I'm just asking do you know what factors  
 12 Oracle considered?  
 13 MS. MANTOAN: Objection. It's vague, it's  
 14 compound, and it's not specific as to any decision.  
 15 BY MR. GARCIA:  
 16 Q. For your experience, do you know what factors  
 17 that you are aware of that any Oracle manager considered  
 18 when hiring someone?  
 19 MS. MANTOAN: Same objections.  
 20 BY MR. GARCIA:  
 21 Q. Do you know if --  
 22 MS. MANTOAN: Are you going to let her answer  
 23 the question?  
 24 THE WITNESS: (Shakes head.)  
 25 MR. GARCIA: Well, she was shaking her head.

1 Q. Please give a verbal --  
 2 A. I didn't mean to be shaking my head.  
 3 Managers have the discretion. And so what you're asking  
 4 me is to get into the head of a manager, which I cannot  
 5 do. So I need you to be more specific.  
 6 Q. Did you attend any training when you worked  
 7 for Lisa Gordon that addressed what managers should  
 8 consider for compensation when hiring people?  
 9 MS. MANTOAN: Objection; vague, ambiguous as to  
 10 "should."  
 11 THE WITNESS: That doesn't sound familiar,  
 12 so -- but I don't recall.  
 13 BY MR. GARCIA:  
 14 Q. Since March 1st, has Oracle made any  
 15 communications to its employees of Redwood Shore  
 16 regarding compensation?  
 17 MS. MANTOAN: Objection; calls for speculation.  
 18 BY MR. GARCIA:  
 19 Q. Do you know of any?  
 20 MS. MANTOAN: Objection; vague.  
 21 THE WITNESS: You're using the word "March  
 22 1st," and I'm not certain if you're referring to  
 23 something specific.  
 24 BY MR. GARCIA:  
 25 Q. I'm asking, to your knowledge --

1 A. You need to give me more information.  
 2 Q. To your knowledge, from March 1st, 2019, to  
 3 the present, has Oracle made any communications to its  
 4 employees who worked at Redwood Shores regarding  
 5 compensation?  
 6 MS. MANTOAN: Objection; vague, calls for  
 7 speculation.  
 8 BY MR. GARCIA:  
 9 Q. I'm asking you about what your knowledge is.  
 10 Do you know of anything?  
 11 MS. MANTOAN: Is the question about  
 12 communication to all employees or any individual  
 13 communication that had anything to do with pay?  
 14 MR. GARCIA: My question is, does she know of  
 15 any communication to any employee at Redwood Shores since  
 16 March 1st, 2019, to the present regarding compensation?  
 17 MS. MANTOAN: Objection; vague and ambiguous.  
 18 THE WITNESS: I don't know what you're  
 19 referring to.  
 20 BY MR. GARCIA:  
 21 Q. I'm not referring to anything specific. I'm  
 22 just asking you what your knowledge is regarding any  
 23 communication regarding pay to anyone -- to any of  
 24 Oracle's employees since March 1st, 2019, to the present.  
 25 MS. MANTOAN: Objection; vague and ambiguous,

1 compound.  
2 THE WITNESS: You're referencing March 1st, so  
3 I don't understand the relevance of March 1st, so I can't  
4 answer that question.  
5 BY MR. GARCIA:  
6 Q. Well, I guess what I'm saying is -- I'm not  
7 saying any communication in your lifetime at Oracle. I'm  
8 just saying do you know of any communications since  
9 March 1st, 2019, regarding pay?  
10 MS. MANTOAN: Objection. It's vague and  
11 ambiguous and compound.  
12 THE WITNESS: You're referencing March 1st. I  
13 don't know what you're referring to. Can you be more  
14 specific?  
15 BY MR. GARCIA:  
16 Q. My question is broad because I don't know all  
17 the communications that you know of --  
18 A. And I don't, either.  
19 Q. -- so I can't refer -- you don't know which  
20 communications that you --  
21 A. I don't know what you're referencing.  
22 Q. My question is, what do you know about  
23 communications regarding pay since March 1st, 2019?  
24 MS. MANTOAN: Objection; vague and ambiguous  
25 and compound.

1 THE WITNESS: You've got to be more specific.  
2 BY MR. GARCIA:  
3 Q. Did Oracle communicate anything to the  
4 rank-and-file employees regarding pay since March 1st,  
5 2019, who are located at Redwood Shores?  
6 MS. MANTOAN: Objection; vague and ambiguous as  
7 to "rank and file" and as to "Oracle," and compound.  
8 BY MR. GARCIA:  
9 Q. You know when I mean Oracle, I mean Oracle  
10 America, Incorporated, right?  
11 A. I understand that.  
12 Q. Okay. Because she just said it was vague and  
13 ambiguous.  
14 MS. MANTOAN: Well, a legal entity cannot  
15 communicate. A person communicates. Someone sends an  
16 email or talks.  
17 BY MR. GARCIA:  
18 Q. To your knowledge -- again, your knowledge --  
19 has Oracle conducted any analysis based on gender  
20 regarding compensation?  
21 A. Not to my knowledge.  
22 Q. To your knowledge, has Oracle conducted any  
23 analysis of pay based on race?  
24 MS. MANTOAN: Objection. It's vague and  
25 ambiguous, as was the prior question.

1 THE WITNESS: Not to my knowledge. I just  
2 don't know. I don't know if I should say "don't know" or  
3 "not to my knowledge," but --  
4 BY MR. GARCIA:  
5 Q. I think they mean --  
6 A. Same thing, right?  
7 Q. -- the same thing.  
8 I'm going to ask the question slightly  
9 different in the hopes that it may refresh your memory.  
10 Before, I asked globally for Oracle. Now I'm  
11 going to limit it to Redwood Shores.  
12 A. Okay.  
13 Q. Has Oracle conducted any analysis of pay for  
14 any -- based on gender for anyone at Redwood Shores?  
15 MS. MANTOAN: Objection. It's vague and  
16 ambiguous, calls for speculation. It's asked and  
17 answered.  
18 BY MR. GARCIA:  
19 Q. Do you know?  
20 A. I don't know.  
21 Q. Again, you have to answer orally instead of  
22 shaking your head sideways. Okay?  
23 A. Well, I answered, and I shook my head at the  
24 same time.  
25 Q. Okay. Just making sure.

1 Did Oracle, just for Redwood Shores --  
2 A. I understand -- sorry.  
3 Q. -- ever conduct any analysis based on race  
4 for compensation?  
5 MS. MANTOAN: Objection. It's vague and  
6 ambiguous, it calls for speculation, and it's asked and  
7 answered.  
8 THE WITNESS: I don't know.  
9 BY MR. GARCIA:  
10 Q. To your knowledge, did U.S. compensation team  
11 ever analyze the pay of anyone in Oracle, in the United  
12 States, based upon gender?  
13 MS. MANTOAN: Objection. It's vague and  
14 ambiguous. It's compound --  
15 THE WITNESS: I don't know.  
16 MS. MANTOAN: -- it calls for speculation.  
17 BY MR. GARCIA:  
18 Q. Same question for race now. To your  
19 knowledge, did the U.S. compensation team ever analyze  
20 pay -- or strike that -- ever analyze compensation based  
21 upon race?  
22 MS. MANTOAN: Objection; vague and ambiguous,  
23 compound, calls for speculation, and it is also asked and  
24 answered.  
25 THE WITNESS: I don't know.

1 BY MR. GARCIA:  
2 Q. So you identified that Oracle conducted focal  
3 reviews in 2019 over the last several months and in 2018,  
4 correct?  
5 A. Correct.  
6 Q. When did Oracle conduct the focal review in  
7 2018?  
8 A. The increases were effective January 1st of  
9 2018, which would have meant we would have conducted it  
10 in late fall, early winter.  
11 Q. Now, for the focal review of 2019, do you  
12 know when those raises would go into effect?  
13 A. June 1st.  
14 Q. To your knowledge, has Oracle ever conducted  
15 two focal reviews in such close proximity where the  
16 raises went into effect in less than six months prior to  
17 this 2018 and 2019 one?  
18 MS. MANTOAN: Objection; assumes facts, vague  
19 and ambiguous.  
20 THE WITNESS: So, January of 2018, June of  
21 2019 --  
22 BY MR. GARCIA:  
23 Q. Oh, I'm sorry --  
24 A. That's over a year.  
25 Q. I misspoke. I thought you were saying

1 January 1st, 2019.  
2 A. No. 2018.  
3 Q. My apologies.  
4 In terms of the focal reviews, from when it's  
5 communicated that one will be given to when the salaries  
6 are increased -- strike that.  
7 From when it's communicated that a focal review  
8 is beginning to when it's completed, on average, how long  
9 does that take?  
10 MS. MANTOAN: Objection; vague and ambiguous.  
11 BY MR. GARCIA:  
12 Q. Couple of months?  
13 A. Broadly, on average, it could be three  
14 months.  
15 Q. An average of three months, give or take?  
16 A. Give or take.  
17 Q. Okay. That's what I'm trying to find out.  
18 To your knowledge, did Oracle increase the pay  
19 of any female employees at Redwood Shores sometime  
20 between December 1st, 2018, and March 31st, 2019?  
21 A. I'm sorry. What were the dates again?  
22 Q. December 1st, 2018, to March 31st, 2019.  
23 A. I don't know.  
24 Q. But there was no focal review that would have  
25 caused salary increases to occur during that time,

1 correct? To your knowledge.  
2 A. I'm sorry. I don't understand the question.  
3 Q. Okay. So what I understand you to say  
4 earlier is that salaries from the 2019 focal review went  
5 in effect on June 1st.  
6 A. Mm-hmm.  
7 MS. MANTOAN: Misstates testimony. June 1st  
8 hasn't happened.  
9 BY MR. GARCIA:  
10 Q. 2019. Would go into effect --  
11 A. They're effective, yes.  
12 Q. -- as of that date?  
13 And you also said that the last time salaries  
14 were effective was as January 1st, 2018, correct?  
15 A. Correct.  
16 Q. So was there any focal review that would have  
17 caused salaries increases between December 1st, 2018, and  
18 March 31st, 2019?  
19 A. What do you mean by "focal review"?  
20 Q. Did any focal review happen that would have  
21 caused salaries increases? What you identified as focal  
22 review, I'm just trying to understand, did a focal review  
23 take place in 2018?  
24 MS. MANTOAN: Objection. It's asked and  
25 answered.

1 THE WITNESS: Salary increases are effective  
2 January 1st of 2018.  
3 BY MR. GARCIA:  
4 Q. Right. And that's because of a focal review  
5 that took place in 2017, correct?  
6 A. Correct.  
7 Q. Okay. Earlier, you stated that a focal  
8 review occurred in 2018. Do you remember that?  
9 A. I remember you were giving me dates and going  
10 down the line for history, and I couldn't recall. So  
11 what I do recall is, January 1st, 2018, increases were  
12 effective, and June 1st, the beginning of our fiscal  
13 year, increases will be effective.  
14 Q. Right.  
15 And as you just spoke, the increase that was  
16 effective on January 1st, 2018, the focal review happened  
17 in 2017 for that increase, correct?  
18 A. The pre-work happened. The process happened.  
19 Q. The process happened in 2017?  
20 A. Correct.  
21 Q. Did a focal review process ever happen in  
22 2018?  
23 MS. MANTOAN: You're talking a calendar year,  
24 not a fiscal year, correct?  
25 BY MR. GARCIA:

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1 Q. I'm talking a calendar year, 2018, did a  
2 focal review process ever happen in that year?  
3 A. No.  
4 Q. And were you considering the focal review  
5 process that happened in the latter half of 2017 to be  
6 fiscal year 2018?  
7 MS. MANTOAN: Objection; vague and ambiguous.  
8 BY MR. GARCIA:  
9 Q. The focal review --  
10 A. I'm referring to those two dates.  
11 Q. Okay. So the focal review process that  
12 occurred that resulted in the January 1st, 2018, salary  
13 increase --  
14 A. Okay.  
15 Q. -- what Oracle fiscal year did that occur in?  
16 A. That would have been fiscal year eight --  
17 that would have been fiscal year '18.  
18 Q. And Oracle's fiscal year starts on June 1st?  
19 A. June 1st.  
20 Q. And goes to May 31st, correct?  
21 A. Right.  
22 Q. Are you familiar with the global job table,  
23 Oracle's global job table?  
24 A. Yes.  
25 Q. Okay. And does Oracle's global job table

1 consist of five parts: a job function, a job specialty, a  
2 job title, a job code, and a global career level?  
3 A. Yes.  
4 Q. And the combination of a job function, a job  
5 specialty, a job title, and a global career level results  
6 in a unique job code; is that correct?  
7 A. Correct.  
8 Q. And that unique job code doesn't have -- only  
9 has one combination of a job function, job specialty, job  
10 title, and global career level, correct?  
11 A. Correct.  
12 Q. And that job code has a salary and grade  
13 assigned to it, correct?  
14 A. Correct.  
15 Q. But that salary grade can be assigned to  
16 multiple job codes, correct?  
17 A. Correct.  
18 Q. And that salary grade has a salary range  
19 assigned to it, correct?  
20 A. Correct.  
21 Q. And each salary grade only has --  
22 A. In most cases.  
23 Q. And what are the exceptions?  
24 A. Executive.  
25 Q. And by "executive," you mean what management

1 level and above? M7 and above?  
2 A. It would generally be -- no. It's above M7.  
3 It would generally be M8 and above.  
4 Q. Okay. Thank you.  
5 Now, each salary grade would only have one  
6 salary range assigned to it, correct, that would change  
7 over years?  
8 MS. MANTOAN: Is your question limited to HQ, a  
9 single location?  
10 THE WITNESS: Yeah.  
11 MR. GARCIA: Okay. Thank you.  
12 Q. My questions for the global job table are  
13 related to Redwood Shores. Do you understand that?  
14 A. Okay.  
15 Q. Would your answers change?  
16 A. Can you restate what you just -- the  
17 question?  
18 Q. Would your answers have changed about what  
19 you just said for the job function, job specialty,  
20 because I didn't mention Redwood Shores, or do --  
21 A. No.  
22 Q. Okay. Thank you.  
23 So would each salary grade only have at any one  
24 point in time one salary range associated with it?  
25 MS. MANTOAN: Again, is this limited to at HQ?

1 MR. GARCIA: Right --  
2 THE WITNESS: At HQ?  
3 BY MR. GARCIA:  
4 Q. All these questions, until I say otherwise,  
5 are for the Redwood Shores headquarters.  
6 A. Okay. Yes.  
7 Q. Do you know if Oracle considers jobs having  
8 the same salary grade to have the same value to Oracle?  
9 MS. MANTOAN: Objection; vague, calls for  
10 speculation, vague as to "value."  
11 THE WITNESS: Can you restate that?  
12 BY MR. GARCIA:  
13 Q. Let me just show you a document. Now,  
14 previously, we had some documents that were previously  
15 marked in a previous deposition, and so we're going to  
16 sequentially select and use the exhibit number. So that  
17 was Exhibit 7 from Ms. Waggoner's deposition.  
18 Now, have you ever seen the document at  
19 Exhibit 7 before?  
20 A. Yes.  
21 Q. What is it?  
22 A. Managing compensation, July of 2016.  
23 Q. And would this be a document that the global  
24 compensation team posted that someone in H.R. could  
25 access?

1 A. This is -- so this is a document that when it  
 2 was created, I don't believe global compensation existed.  
 3 Q. Okay. Do you know what team created it?  
 4 A. I know who created it.  
 5 Q. Okay. Who created it?  
 6 A. Kate Waggoner.  
 7 Q. Now, again, the document has numbers in the  
 8 lower right-hand column. So I'm going to refer you to  
 9 56234-5. So there's a short depiction of a global job  
 10 table, correct?  
 11 A. Correct.  
 12 Q. Now, I'm going to refer you to the next page.  
 13 If you could turn the page.  
 14 A. Mm-hmm.  
 15 Q. And again, this exhibit was a PowerPoint that  
 16 had notes.  
 17 A. Mm-hmm.  
 18 Q. And so the next page is the notes of the  
 19 slide on the previous page, and it lists various  
 20 definitions of what a job code, job title, job function,  
 21 specialty area, global -- or career level are. Are those  
 22 statements true?  
 23 A. Give me one minute.  
 24 MS. MANTOAN: Take your time to read.  
 25 Objection; calls for speculation as to whether  
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1 -- whatever was meant by the author of this document is  
 2 what she would mean.  
 3 BY MR. GARCIA:  
 4 Q. I'm just asking you if those statements, as  
 5 they're listed there, if they're true and correct --  
 6 MS. MANTOAN: Same objections.  
 7 BY MR. GARCIA:  
 8 Q. -- to your knowledge.  
 9 MS. MANTOAN: Same objections.  
 10 THE WITNESS: Okay. So I didn't author it.  
 11 BY MR. GARCIA:  
 12 Q. I understand that. To your knowledge, are  
 13 those statements true and correct?  
 14 MS. MANTOAN: Same objections.  
 15 THE WITNESS: The only thing I would question  
 16 is the number of job codes we have. System title...  
 17 BY MR. GARCIA:  
 18 Q. So the number of 13, you would -- 1,300 you  
 19 would question?  
 20 A. I would question.  
 21 Q. Anything else you would question?  
 22 A. No.  
 23 Q. Now, do you know, of these five -- I'm going  
 24 to call them "core elements" -- the job function, job  
 25 specialty, global career level, job title, and job code.  
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1 Do you understand that?  
 2 A. Mm-hmm.  
 3 Q. Do you know if any of those five elements are  
 4 communicated to Oracle employees beyond those in human  
 5 resources?  
 6 MS. MANTOAN: Objection; vague and ambiguous.  
 7 About themselves? About the peers? About who?  
 8 BY MR. GARCIA:  
 9 Q. I'm just asking you, does -- has Oracle,  
 10 like, post on its intracompany website information that  
 11 an employee can look at to find out what their job  
 12 specialty is, what their job function is, what their job  
 13 code is? Do you know?  
 14 A. I don't think an employee would be able to  
 15 access -- they can't access the global job title table  
 16 that I'm aware of.  
 17 Q. Okay. So --  
 18 MS. MANTOAN: Was the question, though, about  
 19 the whole thing, or was it about the employee-specific  
 20 identifiers?  
 21 BY MR. GARCIA:  
 22 Q. So I'm not asking about can they access the  
 23 global job table. I'm asking can an employee,  
 24 individually, access something on Oracle's internal  
 25 website where they can find out what the employee's  
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1 individual job function, job specialty, job code, job  
 2 title, and global career level?  
 3 MS. MANTOAN: Do you understand the question?  
 4 THE WITNESS: I don't understand the question.  
 5 Sorry.  
 6 BY MR. GARCIA:  
 7 Q. Is there any place an employee can go to to  
 8 find out what his global career level is on Oracle's  
 9 internal website?  
 10 A. They could see it on ARIA.  
 11 Q. So the global career level is located on the  
 12 ARIA? Everybody can see their own global career level?  
 13 A. Correct.  
 14 Q. Can the employee see their systems title on  
 15 ARIA as well?  
 16 A. I believe it's system title. A title is on  
 17 ARIA.  
 18 Q. Do you know whether it's discretionary --  
 19 A. I don't. I don't.  
 20 Q. That's fine. I'm just trying to answer --  
 21 ask you.  
 22 Do you know if an employee's job code is on the  
 23 ARIA for them to access?  
 24 A. I'm just trying to think of my own. Not with  
 25 certainty.  
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1 Q. How about job specialty?  
2 A. No.  
3 Q. No, meaning that it's not on ARIA --  
4 A. I don't believe it is --  
5 MS. MANTOAN: Objection; calls for  
6 speculation --  
7 THE WITNESS: Yeah, I better not --  
8 THE REPORTER: Wait. I'm sorry --  
9 THE WITNESS: I'm going to say I don't know.  
10 BY MR. GARCIA:  
11 Q. Job function. Is job function on ARIA for an  
12 employee to look at?  
13 MS. MANTOAN: Objection; calls for speculation  
14 if you're asking her about other employee.  
15 BY MR. GARCIA:  
16 Q. Do you know?  
17 A. I don't believe so.  
18 Q. Okay. Now, does employee have -- can access  
19 what salary grade they're assigned to any place?  
20 A. To my knowledge, no.  
21 Q. Can an employee access what salary range is  
22 associated with the salary grade that they were assigned?  
23 MS. MANTOAN: You're asking if an employee can  
24 see the range for their own position?  
25 MR. GARCIA: Yes.

1 THE WITNESS: I don't believe so.  
2 BY MR. GARCIA:  
3 Q. Can an employee see what their compa ratio --  
4 or strike that.  
5 Are you familiar with the term "compa ratio"?  
6 A. Yes.  
7 Q. What does "compa ratio" mean?  
8 A. Compa ratio is taking an employee's annual  
9 base salary and dividing it by the midpoint of the salary  
10 range.  
11 Q. Thank you.  
12 Do you know whether an Oracle employee -- and  
13 again, these are at Redwood Shores -- can see what their  
14 compa ratio is anywhere on Oracle's internal website?  
15 A. I don't believe they can.  
16 Q. Do you know if -- does Oracle on a  
17 reoccurring basis ever just distribute information to an  
18 employee -- strike that.  
19 To your knowledge, now, does Oracle on a  
20 reoccurring basis ever distribute compa ratio, salary  
21 range, or salary grade employee to see what their own  
22 individual ones are?  
23 MS. MANTOAN: Objection; vague and ambiguous  
24 and compound.  
25 BY MR. GARCIA:

1 Q. To your knowledge, had you ever seen that?  
2 A. To my knowledge, no --  
3 MS. MANTOAN: Same objections.  
4 THE WITNESS: -- no.  
5 MS. MANTOAN: Make sure you wait after the  
6 question to give time to interpose an objection.  
7 THE WITNESS: Thank you.  
8 BY MR. GARCIA:  
9 Q. Now, the focal reviews that you were talking  
10 about where the guidelines and processes were rolled out,  
11 is that ever made available to non-H.R. employees?  
12 MS. MANTOAN: Objection; calls for speculation,  
13 vague and ambiguous.  
14 BY MR. GARCIA:  
15 Q. To your knowledge.  
16 A. To my knowledge, no.  
17 Q. Do you know why Oracle does not make  
18 available to employees in ARIA information related to  
19 their salary grades and salary ranges and compa ratios?  
20 MS. MANTOAN: Objection; assumes facts not in  
21 evidence and calls for speculation.  
22 THE WITNESS: I don't know.  
23 BY MR. GARCIA:  
24 Q. You previously identified that you know  
25 someone by the name of Shauna Holman-Harries, and she's

1 at different times been a director, senior director of  
2 diversity compliance, correct?  
3 A. I know of her.  
4 Q. Do you know what she does?  
5 A. I know she's in diversity.  
6 Q. And do you know what she does related to  
7 OFCCP?  
8 A. No.  
9 Q. Do you know that OFCCP conducts audits?  
10 A. Yes.  
11 Q. Have you ever been involved with an audit  
12 that OFCCP conducts?  
13 MS. MANTOAN: Objection; vague. Are you asking  
14 at Oracle?  
15 MR. GARCIA: I'm asking at Oracle.  
16 THE WITNESS: At Oracle, no.  
17 BY MR. GARCIA:  
18 Q. Have you ever been involved with an OFCCP  
19 audit with another company?  
20 A. Yes.  
21 Q. And when was that?  
22 A. Back in the early '90s.  
23 Q. Okay. At your time at Oracle, did anyone  
24 ever ask you to provide information for an OFCCP audit?  
25 MS. MANTOAN: Objection; calls for speculation

1 that you understood that was the reason they were asking  
2 for it.

3 THE WITNESS: I don't believe so.

4 BY MR. GARCIA:

5 Q. So are you saying you don't know?

6 A. I don't know.

7 Q. Did Shauna Holman-Harries' team ever ask you  
8 for compensation information?

9 A. No.

10 Q. Did you ever provide any compensation  
11 information to Shauna Holman-Harries' team?

12 A. No.

13 Q. Did you ever provide any compen- -- do you  
14 know who Juana Schurman is?

15 A. I know Juana, yes.

16 Q. Did you ever provide her any compensation --

17 MS. MANTOAN: Objection. That clearly seeks to  
18 invade privilege, and I'm going to instruct you not to  
19 answer.

20 MR. GARCIA: I'm not asking about her -- strike  
21 that.

22 Q. Did you provide any documents to Juana  
23 Schurman?

24 MS. MANTOAN: I'm going to object that that  
25 seeks to invade the attorney-client privilege. Instruct  
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1 the witness not to answer.

2 MR. GARCIA: We have to establish whether it  
3 applies, because if she didn't apply -- if she didn't  
4 provide any documents, then the attorney-client privilege  
5 doesn't apply. Second, I'm not asking what the  
6 information contained within the documents are.

7 Q. I'm just simply asking, have you ever  
8 provided any documents to Juana Schurman?

9 MS. MANTOAN: I'm going to continue with the  
10 privilege objection. I think who counsel is speaking  
11 with and why they're speaking with them is privileged. I  
12 don't think you're entitled to invade that privilege.

13 MR. GARCIA: I'm not asking why you're speaking  
14 with -- I'm not asking why she's providing it. I'm not  
15 asking what she provided.

16 Q. I'm simply asking, did you provide documents  
17 at any time to counsel?

18 MS. MANTOAN: I don't think you're entitled to  
19 that, Counsel. I think it invades the privilege to ask  
20 if a witness has provided documents --

21 MR. GARCIA: Because if you did --

22 MS. MANTOAN: -- been asked to provide and  
23 provided documents --

24 MR. GARCIA: If it did, it's supposed to be  
25 listed in a privilege log, and that's what I'm trying to  
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1 determine, Counsel. And because you have to denote in a  
2 privilege log all documents that involve -- for which you  
3 are asserting a privilege, I have a right to know.

4 MS. MANTOAN: It was a categorical log that we  
5 served.

6 MR. GARCIA: So her name wasn't listed in the  
7 categorical privilege log that you did. So that's what  
8 I'm asking.

9 Q. Did you at any time provide documents to  
10 Juana Schurman?

11 A. That's attorney-client privilege. I can't  
12 answer.

13 MR. GARCIA: So you're -- are you instructed  
14 your client not to answer that question, Counsel?

15 MS. MANTOAN: I think you're trying -- are you  
16 trying to -- is this a question about the privilege log?

17 MR. GARCIA: I'm asking -- because she was not  
18 referenced in the privilege log, I'm asking, did you  
19 provide documents to Juana Schurman? That's all I'm  
20 asking. It's either a "yes" or "no." And to my  
21 knowledge, it's not subject to a privilege objection,  
22 because I'm not asking about the contents of the  
23 documents. I'm not asking about why they were provided.  
24 I'm not --

25 MS. MANTOAN: Well, as you know, the privilege  
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1 issues are a little thorny here, because who people  
2 choose to speak with and what they choose to ask them  
3 about can be privileged, so I -- just let me finish on  
4 the record, please.

5 I will let you answer the very limited question  
6 of whether you have ever sent documents directly to Juana  
7 Schurman within the timeframe that's relevant here, which  
8 is from 2013 forward --

9 MR. GARCIA: The first question is, did you  
10 send the documents? Then I will ask a question about  
11 timeframe.

12 MS. MANTOAN: No, there's only a certain  
13 timeframe relevant to the litigation --

14 BY MR. GARCIA:

15 Q. Okay. So did you send any documents to Juana  
16 Schurman from January 1st, 2013, to January 18th, 2019?

17 THE WITNESS: You're instructing me to answer  
18 it? Because I think it's attorney-client privilege.

19 MS. MANTOAN: Can we take a break so I can  
20 speak with my client? Off the record. I want to protect  
21 the privilege. I want to give you what you're entitled  
22 to, but I also want to protect the privilege.

