

EXHIBIT C

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
PAUL K. MEYER

VOLUME 1; PAGES 1 - 331

WEDNESDAY, MAY 12, 2010

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
REPORTED BY: HOLLY THUMAN, CSR No. 6834, RMR, CRR
(1-427362)

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09:47:59		09:51:07	
09:48:03		09:51:10	
09:48:06		09:51:13	
09:48:09		09:51:27	19 MR. McDONELL: Q. Have you read the
09:48:13		09:51:29	20 report of Mr. Brian Sommer?
09:48:15		09:51:33	21 A. I have just glanced through it at a very,
09:48:17		09:51:38	22 very high level.
09:48:27		09:51:42	23 Q. And why did you choose to review it in
09:48:29		09:51:44	24 that way?
09:48:30		09:51:46	25 A. More from the perspective of timing.

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6:13:38	1 value price at the time, and that premium was paid	16:16:04
6:13:40	2 to have the opportunity to service, cross-sell, and	16:16:09
6:13:47	3 upsell those customers with Oracle's expertise.	16:16:13
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16:15:01	1	16:17:12
16:15:03	2 Q. Yeah, I get that. What I'm trying to	16:17:13
16:15:06	3 understand is, do you know -- I mean, I think	16:17:16
16:15:08	4 you've told us that the opportunity to make future	16:17:20
16:15:11	5 cross-sells and upsells would be embedded in	16:17:22
16:15:17	6 goodwill value. Right?	16:17:24
16:15:18	7 A. That's correct.	16:17:28
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16:16:03		16:18:22

May 19, 2010

PAUL K. MEYER

c/o: HOLLY HOUSE, Attorney at Law

BINGHAM McCUTCHEM

Three Embarcadero Center

San Francisco, California 94111

RE: Oracle vs. SAP, et al.

Dear Mr. Meyer:

Please be advised that the original transcript of Volume 1 of your deposition, taken May 12, 2010 in the above-entitled matter, is available for reading and signing. The original transcript will be held at the offices of:

Merrill Legal Solutions
135 Main Street, 4th Floor
San Francisco, CA 94105
(415) 357-4300

for thirty (30) days in accordance with Federal Rules of Civil Procedure Section 30(e). If you do not sign your deposition within 30 days, it may be used as fully as though signed.

If you are represented by counsel in this matter, you may wish to ask your attorney how to proceed. If you are not represented by counsel and wish to review your transcript, please contact our office for a mutually convenient appointment to review your deposition.

Thank you for your cooperation in this matter.

Sincerely yours,

Holly Thuman, CSR 6834

cc: Original Transcript
All counsel