

EXHIBIT 22

SAFRA CATZ March 27, 2009
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Page 1

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. |) | |
| |) | |

VIDEOTAPED DEPOSITION OF
SAFRA CATZ

FRIDAY, MARCH 27, 2009

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REPORTED BY: HOLLY THUMAN, CSR No. 6834, RMR, CRR
(1-416874)

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08:23:41 10 Q. Does SAP compete with Oracle in any

08:23:46 11 markets?

08:23:46 12 A. Yes.

08:23:47 13 Q. Which markets?

08:23:49 14 A. ERP.

08:23:49 15 Q. Any others?

08:23:51 16 A. CRM.

08:23:52 17 Q. Any others?

08:23:56 18 A. Like what?

08:23:57 19 Q. Any other markets that you can think of in

08:23:59 20 which Oracle participates, does SAP compete?

08:24:06 21 A. Maybe a little in retail, and utilities.

08:24:11 22 But I can -- that's almost ERP.

08:24:15 23 Q. In the ERP market, does Oracle have any

08:24:17 24 more significant competitor than SAP?

08:24:20 25 A. No.

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09:45:46 20 Q. Did Oracle have things in mind it wanted to
09:45:49 21 accomplish by acquiring PeopleSoft?

09:45:51 22 A. Sure.

09:45:52 23 Q. What were those things?

09:45:54 24 A. Oh, wow. They were really to have within

09:46:09 25 Oracle a much larger customer base and a much larger

09:46:15 1 maintenance base so we could spend more on R&D and
09:46:21 2 so that we could sell more to this larger customer
09:46:25 3 base of our other products.

09:46:29 4 And so that we could take advantage of the
09:46:32 5 fact that scale in our business improves the
09:46:36 6 operating performance of the company.

09:46:39 7 Q. And how would acquiring PeopleSoft -- or
09:46:43 8 how do you expect that acquiring PeopleSoft would
09:46:46 9 help you spend more on R&D?

09:46:48 10 A. Well, first of all, that was not a
09:46:51 11 definitive -- a complete list --

09:46:53 12 Q. Oh, I'm sorry.

09:46:54 13 A. Because -- just so that we're clear.

09:46:56 14 Just being larger, having more customers,
09:46:58 15 would also make us much more competitive against
09:47:01 16 SAP.

09:47:02 17 How would it allow us to spend more on R&D?
09:47:06 18 Well, you have more customers, you sell them more,
09:47:10 19 you have an installed base of customers who are
09:47:13 20 paying you maintenance, and thus you have a lot more
09:47:16 21 money you can direct towards R&D.

09:47:22 22 And I mean, as you saw in the previous
09:47:24 23 document, we were planning on retaining a lot of the
09:47:28 24 R&D people. And together, them and the E-Business
09:47:35 25 suite teams could have a lot more resources to build

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09:47:41 1 Fusion applications, which we on our own wouldn't be
09:47:44 2 able to spend nearly as much to do.
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09:53:02 18 Q. Did Oracle have goals in mind for the

09:53:04 19 Siebel acquisition?

09:53:09 20 A. Yes.

09:53:09 21 Q. What were those goals as you recall them?

09:53:12 22 A. Well, we -- obviously, in that case, they

09:53:17 23 had the leading CRM product line, and we wanted to

09:53:23 24 both have their customer base and be able to sell

09:53:26 25 them other products that we already have as well --

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09:53:30 1 including database and all those things, including
09:53:34 2 also have those products to sell to all of our
09:53:38 3 Oracle, PeopleSoft, J.D. Edwards, Retek customers.
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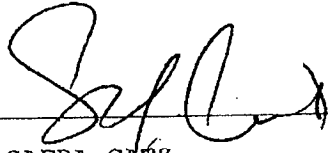
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(Time noted, 1:38 p.m.)

--o0o--

I declare under penalty of perjury that
the foregoing is true and correct. Subscribed at
Redwood City, California, this 6th day of
May, 2009.


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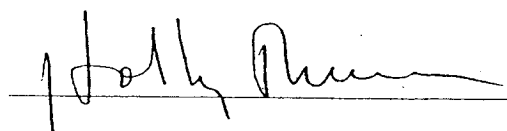
CERTIFICATE OF REPORTER

I, HOLLY THUMAN, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken down in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

DATED April 6¹⁵, 2009.



HOLLY THUMAN, CSR No. 6834