23 MR. GARCIA: Yes, we may take a break. I agree  
24 to that.

25 MS. MANTOAN: Thank you.  
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1 THE VIDEOGRAPHER: This marks the end of media  
 2 file labeled number three. Off the record at 12:04 p.m.  
 3 (Recess from 12:04 p.m. to 12:11 p.m.)  
 4 THE VIDEOGRAPHER: This marks the beginning of  
 5 media file labeled number four. Back on the record at  
 6 12:11 p.m.  
 7 MR. GARCIA: So the question, Counsel, pending  
 8 is, I'm asking the witness did she provide documents to  
 9 Juana Schurman. Are you instructing her to answer or not  
 10 answer that question?  
 11 MS. MANTOAN: She can answer that limited  
 12 question.  
 13 THE WITNESS: No.  
 14 BY MR. GARCIA:  
 15 Q. And again, you knew that that question was  
 16 for the time period of January 1st, 2013, to  
 17 January 18th, 2019, when you answered that, correct?  
 18 A. Correct.  
 19 Q. Does Oracle currently consider prior salaries  
 20 when hiring someone?  
 21 MS. MANTOAN: Objection. It's vague and  
 22 ambiguous, compound, and it calls for speculation.  
 23 BY MR. GARCIA:  
 24 Q. Do you know?  
 25 MS. MANTOAN: Same objections. It's compound.

1 You're bringing in every prior salary decision and  
 2 starting salary decision in the whole company in that  
 3 question.  
 4 BY MR. GARCIA:  
 5 Q. Okay. For the United States, does Oracle  
 6 currently consider current salaries when it's hiring  
 7 someone currently?  
 8 MS. MANTOAN: Objection. Same objections.  
 9 It's compound, it's vague and ambiguous, calls for  
 10 speculation.  
 11 THE WITNESS: Are you asking me with regards to  
 12 every manager at Oracle? Can you --  
 13 MS. MANTOAN: Are you asking about a policy, or  
 14 are you asking about a practice, or are you asking about  
 15 the decision?  
 16 BY MR. GARCIA:  
 17 Q. I'm just asking, do you know whether a  
 18 manager in the United States can currently ask someone  
 19 who they're considering whether to hire what that  
 20 person's current salary is?  
 21 MS. MANTOAN: Objection. It's vague and  
 22 ambiguous, and it calls for speculation.  
 23 THE WITNESS: If you're referencing every  
 24 manager, I can't answer that.  
 25 BY MR. GARCIA:

1 Q. Do you know if any manager in the United  
 2 States can currently ask anyone who they're interested in  
 3 hiring what their current salary is?  
 4 MS. MANTOAN: Objection. It's overbroad. The  
 5 whole U.S.? It's vague and ambiguous as to "can." I'm  
 6 not sure if you're asking if they are physically able to  
 7 or if there's any policy or directive about whether they  
 8 should do so. The question --  
 9 BY MR. GARCIA:  
 10 Q. I'm not talking about their physical ability  
 11 as a human being to ask a question. I'm asking, does --  
 12 can a manager who works at Oracle ask in the United  
 13 States for a job in the United States, for a person who  
 14 they're interviewing, ask any person what their current  
 15 pay is? Do you know?  
 16 MS. MANTOAN: Same objections.  
 17 THE WITNESS: They should not be asking about  
 18 current pay.  
 19 BY MR. GARCIA:  
 20 Q. And why is that?  
 21 A. If you're speaking about a new hire.  
 22 Q. And why?  
 23 A. That is the guideline that they've been  
 24 provided.  
 25 Q. Now, the guidelines that Oracle provides, are

1 managers required to abide by them?  
 2 MS. MANTOAN: Objection; vague and ambiguous,  
 3 lack of foundation, calls for speculation. She's not  
 4 even herself a manager. She doesn't have those  
 5 responsibilities.  
 6 BY MR. GARCIA:  
 7 Q. I'm asking you for the guideline that you  
 8 just identified for me. Does a manager have to abide by  
 9 that?  
 10 MS. MANTOAN: Same objections.  
 11 THE WITNESS: And what I'm stating is, we  
 12 provided a guideline to managers that they should not ask  
 13 about prior salary.  
 14 BY MR. GARCIA:  
 15 Q. Okay. And I'm asking you is, does a manager  
 16 have to follow that guideline, or can a manager choose to  
 17 disregard that guideline?  
 18 MS. MANTOAN: Objection; asked and answered.  
 19 THE WITNESS: Managers should not be asking  
 20 about prior salary. Can I control their behavior? No.  
 21 But generally speaking, they should not be asking about  
 22 prior salary.  
 23 BY MR. GARCIA:  
 24 Q. Because it's a guideline, correct?  
 25 MS. MANTOAN: Objection; misstates the

1 testimony.  
 2 BY MR. GARCIA:  
 3 Q. You can answer the question.  
 4 A. I believe I did reference it as a guideline.  
 5 I mean, they've been directed not to ask about prior  
 6 salary.  
 7 Q. Okay. Now, before, when you were talking  
 8 about the guidelines that Kate Waggoner group posts for  
 9 compensation, do you remember those?  
 10 A. If you're -- with regards to...?  
 11 Q. Well, I think you said regarding they would  
 12 post guidelines regarding base pay, variable pay, and  
 13 equity?  
 14 A. Okay.  
 15 Q. Do you remember --  
 16 A. Yeah.  
 17 Q. And so in those guidelines, did they operate  
 18 the same way, that managers are directed to follow them?  
 19 MS. MANTOAN: Objection; misstates the  
 20 testimony. It's vague and ambiguous. It's compound.  
 21 You're asking her if the prior pay policy now is  
 22 different or the same that it was before or --  
 23 MR. GARCIA: I'm not asking anything about  
 24 prior pay, Counsel.  
 25 Q. I'm trying to understand what you mean by

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1 "guidelines." So let me just ask that. When you say  
 2 "guidelines," what do you mean by "guidelines"?  
 3 A. Okay. Let me go back --  
 4 Q. I want you to answer my question. Just by  
 5 guidelines, when you mention the word "guidelines," what  
 6 do you mean when you say "guidelines"?  
 7 A. We are providing managers, quote-unquote,  
 8 guidelines in order for them to be able to manage  
 9 compensation. When it comes to prior salary, they've  
 10 been instructed not to ask.  
 11 Q. So are you differentiating between the  
 12 guidelines for prior salary and the compensation  
 13 guidelines in terms of the requirements for managers to  
 14 follow them?  
 15 MS. MANTOAN: Objection; vague and ambiguous,  
 16 misstates her testimony.  
 17 THE WITNESS: When we speak about prior salary,  
 18 we're speaking about -- actually, we're speaking about  
 19 both. We're speaking about external hires, as well as  
 20 internal hires. When we're speaking about focal, we're  
 21 speaking about existing employees.  
 22 BY MR. GARCIA:  
 23 Q. Okay. So my question concerns what you mean  
 24 about guidelines. Before, you told me policy -- you  
 25 interpret a policy as a rule or requirement. Do you

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1 remember that testimony?  
 2 A. I don't remember the context of that  
 3 testimony.  
 4 Q. Okay. Let me ask it this way. Are managers  
 5 required to follow the guidelines?  
 6 MS. MANTOAN: Objection; vague as to what  
 7 guideline you're talking about.  
 8 BY MR. GARCIA:  
 9 Q. For the prior pay guideline, are managers  
 10 required to follow it?  
 11 A. Yes.  
 12 Q. Are managers required to follow the  
 13 compensation guidelines that we talked about earlier  
 14 today?  
 15 MS. MANTOAN: Objection. It's vague and  
 16 ambiguous, and it's compound.  
 17 THE WITNESS: Those are guidelines. It's...  
 18 BY MR. GARCIA:  
 19 Q. Right. You just identified that --  
 20 A. They're not a requirement.  
 21 Q. Okay. So you're saying for the compensation  
 22 guidelines that Kate Waggoner posts, it's not a  
 23 requirement for the managers to follow them, but for the  
 24 prior pay guidelines, it is a requirement for the  
 25 managers to follow them? Is that a correct understanding

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1 of what you just said?  
 2 MS. MANTOAN: Objection. It misstates her  
 3 testimony. It lacks foundation. She's not the person  
 4 making these policies. And it feels, Counsel, you're  
 5 trying to trip her up on the word "guideline" when she's  
 6 been clear about one thing being required and one thing  
 7 being recommended.  
 8 MR. GARCIA: Counsel, again, you're not  
 9 supposed to give speaking objections.  
 10 MS. MANTOAN: You're not supposed to ask the  
 11 same question over and over.  
 12 MR. GARCIA: Counsel, please refrain from  
 13 giving speaking objections.  
 14 MS. MANTOAN: Please refrain from asking the  
 15 same question over and over of a witness when you don't  
 16 like the answer.  
 17 BY MR. GARCIA:  
 18 Q. So what does "guidelines" mean to you? Can  
 19 you tell me what that means? I'm not asking for an  
 20 example. I'm not asking for one. I'm asking, what does  
 21 "guidelines" mean to you in terms of your usage of it  
 22 today?  
 23 A. I would refer to a guideline as that. It's a  
 24 guideline. It's not a mandatory requirement. It's to  
 25 provide information to managers to allow them to make

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1 appropriate pay decisions as a guideline.  
2 Q. And you referred to the prior pay as a  
3 guideline, correct?  
4 A. No. I referred to the prior pay as a  
5 requirement. We are not allowing managers to ask about  
6 prior pay, and they've been instructed not to ask.  
7 Q. Because where I was confused, because you  
8 initially said, "prior pay guidelines." You remember  
9 that?  
10 A. Mm-hmm, I do.  
11 Q. So were managers prior -- when was this  
12 instruction given to managers?  
13 MS. MANTOAN: Objection; calls for speculation,  
14 lacks foundation.  
15 THE WITNESS: I don't know. I don't know the  
16 date.  
17 BY MR. GARCIA:  
18 Q. Again, you say "date." So do you know if it  
19 occurred earlier this year?  
20 MS. MANTOAN: Same objections.  
21 THE WITNESS: It may have occurred earlier this  
22 year. It may have occurred towards the end of last year.  
23 It occurred within the last year.  
24 BY MR. GARCIA:  
25 Q. I'm going to be referring to another exhibit  
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1 that we used in the Waggoner deposition. Have you seen  
2 this exhibit that's listed as Exhibit 3 before?  
3 A. Yes.  
4 Q. Does this refresh your memory as to when the  
5 prior pay came into effect?  
6 MS. MANTOAN: I'm going to object to this thing  
7 you're showing. You know there are multiple versions of  
8 this. You're showing the witness one of --  
9 MR. GARCIA: Counsel, again, you're giving a  
10 speaking objection.  
11 Q. Go ahead and answer.  
12 A. It states: "Effective October 31st, 2017."  
13 Q. Okay. Does that refresh your memory as to  
14 when the policy changed?  
15 A. I'm assuming it's correct. I don't know.  
16 Q. Now, you said you've seen this document  
17 before, correct?  
18 A. Yes.  
19 Q. What is this document?  
20 MS. MANTOAN: Objection; calls for speculation,  
21 lacks foundation.  
22 THE WITNESS: This is U.S. pay equity FAQ for  
23 managers and H.R.  
24 BY MR. GARCIA:  
25 Q. Did the U.S. compensation team provide this  
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1 to -- this document to the H.R. business partners?  
2 MS. MANTOAN: Objection; calls for speculation.  
3 THE WITNESS: I don't know.  
4 BY MR. GARCIA:  
5 Q. Did you provide it to your business partner?  
6 A. No. This is the first -- the first time I  
7 saw this was yesterday.  
8 Q. Do you know whether Oracle had frequently  
9 asked questions for its prior pay policy prior to  
10 yesterday?  
11 MS. MANTOAN: Objection; vague and ambiguous.  
12 BY MR. GARCIA:  
13 Q. Go ahead.  
14 A. Prior to yesterday?  
15 Q. Yeah.  
16 A. I knew it existed, because I testified that  
17 we instructed managers not to ask about prior pay, but I  
18 have never seen this document.  
19 Q. I misspoke when I identified this document as  
20 Exhibit 3. It's actually Exhibit 13 from the Waggoner  
21 deposition.  
22 So I'm going to refer you to the first page of  
23 Exhibit 13, the right-hand column. Do you see the  
24 question that says -- so I'm going to read the question:  
25 "Does this mean..." Do you see that?  
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1 A. Yes, right here. Mm-hmm.  
2 Q. So I'm going to read the question. Quote,  
3 "Does this mean that Oracle cannot ask a candidate for  
4 his/her current or prior salary?" unquote.  
5 Did I read that correctly?  
6 A. Yes.  
7 Q. I'm going to read the answer right underneath  
8 it. Quote, "Yes, it means you can no longer ask a  
9 candidate for his or her current or prior salary,"  
10 unquote.  
11 I will acknowledge that it goes on before, but  
12 did I read that statement? Did I read it accurately?  
13 A. You read that one statement accurately.  
14 Q. Is that statement true?  
15 A. But it does go on.  
16 Q. Is that statement true?  
17 MS. MANTOAN: Objection; vague and ambiguous.  
18 The document speaks for itself.  
19 BY MR. GARCIA:  
20 Q. I'm just asking you, is that reference  
21 stating that people in Oracle can no longer ask a  
22 candidate for his or her current or prior salary, is that  
23 a true statement?  
24 A. Yes.  
25 Q. And that's what you testified earlier today,  
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1 correct?  
2 A. Correct.  
3 Q. And is Oracle putting this out because Oracle  
4 employees previously asked about their current or prior  
5 salary?  
6 MS. MANTOAN: Objection; calls for speculation,  
7 lack of foundation.  
8 BY MR. GARCIA:  
9 Q. Do you know?  
10 A. I don't know.  
11 Q. Did anyone brief you on this new guideline  
12 about not asking for prior pay?  
13 MS. MANTOAN: Objection; vague and ambiguous,  
14 misstates the testimony.  
15 BY MR. GARCIA:  
16 Q. Did anyone train you on that?  
17 MS. MANTOAN: Same objections.  
18 THE WITNESS: I'm aware of this policy.  
19 BY MR. GARCIA:  
20 Q. Is it a policy now?  
21 MS. MANTOAN: Objection. That's argumentative.  
22 She told you before that it was a policy.  
23 MR. GARCIA: No. She told me it was a  
24 guideline.  
25 THE WITNESS: I changed my testimony.

1 (Plaintiff's Exhibit 45 was marked for  
2 identification.)  
3 BY MR. GARCIA:  
4 Q. Are you familiar with the document marked as  
5 Exhibit 45?  
6 A. All right. Yes.  
7 Q. Do you recognize the document?  
8 A. I recognize that it's a document that I  
9 forwarded to the team.  
10 Q. So it's an email --  
11 A. Right.  
12 Q. -- that you forwarded --  
13 A. Forwarded.  
14 Q. -- to the team?  
15 A. Correct.  
16 Q. And what is the subject of the email?  
17 MS. MANTOAN: Objection. The document speaks  
18 for itself.  
19 BY MR. GARCIA:  
20 Q. You can go ahead and answer it.  
21 A. Manager impact. Changes to U.S. hiring  
22 process, effective October 31st, 2017.  
23 Q. So that's the subject of an email that you  
24 forwarded?  
25 A. That I forwarded. Right.

1 BY MR. GARCIA:  
2 Q. You're changing -- because before, you  
3 couldn't remember if there was a policy. So now you  
4 remember there is a compensation policy?  
5 MS. MANTOAN: Objection. It's vague and  
6 ambiguous -- it's argumentative. It's asked and  
7 answered, and I'm not going to let you harass the witness  
8 in that way and be argumentative in that way. Her  
9 testimony is what it is.  
10 THE WITNESS: Or maybe I used the word  
11 "requirement." What I stated was that managers are no  
12 longer -- managers can no longer ask about a candidate's  
13 prior salary.  
14 BY MR. GARCIA:  
15 Q. Right. And are you identifying that as a  
16 policy?  
17 A. I'm identifying that as they can no longer  
18 ask. That's --  
19 Q. Is that a rule to you?  
20 A. That's a rule to me, that they can't --  
21 they're not to ask.  
22 Q. Okay. Again, your prior testimony speaks for  
23 itself in terms of what you've testified to.  
24 Court reporter, please mark the next document  
25 as Exhibit 45.

1 Q. What team did you forward it to?  
2 A. Well, this would have gone to Kris Edwards,  
3 direct reports.  
4 Q. So that's everyone on the U.S. compensation  
5 team?  
6 A. That's my peers on the U.S. comp team,  
7 correct.  
8 Q. And it says, "What we are announcing." Do  
9 you see that at the bottom of Exhibit 13, which is Bates  
10 stamp number Oracle HQCA381115 to 11 -- 381117.  
11 A. Okay.  
12 Q. So do you see "what we are announcing" at the  
13 bottom of page 381115?  
14 A. Right.  
15 Q. And it talks about removing a salary field  
16 from the iRecruitment form.  
17 A. Okay. Yes.  
18 Q. Do you know what it's referring to?  
19 A. It is referring to a salary field that was on  
20 the iRecruitment offer form.  
21 Q. And why was it -- do you know anything about  
22 that offer form?  
23 A. As an individual contributor, I don't have  
24 the manager view, so I've never seen the actual view that  
25 a manager sees for iRecruitment.

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1 Q. You just know that it had a place --  
2 A. I just know it exists.  
3 Q. -- for current salary field?  
4 And did you know it existed before this email  
5 was sent to you?  
6 MS. MANTOAN: Objection; vague.  
7 BY MR. GARCIA:  
8 Q. You said you just knew it existed --  
9 A. I knew it existed.  
10 MS. MANTOAN: Same objection.  
11 BY MR. GARCIA:  
12 Q. When did you know it existed?  
13 MS. MANTOAN: Same objection. I don't know  
14 what the "it" is we're talking about.  
15 THE WITNESS: I don't know. I --  
16 BY MR. GARCIA:  
17 Q. We're talking about the current salary field,  
18 and you said you knew it existed.  
19 A. I knew that the salary field --  
20 Q. I'm just asking you when you first knew --  
21 A. -- was there.  
22 Q. When did you first know it was there?  
23 A. I can't answer that.  
24 Q. Did you know it was there before this email?  
25 A. I don't know.

1 MR. GARCIA: Court reporter, can you mark the  
2 next document? Let me see. Exhibit 46.  
3 (Plaintiff's Exhibit 46 was marked for  
4 identification.)  
5 BY MR. GARCIA:  
6 Q. Have you ever seen the document marked as  
7 Exhibit 46?  
8 A. Let's see. Give me a minute. I've seen  
9 portions of it that look familiar to me.  
10 Q. Okay. So what is the document?  
11 MS. MANTOAN: Objection; calls for speculation,  
12 and the document speaks for itself.  
13 THE WITNESS: It's an H.R. learning session,  
14 U.S. pay equity laws, and salary history basis.  
15 BY MR. GARCIA:  
16 Q. I think it's salary history bans.  
17 A. Bans. Salary history bans. Excuse me.  
18 Q. That's okay.  
19 And it's dated October 18th to 19th, 2017,  
20 correct?  
21 A. Correct.  
22 Q. Did you ever attend any training? Did you  
23 attend this H.R. learning session?  
24 A. I'm looking at the presenters, and I'm not  
25 sure whether or not I attended this or not.

1 Q. Who were the presenters?  
2 A. Emily Sullivan, Elena Raymond, and Kris  
3 Edwards.  
4 Q. And your boss was one of the presenters,  
5 correct?  
6 A. My boss was one.  
7 Q. And so did you have any input into the  
8 drafting of this presentation?  
9 A. No.  
10 Q. And you mentioned before that you've seen  
11 parts of it. How is it that you saw parts of it?  
12 A. I can tell you that this slide having to do  
13 with location, scope, risk, and actions is familiar to  
14 me.  
15 Q. What Bates stamp number is that?  
16 A. 1124.  
17 Q. Any others familiar to you?  
18 A. When I mean "familiar," I mean I've seen it  
19 before.  
20 Q. I understand. Have you seen any other slides  
21 before?  
22 A. Just that one looks familiar.  
23 Q. Okay. Thank you.  
24 Now, I'm going to ask you to turn to page Bates  
25 stamp number Oracle HQCA381126. Okay. And you see on

1 that page, it states: "What is changing" in bolded print?  
2 A. Mm-hmm.  
3 Q. So I'm going to read the first two bullets  
4 under it. What is -- quote, "What is changing," unquote.  
5 Quote, "Only change is not asking candidates for current  
6 or prior salary."  
7 Is that a true statement?  
8 MS. MANTOAN: Objection. The document speaks  
9 for itself. To the extent it doesn't, it calls for  
10 speculation.  
11 BY MR. GARCIA:  
12 Q. Do you know if that's a true statement?  
13 MS. MANTOAN: Same objections.  
14 THE WITNESS: I don't know, because -- I mean,  
15 I'm not familiar with this presentation as a whole.  
16 BY MR. GARCIA:  
17 Q. Okay. Now, the next bullet is, quote,  
18 "Removed current salary field from offer form in  
19 iRecruitment (September 23rd)," unquote.  
20 Did I read that correctly?  
21 A. Yeah.  
22 Q. Is that a true statement?  
23 MS. MANTOAN: Objection. The document speaks  
24 for itself. To the extent it doesn't, it calls for  
25 speculation about a form she told you she doesn't see.

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1 THE WITNESS: It's indicating that on  
2 September 23rd, the salary field was removed, but I don't  
3 know if that was the case.  
4 BY MR. GARCIA:  
5 Q. And on the email -- the prior exhibit email  
6 that you sent, talking about the removal of the salary  
7 field, do you actually know if the salary field was  
8 removed?  
9 A. I do know that the salary field was removed.  
10 Q. And how do you know that?  
11 A. Just through communication with Kris Edwards  
12 to her team.  
13 Q. You haven't actually seen the form to know --  
14 A. No.  
15 Q. -- firsthand whether it was removed, correct?  
16 A. I don't have access to those views.  
17 Q. So other than what someone told you, you  
18 don't know if it was actually removed, correct?  
19 A. That's fair. Correct. But my understanding  
20 was, it was removed.  
21 Q. Is your understanding that people can no  
22 longer ask? It's a change that they can no longer ask?  
23 MS. MANTOAN: Objection; misstates testimony,  
24 calls for speculation.  
25 BY MR. GARCIA:

1 Q. So you just said it's your understanding it's  
2 removed. I'm asking you, is it also your understanding  
3 that managers -- the change to the prior -- the change to  
4 the prior policy was that managers can no longer ask?  
5 MS. MANTOAN: It lacks foundation. Objection.  
6 It lacks foundation. It's asked and answered, calls for  
7 speculation.  
8 BY MR. GARCIA:  
9 Q. Is that your understanding?  
10 MS. MANTOAN: Same objections.  
11 THE WITNESS: Managers can no longer ask for  
12 prior salary.  
13 BY MR. GARCIA:  
14 Q. Okay. And that was the previous policy,  
15 correct?  
16 MS. MANTOAN: Objection; vague and ambiguous.  
17 BY MR. GARCIA:  
18 Q. So the previous -- okay. Because this is  
19 where I'm confused. The previous policy is that managers  
20 could ask about prior salary, and the current policy is  
21 they can no longer ask about it; is that true?  
22 MS. MANTOAN: Objection. It misstates  
23 testimony, it lacks foundation and calls for speculation.  
24 BY MR. GARCIA:  
25 Q. Go ahead and answer.

1 A. Previously, that field --  
2 Q. I'm not asking about the field.  
3 A. Okay.  
4 Q. My question is, previously, it was a policy  
5 at Oracle that managers could ask about prior pay, but  
6 that got changed to the current policy that the managers  
7 cannot ask about prior pay; is that true?  
8 MS. MANTOAN: Objection. It's vague and  
9 ambiguous, it calls for speculation, and it lacks  
10 foundation.  
11 THE WITNESS: Can you state that in a different  
12 way?  
13 BY MR. GARCIA:  
14 Q. You said the previous policy was --  
15 correction. You said the current policy is managers  
16 cannot ask about prior pay, correct?  
17 A. Correct. They can no longer ask.  
18 Q. Right. And I'm asking you, is the previous  
19 policy that they could ask about prior pay?  
20 MS. MANTOAN: Objection; vague and ambiguous,  
21 calls for speculation, lacks foundation --  
22 MR. GARCIA: You understand that you're making  
23 the same objection?  
24 MS. MANTOAN: You're asking the same question.  
25 MR. GARCIA: Right, because she wasn't

1 responsive.  
2 Q. Go ahead.  
3 A. I wouldn't refer to it as policy. Managers  
4 could or could not ask.  
5 Q. So they were allowed to ask about prior pay,  
6 correct?  
7 MS. MANTOAN: Objection; vague and ambiguous,  
8 calls for speculation, lacks foundation.  
9 THE WITNESS: Managers had the ability, if they  
10 so wished, could ask or they could elect not to ask. It  
11 wasn't a requirement.  
12 BY MR. GARCIA:  
13 Q. Was it a requirement to fill out the current  
14 salary field in the iRecruitment offer form?  
15 MS. MANTOAN: Objection; calls for speculation.  
16 She's told you she doesn't know --  
17 BY MR. GARCIA:  
18 Q. Do you know?  
19 A. That, I don't know.  
20 Q. Okay. Fair enough.  
21 Court reporter, can you please mark the next  
22 document as Exhibit 47.  
23 (Plaintiff's Exhibit 47 was marked for  
24 identification.)  
25 BY MR. GARCIA:

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1 Q. Are you familiar with the document that's  
2 been marked as Exhibit 47?  
3 A. Okay. I have seen this.  
4 Q. And where have you seen it before?  
5 A. I saw it yesterday.  
6 Q. Is that the first time you've seen it?  
7 A. That was the first time I've seen it.  
8 Q. Do you know if the U.S. compensation team did  
9 any -- so Exhibit 47 is a document with Bates stamps  
10 numbers 381101 to 381114, and it's titled "Recruit and  
11 Hire Guidance World Checklist for Successful Hire New  
12 U.S. Legislation." Then it says, "Hiring manager, hiring  
13 business partner, and talent adviser, partnership."  
14 So do you know if U.S. compensation team put  
15 out any training regarding this document?  
16 A. I do not know. I do not know who the author  
17 is.  
18 Q. When you were told of the change in the prior  
19 pay policy by Oracle, did you receive any training on  
20 that?  
21 MS. MANTOAN: Objection; lacks foundation as to  
22 "change in policy." Vague as to "training."  
23 THE WITNESS: I do recall that it was mentioned  
24 in one of Kris' staff meetings that this was going to  
25 occur.

1 BY MR. GARCIA:  
2 Q. Now, you told me earlier that one of your  
3 roles is to advise business partners, correct?  
4 MS. MANTOAN: Objection; misstates testimony.  
5 BY MR. GARCIA:  
6 Q. H.R. business partners?  
7 A. Correct.  
8 Q. And to answer their questions, right?  
9 MS. MANTOAN: Objection. It misstates her  
10 testimony.  
11 BY MR. GARCIA:  
12 Q. Go ahead and answer the question.  
13 A. To answer H.R. business partner questions  
14 when questions come up.  
15 Q. Okay. So -- and before, I asked you, were  
16 you trained on this? Did you receive any PowerPoint  
17 presentations on power pay -- on prior pay? Excuse me.  
18 A. I don't recall any PowerPoint presentations  
19 on this topic.  
20 Q. And did you attend any webinars regarding  
21 prior pay?  
22 A. I don't recall attending any webinars on  
23 this. That doesn't mean I didn't, but I don't recall  
24 attending.  
25 Q. So is there any other communication you

1 remember about prior pay, other than your manager  
2 discussing it in a staff meeting?  
3 MS. MANTOAN: Objection; vague and ambiguous.  
4 THE WITNESS: Not that I recall.  
5 BY MR. GARCIA:  
6 Q. Have you ever applied to any requisitions  
7 through Oracle's iRecruitment requisition system?  
8 A. No.  
9 Q. Have you seen any requisitions in Oracle's  
10 iRecruitment requisition system?  
11 A. No.  
12 Q. Has anyone discussed what is requested or  
13 what is stated in the requisition in Oracle's  
14 iRecruitment system?  
15 MS. MANTOAN: Objection; vague and ambiguous,  
16 vague as to time.  
17 BY MR. GARCIA:  
18 Q. I'm asking any time.  
19 A. Not that I can recall.  
20 Q. Strike that.  
21 Do you know if Oracle does background checks on  
22 new hires?  
23 MS. MANTOAN: Objection; vague and ambiguous,  
24 compound.  
25 THE WITNESS: Yeah. I don't know for certain.

