

EXHIBIT B-3

KATHERINE WALKER WILLIAMS April 1, 2008

HIGHLY CONFIDENTIAL

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE CORPORATION, ET AL, *
Plaintiffs, *
VS. * CASE NO. 07-CV-01658 (MJJ)
SAP AG, ET AL, *
Defendants. *

HIGHLY CONFIDENTIAL
ORAL AND VIDEOTAPED 30(b)(6) DEPOSITION OF
KATHERINE WALKER WILLIAMS
APRIL 1, 2008

REPORTED BY:
CAROL JENKINS, CSR, RPR, CRR
CERTIFICATE NO. 2660

KATHERINE WALKER WILLIAMS April 1, 2008

HIGHLY CONFIDENTIAL

Page 47

09:53:22 7 Q. And what does the last letter in the name
09:53:26 8 indicate?
09:53:26 9 A. Which database platform it's on, which
09:53:28 10 relational database platform it's built on.
09:53:30 11 Q. So this first one would be on an Oracle
09:53:33 12 platform?
09:53:37 13 A. Yes.

KATHERINE WALKER WILLIAMS April 1, 2008

HIGHLY CONFIDENTIAL

Page 107

11:29:43 13 Q. For clarity, actually, why don't we -- why
11:29:46 14 don't you describe the different pieces of what would
11:29:49 15 constitute a complete client environment including the
11:29:52 16 database piece.

11:29:52 17 A. Again, I'm not a technician, so -- and I know
11:29:56 18 that you questioned this with John Baugh, so I can refer
11:29:59 19 back to some of my notes from -- some of my memory from
11:30:03 20 his notes or his deposition.

11:30:04 21 You have a -- the environment includes
11:30:07 22 having a database built on some relational database
11:30:12 23 platform. And that -- then you would have a PS home
11:30:16 24 which includes all the objects that you need to run this
11:30:22 25 COBOL, the SQRs. And then you would have a library for

Merrill Legal Solutions
(800) 869-9132

KATHERINE WALKER WILLIAMS April 1, 2008

HIGHLY CONFIDENTIAL

Page 108

11:30:27 1 your portal objects. And then there would be another
11:30:30 2 library for your third-party environments. Products,
11:30:37 3 not environments, products, third-party products.

11:30:40 4 Q. So in your early testimony when you're
11:30:43 5 referring to database, you're referring to the totality
11:30:46 6 of the environment?

11:30:47 7 MR. McDONELL: Vague and ambiguous.

11:30:50 8 A. In most cases. I couldn't say that was the
11:30:51 9 case everywhere.

KATHERINE WALKER WILLIAMS April 1, 2008
HIGHLY CONFIDENTIAL

Page 202

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

K Walker

KATHERINE WALKER WILLIAMS

THE STATE OF TEXAS)

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned
authority, by the said KATHERINE WALKER WILLIAMS on this
the 17th day of April, 2008.

[Signature]

Notary Public in and for
the State of Texas

My Commission Expires: _____

