

Exhibit Q

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE CORPORATION, a)
Delaware corporation, ORACLE)
USA, INC., a Colorado)
corporation, and ORACLE)
INTERNATIONAL CORPORATION, a)
California corporation,)
)
Plaintiffs,)

vs.) NO. 07-CV-1658 (PJH)

)
SAP AG, a German corporation,)
SAP AMERICA, INC., a Delaware)
corporation, TOMORROWNOW,)
INC., a Texas corporation, and)
DOES 1-50, inclusive,)
)
Defendants.)

_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GEORGE LESTER

(Taken by Plaintiff)

Charlotte, North Carolina

Thursday, April 23rd, 2009

Reported in Stenotype by

Lisa A. Wheeler, RPR, CRR

Transcript produced by computer-aided transcription

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- 1 Q. When was that approximately?
- 2 A. I'm not exactly sure.
- 3 Q. How did your responsibilities change
- 4 when you were promoted?
- 5 A. My responsibilities were to manage the
- 6 technical support engineers and manage the
- 7 engineers building environments.
- 8 Q. By environments, what -- what does that
- 9 include?
- 10 A. That would be just PeopleSoft
- 11 environments.
- 12 Q. And can you be more specific about what
- 13 the environment is, what it includes?
- 14 A. It would be a support environment. A
- 15 demo installation of -- of PeopleSoft is what was
- 16 installed to the best of my recollection.
- 17 Q. And -- and you're speaking of the -- the
- 18 PeopleSoft applications?
- 19 A. That is correct. The client's -- the
- 20 client's environment.
- 21 Q. You say the client's environment. You
- 22 mean the -- the software that the client provided to
- 23 TomorrowNow?
- 24 A. That is correct.
- 25 Q. And did those environments also have a

20

- 1 database component?
- 2 A. Correct.
- 3 Q. Was your team also responsible for
- 4 building out the database component for those
- 5 environments?
- 6 A. That is correct.
- 7 Q. And where did the database layer come
- 8 from that was used to build those environments?
- 9 A. Where did the database layer software --
- 10 actually, I do not know. I believe that was
- 11 installed by -- that was -- either existed before I
- 12 got there or that was -- actually, yeah. I think
- 13 the software for the database layer was in place
- 14 when I arrived in 2004 so I don't know.
- 15 Q. Was it the same -- same combination of
- 16 database software that you described that you worked
- 17 with earlier at PeopleSoft, Oracle and -- and -- and
- 18 SQL?
- 19 MR. COWAN: Objection, form.
- 20 BY MR. HOWARD:
- 21 Q. What -- what different databases were --
- 22 were in existence when you arrived at TomorrowNow?
- 23 A. SQL Server, Oracle. I believe those are
- 24 it.
- 25 Q. What versions of Oracle were used in