1 I can say, in the past, I'm familiar with the fact that  
2 they did background checks.  
3 BY MR. GARCIA:  
4 Q. Do you know what information they did -- they  
5 checked during the background check?  
6 MS. MANTOAN: Objection. It's vague and  
7 ambiguous, and it's compound as to which -- including on  
8 all employees, all checks.  
9 BY MR. GARCIA:  
10 Q. Again, unless I state otherwise, I'm talking  
11 about the employees at Redwood Shores headquarters. Do  
12 you understand that?  
13 A. Okay. Okay.  
14 Q. Okay. So do you know -- in your previous  
15 knowledge of background checks --  
16 A. Right.  
17 Q. -- do you know what was checked with  
18 background checks?  
19 MS. MANTOAN: Same objections; vague and  
20 ambiguous, calls for speculation, compound.  
21 THE WITNESS: I know they checked for  
22 education. I know they checked for criminal. That's two  
23 examples.  
24 BY MR. GARCIA:  
25 Q. Do you know any others they checked for.

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1 MS. MANTOAN: Same objections.  
2 THE WITNESS: I don't. I don't know specifics.  
3 BY MR. GARCIA:  
4 Q. No, I'm just trying to see what you remember  
5 of what they checked for.  
6 Court reporter, can you please mark the next  
7 document as Exhibit 48, please.  
8 (Plaintiff's Exhibit 48 was marked for  
9 identification.)  
10 BY MR. GARCIA:  
11 Q. Do you recognize the document at Exhibit 48  
12 that's Bates-stamped number Oracle HQCA27412-1 and  
13 dash-two.  
14 A. I recognize it. It's an IRC, and it would  
15 have been from the iRecruitment system.  
16 Q. And by "IRC," do you mean a requisition in  
17 the iRecruitment system?  
18 A. Yes.  
19 Q. I'm going to turn your attention to the  
20 second page of Exhibit 48. Towards the, I would say,  
21 bottom center, there's a part in blue ink. Do you see  
22 that?  
23 A. Where it says, "site name"?  
24 Q. No. Where it says, "As part of Oracle's  
25 employment process." I'm pointing to it so you can see.

1 A. Okay.  
2 Q. I'm going to read that. "As part of Oracle's  
3 employment process, candidates will be required to  
4 complete a preemployment screening process prior to an  
5 offer being made. This will involve identity and  
6 employment verification, salary verification,  
7 professional references, education verification, and  
8 verification of professional qualifications and  
9 memberships if applicable," unquote.  
10 Did I read that correctly?  
11 A. You read that correctly.  
12 Q. Do you know if that statement's true?  
13 MS. MANTOAN: Objection. The document speaks  
14 for itself. To the extent it doesn't, it calls for  
15 speculation. It's compound.  
16 THE WITNESS: I could only testify to what I --  
17 the fact that I know that they checked criminal and  
18 education as two examples, only because the department  
19 was right down the hall from me.  
20 BY MR. GARCIA:  
21 Q. Okay. So you don't know --  
22 A. I --  
23 Q. I'm sorry. I didn't mean to interrupt.  
24 A. I don't have any knowledge otherwise.  
25 Q. Okay. So as you see, it talks about a salary

1 verification for the background check, right?  
2 A. It states that.  
3 MS. MANTOAN: Objection; document speaks for  
4 itself.  
5 BY MR. GARCIA:  
6 Q. So do you know of any way to do a salary  
7 verification without having knowledge of what a person's  
8 current salary is?  
9 MS. MANTOAN: Objection; vague and ambiguous,  
10 argumentative.  
11 BY MR. GARCIA:  
12 Q. I'm just asking you to your knowledge --  
13 MS. MANTOAN: Calls for speculation.  
14 THE WITNESS: This is outside my area of  
15 expertise.  
16 BY MR. GARCIA:  
17 Q. I'm just asking for your knowledge as a  
18 person.  
19 MS. MANTOAN: Objection; argumentative, vague  
20 and ambiguous, asked and answered.  
21 MR. GARCIA: So can I finish my question,  
22 Counsel, before you interrupt, please?  
23 Q. My question is, I'm just asking about your  
24 knowledge as a person. Do you know any way that one can  
25 do a salary verification without knowing what the

1 applicant's salary is?  
2 MS. MANTOAN: Objection. It's argumentative,  
3 assumes facts.  
4 THE WITNESS: I don't know. Again, I'm going  
5 to restate that this is outside my area of expertise.  
6 BY MR. GARCIA:  
7 Q. But you know you're not testifying as an  
8 expert today, correct?  
9 A. Okay. So it's outside of my area.  
10 Q. Okay. So you said, "okay," but I just want  
11 to make sure. You know you're not testifying as an  
12 expert today, correct?  
13 A. Correct. Correct.  
14 MR. GARCIA: Court reporter, can you please  
15 mark the next document as Exhibit 49, please.  
16 (Plaintiff's Exhibit 49 was marked for  
17 identification.)  
18 BY MR. GARCIA:  
19 Q. Do you recognize Exhibit 49?  
20 Exhibit 49 has an extra page, so I would  
21 just -- if you would rip that off. Thank you.  
22 So for the record, Exhibit 49 is a document  
23 with Bates Oracle HQCA34106 to 34110.  
24 Have you ever seen this document before?  
25 A. If you give me a moment to review it.

1 Q. I will. Thank you.  
 2 MS. MANTOAN: Take as much time as you need.  
 3 THE WITNESS: So if you ask me have I ever seen  
 4 it, no.  
 5 BY MR. GARCIA:  
 6 Q. Do you know who Todd Gorman is?  
 7 A. No.  
 8 Q. So if you look on the fourth page --  
 9 correction -- the third page of the document that has a  
 10 Bates stamp of 34108 -- or strike that. I apologize.  
 11 The document consists of two emails, correct?  
 12 MS. MANTOAN: Objection. The document speaks  
 13 for itself. To the extent it doesn't, that calls for  
 14 speculation.  
 15 BY MR. GARCIA:  
 16 Q. Do you recognize that there are two emails in  
 17 this document?  
 18 MS. MANTOAN: There's clearly three, Counsel.  
 19 The document speaks for itself. At least three, maybe  
 20 four.  
 21 MR. GARCIA: I apologize. I didn't look at the  
 22 fourth page.  
 23 Q. Do you see that the document consists of  
 24 several emails, correct?  
 25 A. Several, yes.

1 Q. And towards the bottom of the first page of  
 2 Exhibit 49, it starts to list the information pertaining  
 3 to a requisition, correct?  
 4 MS. MANTOAN: Objection. The document speaks  
 5 for itself. To the extent it doesn't, it calls for  
 6 speculation.  
 7 THE WITNESS: What was your statement?  
 8 BY MR. GARCIA:  
 9 Q. My question was, towards the bottom of the  
 10 first page and continuing on for the next several pages,  
 11 the document includes information regarding a job  
 12 requisition, correct?  
 13 MS. MANTOAN: Same objections.  
 14 THE WITNESS: I see that the document is  
 15 speaking of a candidate. I don't see how you can tell  
 16 it's a requisition.  
 17 BY MR. GARCIA:  
 18 Q. It's information pertaining to a requisition,  
 19 a job opening. Do you agree?  
 20 MS. MANTOAN: Same objection. She's told you  
 21 she's never seen this before. The document speaks for  
 22 itself. To the extent it doesn't, it calls for  
 23 speculation.  
 24 THE WITNESS: Yeah, I don't know. I'm not  
 25 familiar, having never seen one of these.

1 MR. GARCIA: Okay, that's fine.  
 2 Q. Now, you said, just down the hall from you,  
 3 there's a part of Oracle H.R. that deals with background  
 4 checks?  
 5 MS. MANTOAN: Objection; misstates the  
 6 testimony.  
 7 BY MR. GARCIA:  
 8 Q. Is that a correct understanding?  
 9 A. There was.  
 10 Q. There was?  
 11 A. There was.  
 12 Q. And that's how you knew that they at least  
 13 checked for education and criminal records?  
 14 MS. MANTOAN: Objection. It misstates  
 15 testimony.  
 16 BY MR. GARCIA:  
 17 Q. Is that correct?  
 18 A. I am familiar that they checked for education  
 19 and criminal records.  
 20 Q. And how are you familiar with that? Did you  
 21 talk to people? Did you see documents? How are you  
 22 familiar with that?  
 23 A. I'm familiar with that because the individual  
 24 who heads background checks at the time was a couple  
 25 doors down from me, and so I -- I don't want to

1 speculate, but I may have heard that they checked for  
 2 education, and they checked for criminal as examples.  
 3 Q. Okay. Does Oracle have an employee referral  
 4 program?  
 5 A. I believe we still do.  
 6 Q. And are employees encouraged to refer people  
 7 to various job requisitions?  
 8 MS. MANTOAN: Objection. It's vague and  
 9 ambiguous. It's compound.  
 10 THE WITNESS: I know that a program -- I  
 11 believe one still exists. I don't know to the extent we  
 12 encourage employees, other than the program exists.  
 13 BY MR. GARCIA:  
 14 Q. Have you received any training on the  
 15 program?  
 16 A. No.  
 17 MR. GARCIA: Okay. Court reporter, can you  
 18 please mark the next document as Exhibit 50.  
 19 (Plaintiff's Exhibit 50 was marked for  
 20 identification.)  
 21 BY MR. GARCIA:  
 22 Q. So have you ever seen the document, Exhibit  
 23 50, before?  
 24 A. No.  
 25 Q. Have you seen Oracle advertising positions

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1 before for various jobs?  
2 MS. MANTOAN: Objection. It assumes facts.  
3 Also, Counsel, the copy she marked has the Bates number  
4 cut off, so I don't know if you want to read the Bates  
5 number into the record. My copy has it, but the marked  
6 copy doesn't.  
7 MR. GARCIA: Can we re-mark it so that -- let  
8 me see. Do you guys --  
9 MS. HERMOSILLO: Mine's cut off.  
10 MR. ELIASOPH: Mine's cut off.  
11 MR. GARCIA: I can read it into --  
12 MR. ELIASOPH: We can get you copies.  
13 MR. GARCIA: Yeah, let me just read it into the  
14 record what it is. It's Bates stamp number Oracle  
15 HQ33891 through 33894.  
16 MS. MANTOAN: We don't need you to replace the  
17 exhibit. We'll stipulate that that is what the exhibit  
18 is.  
19 MR. GARCIA: Thank you, Counsel.  
20 Q. So in terms of advertisements, is there any  
21 place, do you know of, that Oracle publishes job openings  
22 that are available so that people can refer people to  
23 them?  
24 MS. MANTOAN: Objection; compound and vague and  
25 ambiguous, assumes facts.

1 THE WITNESS: I don't know.  
2 BY MR. GARCIA:  
3 Q. Okay. Now, you previously mentioned that  
4 Oracle removed the current salary field, right --  
5 MS. MANTOAN: Objection; misstates testimony.  
6 BY MR. GARCIA:  
7 Q. -- from iRecruitment, correct?  
8 MS. MANTOAN: Objection. Her testimony speaks  
9 for itself.  
10 THE WITNESS: I previously testified that I  
11 didn't have access to a view of it.  
12 BY MR. GARCIA:  
13 Q. Right.  
14 A. But it is my understanding that it was  
15 removed.  
16 Q. Was there any other instructions to remove  
17 any other fields related to current salary, other than  
18 the current salary field?  
19 MS. MANTOAN: Objection; calls for  
20 speculation --  
21 BY MR. GARCIA:  
22 Q. Do you know?  
23 MS. MANTOAN: -- assumes facts not in evidence.  
24 THE WITNESS: I don't know.  
25 MS. MANTOAN: Could we take that lunch break?

1 It's after 1:00.  
2 MR. GARCIA: I have one more document, then  
3 we'll take it. Is that okay? Thank you.  
4 Court reporter, can you please mark the next  
5 document as Exhibit 51.  
6 (Plaintiff's Exhibit 51 was marked for  
7 identification.)  
8 BY MR. GARCIA:  
9 Q. Are you familiar with the document at  
10 Exhibit 51? It's Bates stamp number Oracle HQCA29001,  
11 and another document: Oracle HQCA33810.  
12 Are you familiar with those two pages?  
13 A. I may have come across, but I can't say I'm  
14 familiar with this.  
15 Q. Okay. Are you familiar with the format of  
16 the two pages of a candidate profile submitted?  
17 A. No.  
18 Q. Do you see in the candidate profile summary,  
19 it lists current compensation on the left-hand side?  
20 A. Yes.  
21 MS. MANTOAN: And the document speaks for  
22 itself.  
23 BY MR. GARCIA:  
24 Q. And the next page also has the same format  
25 for the candidate profile summary, where it also lists

1 current compensation?  
2 A. Yes.  
3 Q. Do you know if Oracle ever removed the  
4 "current compensation" field?  
5 MS. MANTOAN: Objection. It calls for  
6 speculation. It assumes facts not in evidence.  
7 BY MR. GARCIA:  
8 Q. I'm just asking you the question. You said  
9 before you had knowledge that Oracle removed the "current  
10 salary" field. Well, this field is titled something  
11 different. It's current compensation. So I'm asking you  
12 do you know if Oracle removed the "current compensation"  
13 field from iRecruitment?  
14 MS. MANTOAN: Objection. It lacks foundation.  
15 There's been no testimony this is from iRecruitment. And  
16 it lacks foundation and assumes facts.  
17 MR. GARCIA: I'm trying to establish foundation  
18 when I ask, "Do you know?"  
19 Q. Do you know?  
20 A. You're speaking specifically of this form?  
21 Q. Right. This candidate profile summary.  
22 Do you know if Oracle has removed "current  
23 compensation" from the candidate profile summary?  
24 MS. MANTOAN: Objection; assumes facts.  
25 THE WITNESS: I don't know.

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1 MR. GARCIA: We can break for lunch now. Do  
2 you want to meet back at 2:00?  
3 MS. MANTOAN: I can't wait.  
4 MR. GARCIA: I can't wait, either.  
5 THE VIDEOGRAPHER: Off the record. This marks  
6 the end of media file labeled number four. Off the  
7 record at 1:04 p.m.  
8 (Lunch recess from 1:04 p.m. to 2:03 p.m.)  
9 THE VIDEOGRAPHER: This marks the beginning of  
10 media file labeled number five. Back on the record at  
11 2:03 p.m.  
12 BY MR. GARCIA:  
13 Q. I hope you had a nice lunch.  
14 A. It was good.  
15 Q. Great.  
16 So, before, we were talking about there was a  
17 reorganization within a year or two of you getting a new  
18 boss, Kris Edwards. When I asked you the differences  
19 between what you did for Lisa Gordon and what you did for  
20 Ms. Edwards, you talked about that there was a shift in  
21 terms of strategy and less tactical. Was there any other  
22 major changes between the two?  
23 MS. MANTOAN: Objection; misstates testimony.  
24 THE WITNESS: The primary focus is for us to  
25 become more strategic.

1 BY MR. GARCIA:  
2 Q. Okay. And I'm not sure that I understood how  
3 you become more strategic. Can you explain that to me?  
4 A. It involves the type of work.  
5 Q. Can you be specific in the type of work?  
6 A. Should I give you an example? An example  
7 would be that total direct compensation report that I  
8 referenced earlier.  
9 Q. Okay. Any other ways?  
10 A. Well, again, we're looking to be proactive  
11 and to be strategic in assisting our client groups.  
12 Q. And that's what I'm trying to understand, how  
13 you're being strategic and how you're being proactive.  
14 Can you provide any more examples?  
15 A. We're developing tools, and a good example,  
16 which I did provide, was the report is one example. Any  
17 type of specific request that may come in with regards to  
18 retaining an employee would be another example of --  
19 Q. Did you respond to those type of requests  
20 before?  
21 A. -- being strategic.  
22 Q. And then Lisa Gordon?  
23 A. I can't speak to specifics, but I would  
24 assume in the broad, general sense, I've responded to  
25 those requests.

1 Q. Right.  
2 So anything else that you remember that  
3 changes that causes you to be progressive or strategic?  
4 MS. MANTOAN: Object; progressive. I think it  
5 misstates her testimony.  
6 THE WITNESS: If you focus strictly on  
7 strategic, it's -- another thing would be cross-learning  
8 of team members.  
9 BY MR. GARCIA:  
10 Q. What do you mean by "cross-learning"?  
11 A. Meaning providing to other peers examples of  
12 projects we may be on or providing an update of projects  
13 so that it expands their knowledge, as well as it expands  
14 our knowledge.  
15 Q. Right. So what I'm trying to understand is  
16 the specifics, and you've given me a lot of generalities  
17 about what you do. And so in terms of a job description,  
18 is there any other way that you can describe what you  
19 actually did specifically that is different from  
20 currently to what you did under Lisa Gordon?  
21 MS. MANTOAN: Objection; vague and ambiguous.  
22 THE WITNESS: You have to give me some more  
23 context.  
24 BY MR. GARCIA:  
25 Q. I'm just trying to understand what's

1 different between what you did with Lisa Gordon and what  
2 you do now?  
3 MS. MANTOAN: Same objection.  
4 THE WITNESS: I can't answer that without you  
5 being more specific. I'm trying to provide you  
6 specifics. You're calling them "generalities." I'm  
7 calling them -- I'm giving you specific examples to the  
8 best of my ability.  
9 BY MR. GARCIA:  
10 Q. So when you say you're more strategic --  
11 okay. So what I understood you to say is, you do the  
12 report. You do the cross-learning. In terms of the  
13 questions about hiring, you identify that you also did  
14 them before. So what I'm trying to understand is, can  
15 you give me more specifics about how your job today is  
16 different from what it was under Lisa Gordon?  
17 MS. MANTOAN: Objection. It's asked and  
18 answered.  
19 THE WITNESS: I mean, you're going back years  
20 under Lisa. I think most of what I referenced to you is  
21 under Kris Edwards.  
22 BY MR. GARCIA:  
23 Q. Right. So Lisa Gordon was there in 2016,  
24 right?  
25 A. I don't have the specific employment

1 timeframes of when she was there.  
2 Q. Do you know whether she was there in 2016?  
3 A. I don't know.  
4 Q. Okay. And you don't know the year that she  
5 left?  
6 A. I don't.  
7 Q. Did you do focal reviews, the process you  
8 described for focal reviews, with Lisa Gordon?  
9 A. Yes.  
10 Q. Did you do the process you described for  
11 equity under Lisa Gordon?  
12 A. Yes.  
13 Q. Did you do the process you described for  
14 variable pay under Lisa Gordon?  
15 A. If it was to occur, that would have been --  
16 again, that's part of our annual processes.  
17 Q. Right.  
18 And if H.R. business partners asked you  
19 questions when you were working for Lisa Gordon, would  
20 you be responsible for answering them?  
21 A. I would be responsible for not only answering  
22 them, but providing a solution.  
23 Q. And would you also be responsible for giving  
24 them -- or attending training with them about the new  
25 focal reviews that came out if they came out under Lisa

1 Gordon?  
2 A. That would be part of the annual process.  
3 Q. Is there anything that you did for Lisa  
4 Gordon that you no longer do now when you were under her?  
5 A. I will rephrase that and I would say that the  
6 job complexity has increased since Kris Edwards came on  
7 board.  
8 Q. And how has it increased?  
9 A. It has increased because we've been  
10 developing tools. We've been providing additional  
11 insight to the H.R. business partners to assist them in  
12 running their business.  
13 Q. And how do you provide that insight? Do you  
14 run reports?  
15 MS. MANTOAN: Objection; vague, compound.  
16 THE WITNESS: I specifically do not run  
17 reports.  
18 BY MR. GARCIA:  
19 Q. Do you provide them reports?  
20 A. An example would be the total direct  
21 compensation report.  
22 Q. Do you provide them any more reports?  
23 A. Mm-hmm. Another example would be --  
24 Q. Can I ask you to answer that again, because  
25 you answered when you were drinking.

1 A. Oh, yeah, yeah. The answer's "yes." Yeah.  
2 Another example that comes to mind would be off-cycle  
3 increases as a report that's generated. It's generated.  
4 I don't generate it --  
5 Q. You just --  
6 A. -- but I would provide it.  
7 Q. Do you know what types of information is in  
8 that report?  
9 A. It would be broken down by LOB leader, and it  
10 would be a total summary of spend.  
11 Q. Is that the additional hours -- correction --  
12 the additional dollars spent because of the off-cycle  
13 increase?  
14 A. The additional dollars spent. It's a running  
15 total of the additional dollars.  
16 Q. How often do you provide that report?  
17 A. It either comes out monthly or quarterly.  
18 Q. Now, if someone asked you questions about the  
19 information in that report, would you be able to answer  
20 them?  
21 MS. MANTOAN: Objection; incomplete  
22 hypothetical, calls for speculation, vague and ambiguous.  
23 BY MR. GARCIA:  
24 Q. If someone asks questions about the  
25 information in the report, do they go to you?

1 MS. MANTOAN: That calls for speculation,  
2 incomplete hypothetical.  
3 THE WITNESS: That would depend upon whether  
4 it's one of my H.R. business partners.  
5 BY MR. GARCIA:  
6 Q. So if it was one of your H.R. business  
7 partners and they had questions about the information in  
8 either of the reports that you identified today, who  
9 would they go to? Do you know?  
10 A. Did you say it was one of my business  
11 partners?  
12 Q. Yes.  
13 A. They would go to me.  
14 Q. And do you do any other reports for them,  
15 other than the two you mentioned?  
16 A. I don't do the reports. I distribute the  
17 reports.  
18 Q. Thank you for --  
19 A. I just want to make that clear.  
20 Q. Understand.  
21 Do you distribute any more reports to them?  
22 A. Those are the two main ones that come to  
23 mind.  
24 Q. Well, what are the non-main ones?  
25 A. I don't know. That's why I'm not providing

1 another example, because I can't come up with another  
 2 example.  
 3 Q. Okay. Because when you say "main ones," it  
 4 indicates there are non-main ones.  
 5 On the off-cycle report, does it identify  
 6 anyone by gender?  
 7 A. No.  
 8 Q. Does it identify anyone by name?  
 9 MS. MANTOAN: Objection; lacks foundation that  
 10 it identifies individuals.  
 11 THE WITNESS: It is an overall summary of the  
 12 manager's spend, so... \$5,000 as an arbitrary number was  
 13 spent in the month of June, or it was spent in quarter  
 14 one as an example.  
 15 BY MR. GARCIA:  
 16 Q. So if I'm understanding it, it doesn't  
 17 identify anyone specifically by name? Is that a correct  
 18 understanding?  
 19 MS. MANTOAN: Objection. It misstates the  
 20 testimony. Are you saying other than the line of  
 21 business?  
 22 MR. GARCIA: Other than the line of business  
 23 head.  
 24 Q. Let me ask this. What information is on it?  
 25 You've told me the line of business head and the running  
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1 total. Anything else?  
 2 A. These are fairly new reports over the last  
 3 couple of years. And again, I don't generate them, so  
 4 I'm not as familiar with the specific details of the  
 5 reports.  
 6 Q. I'm just asking you what you remember. Do  
 7 you remember anything else, other than the line of  
 8 business leader's name and the running total?  
 9 A. So it would have line of business, and then  
 10 -- see, I don't want to speculate. I'm going to leave it  
 11 at that because I don't want to guess --  
 12 Q. I don't want you to guess --  
 13 A. -- and I want to ensure that I'm providing  
 14 accurate information.  
 15 Q. Right. I want that, too. I don't want you  
 16 to guess. I just want to know what you know.  
 17 A. Right.  
 18 Q. And if you don't know it, you don't know it.  
 19 A. I don't know it.  
 20 Q. Are those reports that you mentioned, are  
 21 they reports run for all the compensation analysts -- or  
 22 compensation consultants on the U.S. compensation team?  
 23 MS. MANTOAN: Objection; calls for speculation.  
 24 BY MR. GARCIA:  
 25 Q. Do you know?  
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1 A. Those reports are generated by lines of  
 2 business.  
 3 Q. So the answer would be yes, it's run for all  
 4 the U.S. compensation team analysts -- or consultants,  
 5 correct?  
 6 A. So it would run for all -- it would be run  
 7 for all the lines of businesses. So, obviously, we each  
 8 have a line of business or multiple lines of business  
 9 that we support.  
 10 Q. I understand.  
 11 And the information in those reports, do you  
 12 analyze them in any way?  
 13 MS. MANTOAN: Objection; vague and ambiguous.  
 14 BY MR. GARCIA:  
 15 Q. You, personally. You. Do you analyze any of  
 16 the information in the reports before you distribute  
 17 them?  
 18 MS. MANTOAN: Same objection.  
 19 THE WITNESS: I distribute them. And then if  
 20 they're -- if there are questions, I would answer  
 21 questions having to do with those reports, but they're  
 22 not further analyzed.  
 23 BY MR. GARCIA:  
 24 Q. Okay. Is it correct in understanding that  
 25 you only look at the information in the reports to  
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1 analyze them if someone has a question?  
 2 MS. MANTOAN: Objection; misstates testimony,  
 3 vague and ambiguous.  
 4 THE WITNESS: State that one more time.  
 5 BY MR. GARCIA:  
 6 Q. What I'm understanding you to say is that you  
 7 distribute the reports, correct?  
 8 A. Mm-hmm.  
 9 Q. And I understood you to say that you don't  
 10 review the information before you distribute the reports,  
 11 correct?  
 12 A. Incorrect.  
 13 Q. You do look at it?  
 14 A. I'm aware of the content of those reports.  
 15 Q. When you say you are aware of the content,  
 16 are you aware of anything more than what types of  
 17 content, or do you specifically look at the numbers  
 18 inside those reports?  
 19 A. It's an aggregate number that I'm looking at.  
 20 So if it says, "500,000," I'm aware that it's 500,000. I  
 21 at least open up the reports and digest the information.  
 22 Q. Okay. Do you look at anything beyond the  
 23 aggregate numbers?  
 24 A. I do not.  
 25 Q. And is the only thing that would --  
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1 A. Let me just caveat that. Unless there's a  
 2 specific request, a question that comes up.  
 3 Q. And do these questions come up before you  
 4 distribute the reports?  
 5 A. Come up before? No.  
 6 Q. Now, do you do any analysis of the  
 7 information on the reports?  
 8 MS. MANTOAN: Objection; vague and ambiguous.  
 9 It's asked and answered.  
 10 THE WITNESS: Let me restate once again that I  
 11 will open the report, I will digest the information, and  
 12 I will provide that information to the H.R. business  
 13 partner.  
 14 BY MR. GARCIA:  
 15 Q. So do you do -- do you provide any  
 16 information to your manager, Kris, Ms. Edwards, regarding  
 17 what's contained in the report that you're providing to  
 18 your H.R. business partner?  
 19 A. No.  
 20 MS. MANTOAN: Objection. It's vague and  
 21 ambiguous --  
 22 THE WITNESS: Sorry.  
 23 MS. MANTOAN: -- and it's compound.  
 24 BY MR. GARCIA:  
 25 Q. And the only time that you would actually

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1 look at the information beyond an aggregate level for  
 2 that report is if someone had a question and asked you  
 3 about it, correct?  
 4 A. If someone had a question, correct.  
 5 Q. Thank you.  
 6 Now, before, we were talking about the focal  
 7 reviews, and I understood you to say that you would look  
 8 at what the lines of business that you're responsible, if  
 9 they perform certain actions, like distribute the budget,  
 10 make recommendations, correct?  
 11 A. Distribute the budget and allocate.  
 12 Q. What other things do you look at that they  
 13 did?  
 14 A. That's what I indicated, is distribute the  
 15 budget, allocate, ensure that they're meeting their  
 16 deadlines, ensure that they've started the process,  
 17 ensure that they complete it.  
 18 Q. Do you provide any information to your boss,  
 19 Kris Edwards, about what the line of business are doing  
 20 during the focal reviews?  
 21 MS. MANTOAN: Objection; vague and ambiguous,  
 22 and it's compound.  
 23 THE WITNESS: Any other information... She has  
 24 the ability to go in and look herself. So the answer is  
 25 "no."

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1 BY MR. GARCIA:  
 2 Q. Well, what I'm trying to get at, even though  
 3 she has the ability, are you responsible -- are there  
 4 any, like, red flags, thresholds that are crossed that  
 5 you're responsible for providing notification to  
 6 Ms. Edwards regarding the focal review?  
 7 MS. MANTOAN: So, objection. It lacks  
 8 foundation and assumes facts about red flags and  
 9 thresholds. Also vague and ambiguous.  
 10 THE WITNESS: I can't answer that the way  
 11 you've stated it.  
 12 BY MR. GARCIA:  
 13 Q. Because you can't answer it the way I stated  
 14 it, I'm going to ask it a little more broadly.  
 15 Do you provide any communications to your boss,  
 16 Ms. Edwards, about the focal reviews while the focal  
 17 reviews are in process?  
 18 MS. MANTOAN: Objection. It's vague and  
 19 ambiguous. It's compound.  
 20 THE WITNESS: Going broadly isn't helping me.  
 21 BY MR. GARCIA:  
 22 Q. I'm just saying, do you talk to your boss,  
 23 Kris Edwards --  
 24 A. I talk to my boss.  
 25 Q. -- about the focal reviews?

