

EXHIBIT B-6

SHELLEY NELSON December 6, 2007

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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.) CASE NO. 07-CV-01658 (MJJ)
)
SAP AG, a German)
corporation, SAP AMERICA,)
INC., a Delaware corporation,)
TOMORROWNOW, INC., a Texas)
corporation, and DOES 1-50,)
inclusive,)
Defendants.)

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ORAL VIDEOTAPED DEPOSITION OF
TOMORROWNOW BY AND THROUGH SHELLEY NELSON

VOLUME 2

DECEMBER 6, 2007

ORAL VIDEOTAPED DEPOSITION OF SHELLEY NELSON, produced as a witness at the instance of the Plaintiffs and duly sworn, was taken in the above-styled and numbered cause on the 6th day of December, 2007, from 9:10 a.m. to 3:53 p.m., before Dana Richardson, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Jones Day, 717 Texas, Suite 3300, Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Job No. 1603-85363

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09:28:01 12 Q. What other materials, then, with that modification
09:28:04 13 was Titan used to download?

09:28:08 14 A. A -- Titan was coded to download other categories of
09:28:15 15 materials. It -- a lot of those didn't get moved into
09:28:21 16 production. So, it may have -- they may have downloaded as
09:28:27 17 part of testing Titan; but they had -- they were working on
09:28:30 18 development of -- of functionality to allow it to download
09:28:36 19 white papers, red papers, upgrade documentation. It was
09:28:45 20 developed to download solutions, and that did get rolled out
09:28:51 21 for at least one client.

09:29:03 22 That's -- that's all I can recall right now.

09:29:06 23 Q. Let me make sure I understand. So, Titan was
09:29:11 24 modified or improved to allow for downloading of additional
09:29:16 25 materials beyond simply updates and fixes, including white

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09:29:22 1 papers, red papers, upgrade documentation and solutions. Is
09:29:27 2 that correct so far?
09:29:28 3 A. Correct.
09:29:30 4 Q. And in at least one case that you recall, it was used
09:29:37 5 to download materials beyond updates and fixes; and that would
09:29:40 6 be solutions?
09:29:42 7 A. Yes.
09:29:43 8 Q. It was also used to download the other items that you
09:29:49 9 identified, white papers, red papers, upgrade documentation
09:29:55 10 and solutions, on a test basis, correct?
09:29:59 11 A. From what I understand, yes.
09:30:00 12 Q. And are you aware of any instances in which it was
09:30:03 13 used to download these other materials, white papers, red
09:30:08 14 papers, upgrade documentation, for a client?
09:30:11 15 A. I'm not -- I'm not aware, for sure, that it -- it
09:30:17 16 actually got rolled into -- to actually use by our download
09:30:21 17 team.

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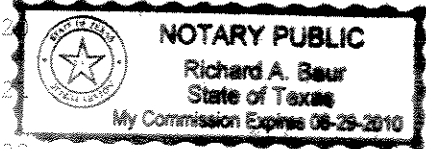
I declare under penalty of perjury that the foregoing is true and correct.

Shelley Nelson

SHELLEY NELSON

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, by the witness, SHELLEY NELSON, on this the 5th day of JANUARY, 2008.

Richard A. Baur



NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

My Commission Expires: 8-29-2010