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17 Attorneys for Defendants
SAP AG, SAP AMERICA, INC., and
18 TOMORROWNOW, INC.

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 ORACLE USA, INC., et al.,
23 Plaintiffs,
24 v.
25 SAP AG, et al.,
26 Defendants.

Case No. 07-CV-1658 PJH (EDL)

**DECLARATION OF
ANNE TUMAN IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFFS' ADMINISTRATIVE
MOTION**

1 I, ANNE TUMAN, declare:

2 I am an Associate Human Resources Business Partner at SAP America, Inc., one of the
3 Defendants in this case. I make this declaration based on personal knowledge and, if called upon
4 to do so, could testify competently thereto.

5 1. The document produced by Defendants in this case, and Bates-labeled SAP-
6 OR00503877 through SAP-OR00503882 and that has been attached as Exhibit "A" to the
7 Declaration of Geoff Howard in support of Plaintiffs' Motion to Compel, contains
8 communications between and amongst prospective and former employees of SAP America, Inc.
9 and SAP AG regarding sensitive personal information, including information about
10 compensation, health, and marital status.

11 2. Defendants' practices are that such information is to be kept confidential and must
12 not publicly be disclosed.

13 3. Harm to SAP America, Inc., SAP AG, their prospective, current, and former
14 employees, and/or other individuals mentioned in this document would result from the disclosure
15 of the information contained in this document without the "Confidential" protections provided by
16 the Agreed Protective Order.

17 I declare under penalty of perjury under the laws of the United States and the State of
18 California that the foregoing is true and correct. Executed this 21st day of January, 2009 in
19 Newtown Square, Pennsylvania.

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22 ANNE TUMAN

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