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1 A. I may talk to my boss to indicate that a  
 2 manager hasn't begun his focal. That may come up, but...  
 3 Q. Have you talked to Kris Edwards for either  
 4 the fiscal year 2018 or the fiscal year 2019 focal  
 5 reviews for any other reason, other than a manager did  
 6 not start a focal review -- or did not start the process?  
 7 A. I would need -- I mean, I'm at a loss,  
 8 really, how to answer these questions.  
 9 Q. Okay. So my first question is, do you have  
 10 any other communications with Kris Edwards regarding the  
 11 focal review, other than the one instance that you  
 12 stated?  
 13 A. Communications that we would have. An  
 14 example I've given previously is, on a staff meeting,  
 15 we'll have a staff call as a team.  
 16 Q. Okay. Do you have any communications with  
 17 Kris Edwards regarding the focal reviews for the lines of  
 18 business that you're responsible for?  
 19 MS. MANTOAN: I'm going to object that it's  
 20 asked and answered. And to the extent you feel you're  
 21 not getting an answer, it's because you're asking for  
 22 everything she's ever talked to her boss about.  
 23 THE WITNESS: Right --  
 24 (Multiple, indistinguishable speakers.)  
 25 BY MR. GARCIA:

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1 Q. I'm trying to find out -- because when I get  
 2 specific, then you have problems with that. So I'm first  
 3 trying to start out large and ask you, did you have any  
 4 other communications with Kris Edwards regarding the  
 5 focal reviews in 2018 and 2019?  
 6 MS. MANTOAN: Objection. It's asked and  
 7 answered --  
 8 THE WITNESS: It is.  
 9 MS. MANTOAN: If you remember anything else --  
 10 THE WITNESS: No.  
 11 MS. MANTOAN: -- that you haven't told him,  
 12 then --  
 13 THE WITNESS: No.  
 14 BY MR. GARCIA:  
 15 Q. So thank you for saying that you don't  
 16 remember anything else.  
 17 How often do you talk to Ms. Edwards about what  
 18 you're doing?  
 19 MS. MANTOAN: Objection; vague and ambiguous.  
 20 BY MR. GARCIA:  
 21 Q. For the last two years, do you have a  
 22 frequency? Do you have weekly meetings with your boss?  
 23 MS. MANTOAN: Objection; compound. Four  
 24 questions there, I think.  
 25 THE WITNESS: Yeah. Can you break it down into  
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1 one question for me?  
 2 BY MR. GARCIA:  
 3 Q. How often do you have communications with  
 4 Kris Edwards in 2019?  
 5 A. That would depend on business need.  
 6 Q. So can you --  
 7 A. I can't throw a number at you.  
 8 Q. So you can't tell me -- is it, like, average  
 9 of once a week?  
 10 A. Well, I've indicated and I've testified to  
 11 the fact that we have staff meetings periodically as a  
 12 team.  
 13 Q. I don't know how often those are. How often  
 14 do you have the staff meetings?  
 15 A. In general, we may have staff meetings on a  
 16 weekly basis or, at times, it may be every two weeks. It  
 17 depends upon activity.  
 18 Q. Average month in 2019 --  
 19 A. I can't --  
 20 Q. -- you can't tell me whether you -- how many  
 21 staff meetings have you had in 2019? Can you answer  
 22 that?  
 23 A. I can't answer that.  
 24 Q. And can you answer that if you've had an  
 25 average of once-a-week staff meeting?  
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1 A. I don't feel I can answer these questions --  
 2 MS. MANTOAN: Objection. It's asked and  
 3 answered. If I could, Counsel, is the issue -- he's  
 4 entitled to your best estimate --  
 5 THE WITNESS: Okay --  
 6 MS. MANTOAN: -- even if you don't recall  
 7 specifically.  
 8 THE WITNESS: Okay.  
 9 MS. MANTOAN: So if all you can give is an  
 10 estimate, feel free to say you can't give the precise  
 11 count that he's asking for.  
 12 THE WITNESS: Okay.  
 13 MS. MANTOAN: You shouldn't guess if you  
 14 genuinely don't remember, but if you can estimate --  
 15 THE WITNESS: If I can estimate, I can  
 16 estimate.  
 17 MS. MANTOAN: Sure. Thank you.  
 18 THE WITNESS: So a staff meeting -- let's just  
 19 say a staff meeting is -- for this particular example is  
 20 held once a week. So there's four weeks typically in a  
 21 month, and there's 12 months, excluding holidays and --  
 22 an estimate. Could it be less? It could be.  
 23 BY MR. GARCIA:  
 24 Q. Okay. But you already told me you know you  
 25 don't have staff meetings every week. So can you  
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1 estimate in a month, in 2019 -- so far, there's been  
 2 five, almost five completed -- how many staff meetings a  
 3 month would you have?  
 4 A. I have answered this question.  
 5 Q. You're not --  
 6 A. I'm providing you an estimate.  
 7 Q. You're providing me an estimate of -- that  
 8 you -- you said assuming that you have once a week. And  
 9 I'm just trying to see if you can nail it down or be more  
 10 specific, and I understand that you cannot, correct?  
 11 A. I cannot.  
 12 Q. Understand.  
 13 When focal reviews are happening, do you have  
 14 communications with Kris Edwards after the webinars?  
 15 MS. MANTOAN: Objection; asked and answered.  
 16 It's vague and ambiguous, compound.  
 17 MR. GARCIA: I'm sorry, Counsel. I didn't mean  
 18 to interrupt.  
 19 Q. 2019, you mentioned there was webinars to  
 20 roll out the focal review and the equity, correct?  
 21 A. Correct.  
 22 Q. So after the webinars, did you have any  
 23 communications with Ms. Edwards regarding the focal  
 24 review?  
 25 MS. MANTOAN: Objection. It's vague and  
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1 ambiguous. It's subsumed in a question you've asked  
2 before.  
3 If you can recall any specific conversation --  
4 THE WITNESS: No.  
5 MS. MANTOAN: -- with Kris Edwards --  
6 THE WITNESS: I can't. I can't.  
7 BY MR. GARCIA:  
8 Q. So, before, I limited it to after the  
9 webinar, and I know that you told me that she discussed  
10 it in a staff meeting. Is there any other communication  
11 that you remember that you had with Ms. Edwards regarding  
12 the 2019 focal review that was not discussed in a staff  
13 meeting?  
14 MS. MANTOAN: Objection; vague and ambiguous.  
15 THE WITNESS: Nothing I can remember.  
16 BY MR. GARCIA:  
17 Q. So you talked about the budgets and rolling  
18 out the budgets. What do you mean by that?  
19 MS. MANTOAN: Objection. It's compound. She  
20 talked about several different budgetary processes.  
21 BY MR. GARCIA:  
22 Q. So you talked about focal reviews and  
23 budgets, correct?  
24 A. Talked about focal reviews and budgets.  
25 Q. And talking about the budgets being

1 distributed, correct?  
2 A. Talked about the budgets being allocated.  
3 Q. I thought you mentioned also distributed?  
4 A. It's the same thing.  
5 Q. Oh, okay. Because you --  
6 A. I have used both words. I have used both  
7 words.  
8 Q. Okay. Thank you.  
9 Now -- and then you also mentioned that you  
10 looked to see -- once they've made recommendations on the  
11 budgets that have been allocated, to see if they started  
12 the process, correct?  
13 MS. MANTOAN: Objection. That misstates  
14 testimony --  
15 THE WITNESS: I'm getting really lost as to  
16 what I have and what I have not stated here when you keep  
17 referencing prior testimony. Unless it's read back to  
18 me, I can't answer.  
19 BY MR. GARCIA:  
20 Q. You can't remember what you said earlier.  
21 Okay. Fair enough.  
22 Let me ask it this way. After the budgets are  
23 allocated, what do the managers do after they receive an  
24 allocated budget?  
25 MS. MANTOAN: Objection. That calls for

1 speculation --  
2 THE WITNESS: I don't know what the managers  
3 do.  
4 MS. MANTOAN: -- and compound.  
5 BY MR. GARCIA:  
6 Q. Are they required to allocate the budget to  
7 their employees?  
8 MS. MANTOAN: Objection; compound.  
9 BY MR. GARCIA:  
10 Q. Do managers allocate part of the budgets  
11 they've been allocated to their employees?  
12 MS. MANTOAN: Objection; calls for speculation,  
13 and it's compound in that you're asking a single question  
14 about what every manager in the company does.  
15 BY MR. GARCIA:  
16 Q. What are managers supposed to do after they  
17 receive the allocation of the budget?  
18 MS. MANTOAN: Same objections.  
19 THE WITNESS: I can answer it in general terms,  
20 that they're supposed to work with their H.R. business  
21 partner. I don't have any insight into what a specific  
22 manager does, what a manager has been told.  
23 MR. GARCIA: Let's mark the next document as  
24 Exhibit 52.  
25 (Plaintiff's Exhibit 52 was marked for

1 identification.)  
2 BY MR. GARCIA:  
3 Q. Are you familiar with the document placed in  
4 front of you as Exhibit 52?  
5 MS. MANTOAN: You should take whatever time you  
6 need to look before answering.  
7 THE WITNESS: 2014. Okay. Without going  
8 through every single page, I can state that to the best  
9 of my knowledge, I did not -- number one, did not develop  
10 this document, but this document was rolled out here. It  
11 has a date of June 2014. It has to do with manager  
12 training, compensation process for global corporate bonus  
13 and fusion workforce compensation.  
14 BY MR. GARCIA:  
15 Q. Is fusion workforce compensation a program,  
16 software program?  
17 A. We would refer to it as a tool.  
18 Q. So you refer to software programs for  
19 compensation as tools?  
20 MS. MANTOAN: Objection; misstates the  
21 testimony.  
22 BY MR. GARCIA:  
23 Q. I'm asking the question.  
24 A. I would refer to fusion workforce  
25 compensation as a tool.

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1 Q. And fusion workforce compensation is new,  
2 correct, last couple of years?  
3 A. Well, this indicates it was 2014.  
4 Q. Right. So was there --  
5 A. It was there in 2014.  
6 Q. Was there a work bench tool before then?  
7 A. There is what one would refer to as a work  
8 bench tool.  
9 Q. And it also dealt with the base pay  
10 compensation, correct?  
11 MS. MANTOAN: Objection; misstates testimony.  
12 THE WITNESS: That would be -- so if you're  
13 saying it's misstating...  
14 MS. MANTOAN: Well, it assumes facts that the  
15 workforce compensation tool includes base pay. You  
16 didn't lay that foundation.  
17 BY MR. GARCIA:  
18 Q. Okay. So was -- Oracle used work base  
19 compensation -- or the work bench compensation prior to  
20 fusion workforce compensation, correct?  
21 A. What do you mean by "used"? What do you mean  
22 by "Oracle"?  
23 Q. Well, Oracle means Oracle America, Inc.  
24 A. Okay.  
25 Q. So Oracle America, Inc. is in the United

1 States, right? It's not Oracle -- it's not the India?  
2 A. Correct.  
3 Q. So what I'm trying to determine is, did  
4 Oracle use a tool before fusion workforce compensation?  
5 MS. MANTOAN: Objection; vague and ambiguous.  
6 I'm sure the company used tools.  
7 MR. GARCIA: Counsel, please don't give  
8 speaking objections.  
9 Q. So did fusion workforce compensation replace  
10 any tool?  
11 A. It did.  
12 Q. And what tool did it replace?  
13 A. If you're asking for the specific name of the  
14 tool, I can't remember.  
15 Q. Does the specific name of the tool have "work  
16 bench" in it?  
17 A. Had the word "work bench," correct.  
18 Q. You just can't remember the full name?  
19 A. No, no.  
20 Q. That's fine.  
21 And does fusion workforce compensation in any  
22 way relate to base pay increases?  
23 MS. MANTOAN: Objection. It's vague and  
24 ambiguous.  
25 THE WITNESS: Does in any way relate to base

1 pay increases...  
2 BY MR. GARCIA:  
3 Q. To the increases of a person's base pay?  
4 A. What do you mean by the word "relate"?  
5 Q. Does it affect, does it change, the amount of  
6 base pay a person gets?  
7 A. The tool itself does not.  
8 Q. But does the inputs to the tool?  
9 A. The inputs to the tool, it allows for  
10 managers to make recommendations or allocations, correct.  
11 Q. Okay. Now, do you monitor the  
12 recommendations that managers make?  
13 MS. MANTOAN: Objection; vague and ambiguous,  
14 asked and answered, compound.  
15 THE WITNESS: Okay. So as I've stated  
16 previously, and I'm going to state it for about the tenth  
17 time here, is that a manager may allocate an amount, and  
18 I may note, be aware, that a manager has made an award to  
19 that extent.  
20 BY MR. GARCIA:  
21 Q. Now, when the managers -- managers make  
22 initial recommendations, right?  
23 A. I don't know.  
24 Q. You don't know?  
25 A. I don't know. I'm at such a high level, I

1 don't know.  
2 Q. So let's -- this training that you've seen  
3 before, were you -- did you participate in any webinars  
4 about it?  
5 A. Most likely, I would have.  
6 Q. And would this training -- these webinars  
7 would indicate your attendance that -- was this training  
8 also wrote out to the line of business units that you  
9 provide support for?  
10 MS. MANTOAN: Objection. That calls for  
11 speculation.  
12 THE WITNESS: It was so long ago, I don't know.  
13 It would have been provided to the H.R. business partners  
14 at that time, but I can't say with -- although it says,  
15 "manager training." I just don't know what the word  
16 "manager" in this case means. I don't know who the  
17 audience was. I didn't author the document.  
18 BY MR. GARCIA:  
19 Q. Did you contribute to any part of it?  
20 A. I did not contribute to any part.  
21 Q. But you do believe you attended a webinar  
22 training where this document was communicated to the H.R.  
23 business partners, correct?  
24 A. I may have. Considering my role, I may have.  
25 Q. So I want you to turn to the slide that has

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1 48 on it. So it's Oracle HQCA56242-48. And it talks  
2 about submitting to the next level.  
3 So when the first manager makes his allocation  
4 of who -- of what salary he wants to pay to his  
5 employees, is it a decision at that point or a  
6 recommendation?  
7 MS. MANTOAN: Objection. It's vague and  
8 ambiguous. It's also compound.  
9 THE WITNESS: I can't answer that, because I'm  
10 not in the weeds with the managers. The H.R. business  
11 partners are.  
12 BY MR. GARCIA:  
13 I see, I see. So let's turn to page 42 first.  
14 Strike that. No, we'll go to 42. You see that  
15 page is entitled "Review, Approve, and Submit"?  
16 A. Mm-hmm.  
17 Q. Is that part of the focal review that a  
18 manager reviews, approves, and submit the recommendations  
19 of the manager -- of that manager's subordinates?  
20 MS. MANTOAN: Objection. It's vague and  
21 ambiguous, and it's compound.  
22 THE WITNESS: You want to give me an example?  
23 BY MR. GARCIA:  
24 Q. I'm talking about the process. So is the  
25 process where a manager receives what his subordinate

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1 does and then the manager looks at it, approves, and  
2 submits it to the next higher level?  
3 MS. MANTOAN: Same objections. It's a compound  
4 question.  
5 THE WITNESS: It's going to depend on the LOB.  
6 And from that standpoint -- I mean, it's going to depend  
7 upon how they allocate and who received the budget. And  
8 I'm not at that level. So many discussions take place  
9 that I'm not privy to.  
10 BY MR. GARCIA:  
11 Q. So I want to understand the process, then.  
12 And so the process is, the managers -- so the process is,  
13 up at high, the corporation has a budget, and then it  
14 gets distributed or allocated down; however -- to  
15 whatever level the line of business leader wants to  
16 distribute it, correct?  
17 MS. MANTOAN: Objection. That's compound.  
18 THE WITNESS: Boy.  
19 BY MR. GARCIA:  
20 Q. Tell me the process. Tell me the process of  
21 how it starts, how the money moves through the  
22 corporation according to this training.  
23 A. I'm not privy at that level, either. I --  
24 Q. Okay. When do you know -- when do you first  
25 know where the money is? What level?

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1 MS. MANTOAN: Objection; vague, compound.  
2 THE WITNESS: What I can state is, I may  
3 know -- and I don't have access to all the LOBs. I have  
4 access to my world. I may know --  
5 BY MR. GARCIA:  
6 Q. I'm talking about what you know.  
7 A. I may know when a manager has allocated the  
8 budget.  
9 Q. No. I'm talking about -- a manager to  
10 allocate the budget has to receive a budget to allocate,  
11 correct?  
12 A. Correct.  
13 Q. So what level of your knowledge do you know  
14 that where this budget starts, the first point that you  
15 know that it starts where it gets allocated? Does it  
16 start at a line of business level?  
17 MS. MANTOAN: Objection; vague and ambiguous.  
18 THE WITNESS: I can't answer that.  
19 BY MR. GARCIA:  
20 Q. You can't answer that?  
21 A. I cannot answer that.  
22 Q. Okay. So you said a manager gets a budget  
23 that's allocated, right?  
24 A. Correct.  
25 Q. Where does the manager get that budget from?

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1 MS. MANTOAN: Objection. It's compound.  
2 BY MR. GARCIA:  
3 Q. I'm talking about the process. A manager  
4 gets a budget --  
5 A. I understand you're talking about the  
6 process.  
7 Q. So where does the manager get that budget  
8 from?  
9 MS. MANTOAN: Same objection.  
10 THE WITNESS: It may depend. It may depend.  
11 BY MR. GARCIA:  
12 Q. In the process, where does the manager get  
13 the budget from?  
14 A. I'll give you an example. If I'm a director,  
15 I may receive -- I may receive a budget from my manager,  
16 or actually, I may not receive a budget from my manager,  
17 and I may just be asked to make allocations.  
18 Q. Okay. So I'm going to turn to page 18 of  
19 that exhibit. Page 18 talks about allocating a budget,  
20 right?  
21 A. Right.  
22 Q. And so a manager allocates a budget to a  
23 lower-level manager in his organization, correct?  
24 A. Not necessarily. It depends.  
25 Q. A manager can allocate a budget, correct?

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1 A. A manager can, if they have a budget and --  
2 yeah.  
3 Q. Okay. And so can someone who's not allocated  
4 a budget make pay recommendations in the system?  
5 A. Yes. Because the budget's held at a higher  
6 level.  
7 Q. How would they know what amount of money they  
8 have to allocate?  
9 A. They don't necessarily know.  
10 Q. So you're saying they can make a  
11 recommendation on how much someone should be paid without  
12 knowing how much money is in the budget?  
13 MS. MANTOAN: Objection; that misstates  
14 testimony.  
15 BY MR. GARCIA:  
16 Q. Is that what you're saying to me?  
17 MS. MANTOAN: Objection. It misstates  
18 testimony. It's argumentative.  
19 BY MR. GARCIA:  
20 Q. Go ahead and answer the question.  
21 A. Believe me, I'm trying to answer your  
22 questions. At some level in the management hierarchy,  
23 the budget may or may not be distributed down further.  
24 That doesn't mean the manager cannot make  
25 recommendations. In many cases, the higher-level manager  
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1 requests that the lower-level manager just go in and put  
2 down their recommendations, and then further discussion  
3 ensues, but I can't speak to the specifics.  
4 Q. I'm just trying to understand what the  
5 process is. And what I understand you to say is that a  
6 manager who a budget is not distributed to can go in and  
7 make pay recommendations in the tool. Is that a correct  
8 understanding?  
9 A. Allocate budget, if you look in the middle of  
10 this slide --  
11 Q. And what page are you referring to?  
12 A. We are still on the same page. We're on 18.  
13 Q. Thank you.  
14 A. Select budget method. There's three choices:  
15 "I will not pass down budgets to managers below me.  
16 Instead I will hold the entire amount". Option two, "I  
17 will pass down budgets only to those managers reporting  
18 directly to me." Option three, "I will pass down budgets  
19 to all of my lower managers."  
20 Q. So my question is, in this tool, can a person  
21 who has not received an allocation of a budget make pay  
22 recommendations within this tool?  
23 A. As I've previously stated, where it says, "I  
24 will not pass down budgets to managers below me.  
25 Instead, I will hold the entire amount."  
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1 Q. My question is, what I'm trying to understand  
2 is, within this tool, for a manager who has not been  
3 allocated a budget --  
4 A. A budget.  
5 Q. -- can they make recommendations on what a  
6 person should be paid salary-wise within this tool?  
7 A. They have the ability to go into the module  
8 and make recommendations.  
9 Q. Without knowing what the budget is? Is that  
10 what you're saying?  
11 A. Without knowing what the budget is.  
12 Q. Now, once they make recommendations, then  
13 what happens?  
14 MS. MANTOAN: Objection; vague and ambiguous  
15 and compound.  
16 BY MR. GARCIA:  
17 Q. In terms of the process. Does the manager to  
18 whom they make recommendations have any responsibilities  
19 for the process?  
20 MS. MANTOAN: So, objection. It's vague and  
21 ambiguous as to "process" and "responsibility," and it's  
22 compound in that it's asking for a single answer for all  
23 managers.  
24 BY MR. GARCIA:  
25 Q. I'm asking for the process, not what --  
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1 A. I can't answer your question.  
2 Q. Do you understand that?  
3 A. I --  
4 Q. Do you understand the question I just --  
5 A. Do you understand that I cannot --  
6 Q. Please don't interrupt me. Do you understand  
7 that I'm asking about the process of -- under this  
8 program? I'm not asking about what a specific manager  
9 does. Do you understand that?  
10 MS. MANTOAN: Objection. It's argumentative.  
11 THE WITNESS: Yeah.  
12 BY MR. GARCIA:  
13 Q. Can you answer my question?  
14 A. I can't answer your question.  
15 Q. You can't answer my question where I'm  
16 saying, I'm not asking about a specific manager and all  
17 the managers in the universe? Do you understand that?  
18 A. Can we take a break? I know we're in the  
19 middle, but --  
20 Q. No. We're in the middle of a question.  
21 MS. MANTOAN: Can you just read back the  
22 question?  
23 And see if you can answer it, and then we would  
24 like to take a break after that answer.  
25 THE REPORTER: "Q. You can't answer my  
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1 question where I'm saying, I'm not asking about a  
 2 specific manager and all the managers in the universe?  
 3 Do you understand that?"  
 4 THE WITNESS: Okay. So the best way that I can  
 5 answer, I am not privy to what happens within a line of  
 6 business and any discussions they have with their H.R.  
 7 business partners.  
 8 MS. MANTOAN: Please allow her to finish her  
 9 answer.  
 10 MR. GARCIA: I'm going to move to strike as  
 11 nonresponsive.  
 12 Q. My question is --  
 13 MS. MANTOAN: Counsel, we're going to take a  
 14 break --  
 15 (Multiple, indistinguishable speakers.)  
 16 MR. GARCIA: Counsel --  
 17 THE WITNESS: We're taking a break.  
 18 MR. GARCIA: We're in the middle of a question,  
 19 Counsel.  
 20 Q. My question to you is, very simply, when you  
 21 state that you don't know what every manager is, that's  
 22 what I'm saying. My question is not pointed to what  
 23 every manager does.  
 24 My question is simply, after -- my question is  
 25 simply, what is the process for a manager who receives

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1 the recommendations from a subordinate for the  
 2 process-wise, what is that manager supposed to do? Do  
 3 you understand that I'm looking process-wise in terms of  
 4 what's common for this? Do you understand that? That  
 5 was my question.  
 6 MS. MANTOAN: Objection. It's vague and  
 7 ambiguous. You asked several questions.  
 8 So right now, he's just asking, do you  
 9 understand what he's saying? And if the answer --  
 10 THE WITNESS: I understand, but I can't answer  
 11 it.  
 12 MS. MANTOAN: We're going to take a break.  
 13 Thank you.  
 14 THE VIDEOGRAPHER: This marks the end of media  
 15 file labeled number five. Off the record at 2:50 p.m.  
 16 (Recess from 2:50 p.m. to 2:55 p.m.)  
 17 THE VIDEOGRAPHER: This marks the beginning of  
 18 media file labeled number six. Back on the record at  
 19 2:55 p.m.  
 20 BY MR. GARCIA:  
 21 Q. So if you can please turn to page 48 of that  
 22 Exhibit 52. So do you see -- I'm going to read the  
 23 sentence there. Do you see the sentence that starts with  
 24 "do not communicate" in red, bolded print?  
 25 A. Yes, mm-hmm.

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1 Q. So it says, quote, "Do not communicate any  
 2 changes until the last approval action shows approved by  
 3 Larry Ellison," unquote. Did I read that correctly?  
 4 A. You read that correctly.  
 5 Q. What does that mean?  
 6 MS. MANTOAN: Objection. It calls for  
 7 speculation.  
 8 BY MR. GARCIA:  
 9 Q. Do you know?  
 10 MS. MANTOAN: Same objection; lacks foundation,  
 11 since she didn't author this document.  
 12 THE WITNESS: What this references is that  
 13 there is eventually a sign-off and that managers are not  
 14 to communicate anything to their employees until we have  
 15 that sign-off.  
 16 BY MR. GARCIA:  
 17 Q. And by "sign-off," do you mean approval by  
 18 Larry Ellison's office?  
 19 MS. MANTOAN: Objection. It's vague and  
 20 ambiguous.  
 21 THE WITNESS: When you state "office," I'm not  
 22 certain what you're referencing when you state "office."  
 23 BY MR. GARCIA:  
 24 Q. I don't see "sign-off" there. So by  
 25 "sign-off," do you mean "approval"?

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1 MS. MANTOAN: Objection. It's vague and  
 2 ambiguous.  
 3 THE WITNESS: I mean that the upper leaders, we  
 4 eventually have to get to a sign-off. And by that, I  
 5 would mean in my example -- I'm only going to speak to my  
 6 responsibilities -- we would be obtaining Safra's  
 7 sign-off as an example.  
 8 BY MR. GARCIA:  
 9 Q. So does Larry Ellison ever have to approve  
 10 salary increases for the lines of business that you  
 11 support?  
 12 A. Technically, no. It's Safra.  
 13 Q. Has he in the past, from January 1st, 2013,  
 14 to January 18, 2019, ever approved any of the base salary  
 15 increases?  
 16 A. You're asking me to comment on a group that I  
 17 don't know, because I don't handle --  
 18 Q. I'm talking about the groups that you handle.  
 19 Do you understand that?  
 20 A. I understand groups -- okay, the groups that  
 21 I handle.  
 22 Q. Has he ever made an approval to the  
 23 recommendations for pay increases from January 1st, 2013,  
 24 to January 18, 2019?  
 25 A. You're asking me to speculate. Safra's the

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1 top-level approval for the groups that I handle.  
2 Q. And I'm asking you to your knowledge. So --  
3 A. "I don't know" is the response, other than  
4 generic sign-off.  
5 Q. Okay. So, now, why does it -- do you know  
6 why there are no communications until it receives the  
7 final sign-off?  
8 A. Because we want to ensure that -- things  
9 could change prior to. Just because a manager entered an  
10 amount, that amount could change. So we want to ensure  
11 that there aren't any communications until it is set in  
12 stone and signed off.  
13 Q. Do you know how many times it changes?  
14 A. I don't.  
15 Q. Is there any record kept of how many times it  
16 changes?  
17 A. No. That I'm aware of.  
18 Q. Who can change what a manager allocated?  
19 MS. MANTOAN: Objection. It's compound. It's  
20 vague and ambiguous.  
21 BY MR. GARCIA:  
22 Q. You said there could be changes made. So  
23 who --  
24 A. There can be changes made.  
25 Q. Who can make the changes?

