

# **EXHIBIT B-3**

KATHERINE WALKER WILLIAMS April 1, 2008  
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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. \*

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

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

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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.

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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

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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.

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KATHERINE WALKER WILLIAMS

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11 THE STATE OF TEXAS )

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SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned

13

authority, by the said KATHERINE WALKER WILLIAMS on this

14

the 17<sup>th</sup> day of April, 2008.

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Notary Public in and for

18

the State of Texas

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My Commission Expires: \_\_\_\_\_

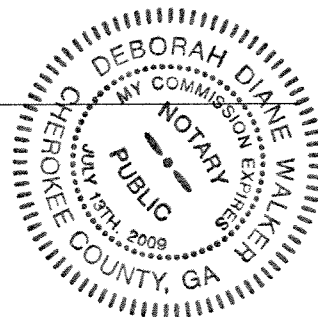
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