1 MS. MANTOAN: Objection. It's compound, and  
2 it's a single question about every level of management  
3 and every decision.  
4 BY MR. GARCIA:  
5 Q. I'm talking about the process. Who can make  
6 a change to what a subordinate manager recommended?  
7 MS. MANTOAN: Same objections.  
8 THE WITNESS: If manager X-Y-Z submits a  
9 recommendation, anyone above that manager could  
10 ultimately, as an example, make a change.  
11 BY MR. GARCIA:  
12 Q. Up to and include the final approval being  
13 Safra Catz for your organization, correct?  
14 A. Technically, yes.  
15 Q. And you don't personally know the amount of  
16 changes that actually occur, correct?  
17 A. I don't have --  
18 MS. MANTOAN: Objection. It assumes facts.  
19 BY MR. GARCIA:  
20 Q. Okay. So when a supervisor is making a  
21 decision in terms of what amount that they can make, I'm  
22 trying -- and I'll just give you a general thing, and  
23 then I'll ask my specific question. I'm trying to  
24 understand what information that person has available to  
25 them.

1 So in the process, can a supervisor see the pay  
2 of the subordinates of his peers?  
3 MS. MANTOAN: Objection. It's vague and  
4 ambiguous, and it's compound.  
5 THE WITNESS: I'm getting caught with the word  
6 "supervisor."  
7 BY MR. GARCIA:  
8 Q. Okay. Manager.  
9 A. So if we use the word "manager" -- because  
10 supervisor can't make pay decisions.  
11 Q. So can a manager, who has people, see the pay  
12 recommendations of his peers who also have people?  
13 MS. MANTOAN: Same objections.  
14 THE WITNESS: No, they cannot.  
15 BY MR. GARCIA:  
16 Q. So is it that a manager can see the pay of  
17 the people below him, but not his peers, correct?  
18 A. Correct.  
19 MS. MANTOAN: Objection. It's vague and  
20 ambiguous, and it's compound.  
21 So that the record is cleaner, just give a  
22 second after the question.  
23 THE WITNESS: Okay, okay.  
24 BY MR. GARCIA:  
25 Q. Now, do you know, in the module of the pay or

1 the information that's available to the supervisor, is a  
2 person's gender identified in this tool?  
3 MS. MANTOAN: Same objections.  
4 THE WITNESS: I'm going to once again insert  
5 "manager."  
6 BY MR. GARCIA:  
7 Q. I'm sorry. Manager.  
8 A. Not identified, other than if you can figure  
9 out the gender based on name.  
10 Q. Same question with race. In this tool, when  
11 the manager is making allocations, compensation  
12 allocations, is the race of his subordinates identified?  
13 MS. MANTOAN: Same objections.  
14 THE WITNESS: No identifying with regards to  
15 race in the tool.  
16 MR. GARCIA: Thank you.  
17 Q. Now I'm going to ask, not necessarily in the  
18 tool, but managers have -- again, not this tool. But  
19 managers have the ability to look at what their  
20 subordinates are making in terms of pay-wise, independent  
21 of this tool, correct?  
22 MS. MANTOAN: Objection. It calls for  
23 speculation, it's vague, it's compound.  
24 THE WITNESS: Are you asking whether a manager  
25 has the ability at a point in time to review their

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1 direct's base pay as an example?  
2 BY MR. GARCIA:  
3 Q. Yes.  
4 A. They have that ability.  
5 Q. Do they have the ability to look at the base  
6 pay of the subordinates of their peers?  
7 MS. MANTOAN: Objection; vague.  
8 THE WITNESS: Their subordinates of their  
9 peers... You mean by other managers when you say "peers"?  
10 BY MR. GARCIA:  
11 Q. By "peers," I mean if someone's an M3.  
12 A. Okay.  
13 Q. I'll call that person A. And person B is an  
14 M3, and they both report to the same M4.  
15 A. Okay.  
16 Q. So can person A, M3, look at the subordinates  
17 of person B, M3, in terms of their pay?  
18 A. No.  
19 Q. Now, can a manager -- before, we talked  
20 about, you know, there were five core functions, like job  
21 function, job specialty, systems title, job code, and  
22 global career level?  
23 A. Mm-hmm.  
24 Q. Can a manager review each one of those items  
25 for their subordinates?

1 compound.  
2 BY MR. GARCIA:  
3 Q. So we just talked before about whether person  
4 A can look at person B's subordinates in terms of pay.  
5 So now I'm trying to determine if person A can look at  
6 person B's subordinates in terms of the five core  
7 element: salary grade, salary range, and compa ratio?  
8 MS. MANTOAN: Same objection.  
9 THE WITNESS: I want to make sure I understand  
10 the question. Person A, you're speaking of -- person B  
11 and person C are direct reports of person A; is that  
12 correct?  
13 BY MR. GARCIA:  
14 Q. No. Person B is a peer of person A.  
15 A. Person B --  
16 Q. They're both M3 managers reporting to the  
17 same M4 manager. So what I'm trying to determine, in the  
18 manager view, can person A, M3, look at the subordinates  
19 of person B, M3, in terms of their global career level,  
20 job function, job specialty, job code, systems job title,  
21 salary grade, salary range, and compa ratio?  
22 MS. MANTOAN: Same objections.  
23 THE WITNESS: Let me clarify. Person B is a  
24 direct report of person A?  
25 BY MR. GARCIA:

1 MS. MANTOAN: Objection; vague, compound.  
2 BY MR. GARCIA:  
3 Q. To see what the codes are?  
4 A. You're speaking of a specific manager?  
5 Q. Right. M3 person pay --  
6 A. An M3...  
7 Q. Person A's direct -- the subordinates of M3,  
8 person A, can he look at the job function, job specialty,  
9 global career level, job code, and job systems, job title  
10 of his people?  
11 A. Of his directs?  
12 Q. Yes.  
13 A. Yes.  
14 Q. And also the directs of his directs?  
15 A. Yes, he has that ability.  
16 Q. Can he also look at their salary grade,  
17 salary ranges, and compa ratios, too?  
18 A. That is in the manager view.  
19 Q. Now, again, I'm doing person A, M3, and  
20 person B, M3, reporting to the same M4. Is it also true  
21 that person M -- person A, M3, cannot look at the job  
22 code, job specialty, global career level, job title, or  
23 systems title, the salary grade, the salary range, and  
24 the compa ratio of the subordinates of M3, person B?  
25 MS. MANTOAN: Objection. It's vague and

1 Q. I said they're peers. They're both M3s.  
2 They're not direct reports. Person B is not a direct  
3 report of person A. Person B is a direct report of the  
4 same M4.  
5 A. The view a manager has, they only have the  
6 view for their direct reports and the employees under  
7 those direct reports. They cannot view sideways, for  
8 instance.  
9 Q. And that would also apply to career level,  
10 salary grade, compa ratio, too, correct?  
11 A. That's correct.  
12 Q. Okay. Thank you.  
13 One last thing for sideways.  
14 A. Sorry. It's just a comp term.  
15 Q. That's okay.  
16 So, again, they're peers. They're both M3s.  
17 They also can't look at a person's race and gender,  
18 correct?  
19 A. That's correct.  
20 Q. I'm going to have you look at another  
21 exhibit. I believe that we covered a lot of this, but I  
22 still want to go through it. This was Exhibit 11 of the  
23 Kate Waggoner's deposition. Do you recognize this  
24 document?  
25 A. It's completely different than anything I've

1 seen?

2 Q. Okay.

3 A. Is it?

4 Q. I think we'll get to it.

5 A. Maybe I should look. 2018.

6 Q. Right. The date of the document is 2018.

7 A. 2018, right.

8 Q. So I see that you stopped looking through it,

9 so I'll ask you a question --

10 A. Right. I thought I'd wait for the specific

11 pages.

12 Q. Are you familiar with the document at Exhibit

13 11?

14 A. Yes.

15 Q. What is it?

16 A. It's the annual bonus program and workforce

17 compensation manager training.

18 Q. And --

19 A. 2018.

20 Q. Thank you. You anticipated my next question.

21 Be more efficient that way.

22 So do you remember if this was part of any

23 webinar presentation that you were involved with, this

24 document as Exhibit 11?

25 MS. MANTOAN: When you say "involved with," you

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1 mean she attended or she presented?

2 MR. GARCIA: Attended.

3 THE WITNESS: Chances are I would have

4 attended.

5 BY MR. GARCIA:

6 Q. And did you do any -- did you assist in

7 making the document at Exhibit 11?

8 A. No.

9 Q. Did you have any input?

10 A. No.

11 Q. Now, Ms. Waggoner's global compensation team,

12 when they're developing their compensation presentations

13 for the focal reviews, do they at all communicate with

14 any -- to your knowledge, anyone on the U.S. compensation

15 team before it's rolled out?

16 A. I'm not privy to those discussions.

17 Q. That's all I'm asking, is what you know.

18 A. Yeah.

19 Q. Now, would the document at Exhibit 11 be the

20 type of document that would be given to your H.R.

21 business partners?

22 A. Typically, these aren't given to them. We

23 present the information to them.

24 Q. And then they have access where they can pull

25 up the document, correct?

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1 A. Generally, yes.

2 Q. And then if they have questions about the

3 document at Exhibit 11, then you answer them?

4 A. Correct.

5 MS. MANTOAN: Counsel, I don't want to forget

6 to put something on the record about these exhibits. I

7 believe this Exhibit 11 was produced confidential, and

8 then you've put on Bates numbers with pages. Is that

9 correct?

10 MR. GARCIA: My understanding, Counsel, is that

11 if you looked at the meta data, it was marked

12 confidential. And if you look at the file -- if you look

13 at the Bates stamp numbered -- the Bates stamp number for

14 Exhibit 11 would be 381306.

15 MS. MANTOAN: Okay.

16 MR. GARCIA: Oracle only put one Bates stamp

17 number to the whole document. To make it easier to look

18 at individual pages, we added the dash and then the

19 specific page number.

20 MS. MANTOAN: Okay. I just wanted to have the

21 record clear that Exhibit 11, which you're talking about

22 with the witness now -- same thing for Exhibit 52 and

23 Exhibit 7 -- they were all produced with a confidential

24 designation, and we would retain those.

25 MR. GARCIA: To my knowledge, yes.

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1 MS. MANTOAN: Thank you.

2 BY MR. GARCIA:

3 Q. So -- sorry. I want you to look at slide 39,

4 which is actually dash-75, Oracle HQ 381306-75.

5 Okay. So this page here at 75, it's similar to

6 the other one where it says, quote, "Do not communicate

7 recommendations until you receive notification that

8 corporate compensation has obtained final approval."

9 Did I read that correctly?

10 A. You read that correctly.

11 Q. And the "do not" is in red, bolded print,

12 correct?

13 A. Correct.

14 Q. When it refers to corporate compensation,

15 who's it referring to?

16 MS. MANTOAN: Objection. It calls for

17 speculation, since she didn't author this document.

18 BY MR. GARCIA:

19 Q. Do you know who it's referring to?

20 MS. MANTOAN: The question still calls for

21 speculation.

22 THE WITNESS: So this is in 2018. This is old

23 language that was used. Corporate compensation at this

24 timeframe no longer existed.

25 BY MR. GARCIA:

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1 Q. I'm sorry. I didn't understand that. Are  
2 you saying --

3 A. "Corporate compensation" is an old term.

4 Q. So are you saying in 2018, when this was  
5 created, corporate compensation no longer existed?

6 A. It's an old term. What I'm saying is, to  
7 replace corporate compensation, you would replace it with  
8 U.S. compensation, global compensation. And in this  
9 case, because it's approval, it's global compensation.

10 Q. Okay. So I'm just going to ask a question so  
11 that I understand. So the previous slide that we looked  
12 at was June 2014 where it talked about "Do not  
13 communicate until Larry Ellison approved." Do you  
14 remember that?

15 MS. MANTOAN: Objection; misstates the  
16 document. Document speaks for itself.

17 BY MR. GARCIA:

18 Q. Or do you want us to go back and look at it?  
19 Do you remember this as "Do not communicate until Larry  
20 Ellison approved"?

21 MS. MANTOAN: Objection; misstates the  
22 documents.

23 THE WITNESS: Let's go back and look at that  
24 actual language.

25 BY MR. GARCIA:

1 Q. Okay. So if you go back and look at page  
2 48 --

3 MS. MANTOAN: In Exhibit 53, Counsel?

4 MR. GARCIA: Yes.

5 THE WITNESS: Okay.

6 BY MR. GARCIA:

7 Q. So in 2014, it was, "Do not communicate until  
8 the last approval action shows approved by Larry  
9 Ellison," correct?

10 A. Correct.

11 Q. And so -- and then, 2018, it says, "Do not  
12 communicate recommendations until you receive  
13 notification that corporate compensation has obtained  
14 final approval," correct?

15 A. Correct.

16 Q. So are there different -- are different  
17 people making the approvals between 2014 and 2018?

18 MS. MANTOAN: Objection. It's vague and  
19 ambiguous, it's compound, calls for speculation.

20 THE WITNESS: There could have been different  
21 leaders in place at the top, top levels.

22 BY MR. GARCIA:

23 Q. Okay. So --

24 A. Could have.

25 Q. So in 2018, who made the final approval for

1 compensation if it's not corporate compensation?

2 MS. MANTOAN: Objection. It's vague and  
3 ambiguous, and it's compound, and the document speaks for  
4 itself.

5 BY MR. GARCIA:

6 Q. But you're telling me the document's wrong,  
7 right?

8 A. I'm telling you the language referring to our  
9 department as corporate compensation is --

10 Q. Incorrect?

11 A. -- is incorrect. We still at times resort to  
12 that language, which -- old habits.

13 Q. Right. But as I understand -- what you said  
14 earlier is that compensation documents for the focal  
15 review in 2018 were produced out of Kate Waggoner's  
16 global compensation team, correct?

17 A. That's correct.

18 Q. So since you're stating that it's an  
19 incorrect language, do you know who the final approval  
20 was for the 2018 focal review?

21 MS. MANTOAN: Objection. It's vague and  
22 ambiguous.

23 THE WITNESS: So for my groups, again, same as  
24 here. Safra would have been the top-level approver.

25 BY MR. GARCIA:

1 Q. Now, did the global compensation team, Kate  
2 Waggoner's group, did they have any approvals in terms of  
3 compensation for the 2018 focal review?

4 MS. MANTOAN: Objection; vague and ambiguous,  
5 overbroad. Are you talking about her own team for comp  
6 people?

7 BY MR. GARCIA:

8 Q. I'm talking about do you know for any line of  
9 business, to include your own, whether Kate Waggoner's  
10 global compensation team approved anything for the focal  
11 review of 2018 in terms of the salary recommendations?

12 MS. MANTOAN: Objection; vague and ambiguous,  
13 lack of foundation.

14 THE WITNESS: Are you asking whether Kate  
15 Waggoner or her team specifically was the approver here?

16 BY MR. GARCIA:

17 Q. I'm asking were they involved in any part of  
18 -- I'll change it slightly. Were they involved in any  
19 part of the approval process?

20 MS. MANTOAN: Same objections.

21 THE WITNESS: They would have been involved in  
22 seeking the sign-off.

23 BY MR. GARCIA:

24 Q. So by "the sign-off," you mean by Safra Catz?

25 A. As an example.

1 Q. But they don't actually have any approval  
2 authority by themselves?  
3 A. No.  
4 Q. Okay. Now, you said corporate  
5 compensation -- was that the name of the compensation  
6 team that when Lisa Gordon was there?  
7 A. Yes.  
8 Q. And also, the very last sentence of this  
9 slide 75, it says, quote, "Always verify in workforce  
10 compensation before you communicate to employees to  
11 ensure that the final recommendations have not changed,"  
12 unquote.  
13 Did I read that correctly?  
14 A. You read that correctly.  
15 Q. Okay. So was that the same process that you  
16 identified before for Exhibit 52 that after a manager  
17 makes pay recommendations, anyone above him during the  
18 approval process can make changes?  
19 MS. MANTOAN: Objection; vague and ambiguous  
20 and misstates testimony.  
21 THE WITNESS: I was referring to the same  
22 process.  
23 BY MR. GARCIA:  
24 Q. That if someone makes recommendations, the  
25 higher-level manager can make changes to those

1 recommendations, correct?  
2 MS. MANTOAN: Same objection.  
3 THE WITNESS: Higher-level manager has the  
4 ability to go into the worksheet and make changes prior  
5 to the module closing.  
6 BY MR. GARCIA:  
7 Q. Now, before, we were talking about your  
8 knowledge regarding 2014. Did your knowledge about how  
9 many changes were made and who made the changes, did that  
10 change between the focal review of 2014 to the focal  
11 review in 2018?  
12 MS. MANTOAN: Objection; lacks foundation,  
13 assumes facts.  
14 BY MR. GARCIA:  
15 Q. Go ahead.  
16 A. I don't understand the question. What do you  
17 mean by "knowledge"?  
18 Q. Okay. I asked you before did you know of --  
19 whether changes were actually made to the recommendations  
20 by higher-level managers.  
21 A. Okay.  
22 Q. And I thought you said, "no." Is that  
23 correct?  
24 A. I said, "no."  
25 Q. And would that also apply to the 2018 focal

1 review?  
2 A. That would also apply.  
3 Q. Thank you.  
4 A. Yep.  
5 Q. Now, before, we talked about when focal  
6 reviews occurred, and you identified one occurred a  
7 couple months ago, just completed a couple days ago, and  
8 one occurred in fiscal year 2018. Do you know when the  
9 last bonus process was done? Again, for Redwood Shores.  
10 A. No.  
11 MS. MANTOAN: Objection; vague as to which line  
12 of business or lines of business.  
13 THE WITNESS: So as an example, I'll take the  
14 -- because there's only one. One, really -- there's more  
15 than one, but -- I'll take the global corporate bonus.  
16 That would be the non-sales population.  
17 BY MR. GARCIA:  
18 Q. Right. Thank you for clarifying. That's the  
19 population I'm referring to.  
20 A. Okay. We did not pay out this year.  
21 Q. And by "this year," do you mean fiscal year  
22 two thousand -- so today -- is today --  
23 A. FY --  
24 Q. Is today fiscal year 2018 or '19?  
25 A. This is '19. June 1st will be FY-20.

1 Q. So did Oracle pay out a bonus in fiscal year  
2 '19, a global corporate bonus?  
3 A. No.  
4 Q. Did it pay out a global corporate bonus for  
5 fiscal year 2018?  
6 A. I can't remember whether we did or not.  
7 Q. When was the last global corporate bonus, do  
8 you remember, Oracle giving out?  
9 A. We have paid out within recent years. I just  
10 can't remember what fiscal year it referred to or what  
11 timeframe.  
12 Q. Okay. So let me ask -- I'm changing subjects  
13 slightly. So it's my understanding that transfers happen  
14 in Oracle where a person moves from one manager to  
15 another manager, correct?  
16 A. Internal transfers.  
17 Q. Thank you.  
18 And in those internal transfers -- excuse me.  
19 Does the -- when a person transfers, does the salary and  
20 the headcount of that person when they transfer move from  
21 the organization where they were to the organization they  
22 transferred to?  
23 MS. MANTOAN: Objection; lack of foundation,  
24 calls for speculation, compound.  
25 THE WITNESS: I can't speak to headcount.

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1 BY MR. GARCIA:  
2 Q. Can you speak to salary?  
3 A. But I can speak to the employee would  
4 transfer from one manager to another. Clearly, the  
5 salary would move with the employee. And as far as with  
6 the new manager, there may or may not be a salary  
7 increase. Typically, there's not, but there could be.  
8 It all depends on the business circumstances.  
9 Q. During the focal review, if someone transfers  
10 from one organization to the other organization, do you  
11 know whether the headcount moves as well?  
12 MS. MANTOAN: Objection; incomplete  
13 hypothetical.  
14 THE WITNESS: During the focal review, as an  
15 example for this particular year, the effective date was  
16 4/1, meaning we cut the data on 4/1. There is no further  
17 transferring of the employee.  
18 BY MR. GARCIA:  
19 Q. Until when?  
20 A. Well, in the module. So in the module, I'm  
21 assigned to manager A, okay?  
22 Q. Right.  
23 A. All right? I may have -- I may have moved in  
24 May while the process was still going to manager B.  
25 Chances are, at that time, the employee may or may not

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1 move, because the issue is the budget would move with the  
2 employee. So that is a discussion that's held between  
3 the releasing and the new manager.  
4 MR. GARCIA: Okay. Court reporter, can you  
5 please mark the next document as Exhibit 53, please.  
6 (Plaintiff's Exhibit 53 was marked for  
7 identification.)  
8 BY MR. GARCIA:  
9 Q. Are you familiar with the document,  
10 Exhibit 53?  
11 A. I've never seen this document.  
12 Q. Before, you were talking about tier one  
13 schools?  
14 A. Correct.  
15 Q. Were you referring -- what schools were you  
16 referring to when you say "tier one schools"?  
17 A. I'm not familiar with what -- I just know  
18 there are tier one schools. This particular document  
19 gives me top schools.  
20 Q. Were you referring to top schools when you  
21 said, "tier one schools"?  
22 A. I was just referring to tier one. That was  
23 what was on the email.  
24 Q. Do you know what schools constituted the tier  
25 one schools?

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1 A. Do not.  
2 Q. So I know that you haven't seen this document  
3 before, but I'm just going to ask you about a statement  
4 therein. Do you see the statement that starts with  
5 "LJE"?  
6 A. Yes.  
7 Q. Do you know who's represented by those  
8 initials?  
9 MS. MANTOAN: Objection; calls for speculation.  
10 She's never seen this before.  
11 THE WITNESS: Yeah.  
12 BY MR. GARCIA:  
13 Q. Have you ever seen the initials LJE before?  
14 A. I've seen the initials LJE.  
15 Q. And when you saw it before, do you know who  
16 that person was -- who was being referred to with those  
17 initials?  
18 A. Again, having never seen this document --  
19 Q. I'm talking about when you saw LJE before, so  
20 I'm not talking about this document. When you saw the  
21 initials LJE before, do you know which person was being  
22 referenced by those initials?  
23 A. Typically, that would refer to the board of  
24 directors.  
25 Q. Does that refer to Larry Ellison?

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1 A. Typically, it referred to the board of  
2 directors.  
3 Q. Do you know if Larry Ellison has the initials  
4 LJE?  
5 A. Larry Ellison has the initials LJE, but this  
6 doesn't indicate whether or not it's actually Larry.  
7 Q. I understand.  
8 And it goes, quote, "LJE has approved a new  
9 compensation packages for top schools (MIT, Stanford,  
10 Caltech, and CMU)," end quote. Did I read that  
11 correctly?  
12 A. Yes.  
13 Q. And you just stated that LJE could refer to  
14 possibly the board of directors and the -- or Larry  
15 Ellison himself, correct?  
16 MS. MANTOAN: Objection. The question calls  
17 for speculation.  
18 BY MR. GARCIA:  
19 Q. But you don't know who --  
20 A. I don't know.  
21 Q. But it could refer to those two, but you  
22 don't know who in this particular context, correct?  
23 A. It may or may not in this context, having  
24 never seen this document.  
25 Q. Understand.

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1 Do you know whether the board approves  
2 compensation policies for hiring from colleges?  
3 MS. MANTOAN: Objection; misstates the  
4 document --  
5 BY MR. GARCIA:  
6 Q. I'm not talking about the document. I'm just  
7 asking, do you know whether the board approves  
8 compensation packages for college hires?  
9 MS. MANTOAN: Objection; vague and ambiguous,  
10 assumes facts.  
11 THE WITNESS: Yeah, I don't know. I'm not  
12 close enough to this to know, to have any insight.  
13 BY MR. GARCIA:  
14 Q. Has anybody -- have you dealt with  
15 compensation packages for new hires?  
16 A. For new hires?  
17 Q. Yeah.  
18 A. Yes.  
19 Q. And who approves those compensation packages  
20 for the new hires that you've dealt with?  
21 MS. MANTOAN: Objection; vague and ambiguous,  
22 compound.  
23 THE WITNESS: That's all dependent upon the  
24 LOB, the manager, the manager's hierarchy. This is a  
25 very lengthy process.

1 BY MR. GARCIA:  
2 Q. So you said it's a very lengthy process. Why  
3 do you say that?  
4 A. I say that because, depending upon the level  
5 of manager involved, we could be dealing with six  
6 managers in the hierarchy. We could be dealing with  
7 eight managers in the hierarchy. I can't speak to it.  
8 There isn't a one size fits all here.  
9 Q. I understand that.  
10 To hire someone, is there -- strike that.  
11 So we saw with the compensation, there was a  
12 final approver, if you will, correct? And you identified  
13 Safra Catz for your organization, correct?  
14 A. For my organization.  
15 Q. Is there also final approval for hiring?  
16 MS. MANTOAN: Objection; vague and ambiguous  
17 and compound.  
18 THE WITNESS: That would be -- eventually, it  
19 would get up to the board of directors to sign off, but  
20 prior to sign-off, there's many, many discussions that  
21 are taking place.  
22 BY MR. GARCIA:  
23 Q. I understand. So I'm trying to get -- so  
24 when you say "the final sign-off," when you use the term  
25 "sign-off," you also mean approval, correct?

1 A. It's not that straightforward.  
2 Q. It's not?  
3 A. Okay. Ultimately, there has to be some  
4 guideline in place, some process in place, to bring in a  
5 new hire. What I'm saying to you is, at some point,  
6 these offers eventually make their way to the board of  
7 directors.  
8 Q. And so when the board of directors signs off,  
9 that means it's giving approval to hire that person?  
10 MS. MANTOAN: Objection; vague and ambiguous.  
11 The question has been asked and answered. Compound.  
12 THE WITNESS: The board of directors in this  
13 case is three individuals. It's not your typical board  
14 of directors as in a compensation committee as an  
15 example.  
16 BY MR. GARCIA:  
17 Q. So who are the three individuals that compose  
18 the board of directors that does sign-offs?  
19 A. You're looking for names?  
20 Q. Yes.  
21 A. So you would have Carolyn Balkenhol would be  
22 the manager, and she has two direct reports: Yvonne  
23 Sieber or Sieber, and Lynn Taylor.  
24 Q. So those are the three people that you're  
25 talking about as the board of directors would sign off?

1 A. Well, they -- eventually, somebody -- and in  
2 this case, obviously, it would be them that would  
3 ultimately have to sign off.  
4 Q. And so I'm trying to determine what the term  
5 "sign-off." That means -- does that mean approved?  
6 MS. MANTOAN: Objection. It's asked and  
7 answered. Same objections to the earlier question.  
8 THE WITNESS: Yeah, yeah.  
9 BY MR. GARCIA:  
10 Q. "Yeah," as in correct, or "yeah," as in  
11 something else?  
12 A. As in -- ultimately, there's going to be one  
13 individual who, based on all the business justification  
14 that's been provided, is going to say, "This looks  
15 reasonable, and I'm going to sign off." And if it's not  
16 reasonable, they're going to ask questions.  
17 Q. So the result of them signing off, does that  
18 enable a person to be hired after this compensation --  
19 this board of directors signs off?  
20 A. That would enable the process to continue  
21 where an offer would be generated.  
22 Q. I get it. Okay. Thank you for explaining.  
23 Attached -- or not attached. This is Exhibit  
24 12. Have you ever heard of the name Vicki Ton before?  
25 A. She was an H.R. rep.

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1 Q. So I'm going to call -- so, Exhibit 12 was  
2 previously in Kate Waggoner's deposition. It's Oracle  
3 Bates stamp number 7021 to 24.  
4 I'm going to call your attention to the  
5 sentence -- the first paragraph where it starts with,  
6 "Remember that CEO," towards the right-hand side, the  
7 first paragraph, middle line. Do you see that?  
8 A. I see that.  
9 Q. So I'm going to state it. So it states,  
10 quote, "Remember that the CEO office approver is the  
11 ultimate reviewer so keep it simple and offer only the  
12 unique points to justify the hire," unquote.  
13 Did I read that correctly?  
14 A. You read that correctly.  
15 Q. So was that referring to the CEO office of  
16 those three individuals that you were just referring to?  
17 MS. MANTOAN: Objection. That plainly calls  
18 for her to speculate about what Sudhakar Kaki meant.  
19 BY MR. GARCIA:  
20 Q. So is there anything ever at Oracle in the  
21 last, say, six years that was referenced: CEO office  
22 approval?  
23 MS. MANTOAN: Objection; calls for  
24 speculation --  
25 BY MR. GARCIA:

1 Q. I'm asking about your knowledge. Have you  
2 ever heard of that phrase, "CEO office approver"?  
3 A. I would refer to it as the B.O.D. I can't  
4 say I have or I have not. Very old term.  
5 Q. What is an old term?  
6 A. The CEO office approver.  
7 Q. Because this email is dated in 2013, correct?  
8 A. That's correct.  
9 Q. And so that old term of CEO office approver,  
10 who is it referring to?  
11 MS. MANTOAN: Objection; calls for speculation.  
12 THE WITNESS: I don't know.  
13 BY MR. GARCIA:  
14 Q. So when you knew of the term --  
15 A. Do not know.  
16 Q. You just know it's an old term, but --  
17 A. It's an old term.  
18 Q. -- you don't know who it was referring to,  
19 correct?  
20 A. Correct.  
21 Q. Okay. Thank you.  
22 Court reporter, can you please mark the next  
23 document as Exhibit 54.  
24 (Plaintiff's Exhibit 54 was marked for  
25 identification.)

1 BY MR. GARCIA:  
2 Q. Have you ever seen Exhibit 54 before?  
3 MS. MANTOAN: While the witness is reviewing,  
4 just for the record, this also was produced with a  
5 confidential designation. We would maintain that  
6 designation. Do you agree, Counsel?  
7 MR. GARCIA: I agree, Counsel.  
8 MS. MANTOAN: Thank you.  
9 BY MR. GARCIA:  
10 Q. Are you looking to see if I gave it to you  
11 before?  
12 A. Yeah, I am.  
13 Q. I don't believe so.  
14 A. "No"? Slightly different language?  
15 Q. Has similar language. It's just a  
16 different...  
17 A. Okay.  
18 Q. Do you recognize the document?  
19 A. I recognize the contents of the document.  
20 Q. Okay. And how is it that you recognize it?  
21 A. That I recognize some of the slides that have  
22 been presented here.  
23 Q. Okay. And can you tell me what slides you  
24 recognize? Tell me the page numbers, please.  
25 A. Many of them are going to be very similar

1 to...  
2 Q. What two exhibits are you comparing?  
3 A. Well, it's very similar when we introduce the  
4 tool. So one of them that we talked about earlier was  
5 manager training.  
6 Q. And what --  
7 A. And this one's H.R. training. It's the same  
8 general concepts.  
9 Q. I got you. And when you said, "this one,"  
10 can you tell me the exhibit number? It's at the top.  
11 A. Oh. 52.  
12 Q. Okay. So you're saying Exhibit 52 and 54 are  
13 similar in concept. 52 is delivered to the managers, and  
14 54 was delivered to H.R.? Is that a correct  
15 understanding?  
16 MS. MANTOAN: Objection; calls for speculation.  
17 THE WITNESS: I'm saying both were produced in  
18 June of 2014. One of them clearly was produced by Lisa  
19 Gordon. I don't know the author of the other one. The  
20 subject matter is global corporate bonus process and  
21 fusion workforce compensation on the H.R. training.  
22 Subject matter on the manager training is global process  
23 for global corporate bonus and fusion workforce  
24 compensation.  
25 BY MR. GARCIA:

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1 Q. Okay. So if you look at slide three of  
2 Exhibit 50 -- strike that.  
3 If you look at the slide three, it's on Oracle  
4 HQCA56247-4.  
5 A. I'm sorry. Where are you?  
6 Q. The fourth page. Right. So on that page, it  
7 gives a calendar of -- it looks like the advances is  
8 almost completely three months for a bonus. Is that  
9 typically how long it takes to complete the bonus process  
10 for variable pay for Oracle's corporate bonus?  
11 MS. MANTOAN: Objection. I believe it's asked  
12 and answered this morning.  
13 THE WITNESS: Yeah, I stated earlier that, on  
14 average, it was three months.  
15 BY MR. GARCIA:  
16 Q. Okay. So this is the bonus?  
17 A. This is the bonus.  
18 Q. So does a bonus, on average, take three  
19 months, just like the focal review takes three months?  
20 A. Typically.  
21 Q. Okay. Thank you.  
22 I want you to turn to page 26 of this  
23 presentation, which is slide 18.  
24 A. Okay.  
25 Q. Okay. So at the bottom of slide 18, which is  
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1 page 26, it says, in red, quote -- red, bolded print,  
2 that is, "Caution. Changing the manager will change the  
3 manager's budget. It could also change the LOB budget,"  
4 unquote. Did I read that correctly?  
5 A. You read that correctly.  
6 Q. Okay. So this was what you were referring to  
7 before, that if there is -- changing the manager of the  
8 person will change -- in other words, a person transfers  
9 will change the budget for that manager?  
10 MS. MANTOAN: Objection. The document speaks  
11 for itself.  
12 THE WITNESS: If the budget allocation was in a  
13 percentage and not an amount, what this is indicating,  
14 that if somebody moved worksheets and they moved  
15 worksheets outside the LOB, it would change the amount  
16 potentially.  
17 BY MR. GARCIA:  
18 Q. And it would also change the amount  
19 potentially if someone -- it moved within an LOB? Am I  
20 understanding this? Changing the manager will change the  
21 manager's budget indicates to me that there will also be  
22 a change if its within the line of business. Is that  
23 your understanding?  
24 A. May or may not.  
25 Q. Okay. I'm going to go to the next document.  
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1 MS. MANTOAN: Either now or after that next  
2 one, can we take a break? We've been going about an  
3 hour.  
4 MR. GARCIA: Okay, we'll take a break after  
5 this one.  
6 Q. This document has previously been marked as  
7 Exhibit 1 at Ms. Waggoner's deposition. Are you familiar  
8 with Exhibit 1?  
9 MS. MANTOAN: Again, Counsel, this is one we  
10 produced with a confidential designation. Do you agree?  
11 MR. GARCIA: I agree.  
12 THE WITNESS: I am familiar.  
13 BY MR. GARCIA:  
14 Q. And how are you familiar?  
15 A. I'm familiar with -- this is one of the  
16 presentations that Kate developed.  
17 Q. So the copyright date is 2011.  
18 A. Mm-hmm.  
19 Q. Does that change your opinion if Kate  
20 developed -- if Kate Waggoner developed it?  
21 A. It does not change my opinion. These were  
22 originally developed in 2009.  
23 Q. And how do you know that?  
24 A. And then revised.  
25 Q. How do you know they were developed in 2009?  
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1 A. Because I will on occasion reference such  
2 documents.  
3 Q. You said they were revised in 2011?  
4 A. Yeah.  
5 Q. And how do you know that?  
6 A. Because there's a new set that are out there,  
7 2011.  
8 Q. Okay. So my understanding is, this document,  
9 Exhibit 1, was part of compensation modules. Was that  
10 your understanding?  
11 A. Yes.  
12 Q. And if you would look at the second page of  
13 Exhibit 1, it lists them after the modules, correct?  
14 A. Correct.  
15 Q. And one of them is salary ranges, which is  
16 Exhibit 1, correct?  
17 A. Correct.  
18 Q. Okay. So I want you to look at slide eight,  
19 which is page Oracle HQCA364272-15.  
20 MS. MANTOAN: Did you say "15," Counsel, or  
21 "14"?  
22 MR. GARCIA: 15.  
23 MS. MANTOAN: So the notes to page 8? I just  
24 want to make sure --  
25 MR. GARCIA: Correct. The notes to slide  
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1 eight.

2 MS. MANTOAN: Thank you.

3 THE WITNESS: I got the wrong one.

4 BY MR. GARCIA:

5 Q. Okay. So if you look at the first paragraph

6 of Exhibit 1, page 15, I'm going to read it. "Salary

7 grade is the length between internal and external

8 equity," unquote --

9 MS. MANTOAN: Counsel, salary range, not grade.

10 MR. GARCIA: I apologize.

11 MS. MANTOAN: That's okay.

12 MR. GARCIA: Let me start over.

13 Q. Quote, "Salary range is the length between

14 internal and external equity," unquote. Do you know if

15 that statement's true?

16 MS. MANTOAN: Objection; calls for speculation

17 as to what this person meant, so as to whether what they

18 meant is true.

19 BY MR. GARCIA:

20 Q. So let's first start. Did I read that

21 correctly?

22 A. You read it correctly the second time, yes.

23 Q. Thank you. Practice makes perfect.

24 Do you know if that statement is true?

25 MS. MANTOAN: Same objection.

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1 THE WITNESS: I'm not clear what she's

2 referencing here when she says, "the link between."

3 BY MR. GARCIA:

4 Q. Let me read the next sentence. Quote, "All

5 jobs are considered equal in value to Oracle are grouped

6 into the same local grade level, and have the same salary

7 range," unquote. Did I read that correctly?

8 A. You read that correctly.

9 Q. Is that a true statement?

10 MS. MANTOAN: Same objection, that it calls for

11 her to speculate as to what this person meant, so she can

12 say whether --

13 BY MR. GARCIA:

14 Q. I'm asking you to look at the plain language

15 of the words. And is that -- based on the plain language

16 and the meaning of the words, do you believe that that's

17 a true statement?

18 MS. MANTOAN: Same objection. It's vague and

19 ambiguous.

20 THE WITNESS: What I can tell you is, if we

21 have two jobs and they're both assigned the same salary

22 range, the market value salary grade midpoint is aligned

23 closely with the market 50th percentile, and that's how

24 we determine whether or not two jobs would hold the same

25 salary grade.

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1 BY MR. GARCIA:

2 Q. Okay. So I understand previously that you

3 testified that a salary grade can be assigned to more

4 than one job code.

5 A. No, I never testified to that. Salary grade

6 -- wait. No, take that back. Sorry. A job code can

7 only have one salary grade.

8 Q. But a salary grade can be assigned to

9 multiple job codes, correct?

10 A. Yes. I'm sorry. Yes.

11 Q. That's okay.

12 A. Yes.

13 Q. It goes job code, salary grade, salary range,

14 correct?

15 A. Yes. Salary grade is going to have an

16 associated -- in most cases, it's going to have an

17 associated salary range.

18 Q. Right.

19 A. Correct.

20 Q. Okay. So going back to the sentence that I

21 just read, it states that "All jobs that are considered

22 equal in value to Oracle are grouped in the same local

23 grade [sic], and have the same salary range."

24 So I'm asking, the plain meaning of the words,

25 do you know if that's a true statement?

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1 MS. MANTOAN: Objection; calls for speculation.

2 It's vague and ambiguous. And she already answered the

3 question exactly as you phrased it.

4 THE WITNESS: Yeah. I do not know what is

5 meant by this statement. I've provided to you my

6 understanding of how a salary grade is assigned to a job.

7 BY MR. GARCIA:

8 Q. But see, what I'm trying -- your question

9 didn't address equal in value. So that's what I'm trying

10 to get at, because what I understood you saying is, there

11 are certain market surveys, like the Radford survey, and

12 that identifies a midpoint, which is the 50, and then

13 it's expanded out to the maximum and minimum of its

14 salary range, correct?

15 A. I'm sorry. One more time. Salary grade.

16 Q. So you have these market surveys that give

17 you a midpoint, and then the midpoint of that salary

18 range is linked to salary grades, and then there's a

19 certain width associated with that that gives you the

20 minimum and the maximum of the salary range; is that

21 correct?

22 A. That's not correct.

23 Q. Can you tell me --

24 A. A salary survey is not going to provide the

25 midpoint. The midpoint is going to be determined by, in

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1 this case, because of our compensation philosophy, the  
 2 50th percentile, but somebody else may look at that data,  
 3 another company, for example, may have a different  
 4 philosophy and may target a different percentile.  
 5 Q. Okay. So that tells me about how Oracle uses  
 6 the market survey to get at the 50 percent mark, 50  
 7 percentile. So what I'm trying to understand is, this  
 8 reference to salary grades, to jobs being equal and  
 9 valuable -- equal in value to Oracle if they have the  
 10 same salary grade. Are you able to answer that part of  
 11 the question?  
 12 A. I'm not able to answer that part. I don't  
 13 know what's being inferred here, and I don't want to  
 14 guess. So the way I'm answering it is the way I  
 15 understand it. I didn't author the document, and I don't  
 16 understand specifically, exactly the phrase that you  
 17 used, and it's why I answered it the way I did.  
 18 Q. It's not me making up this phrase.  
 19 A. No, I understand.  
 20 Q. This is the phrase that's stated in one of  
 21 Oracle's documents.  
 22 A. Correct.  
 23 Q. Now, earlier, we talked about compa ratios,  
 24 and I believe you identified a compa ratio as the  
 25 person's base salary divided by the midpoint of the

1 salary range.  
 2 Is that a correct understanding?  
 3 A. That is not.  
 4 Q. What is a compa ratio?  
 5 A. What I indicated was, it's an employee's  
 6 annual base salary divided by the midpoint of the  
 7 assigned salary range would give you the compa ratio.  
 8 Q. And how does Oracle use compa ratio?  
 9 MS. MANTOAN: Objection. That's vague and  
 10 ambiguous --  
 11 BY MR. GARCIA:  
 12 Q. Do you know?  
 13 MS. MANTOAN: -- and it's compound as in  
 14 implying there's a single way that's used by everyone in  
 15 the company.  
 16 THE WITNESS: Exactly. Yeah.  
 17 BY MR. GARCIA:  
 18 Q. So do you know some of the ways that a compa  
 19 ratio is used in Oracle?  
 20 MS. MANTOAN: Objection; vague.  
 21 BY MR. GARCIA:  
 22 Q. What do you know about how the compa ratio is  
 23 used at Oracle?  
 24 MS. MANTOAN: Same objection.  
 25 THE WITNESS: A compa ratio -- we provide a

1 compa ratio on reports. As an example, the total direct  
 2 comp report. How a manager elects to utilize that compa  
 3 ratio is beyond my knowledge.  
 4 BY MR. GARCIA:  
 5 Q. Have you seen any trainings that advise  
 6 managers how they can use a compa ratio?  
 7 MS. MANTOAN: Objection. It's vague.  
 8 THE WITNESS: I can't think of any trainings,  
 9 other than providing to the manager what the definition  
 10 of a compa ratio is.  
 11 MR. GARCIA: I understand.  
 12 Q. So if a person had a compa ratio of 1.0,  
 13 would that mean that their annual base salary is exactly  
 14 the midpoint of the salary range?  
 15 A. Very, very close.  
 16 Q. Depends how many --  
 17 A. How many decimal --  
 18 Q. -- decimal points -- okay. Very good.  
 19 MS. MANTOAN: Counsel, could we take that  
 20 break, or are we still --  
 21 MR. GARCIA: I'm sorry. I apologize, Counsel.  
 22 Let's take a break.  
 23 MS. MANTOAN: Thank you.  
 24 THE VIDEOGRAPHER: This marks the end of media  
 25 file labeled number six. Off the record at 4:01 p.m.

1 (Recess from 4:01 p.m. to 4:11 p.m.)  
 2 THE VIDEOGRAPHER: This marks the beginning of  
 3 media file labeled number seven. Back on the record at  
 4 4:11 p.m.  
 5 BY MR. GARCIA:  
 6 Q. There is another document that was during  
 7 Lisa Waggoner's interview. Do you recognize the  
 8 document?  
 9 MS. MANTOAN: You said, "interview." Did you  
 10 mean deposition?  
 11 MR. GARCIA: I meant deposition. Thank you,  
 12 Counsel.  
 13 MS. MANTOAN: Again, can we agree this was  
 14 produced with a confidential designation?  
 15 MR. GARCIA: Yes.  
 16 THE WITNESS: This one is missing the cover  
 17 sheet. This appears to be another one of the modules  
 18 that Kate would have created.  
 19 BY MR. GARCIA:  
 20 Q. Okay. I can only represent this is how it  
 21 was provided to us.  
 22 A. Right.  
 23 Q. Okay. So you recognize the document at  
 24 Exhibit 3 being compensation module that Ms. Waggoner  
 25 developed in and around 2012?

1 A. Correct.  
2 Q. I want you to turn to page 6.  
3 MS. MANTOAN: Counsel, are you asking about  
4 slide six or the Bates number that --  
5 MR. GARCIA: The dash-six. Thank you. I can't  
6 see it. Oh, I guess it's on the left side versus the  
7 right.  
8 Q. So earlier today you talked about Oracle's  
9 compensation philosophy. Do you remember that?  
10 A. Yes.  
11 Q. Were you referring to the compensation  
12 philosophy on Oracle HQCA 42098-6?  
13 A. In general terms, yes.  
14 Q. Okay. Do you know what the words "legally  
15 compliant" in that philosophy is supposed to represent?  
16 MS. MANTOAN: Objection. It calls for  
17 speculation. She's not the author.  
18 THE WITNESS: I do not. I don't want to  
19 assume.  
20 BY MR. GARCIA:  
21 Q. So if an H.R. business partner received this  
22 training and asked you a question about legally  
23 compliant, what would you say to that H.R. business  
24 partner?  
25 MS. MANTOAN: Objection. It's an incomplete  
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1 hypothetical.  
2 BY MR. GARCIA:  
3 Q. Go ahead and answer.  
4 A. If I had a question of which -- I have a  
5 question, I would reach out to Kate to find out what the  
6 intent of that statement was.  
7 Q. Okay. Because when I look on the next page,  
8 page 7, it says, quote, "We must be legally compliant  
9 wherever we do business," end quote. Did I read that  
10 correctly?  
11 A. You read that correctly.  
12 Q. And that doesn't really -- does that indicate  
13 to you what "legally complaint" means?  
14 A. No.  
15 Q. Does Oracle follow a philosophy of being  
16 legally compliant in its compensation? Do you know?  
17 MS. MANTOAN: Objection. It's vague and  
18 ambiguous and compound.  
19 THE WITNESS: I don't know what that term  
20 refers to, but we abide by California law as an example,  
21 as far as, like, FLSA.  
22 BY MR. GARCIA:  
23 Q. Is FLSA a California law?  
24 A. Well, that's federal, and there's, obviously,  
25 state laws.  
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1 Q. Okay. Do you abide by -- is there any other  
2 law that you know of that Oracle has to comply with in  
3 the State of California regarding compensation?  
4 MS. MANTOAN: Objection. It's vague and  
5 ambiguous, and it's improper to ask her about the company  
6 at large. It's compound.  
7 BY MR. GARCIA:  
8 Q. I'm asking you. Do you know?  
9 A. Give me a minute. I may find something in  
10 here.  
11 Q. So as you sit here today, without looking  
12 through that exhibit, do you know what laws regarding  
13 compensation -- strike that.  
14 Without looking at the exhibit, because I don't  
15 believe it's in there --  
16 A. Okay.  
17 Q. -- I'm asking you, as you sit here today,  
18 what laws for the State of California, the geographical  
19 area of the State of California, not the entity of the  
20 State of California, what compensation laws does Oracle  
21 have to comply with, to your knowledge?  
22 MS. MANTOAN: Objection. It's vague and  
23 ambiguous, it calls for a legal conclusion, it calls for  
24 speculation, and it's compound.  
25 BY MR. GARCIA:  
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1 Q. You mentioned the Fair Labor Standards Act.  
2 A. Right.  
3 Q. The FLSA.  
4 A. Correct.  
5 Q. You mentioned state law. I'm assuming you  
6 mean the state industrial wage. Do you know of any other  
7 law that Oracle has to comply with regarding  
8 compensation?  
9 MS. MANTOAN: So, objection. It's vague and  
10 ambiguous. It calls for a legal conclusion. It asks her  
11 to speculate. It's compound.  
12 BY MR. GARCIA:  
13 Q. I'm not asking you to define the laws. I'm  
14 asking you what your understanding is.  
15 MS. MANTOAN: Same objections.  
16 MR. GARCIA: Okay.  
17 THE WITNESS: As an example, we cannot  
18 discriminate with regards to race, gender, protected  
19 class, sexual orientation.  
20 BY MR. GARCIA:  
21 Q. And that's Title VII? Is that what you're  
22 referring to?  
23 MS. MANTOAN: Objection; calls for a legal  
24 conclusion. You're putting words in the witness' mouth.  
25 THE WITNESS: Yeah.  
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1 BY MR. GARCIA:  
2 Q. No. I'm just asking you on what basis do you  
3 say that? What are you referring to?  
4 A. I don't know if it's Title VII or not.  
5 Q. Okay. And when you say that you cannot  
6 discriminate against a person, what do you mean by that?  
7 MS. MANTOAN: Objection; calls for a legal  
8 conclusion. It's vague and ambiguous. If you have an  
9 understanding as to what you think your obligations are  
10 and how you exercise them, you can answer in that limited  
11 vein.  
12 THE WITNESS: I can't answer that.  
13 BY MR. GARCIA:  
14 Q. Okay. Do you personally take any training  
15 regarding not discriminating against a person based on  
16 sex, race?  
17 A. We have periodical legal training that comes  
18 out on different topics. It comes out -- the training  
19 varies from one year to another, but typically, everyone  
20 has to take some sort of training in a two-year period  
21 before it, then, gets renewed the following two years.  
22 Q. Right. So I'm not talking about all the  
23 training that you take. I'm talking about training  
24 specifically regarding discrimination. Do you take that  
25 training?

1 A. I can't think of any specific training to  
2 give as an example.  
3 Q. Okay. Do you recall you ever being given any  
4 training relating to not discriminating based on sex or  
5 race?  
6 MS. MANTOAN: Objection. It's asked and  
7 answered. It's vague and ambiguous. If you can recall  
8 as you sit here today a specific training.  
9 THE WITNESS: I can't recall a specific  
10 training, if that's what you're asking.  
11 BY MR. GARCIA:  
12 Q. Were you trained on not to discriminate based  
13 on sex and race?  
14 MS. MANTOAN: Objection. It's asked and  
15 answered --  
16 BY MR. GARCIA:  
17 Q. I'm not asking about a specific training.  
18 I'm asking in general. Were you ever trained at Oracle  
19 not to discriminate based on sex and race?  
20 A. In general, I'm aware that you can't  
21 discriminate based on those factors.  
22 Q. That's not my question. My question is, do  
23 you recall whether you ever received any training at  
24 Oracle about not discriminating based on sex and race?  
25 MS. MANTOAN: Objection. It's asked and

1 answered. It's just what you can recall as you sit  
2 here --  
3 THE WITNESS: I can't recall any specific  
4 training. That doesn't mean that I didn't attend  
5 something. I may or may not. But if you're asking me  
6 can I recall something specifically in the last 21  
7 years...  
8 BY MR. GARCIA:  
9 Q. And see, my question -- because you're using  
10 the word "specifically," if I'm asking you if you can  
11 specifically recall training. I'm not asking you if you  
12 can recall a specific training. I'm asking you, do you  
13 recall if you've ever been trained on the subject by  
14 Oracle regarding not discriminating against someone  
15 because of sex -- or because of gender or race?  
16 MS. MANTOAN: Objection. It's asked and  
17 answered, and it's vague and ambiguous.  
18 THE WITNESS: I just can't recall. It doesn't  
19 mean it didn't happen. I just can't recall.  
20 BY MR. GARCIA:  
21 Q. How did you become aware not to discriminate  
22 based on gender and race?  
23 A. My bachelor's degree is in H.R. Would have  
24 been one of the areas.  
25 Q. Any other basis for how you recall that?

1 A. I consult frequently with -- it's  
2 attorney-client privilege upon matters.  
3 MS. MANTOAN: Yeah.  
4 THE WITNESS: Period.  
5 BY MR. GARCIA:  
6 Q. Have you received any training at Oracle on  
7 affirmative action?  
8 MS. MANTOAN: Objection; vague and ambiguous.  
9 THE WITNESS: Not that I can recall.  
10 BY MR. GARCIA:  
11 Q. Have you received any training at Oracle  
12 regarding the requirements that Oracle has because it is  
13 a federal contractor?  
14 MS. MANTOAN: Objection; vague and ambiguous.  
15 THE WITNESS: I don't know.  
16 BY MR. GARCIA:  
17 Q. So you don't know if you received the  
18 training? Is that what I understand you to say?  
19 A. I'm aware that Oracle's a federal contractor,  
20 but to that extent...  
21 Q. Are you aware of the obligations that Oracle  
22 has as a federal contractor?  
23 MS. MANTOAN: Objection; calls for a legal  
24 conclusion, vague and ambiguous.  
25 THE WITNESS: Yeah, I don't feel this -- that I

1 can answer that question as well.  
 2 BY MR. GARCIA:  
 3 Q. And why not?  
 4 A. Because I don't know the specifics.  
 5 Q. So the reason why you're not answering, I  
 6 understand, is because you don't know what obligation  
 7 Oracle has as federal contractor? Is that a correct  
 8 understanding?  
 9 MS. MANTOAN: Objection. It's vague and  
 10 ambiguous, and it calls for a legal conclusion.  
 11 THE WITNESS: I'm not answering because I don't  
 12 know the answer to your question, period.  
 13 MR. GARCIA: Understand.  
 14 Q. I'm going to ask the question slightly  
 15 different ways. I may get the same answer, but I'm just  
 16 going to ask it a slightly different way.  
 17 Do you know what actions Oracle has taken, if  
 18 any, to comply with its obligations of being a federal  
 19 contractor?  
 20 MS. MANTOAN: Objection; vague and ambiguous.  
 21 Simply asking what you know.  
 22 THE WITNESS: I don't know.  
 23 BY MR. GARCIA:  
 24 Q. Do you know anything about OFCCP's lawsuit  
 25 against Oracle that you're taking a deposition for?

1 MS. MANTOAN: I'm going to instruct you to not  
 2 answer in any way that would reveal any attorney-client  
 3 communications. Outside of something you may have  
 4 learned from attorneys, you could answer with respect to  
 5 that.  
 6 THE WITNESS: I recall reading in the press  
 7 that OFCCP had filed a claim, if that's the right word,  
 8 against Oracle.  
 9 BY MR. GARCIA:  
 10 Q. And did it state why OFCCP filed a lawsuit  
 11 against Oracle?  
 12 A. I don't recall the specifics. I just -- I do  
 13 recall seeing an article.  
 14 Q. Did you talk with Kris Edwards today about  
 15 your deposition -- strike that.  
 16 Did you talk with your supervisor, Ms. Edwards,  
 17 about anything related to your deposition today?  
 18 A. No.  
 19 MS. MANTOAN: Objection. It's asked and  
 20 answered.  
 21 BY MR. GARCIA:  
 22 Q. Okay. So did you tell her that you're going  
 23 to a deposition today?  
 24 A. She is aware, because I had to let her know  
 25 I'd be out of the office.

1 Q. So you did at least talk to her about that  
 2 you had a deposition, correct?  
 3 A. I notified her of.  
 4 Q. You talk to her anything else related to your  
 5 deposition today?  
 6 A. No.  
 7 MR. GARCIA: So what's the next number we're  
 8 on?  
 9 THE REPORTER: 55.  
 10 MR. GARCIA: Let's make this 55.  
 11 (Plaintiff's Exhibit 55 was marked for  
 12 identification.)  
 13 BY MR. GARCIA:  
 14 Q. Do you recognize the document as Exhibit 55?  
 15 A. Only to the standpoint that it appears to be  
 16 mandatory training for U.S. managers and managers not in  
 17 the U.S. but that have direct reports.  
 18 Q. So I see that you're reading from the slide.  
 19 A. I am. I am.  
 20 Q. My question is, have you ever seen this  
 21 document before?  
 22 A. No.  
 23 Q. Have you ever -- okay. And so the slide also  
 24 says, "H.R. personnel." You see that?  
 25 A. I see that.

1 Q. Okay. So you don't recall ever receiving the  
 2 training at Exhibit 55, correct?  
 3 A. I do not.  
 4 Q. Does the exhibit, Exhibit 55, refresh your  
 5 memory if you've ever received any affirmative action  
 6 training at Oracle during your tenure?  
 7 A. It does not.  
 8 Q. Okay. Going back to the compensation  
 9 training that Oracle provides, whether to the H.R., to  
 10 the managers, we identified in a couple of previous -- or  
 11 a couple of previous exhibits that some are named H.R.  
 12 training, and some are named manager training, correct?  
 13 A. Correct.  
 14 Q. Is there anyone respon- -- to your knowledge,  
 15 do you know of anyone who's responsible for giving the  
 16 manager training to the different managers regarding  
 17 compensation?  
 18 MS. MANTOAN: Objection; vague and ambiguous,  
 19 including vague as to time.  
 20 BY MR. GARCIA:  
 21 Q. Again, I'm talking about the six years from  
 22 January 1st, 2013, to January 18, 2019?  
 23 MS. MANTOAN: Still vague as to time.  
 24 THE WITNESS: You said, "2013"?  
 25 BY MR. GARCIA:

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1 Q. Yes. 1/1/13 to 1/18/19.  
2 A. I can say Kate would have been involved only  
3 because she authored the documents. And back then, we  
4 weren't split into global and U.S.  
5 Q. So when you're holding up a document, was  
6 Kate involved in the document that you have in your right  
7 hand?  
8 MS. MANTOAN: She has multiple documents, I  
9 believe.  
10 THE WITNESS: Sorry.  
11 BY MR. GARCIA:  
12 Q. So what's the exhibit number of the document  
13 you have?  
14 A. 52.  
15 Q. Okay. So you believe Kate was involved with  
16 that. And probably also the document that you identified  
17 that was missing the cover page that we just went over, I  
18 think that was Exhibit 1? It's a thick document.  
19 MS. MANTOAN: It's this one.  
20 BY MR. GARCIA:  
21 Q. Oh, it's Exhibit 3. I'm sorry. So Exhibit 3  
22 is the one that you said that was missing the cover page?  
23 A. Right, right.  
24 Q. So you also said Kate was involved with that  
25 one, correct?

1 A. Kate would have developed this training.  
2 Q. By "Kate," you mean Kate Waggoner?  
3 A. Kate Waggoner.  
4 Q. So the other training that's put out --  
5 strike that.  
6 The training you said that Kate Waggoner's team  
7 puts information to include training on Oracle's intranet  
8 for people in H.R. to access, correct?  
9 MS. MANTOAN: Objection. It's vague and  
10 ambiguous. It's compound.  
11 BY MR. GARCIA:  
12 Q. You identified for the focal reviews that  
13 Kate Waggoner's global compensation team puts documents  
14 on some internal website that the H.R. managers could  
15 access, correct?  
16 A. H.R. business partners would have access  
17 during the process.  
18 Q. Okay. So has Kate Waggoner's team put on  
19 that site that H.R. business partners and others could  
20 access any, like, video presentations?  
21 MS. MANTOAN: Objection. That's asked and  
22 answered many times.  
23 THE WITNESS: I did answer that earlier and --  
24 BY MR. GARCIA:  
25 Q. I apologize. I don't recall the answer.

1 A. I'm not aware of any videos.  
2 Q. I'm going to ask the question slightly  
3 different. Did it -- are you aware of Kate Waggoner's  
4 team putting on a site any audiovisual presentations in  
5 case someone -- that's not a visual presentation that  
6 someone doesn't consider a video?  
7 MS. MANTOAN: Objection; vague and ambiguous,  
8 and it calls for speculation.  
9 THE WITNESS: I'm not aware.  
10 BY MR. GARCIA:  
11 Q. And is it correct to say that you're only  
12 aware of Kate Waggoner's global compensation teams  
13 putting documents on that website for people to access?  
14 MS. MANTOAN: Objection; vague and ambiguous.  
15 BY MR. GARCIA:  
16 Q. Is that a correct understanding?  
17 A. If we define documents as a presentation --  
18 Q. A PowerPoint --  
19 A. -- and a PowerPoint --  
20 Q. -- an Excel spreadsheet, something, a PDF,  
21 either one of those three?  
22 A. A timeline.  
23 Q. Yeah.  
24 A. Actually, these would all be PDFs.  
25 Q. Okay. So are you aware of anything, besides

1 PDFs, that Ms. Waggoner's team would put on that site for  
2 people to access?  
3 MS. MANTOAN: Other than what she just  
4 testified to?  
5 MR. GARCIA: Yes.  
6 THE WITNESS: Other than what I've testified  
7 throughout the whole day with regards to those sites?  
8 BY MR. GARCIA:  
9 Q. Well, I didn't think you testified anything  
10 besides documents, but erring on the side of caution, I'm  
11 trying to confirm that now.  
12 A. Timelines.  
13 Q. Are the timelines in a document?  
14 MS. MANTOAN: Objection; vague and ambiguous.  
15 BY MR. GARCIA:  
16 Q. I don't know what you mean by "timelines."  
17 She puts a timeline. How does she -- what form is the  
18 timeline that she puts on the site?  
19 MS. MANTOAN: Objection; calls for speculation.  
20 It's vague and ambiguous.  
21 THE WITNESS: It would just be a written  
22 timeline.  
23 BY MR. GARCIA:  
24 Q. Okay. So other than written documents,  
25 that's what I'm trying to do. So if it's a written

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1 **timeline, it's part of a document, correct?**  
2 A. Correct.  
3 MS. MANTOAN: Objection; vague and ambiguous.  
4 BY MR. GARCIA:  
5 **Q. Okay. So --**  
6 A. Oh, wait. No, I take that back. If it's  
7 written, it's not necessarily part of a document.  
8 **Q. And that's because it's part of a program or**  
9 **something? Why do you say that?**  
10 A. It could be the written word, but it's not  
11 part of a PDF.  
12 **Q. Is it part of another document, like an Excel**  
13 **or a Word file?**  
14 A. No. It's just -- it would just be a  
15 standalone timeline.  
16 **Q. So it's a written timeline that people can**  
17 **access by using an internal website at Oracle?**  
18 A. When you state "people" --  
19 **Q. I'm talking about the H.R. business --**  
20 A. It's limited to the H.R. business partners  
21 and compensation.  
22 **Q. So it's a document that those two groups can**  
23 **access by looking it up internally on the site that Kate**  
24 **Waggoner posts to, correct?**  
25 A. You're using the word "document." And if I'm  
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1 providing to you an example, such as a timeline, a  
2 timeline is not embedded in a document.  
3 **Q. What is it in?**  
4 MS. MANTOAN: Objection. It's asked and  
5 answered. She told you there's content at the intranet,  
6 and I think we're having some debate about what a  
7 document constitutes --  
8 MR. GARCIA: No. I'm just trying to  
9 understand.  
10 **Q. Is it part of a program?**  
11 A. I don't know what the program is that allows  
12 her to do that. I just don't know.  
13 **Q. So how does a person gain access to the**  
14 **timeline? Do they click on a timeline, and they're**  
15 **routed to it? How does a person be able to view it?**  
16 MS. MANTOAN: Objection; calls for speculation.  
17 It's vague. You can answer as to how you are able to  
18 view it.  
19 THE WITNESS: So I am able to view it because  
20 I've been given authorization to the site to view it.  
21 BY MR. GARCIA:  
22 **Q. So you gain access to the site. How do you**  
23 **indicate to the site that you want to look at the**  
24 **timeline versus a compensation program or presentation,**  
25 **PDF?**  
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1 MS. MANTOAN: Objection; incomplete  
2 hypothetical, vague.  
3 THE WITNESS: I'm not communicating with the  
4 site.  
5 BY MR. GARCIA:  
6 **Q. How are you able to acquire the information**  
7 **from the site regarding the timeline?**  
8 A. With my eyes.  
9 **Q. And how does the site know to show you the**  
10 **timeline, as opposed to a PDF?**  
11 MS. MANTOAN: Objection; vague and ambiguous.  
12 BY MR. GARCIA:  
13 **Q. So when you go to --**  
14 A. It's me that makes a determination of what  
15 I'm going to see on the site.  
16 **Q. And how do you communicate to the site what**  
17 **you want to see on the site?**  
18 A. With my eyes.  
19 **Q. So your eyes look at a monitor, and that**  
20 **communicates to the site that you want to look at a**  
21 **timeline versus a PDF?**  
22 MS. MANTOAN: Objection; vague and ambiguous.  
23 It's argumentative. She's testified there's a site with  
24 content on it, and she reads the content on the site.  
25 THE WITNESS: I read the content.  
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1 BY MR. GARCIA:  
2 **Q. Do you click on a link at the site to get to**  
3 **the timeline?**  
4 A. No. Actually, no.  
5 **Q. That's what I'm trying to determine, is when**  
6 **you get onto the site, how are you able to access the**  
7 **timeline versus another document?**  
8 A. Because I've been given authorization to the  
9 site.  
10 **Q. It gives you authorization -- once you're at**  
11 **the site, how do you acquire the ability to look at the**  
12 **timeline, as opposed to another document?**  
13 A. Because it's right there in front of me.  
14 **Q. So you're saying, once you get to the site,**  
15 **that's the first thing you see?**  
16 A. That's the first thing I see.  
17 **Q. Okay. Thank you.**  
18 **Do you know anything about Oracle's affirmative**  
19 **action program?**  
20 MS. MANTOAN: Objection. It's asked and  
21 answered.  
22 BY MR. GARCIA:  
23 **Q. I asked you about affirmative action before.**  
24 **Now I'm asking about an affirmative action program. Do**  
25 **you know anything about that?**  
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1 A. I can't speak to it.  
2 Q. Have you ever been trained on what the  
3 affirmative action program goals of Oracle are?  
4 MS. MANTOAN: Objection; vague and ambiguous.  
5 THE WITNESS: I've already answered that, to my  
6 knowledge, once. I didn't know. And that one document  
7 that you showed me having to do with training, I had  
8 never seen.  
9 BY MR. GARCIA:  
10 Q. I understand that you haven't seen Exhibit 55  
11 before.  
12 A. Right, right.  
13 Q. What I'm asking, though, is -- I'm not asking  
14 about that document. I'm asking you, have you ever  
15 received any information about the goals of Oracle's  
16 affirmative action program?  
17 MS. MANTOAN: Objection; vague and ambiguous.  
18 Do you know what he means when he says, "goals of the  
19 affirmative action program"?  
20 THE WITNESS: In general terms, I believe I  
21 understand what you mean. But in very broad -- the broad  
22 sense of the word, because this is really outside my  
23 area, is that I know as much that we have goals that we  
24 must meet.  
25 BY MR. GARCIA:

1 Q. How do you know you have goals that you must  
2 meet?  
3 A. Just from working there for 21 years.  
4 Q. Can you identify the basis of that belief,  
5 other than your 21-year tenure at Oracle?  
6 MS. MANTOAN: Objection. It's asked and  
7 answered.  
8 THE WITNESS: I can't go into any specifics.  
9 MR. GARCIA: Okay. Let's mark the next  
10 document as Exhibit 56.  
11 (Plaintiff's Exhibit 56 was marked for  
12 identification.)  
13 BY MR. GARCIA:  
14 Q. Have you ever seen the document before in  
15 Exhibit 56?  
16 MS. MANTOAN: Counsel, is there a Bates number  
17 on this? It's cut off on my version.  
18 MR. GARCIA: The Bates numbers are 417316 to  
19 19.  
20 THE WITNESS: Most likely, I eventually  
21 received this email, and it would have been forwarded  
22 from Kris to the team. I am aware of the new global  
23 rehire guidelines that it's referencing, but I can't tell  
24 you that I received it in this particular format.  
25 BY MR. GARCIA:

1 Q. Have you received Oracle's global rehire  
2 guidelines in 2018 in another format?  
3 A. Probably in another format.  
4 Q. Okay. I'm going to ask you to turn to page 3  
5 of Exhibit 56. I will ask you to go towards the bottom  
6 of the page. Do you see the heading of "Compensation  
7 Other" -- correction -- "Compensation Offer  
8 Considerations"?  
9 A. Yes.  
10 Q. So I'm going to read one of the bullets  
11 there. It says, quote, "Internal pay equity. How does  
12 the offer for the rehire compare against peers in the  
13 same role, hierarchy and/or location? Review comparable  
14 peers; i.e., job, level, location, manager," unquote.  
15 Did I read that correctly?  
16 A. Yes.  
17 Q. What does that mean to you?  
18 MS. MANTOAN: Objection to the extent you're  
19 asking her to speculate as to the meaning of the  
20 document.  
21 If you have some independent understanding of  
22 those words, as you sit here and read them, you can  
23 testify.  
24 THE WITNESS: So if we were considering a  
25 rehire -- and let's make the assumption that it's okay to

1 move forward with rehiring based on prior performance  
2 level and that they're eligible for rehire.  
3 BY MR. GARCIA:  
4 Q. I agree with that.  
5 A. One would compare the rehire against  
6 comparable peers. And when it says, "in the same role,"  
7 that would indicate to me in the same job title, not  
8 necessarily same role, because the duties and  
9 responsibilities can vary significantly from employee to  
10 employee, although they may have the same job title. But  
11 we would look at the location in question, and those  
12 would be the individuals that we would compare to within  
13 the manager hierarchy.  
14 We would also compare any experience, any  
15 specialized skill set since leaving Oracle, what they've  
16 brought back to the table with regards to relevant skill  
17 sets and any recent experience.  
18 Q. So I'm asking just for the term of pay  
19 equity, internal pay equity, what that meant. So when  
20 you say "experience," are you saying that that's included  
21 as part of internal pay equities, since it's not listed  
22 as an example, or are you saying that, overall, Oracle  
23 compares the experience of its employees?  
24 MS. MANTOAN: Objection; misstates the  
25 testimony, and it's vague and ambiguous. Are you asking

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1 her what she thinks the document means, or are you asking  
2 her something else?  
3 MR. GARCIA: I'm asking her definition of  
4 internal pay equity, when she talked about experience,  
5 that she's including experience in her understanding of  
6 internal pay equity.  
7 THE WITNESS: Skills and experience would be  
8 one factor that would be considered when you look at the  
9 overall situation of assessing that one individual. One  
10 would look at -- in this case, one would look at --  
11 request the résumé of the individual to take a look at to  
12 what extent their skills and experience has been  
13 increased in complexity since they left Oracle.  
14 BY MR. GARCIA:  
15 Q. So when I'm understanding pay equity,  
16 internal pay equity is a comparison of things between  
17 peers?  
18 A. Mm-hmm. Yep.  
19 Q. Is that your understanding, too?  
20 A. My understanding of internal pay equity is,  
21 it's a comparison of looking at comparable peers.  
22 Q. Okay. Now, that's what I'm trying to  
23 understand of -- when you say "comparable," what do you  
24 mean by that?  
25 MS. MANTOAN: Again, Counsel, are you asking

1 her what she understands this word in this document to  
2 mean, or are you asking her something else?  
3 MR. GARCIA: I'm talking about her knowledge of  
4 internal pay equity and how it's used.  
5 Q. And you used the word "comparable," and I'm  
6 asking you what do you mean by that?  
7 MS. MANTOAN: I'm going to object that you  
8 weren't asking her about her knowledge of how it's used  
9 by anyone else. Today, you've been asking her about her  
10 understanding of that term, not this document, just what  
11 she understands it to mean. Is that what you're  
12 continuing to ask her about, or are you asking her  
13 something else?  
14 MR. GARCIA: I'm asking -- right now, we're on  
15 internal pay equity, as she understands it.  
16 MS. MANTOAN: Okay. So he's not asking you  
17 about the document. He's asking you about your own  
18 understanding of --  
19 THE WITNESS: My own understanding of internal  
20 pay equity.  
21 BY MR. GARCIA:  
22 Q. So when you say "comparable," what do you  
23 mean by that?  
24 A. What I mean by "comparable" is that you need  
25 to assess those individuals that would be in the same

1 work location --  
2 Q. So when you say "work location," do you  
3 mean --  
4 MS. MANTOAN: Had you finished your answer?  
5 Did you just mean every individual in the work location?  
6 THE WITNESS: No, I hadn't finished my answer.  
7 MS. MANTOAN: Would you allow her to finish?  
8 MR. GARCIA: I thought she was done, since she  
9 paused.  
10 MS. MANTOAN: Could you just complete your  
11 answer and then let him know when you're done?  
12 MR. GARCIA: Thank you.  
13 THE WITNESS: All right. So we're assessing --  
14 if we're looking at a rehire as an example as what these  
15 guidelines are indicating --  
16 MS. MANTOAN: Sorry to interrupt. I just want  
17 to caution you. He's not asking you about what the  
18 guidelines say. He's just asking your personal  
19 understanding --  
20 THE WITNESS: I understand, I understand, I  
21 understand. So we're comparing two individuals. They  
22 would be within the same work location, within the same  
23 management hierarchy, assign the same global career  
24 level, assign the same system job title and job code.  
25 That would be our starting point.

1 BY MR. GARCIA:  
2 Q. Are you done?  
3 A. I'm done.  
4 Q. Because I didn't want to interrupt you, and I  
5 was waiting for you to say when you were done.  
6 MS. MANTOAN: I appreciate that. Thank you.  
7 BY MR. GARCIA:  
8 Q. When you say "work location," if you had a  
9 manager who had someone in the same global career level,  
10 same title, system title, same job code, and one person  
11 was in Pleasanton, and one person was in Redwood Shores,  
12 would that be the same location?  
13 MS. MANTOAN: Objection. It's compound and  
14 vague and ambiguous. So, all context.  
15 BY MR. GARCIA:  
16 Q. Go ahead and answer --  
17 MS. MANTOAN: It's an incomplete hypothetical  
18 also.  
19 THE WITNESS: Both locations would be  
20 considered HQ.  
21 BY MR. GARCIA:  
22 Q. And would they -- because they're at both  
23 locations, are considered HQ, then those would both be  
24 comparable?  
25 MS. MANTOAN: Objection; misstates testimony.

1 BY MR. GARCIA:  
2 Q. Go ahead and answer.  
3 A. I would select both individuals, because both  
4 individuals would be considered HQ. I don't know how  
5 else to answer that.  
6 Q. Okay. So would both those individuals be --  
7 okay. Would the individual in Pleasanton, having the  
8 same job code, same global career level, same systems job  
9 title, reporting to the same manager, be comparable with  
10 someone at Redwood Shores?  
11 MS. MANTOAN: Objection. It's vague and  
12 ambiguous. And she already testified this was a starting  
13 point for her understanding. It's misstating her  
14 testimony.  
15 THE WITNESS: So this is a starting point, and  
16 then we have to dig further with regards to the  
17 employee's performance, the employee's job duties and  
18 responsibilities, the employee's experience. It's not  
19 necessarily apples to apples.  
20 BY MR. GARCIA:  
21 Q. Okay. So would people both have to have the  
22 same college degree to become comparable --  
23 MS. MANTOAN: Objection --  
24 BY MR. GARCIA:  
25 Q. -- if they had everything else in common?

1 MS. MANTOAN: Objection; incomplete  
2 hypothetical, vague and ambiguous, overbroad.  
3 BY MR. GARCIA:  
4 Q. So if they had the same level of experience,  
5 the same job duties, the same global career level, the  
6 same job title, the same job code, the same -- every  
7 other variable that could possibly be to include the same  
8 manager, but they had different education degrees, would  
9 they be comparable? Would you consider them to be  
10 comparable?  
11 MS. MANTOAN: Objection. It's vague as to what  
12 you are meaning by "comparable."  
13 BY MR. GARCIA:  
14 Q. You used the word "comparable."  
15 A. I used the word "comparable" because I'm  
16 reading the word "comparable."  
17 Q. I understand. So I asked you what was your  
18 understanding of what would it take for people to be  
19 comparable and measured against each other as peers, and  
20 you gave me a list of factors that you would look at,  
21 some as a starting point, some beyond a starting point.  
22 A. Correct.  
23 Q. So I'm saying, if they had all those factors  
24 in common, except one, education, degree, would you  
25 consider those people comparable?

1 MS. MANTOAN: Objection. It's an incomplete  
2 hypothetical, and it's compound to the extent you're  
3 asking for a single answer for all.  
4 THE WITNESS: At Oracle, it would be very  
5 atypical for somebody in a singular job code to be  
6 performing the same work. That is just so far off the  
7 map.  
8 BY MR. GARCIA:  
9 Q. I'm not asking atypical or I'm not asking  
10 typical. I just want to know, if they have everything  
11 alike, except for one thing, education, and how you  
12 understand and define "comparable," would you identify  
13 those people as being peers that can be compared against?  
14 MS. MANTOAN: The question's asked and  
15 answered. It's an incomplete hypothetical. It's  
16 compound.  
17 THE WITNESS: I can't --  
18 MR. GARCIA: I'll let you have a standing  
19 objection of that, Counsel, because I disagree whether  
20 it's been answered.  
21 MS. MANTOAN: Every time you ask the question  
22 again, I'm going to put this objection on the record  
23 again.  
24 MR. GARCIA: Okay. Even though I gave you a  
25 standing objection?

1 MS. MANTOAN: I want to make sure that the  
2 witness understands that the question is objectionable.  
3 MR. GARCIA: I just want to make sure it's on  
4 the record of what you're doing.  
5 Q. So they have everything else in common. I'm  
6 not asking -- I'm not asking if that's typical or  
7 atypical. I'm asking, they have everything exactly  
8 alike, except for education. Would you, in your  
9 understanding of the word "comparable," consider them to  
10 be comparable?  
11 MS. MANTOAN: Same objections.  
12 THE WITNESS: It depends. It depends on all  
13 these other factors that you're not allowing me to --  
14 BY MR. GARCIA:  
15 Q. I said they have -- all the other factors are  
16 exactly the same, except the only factor that they have  
17 different is whether they're comparable. So in your  
18 understanding of the word "comparable" and usage thereof,  
19 would you consider these two people to be comparable?  
20 MS. MANTOAN: Same objections. It's asked  
21 repeatedly and answered.  
22 THE WITNESS: Education is not mandatory,  
23 so....  
24 BY MR. GARCIA:  
25 Q. That's not -- my question is -- and you're

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1 still not answering it. My question is, if they have all  
 2 the factors in common, under your definition of  
 3 "comparable," are these people comparable? It's a  
 4 yes-or-no answer.  
 5 MS. MANTOAN: Same objections. And I'd ask  
 6 that you not raise your voice.  
 7 THE WITNESS: It's not that clearcut.  
 8 BY MR. GARCIA:  
 9 Q. And why is that?  
 10 A. Because you could have employee X, Y, Z in  
 11 the same job code, performing different work than  
 12 employee A, B, C, also in the same job. Their  
 13 performance level could be different. There's just so  
 14 many factors that go into this.  
 15 Q. And so what I'm saying for you is, every  
 16 factor possible, to include performance, to include what  
 17 they do, to include global career level, job function,  
 18 job code, every factor is exactly the same between these  
 19 two people, except they differ in educational level.  
 20 What I'm asking you is, would you consider, with your  
 21 knowledge of what's comparable, those people to be  
 22 comparable against each other?  
 23 MS. MANTOAN: Same objections.  
 24 THE WITNESS: My same response is, it depends.  
 25 MS. MANTOAN: Counsel, I think she's answered  
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1 the question now. Her answer is, it depends --  
 2 THE WITNESS: It depends.  
 3 BY MR. GARCIA:  
 4 Q. And what does it depend on?  
 5 A. It depends on here -- these factors.  
 6 Q. But I've already --  
 7 A. It's going -- I understand what you're  
 8 saying, but my point is, I cannot answer that  
 9 hypothetical.  
 10 Q. So you understand --  
 11 A. It's not true life.  
 12 Q. I'm not asking whether it's true life. I'm  
 13 giving you a hypothetical, and my question is, do you  
 14 understand in that hypothetical I'm giving you that every  
 15 factor is exactly the same, except for their education.  
 16 Do you understand that?  
 17 MS. MANTOAN: Same objections, Counsel. And  
 18 I'm going to ask you to terminate this line of  
 19 questioning soon, because I think it's getting harassing.  
 20 You've asked the witness repeatedly, and she's given you  
 21 the answer.  
 22 MR. GARCIA: Her answer is nonresponsive,  
 23 Counsel.  
 24 MS. MANTOAN: She said, "It depends." That was  
 25 her answer.  
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1 THE WITNESS: My answer is, it depends.  
 2 BY MR. GARCIA:  
 3 Q. And you said it depends on various factors,  
 4 right?  
 5 A. That's correct.  
 6 Q. And I said, I'm eliminating the "depends"  
 7 part, because it's -- they have exactly the same. And so  
 8 what you're saying to me is, because no two people are  
 9 exactly the same, you disagree with and, therefore,  
 10 you're going to say it depends? Is that what I'm  
 11 understanding?  
 12 A. What I'm saying is, it depends. It depends.  
 13 Q. It depends on various factors, even though I  
 14 said all factors but one are exactly the same?  
 15 A. It depends.  
 16 Q. Okay. Can you ever have two people --  
 17 because it depends on various factors, and as you just  
 18 identified, no two people are exactly alike --  
 19 A. Right.  
 20 Q. -- can you ever have comparators that can be  
 21 compared against one another?  
 22 MS. MANTOAN: Objection. It's vague and  
 23 ambiguous. I'm not sure if you're asking her for a legal  
 24 conclusion and --  
 25 BY MR. GARCIA:  
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1 Q. I'm asking for your understanding.  
 2 MS. MANTOAN: It's compound, and it's vague and  
 3 ambiguous, Counsel.  
 4 THE WITNESS: I am not understanding.  
 5 BY MR. GARCIA:  
 6 Q. Okay. So you previously testified that my  
 7 example was not the real world, because two people cannot  
 8 have exactly the same factor, the same global career  
 9 level, the same -- exact same job duties, the exact same  
 10 manager, the exact same level of experience, et cetera.  
 11 You said that was atypical, correct?  
 12 MS. MANTOAN: Objection. That misstates the  
 13 testimony.  
 14 BY MR. GARCIA:  
 15 Q. Go ahead and answer.  
 16 A. You want to read back my -- why don't we just  
 17 read back my original response.  
 18 Q. No.  
 19 How much time do we have left?  
 20 THE VIDEOGRAPHER: You're at six hours, 18  
 21 minutes.  
 22 BY MR. GARCIA:  
 23 Q. So my question is, is there ever a situation,  
 24 to your knowledge, of people being comparable that can be  
 25 compared against another because they have exactly the  
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1 same factors?  
 2 MS. MANTOAN: Objection. It's vague and  
 3 ambiguous --  
 4 THE WITNESS: I can't answer that.  
 5 MS. MANTOAN: -- it's compound.  
 6 THE WITNESS: I can't answer it the way you're  
 7 -- I've tried to answer your question multiple times.  
 8 BY MR. GARCIA:  
 9 Q. I'm asking the question a different way --  
 10 A. I can't answer it.  
 11 Q. Okay. So you're saying that a person is  
 12 supposed to be compared to the peers. So in the  
 13 document, it says, "role." What does "role" mean?  
 14 MS. MANTOAN: Objection. It calls for  
 15 speculation as to the meaning of this document. She  
 16 didn't write it.  
 17 BY MR. GARCIA:  
 18 Q. What did you understand "role" to mean in  
 19 this document?  
 20 A. In a prior role at Oracle, the candidate  
 21 should have had a satisfactory performance level or  
 22 above. If you're asking --  
 23 Q. I'm talking about internal pay equity, where  
 24 it states --  
 25 A. You're asking me about "role."

1 Q. I'm asking you -- I want to make sure we're  
 2 looking at the same place for role. So it says,  
 3 "Internal pay equity. How does the offer for the same  
 4 rehire compare against peers in the same role?"  
 5 So that's the role I'm asking you about. How  
 6 do you understand -- what do you understand that same  
 7 role to mean?  
 8 A. My understanding of the role would be an  
 9 individual's job duties and responsibilities.  
 10 Q. And how similar does a person's job duties  
 11 and responsibilities have to be for a person to be  
 12 considered a peer to be comparable with?  
 13 MS. MANTOAN: So, objection. Appears to call  
 14 for a legal conclusion. It's vague and ambiguous and  
 15 maybe calls for speculation about what is intended here.  
 16 I guess he's asking if you have some  
 17 understanding of how similar people need to be to be  
 18 peers --  
 19 THE WITNESS: I don't have --  
 20 MS. MANTOAN: -- you can answer the question.  
 21 THE WITNESS: Yeah, I don't have a specific  
 22 rule of thumb.  
 23 BY MR. GARCIA:  
 24 Q. So if an H.R. business partner asked you  
 25 "same role," what does that mean? What would you do?

1 MS. MANTOAN: Objection. It's an incomplete  
 2 hypothetical. It's vague and ambiguous.  
 3 BY MR. GARCIA:  
 4 Q. Go ahead.  
 5 A. You're not giving me a scenario. You're not  
 6 giving me anything. You're giving me this big, broad,  
 7 general, and my response is, it depends.  
 8 Q. Right. And I gave you a very specific  
 9 situation where they were exactly the same, all --  
 10 A. And I still said it depends.  
 11 Q. -- and even though I gave you that specific  
 12 of a situation, you still said it depends upon factors,  
 13 even though I stated that the factors were the same?  
 14 A. It depends.  
 15 MS. MANTOAN: Counsel, I'm going to take a  
 16 break -- we're going to take a break now, please.  
 17 MR. GARCIA: Okay.  
 18 THE VIDEOGRAPHER: This marks the end of media  
 19 file labeled number seven. Off the record at 5:04 p.m.  
 20 (Recess from 5:04 p.m. to 5:09 p.m.)  
 21 THE VIDEOGRAPHER: This marks the beginning of  
 22 media file label numbered eight. Back on the record at  
 23 5:09 p.m.  
 24 BY MR. GARCIA:  
 25 Q. Has anyone -- any of the H.R. business

1 members or their staff asked you any questions about  
 2 internal pay equity?  
 3 A. I'm going to say "no" to that.  
 4 Q. Have you ever given advice as to internal pay  
 5 equity.  
 6 A. I'd say no one has asked specifically in  
 7 those terms.  
 8 Q. I'm asking you whether you've given any  
 9 advice, regardless if they've asked or not.  
 10 A. No.  
 11 Q. And has anyone trained you on what internal  
 12 pay equity means?  
 13 A. You have it right here.  
 14 Q. So does this constitute your sole training on  
 15 what internal pay equity means?  
 16 A. I have 21 years of sole training.  
 17 Q. You have 21 years of what training?  
 18 A. Compensation training. This is part of it.  
 19 Q. And so prior to this document, when was the  
 20 last time you were trained on internal pay equity?  
 21 A. It is just -- it's part of the job duties and  
 22 responsibilities.  
 23 Q. Can you answer the question? When was the  
 24 last time you were trained on internal pay equity?  
 25 A. In what sense?

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1 Q. Any sense besides this document. When was  
2 the last time that you were trained on internal pay  
3 equity prior to the document at Exhibit 56?  
4 A. This would be October of 2017. And I can't  
5 give you specifics, other than it's part of the job.  
6 Q. Okay. So when it says, "location," what is  
7 looked for when you're comparing people to see if they're  
8 peers regarding location?  
9 MS. MANTOAN: Objection to the extent it calls  
10 for speculation about the meaning of a document. It's  
11 vague and compound. If you have an understanding, other  
12 than what you've already testified to, you can respond.  
13 THE WITNESS: I have nothing more to add.  
14 BY MR. GARCIA:  
15 Q. Okay. Because you just identified that  
16 internal pay equity is part of your 21 years of working  
17 in compensation, and you just know it because you work in  
18 compensation. So I'm looking for your understanding of  
19 what "location" means in terms of what's going to make  
20 someone comparable. Is there a certain mile radius? Is  
21 it in the Bay Area? What for location would make someone  
22 comparable? What do you look at?  
23 MS. MANTOAN: Counsel, objection. It's  
24 compound. It's been asked and answered many times.  
25 She's already answered it for you.

1 THE WITNESS: Yeah.  
2 BY MR. GARCIA:  
3 Q. Go ahead and answer the question.  
4 A. I've already answered work location.  
5 Q. You answered a hypothetical from Pleasanton  
6 to Redwood Shores. I'm asking you a broader question.  
7 And what is the location? What do you look for for  
8 location to determine whether it's comparable or not?  
9 MS. MANTOAN: Objection. It's vague and  
10 ambiguous, and it's compound.  
11 THE WITNESS: Yeah, that is vague.  
12 BY MR. GARCIA:  
13 Q. What do you look for in terms of hierarchy?  
14 Do they have to have exactly the same M1, M2, M3, all the  
15 way up to M8 managers for hierarchy?  
16 MS. MANTOAN: Same objections.  
17 THE WITNESS: What do you mean by "they"?  
18 BY MR. GARCIA:  
19 Q. Well, you said internal pay equity says  
20 hierarchy, correct?  
21 A. Job, level, location, and manager. Hierarchy  
22 and/or location.  
23 Q. Okay. So in terms of hierarchy, what do you  
24 look at to determine if there's comparable hierarchy?  
25 MS. MANTOAN: Same objections.

1 THE WITNESS: There's not comparable hierarchy.  
2 So you want to restate the question?  
3 BY MR. GARCIA:  
4 Q. Okay. When you're determining internal pay  
5 equity and the factor's hierarchy, what are you looking  
6 at?  
7 MS. MANTOAN: Objection; assumes facts, vague  
8 and ambiguous, compound.  
9 THE WITNESS: It depends. I've answered this  
10 ten different times. I've provided to you what I can  
11 provide. I don't know how else to answer your questions.  
12 BY MR. GARCIA:  
13 Q. So does "hierarchy" mean something different  
14 to you than "manager"?  
15 MS. MANTOAN: Same objections.  
16 THE WITNESS: A hierarchy to me would mean a  
17 management hierarchy.  
18 BY MR. GARCIA:  
19 Q. So this explanation or description of pay  
20 equity has both "hierarchy" and "manager." That  
21 indicates to me that there is something different between  
22 those two words. Does that indicate to you that there's  
23 something different?  
24 A. The manager would be -- if I can give you an  
25 example. A manager would be the hiring manager.

1 Q. Okay. And what would hierarchy be?  
2 A. The management hierarchy would be the  
3 hierarchy of the manager --  
4 Q. Of the hiring manager?  
5 A. -- within the -- no. It's broader. It would  
6 be your -- it would be the -- as an example -- let's say  
7 the M2 is the hiring manager. Their direct report --  
8 let's just make it simple -- M3, the M4, the M5, the M6.  
9 That's a management hierarchy.  
10 Q. Thank you.  
11 Court reporter, can you please mark the next  
12 document as Exhibit 57.  
13 (Plaintiff's Exhibit 57 was marked for  
14 identification.)  
15 MS. MANTOAN: Counsel, do you agree this  
16 document was also produced with a confidentiality  
17 designation?  
18 MR. GARCIA: I don't know, actually, if this  
19 one was, since it's an Excel spreadsheet. If you want to  
20 claim confidential, that's fine.  
21 Q. Do you recognize the document?  
22 A. I do.  
23 Q. What is it?  
24 A. It's a global job classification.  
25 Q. Do you know what the purpose of this document

1 is?

2 A. This document provides a framework for our  
3 job classification.

4 Q. And how does the framework of this document  
5 differ from the framework of Oracle's global job table?

6 MS. MANTOAN: Objection; assumes facts.

7 THE WITNESS: I'm sorry. What was your  
8 objection?

9 MS. MANTOAN: They're just for the record.

10 THE WITNESS: Okay. I'm not sure what the  
11 header "code" means in this case. I guess it's just an  
12 abbreviation of the functional area. So that's on there.

13 BY MR. GARCIA:

14 Q. When you say "header code," what are you  
15 referring to?

16 A. I'm just referring to this code here.

17 Q. Oh, the code above INFTECH?

18 A. Yeah. I just think it's an abbreviation of  
19 the functional area.

20 Q. Okay. So I'm asking you, how does this  
21 document -- well, strike that.

22 This document has job function and job  
23 specialty area, just like the Oracle's global job table?

24 A. It does. It has the code.

25 Q. And I'm going to read the first paragraph.

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1 It says, quote, "In order to provide accurate, consistent  
2 employee information for global reporting and analysis,  
3 Oracle must classify all employees according to four  
4 standard categories: Function, Specialty Area, Career  
5 Level, and Product Association. This page defines  
6 Function and Specialty Areas, as well as identifies which  
7 Function/Specialty Area combinations require Product  
8 Association. The Product List and Career Level  
9 definitions can be found on the other worksheets within  
10 this Excel file," unquote.

11 Did I read that correctly?

12 A. Yes.

13 Q. And is that the purpose of this document?

14 MS. MANTOAN: Objection; calls for speculation.  
15 If you have an understanding, you can give it.

16 THE WITNESS: I would just read it right back  
17 to you.

18 BY MR. GARCIA:

19 Q. Okay. And so you said you saw this document  
20 and recognized it, right?

21 A. Yes.

22 Q. And so this document identifies if the  
23 combination of job functions and specialty areas are  
24 associated with a particular product, correct?

25 A. That's not the purpose, but it does tell you

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1 for which functions there is an associated product.

2 Q. Right. And so to me, it's saying there's a  
3 combination of which job functions and which job -- which  
4 specialty areas have a product associated with them. And  
5 I get that from where it says in the first paragraph,  
6 quote, "This page defines Function and Specialty Area, as  
7 well as it identifies which Function/Specialty Area  
8 combinations require a Product Association," end quote.

9 So to your knowledge, does this document in  
10 Exhibit 57 identify the combination of job function,  
11 specialty area, that combination, and which of those  
12 combinations have a product associated with them?

13 MS. MANTOAN: Objection. It's vague and  
14 ambiguous. It's vague as to time.

15 THE WITNESS: Okay. So, for example, this  
16 document -- I can tell by reading this document that in  
17 the function of support, with a specialty area of account  
18 management, that there is, in fact, a product  
19 association.

20 BY MR. GARCIA:

21 Q. With that particular combination, correct?

22 A. For that particular combination.

23 Q. And it also identifies when there is not a  
24 product associated with the particular combination of  
25 function and specialty area on the first page of

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1 Exhibit 57, right?

2 MS. MANTOAN: Objection. It misstates the  
3 document. You're leaving out the word "required."  
4 Selectively quoting from the document.

5 MR. GARCIA: Can you read back her objection?

6 THE REPORTER: "Ms. Mantoan: Objection. It  
7 misstates the document. You're leaving out the word  
8 'required.' Selectively quoting from the document."

9 BY MR. GARCIA:

10 Q. Can you answer the question?

11 A. So in this document, there are functions with  
12 associated specialty areas that do not require a product.

13 Q. They're not associated with a particular  
14 product, correct?

15 MS. MANTOAN: Objection --

16 BY MR. GARCIA:

17 Q. If you look at -- you see that the word  
18 "product" as part of the gray heading?

19 A. I do. And I also see "required" as part of  
20 the blue heading.

21 Q. Right. And it says, in terms of product, "Is  
22 the product [sic] associated with a particular product?"  
23 in the gray heading. Correct?

24 A. Is the position associated with a particular  
25 product?

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1 Q. In the gray heading, correct?  
 2 A. In the gray, that's what it's stating.  
 3 Q. Right. And by "position," it's referring to  
 4 a position that has a combination of the job function and  
 5 specialty area, correct?  
 6 A. Yes.  
 7 Q. Okay. And then under that, then it breaks  
 8 down that definition further and states: "Is the product  
 9 required?" in the blue, shaded area, correct?  
 10 A. Correct.  
 11 Q. And so for the information technology and  
 12 product development, under those headings, it's "no" at  
 13 Exhibit 57 in all cases, correct?  
 14 A. Correct.  
 15 Q. Now, this document talks about -- only has  
 16 three functions of information technology and product --  
 17 information technology, product development, support,  
 18 correct?  
 19 A. No.  
 20 Q. Does it have -- what other --  
 21 A. Information technology is the function.  
 22 Q. Right. So it has three functions of  
 23 information technology, product development and support  
 24 listed, right?  
 25 A. Okay. Yes.

1 Q. Okay. And in Oracle's global job  
 2 classification, does it have more functions listed?  
 3 A. Yes.  
 4 Q. So what we have is an incomplete document,  
 5 correct?  
 6 MS. MANTOAN: Objection; lacks foundation,  
 7 calls for speculation.  
 8 MR. GARCIA: She just answered "correct,"  
 9 Counsel. Counsel, it appears we have an incomplete  
 10 document here, it appears, that Oracle has left out.  
 11 This also identifies that there are other documents as  
 12 part of the Excel file. We would ask those to be  
 13 produced.  
 14 MS. MANTOAN: We'll address that separately  
 15 outside the context of this deposition.  
 16 MR. GARCIA: Well, I'm just putting it on the  
 17 record.  
 18 MS. MANTOAN: Okay.  
 19 MR. GARCIA: Do you know if they've been  
 20 produced?  
 21 MS. MANTOAN: I'm not going to go into details.  
 22 We can talk off the record after the deposition about any  
 23 documents. I do notice those are the three functions  
 24 that you've put at issue in the case --  
 25 MR. GARCIA: I understand, but there's no

1 indication that the document was redacted or what parts  
 2 were left out. It was only because when a person has to  
 3 read the document itself, do they find that there are  
 4 missing pieces to that document.  
 5 MS. MANTOAN: I object to the idea that there  
 6 are missing pieces, and we'll discuss it outside the  
 7 context of the deposition.  
 8 MR. GARCIA: Okay.  
 9 Q. So I'd like to go back to the email in  
 10 Exhibit 56, if you could, please. Do you know who Vickie  
 11 Thrasher is?  
 12 A. Yes.  
 13 Q. Who's Vickie Thrasher?  
 14 A. She's one of our H.R. VPs.  
 15 Q. Is she your H.R. VP?  
 16 A. No.  
 17 Q. Who is your H.R. VP?  
 18 A. Phil Jenish.  
 19 Q. Who does Mr. Jenish report to?  
 20 A. Joyce Westerdahl.  
 21 Q. And what is Joyce Westerdahl's title?  
 22 A. Executive vice president.  
 23 Q. Does she have anything more in her title?  
 24 MS. MANTOAN: Objection; calls for speculation.  
 25 BY MR. GARCIA:

1 Q. Do you know?  
 2 A. I don't know her.  
 3 Q. She's the executive vice president of what?  
 4 A. Human resources.  
 5 Q. Do you know that for sure, or are you --  
 6 A. She is the executive vice president of human  
 7 resource. I don't know if that portion is in her title.  
 8 Q. Very good.  
 9 What is Phil's title? Jenish?  
 10 A. H.R. VP.  
 11 Q. Is that his systems title?  
 12 A. That's his system title.  
 13 Q. What's his discretionary title?  
 14 A. This isn't going to be exact. H.R. VP,  
 15 compensation and workforce intelligence.  
 16 Q. Do you know what Ms. Edwards' title is, her  
 17 systems title?  
 18 A. H.R. senior director.  
 19 Q. Do you know what her discretionary title is?  
 20 A. I do not.  
 21 Q. Now, when I look at Exhibit 56 and I see  
 22 Vickie Thrasher, it says, "A group vice president,  
 23 America's H.R." Is there a difference between a group  
 24 vice president and a vice president?  
 25 A. That's a discretionary job title.

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1 Q. When it says, "America's H.R.," do you know  
2 what that means?  
3 A. It's just part of the discretionary job  
4 title.  
5 Q. Do you know what region she has  
6 responsibilities for?  
7 MS. MANTOAN: Objection; assumes facts, vague  
8 as to time.  
9 THE WITNESS: Region in this case would be U.S.  
10 BY MR. GARCIA:  
11 Q. Okay. Now, for Oracle, is North America  
12 considered a region?  
13 MS. MANTOAN: Objection; vague and ambiguous,  
14 calls for speculation, compound. If you know.  
15 THE WITNESS: I do know, yeah. Okay. So North  
16 America, actually, includes Canada as well.  
17 MR. GARCIA: Okay. Thank you.  
18 Q. Does Oracle have any offices in Mexico or  
19 Central America?  
20 MS. MANTOAN: Objection; calls for speculation.  
21 THE WITNESS: We have offices in Latin America.  
22 BY MR. GARCIA:  
23 Q. What do you mean by "Latin America"?  
24 A. What do you mean by "Central America"?  
25 Q. By "Central America," I mean any countries

1 below the United States border and north of the  
2 Venezuelan border.  
3 A. That doesn't help me, because I'm very bad  
4 with directions. Sorry.  
5 Q. What do you mean by "Latin America"?  
6 A. Latin America would be Brazil, Venezuela,  
7 Chile, Costa Rica, Argentina, Peru, Mexico. I don't know  
8 if we have an office in Mexico, but Mexico.  
9 Q. So Latin America is everything south of the  
10 United States-Mexican border?  
11 A. Again, I'm bad with geography.  
12 Q. Okay. Fair enough.  
13 What region is Phil Jenish the VP of?  
14 A. U.S. I'm uncertain whether or not he has  
15 Canada. I don't know.  
16 Q. So is anyone responsible for anyone in Canada  
17 on the U.S. compensation team?  
18 A. No.  
19 Q. Does Canada have its own compensation team?  
20 A. Yes.  
21 Q. Now, you said you've been in compensation for  
22 the last 21 years, correct?  
23 A. Correct.  
24 Q. Has all that time been with Oracle?  
25 A. The 21 years, yes.

1 MR. GARCIA: How much time we have left?  
2 THE VIDEOGRAPHER: You're at six hours, 44  
3 minutes.  
4 MR. GARCIA: Okay. I'm going to take a break  
5 now and consult with co-counsel.  
6 THE VIDEOGRAPHER: This marks the end of  
7 media --  
8 MS. MANTOAN: Do you need us to step out so you  
9 can do that?  
10 MR. GARCIA: I didn't hear what you said.  
11 THE VIDEOGRAPHER: You want to go off the  
12 record first?  
13 MR. GARCIA: We can step out or you can step  
14 out. Which do you prefer?  
15 MS. MANTOAN: We should let him go off the  
16 record.  
17 MR. GARCIA: Oh, I thought you were off the  
18 record.  
19 THE VIDEOGRAPHER: This marks the end of media  
20 file labeled number eight. Off the record at 5:31 p.m.  
21 (Recess from 5:31 p.m. to 5:38 p.m.)  
22 THE VIDEOGRAPHER: This marks the beginning of  
23 media file labeled number nine. Back on the record at  
24 5:38 p.m.  
25 BY MR. GARCIA:

1 Q. So earlier, you were talking about U.S.  
2 compensation team, and you identified your compensation  
3 consultant. Were all the other members of the U.S.  
4 compensation team, besides Ms. Edwards, compensation  
5 consultants?  
6 A. Yes.  
7 Q. And before, you identified that product  
8 development, in terms of line of business leader  
9 responsibility, was split between two people, correct?  
10 A. I identified it was split between -- depends  
11 upon what section of the testimony.  
12 Q. I'm talking about currently.  
13 A. Currently? If I'm not mistaken, I mentioned  
14 Jocelyn, who was just hired.  
15 Q. Three months ago. And Ms. Edwards, correct?  
16 A. And Monica. And that Ms. Edwards had it  
17 previously.  
18 Q. When did Ms. Edwards have -- now, when  
19 Ms. Edwards had product development, did she have all of  
20 product development?  
21 A. No. Well, I'm uncertain how to answer that.  
22 Q. Which portions of product development did  
23 Ms. Edwards have previously that you have knowledge of?  
24 A. I don't know. We had an individual by the  
25 name of Amanda Crane that had a portion of product

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1 development. Monica had a portion, and Kris had a  
2 portion. If you're asking me to be specific on what  
3 portion Kris had --

4 Q. Can you estimate?  
5 A. -- I am not certain. No, I can't estimate.

6 Q. Okay. Do you know what portion Monica had?  
7 A. I do not know.

8 Q. Do you know what portion Amanda had?  
9 A. I am not certain, so I don't want to  
10 speculate on the leaders.

11 Q. So it's not either absolute certainty or  
12 speculation. Can you estimate who they have?  
13 A. I can't.

14 Q. Okay. So you have no knowledge whatsoever  
15 about what leaders in product development Ms. Edwards,  
16 Monica, and Amanda supported, correct?  
17 A. The three of them had responsibility for  
18 product development for different leaders. Now, if  
19 you're asking me currently who has what, Kris no longer  
20 has product development.

21 Q. Okay. Do you know what Monica currently has?  
22 A. I don't.

23 Q. And do you know what Jocelyn currently has?  
24 A. I don't know how it's split.

25 Q. So my understanding is, you don't know

1 currently or before what those four individuals of  
2 Jocelyn, Amanda, Monica, or Kris, or Ms. Edwards, what  
3 parts of product development they had, correct?  
4 A. As I think about it, Kris would have had  
5 Thomas Kurian back in the day; but as far as the others,  
6 no. I don't know.

7 Q. Do you know how long Monica's been there as  
8 part of the U.S. compensation team?  
9 A. Probably about six months after Kris, so  
10 approximately two, two-and-a-half years.

11 Q. And did Monica replace anybody or take the  
12 job with anybody?  
13 A. I think Monica was an additional headcount,  
14 but I'm not positive.

15 Q. Okay. How long was Amanda there?  
16 A. Amanda was with Oracle in some capacity  
17 approximately ten years.

18 Q. Does Amanda still work for Oracle?  
19 A. No.

20 Q. Do you know what her last name is?  
21 A. Crane.

22 Q. I think you said that. I apologize.  
23 A. Mm-hmm.

24 Q. Was Ms. Edwards working for Oracle prior to  
25 working with the U.S. compensation team?

1 A. Okay. Prior to the compensation department,  
2 in general, was she working in another capacity at  
3 Oracle?

4 Q. Yes.  
5 A. No.

6 Q. So to your knowledge, Ms. Edwards' first job  
7 at Oracle was part of the compensation team?  
8 A. Yes.

9 Q. Do you know where she came from?  
10 A. I'm not certain.

11 Q. Can you estimate?  
12 A. I can tell you one company that she did work  
13 for. I can't tell you if she directly came from that  
14 company.

15 Q. And what company is that?  
16 A. I think it's called TeleTech.

17 Q. Did Oracle acquire that company?  
18 A. No.

19 Q. Since you graduated from college, have you  
20 taken any compensation courses outside of Oracle, like at  
21 a college, university, things of that nature?  
22 A. Since I graduated, I've obtained my CCP.

23 Q. And what is a CCP?  
24 A. Certified compensation professional.

25 Q. And what did you have to do to attain that?

1 A. You had to take approximately 12 courses.  
2 Q. Is that after you graduated, or did your  
3 college courses count towards those 12 courses?  
4 A. No, the college courses did not count.

5 Q. And when did you obtain this certification,  
6 approximately?  
7 A. It takes years and years of work to obtain  
8 it.

9 Q. Well, congratulations.  
10 A. Let's see. So I rejoined in '94 -- no. '98.  
11 Sorry. Probably would have obtained it around 2007.

12 Q. Do you have any other certifications  
13 regarding being in compensation?  
14 A. No other, no.

15 Q. Now, is this -- who runs that certification  
16 that you just mentioned that you had to take 12 courses  
17 for? Is that the State of California? Is that federal?  
18 A. No.

19 Q. Is it a non-governmental body that issues the  
20 certification?  
21 A. It's non-governmental.

22 Q. What is the body that issues the  
23 certification?  
24 A. It's called World at Work, or formerly known  
25 as the American Compensation Association.

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1 Q. Thank you. I was a little confused with the  
2 World at Work title.  
3 A. Mm-hmm.  
4 Q. Other than the training you took for that  
5 certification, have you taken any other training  
6 regarding compensation outside of Oracle?  
7 A. I would have attended periodic seminars, but  
8 I wouldn't necessarily consider that training. As far as  
9 in-class training, I would have taken webinars also  
10 through the American Compensation Association.  
11 Q. Have you ever taken training inside Oracle,  
12 not related to a focal review or equity or variable pay,  
13 related to compensation?  
14 A. Excluding any training that I would have  
15 attended?  
16 Q. Well, I'm --  
17 A. As part of the team?  
18 Q. Well, I'm talking about -- what I'm trying to  
19 determine is, besides, you know, the webinars that you  
20 attended for focal reviews, and equity, and the variable  
21 pay, did you take any other training regarding  
22 compensation at Oracle?  
23 A. Trying to think. Specific to Oracle?  
24 Q. No. When you were at Oracle, did you take --  
25 A. When I was at Oracle --

1 Q. -- take any training administered by Oracle  
2 that concerned compensation, besides the training  
3 associated with focal reviews, equity, and variable pay?  
4 A. I'd have to answer that by "I don't recall."  
5 Q. Does Oracle require you, as part of a  
6 compensation consultant, to take, like, refresher  
7 training, so many credits or so many hours, during any  
8 period of time?  
9 For example, like, attorneys, we have to take  
10 mandatory training, unless there's an exception, certain  
11 amount of hours every three years. I'm trying to  
12 understand if Oracle has anything similar to that for its  
13 compensation consultants.  
14 A. It does not have a requirement per se.  
15 MR. GARCIA: How much time we have left?  
16 THE VIDEOGRAPHER: You're at six hours, 55  
17 minutes and 40 seconds.  
18 MR. GARCIA: Okay. I have four minutes.  
19 Q. Is there anything about compensation that I  
20 haven't asked today that you think I should know about?  
21 MS. MANTOAN: Objection; vague and ambiguous,  
22 calls for speculation.  
23 THE WITNESS: No.  
24 BY MR. GARCIA:  
25 Q. Okay. Is there any part of your testimony

1 that you want to change today?  
2 A. No.  
3 Q. In the last ten years, is the location where  
4 you've worked at Oracle at Redwood Shores?  
5 A. Yes.  
6 MR. GARCIA: Counsel, I have no further  
7 questions, unless you have any questions.  
8 MS. MANTOAN: No questions. Thank you.  
9 MR. GARCIA: Okay. The process, are you going  
10 to ask the person to review and sign?  
11 MS. MANTOAN: Under the rules, she's given an  
12 opportunity to review and sign, right?  
13 MR. GARCIA: Right. I'm just asking if you're  
14 going to do that, as opposed to waive it.  
15 MS. MANTOAN: Well, I don't intend to waive it.  
16 I don't intend to commit to it.  
17 MR. GARCIA: Okay. Well, the important part  
18 for me is whether you're waiving it or not.  
19 Then we will conclude before we hit the  
20 seven-hour mark.  
21 MS. MANTOAN: Thank you.  
22 THE VIDEOGRAPHER: I'll go ahead and conclude.  
23 This concludes today's deposition of Lynne Ann  
24 Carrelli on May 24th, 2019, which consists of nine media  
25 files in volume number one. The original media files

1 will remain in the custody of Grodillis Court Reporters.  
2 Off the record at 5:51 p.m.  
3 (Deposition concluded at 5:51 p.m.)  
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|--|--|
| <p>1 SCANLAN STONE REPORTERS<br/>2 1245 Kearny Street, Suite 2A<br/>San Francisco, California 94133<br/>415.834.1114<br/>3<br/>4 Norman E. Garcia, Esq.<br/>U.S. Department of Labor<br/>5 Office of the Solicitor<br/>90 7th Street, Suite 3-700<br/>6 San Francisco, CA 94103<br/>7 Deposition of: LYNNE ANN CARRELLI<br/>Case: OFCCP VS. ORACLE AMERICA, INC.<br/>8 OALJ Case No. 2017-OFC-00006<br/>OFCCP No. R00192699<br/>9 Date of deposition: May 24, 2019<br/>10 Dear Mr. Garcia:<br/>11 We wish to inform you of the disposition of this original<br/>transcript. The following procedure is being taken by<br/>12 our office:<br/>13<br/>14 _____SIGNED (The witness has read and signed the<br/>deposition.)<br/>15<br/>16 _____UNSIGNED (The witness read the transcript - did not<br/>sign.)<br/>17 _____FAILED TO READ AND SIGN (The time for reading and<br/>signing has expired.)<br/>18<br/>19 _____NOTICE OF CHANGES AND/OR CORRECTIONS ATTACHED (made<br/>a part of the original transcript by binding<br/>20 therewith at the back of the deposition. Copies of<br/>said changes and/or corrections are attached<br/>thereto.)<br/>21<br/>22 _____The sealed original deposition is being forwarded to<br/>your office.<br/>23 Sincerely,<br/>24<br/>25 Mary Ann Scanlan, CSR No. 8875</p> <p style="text-align: right;">Page 325</p> |  |
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|---|--|---|---|
| <b>Exhibits</b>   | -  | 268:22 292:20   | <b>2016</b><br>79:16 120:22 176:23 177:2  |
| <b>Exhibit 44</b><br>5:6 91:23,24 93:20                                     | ---o0o---<br>7:10  | <b>18th</b><br>132:16 133:17 150:19   | <b>2017</b><br>10:9 58:6,17 79:14 80:6<br>116:5,17,19 117:5 142:12<br>147:22 150:19 297:4   |
| <b>Exhibit 45</b><br>5:8 146:25 147:1,5                                     | <b>1</b>   | <b>19</b><br>231:24,25 232:2 278:19   | <b>2017-OFC-00006</b><br>7:18   |
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