

EXHIBIT 19

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09:10:10 23 A. Yes.
09:10:15 24 Q. Thank you. How -- you also understand
 25 today that you're being presented as a corporate

09:10:21 1 representative of the plaintiffs in this case; that
09:10:23 2 you're not being deposed in your individual capacity
09:10:29 3 as Dr. Uwe Koehler, but as a representative of the
09:10:32 4 plaintiffs that have sued my clients in this case?

09:10:32 5 A. Yes.

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09:12:34 5 Q. What were the documents that you recall
09:12:36 6 looking at, beginning 2 weeks ago?

09:12:39 7 A. The documents I recall -- and do you mean
09:12:40 8 the documents in the binder?

09:12:41 9 Q. Yes.

09:12:43 10 A. Yes, okay. The documents I remember were
09:12:51 11 the third amended complaint, the deposition notice,
09:12:54 12 and interrogatory response related to the
09:12:58 13 investigation, and a bunch of emails.

09:13:02 14 Q. What emails do you recall looking at?

09:13:08 15 A. I recall specifically three, let's say,
09:13:09 16 categories of emails.

09:13:14 17 The first category of emails were about, as
09:13:20 18 we say, the first start of the investigation, in
09:13:22 19 November-December, 2006.

09:13:25 20 The second category were a bunch of emails
09:13:30 21 related to the second phase of the investigation, or
09:13:34 22 click investigation as we call it, in January, early
09:13:36 23 February 2007.

09:13:38 24 And the third category of emails were about
25 fixing a security hole we identified in the

09:13:46 1 application related to the investigation.

09:13:48 2 Q. What do you recall about the emails on
09:13:51 3 the -- in the first category, those that began in
09:13:55 4 November and December of '06?

09:13:58 5 A. The emails I recall in November-December
09:14:03 6 were emails from Buffy Ransom, who initially
09:14:08 7 detected the issue, raised the issue to her manager,
09:14:11 8 Jim Patrice. Jim Patrice raised it to my boss, my
09:14:13 9 boss raised it to me.

09:14:15 10 I started a verification, involved my team,
09:14:31 11 and finally, 2 days later, involved the attorneys.

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09:20:58 9 Q. Okay. What other emails do you recall
09:21:02 10 looking at that you categorized in that first group
09:21:03 11 of emails, the beginning of the investigation in
09:21:07 12 November or December of 2006, that you reviewed in
09:21:09 13 preparation for your deposition?

09:21:15 14 A. The first email I remember is an email from
09:21:21 15 my previous boss, Todd Barton, to me, with a voice
09:21:24 16 mail attachment. The voice mail was from Jim
09:21:32 17 Patrice, stating that his team found suspicious,
09:21:40 18 strange things on the PeopleSoft Customer Connection
09:21:43 19 system. He also mentioned that it may point to
09:21:48 20 TomorrowNow, because one of the user names or user
09:21:54 21 IDs showing up was TomNow, and he asked Todd to have
09:21:58 22 a look at that. That was the first one.

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09:27:36 7 Q. Then what was the start; what precipitated
09:27:39 8 or started the click investigation?
09:27:40 9 MR. ALINDER: Objection. Calls for
09:27:41 10 speculation.
09:27:43 11 You can answer it to the extent you know.
09:27:46 12 THE WITNESS: Okay. I can tell you what I
09:27:50 13 know, what I found out speaking to the people who
09:27:55 14 had been involved in this clickstream investigation.
09:28:07 15 What I learned was that Oracle, the support
09:28:11 16 organization, lost customers. That was just a
09:28:16 17 matter of fact. And some of these customer names
09:28:20 18 showed up on the TomorrowNow web page, as a matter
09:28:23 19 of fact. That was not a secret. Public
09:28:24 20 information.
09:28:29 21 And the support organization became
09:28:34 22 concerned why this happens, and wanted to know
09:28:38 23 what's wrong, what are we doing wrong, what can we
09:28:41 24 do better, whatever.
 25 And that was mentioned in a meeting, Jim

09:28:55 1 Patrice meeting. And Sid Chilakapati, or -- I don't

09:28:57 2 know how to pronounce the name.

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14:42:32 17 Q. I'm not going to mark this, but I just
14:42:36 18 wanted to show it to you.
14:42:45 19 On the document I just handed you, the
14:42:49 20 second little bullet point down says, no customer
14:42:50 21 systems affected.
14:42:51 22 Do you see that?
14:42:52 23 A. Yes, I see that.
14:42:55 24 Q. What did you mean by that?
 25 A. As I mentioned before, initially when Jim

14:43:02 1 Patrice brought that issue to our attention, it was
14:43:05 2 not clear at all what happened. And I investigated
14:43:09 3 that into two directions, first of all, because
14:43:13 4 that -- we looked at the highest risk first, so are
14:43:17 5 any of our systems compromised, hacked, by any
14:43:19 6 external party?

14:43:22 7 And since he mentioned customer names, and
14:43:25 8 it was about customers, and customer IDs, we
14:43:31 9 initially thought, is any of our customers affected?
14:43:35 10 So how the hell these people got the customer IDs,
14:43:37 11 for example, that was one of the questions.

14:43:39 12 And we looked into that, is there any
14:43:41 13 evidence that customers are affected or customers
14:43:45 14 had been hacked and their systems had been abused to
14:43:46 15 go into all that.

14:43:48 16 And in the initial verification, I couldn't
14:43:53 17 find any of that. That's why my outcome was, it's
14:43:56 18 not as serious as it looked like, because there's no
14:43:59 19 evidence that our systems have been compromised, and
14:44:03 20 there's no evidence that customer systems had been
14:44:03 21 compromised.

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16:14:17 17 I declare under penalty of perjury that
16:14:18 18 the foregoing is true and correct. Subscribed at
16:14:19 19 Denver, ^{Colorado} ~~California~~, this 20 day of
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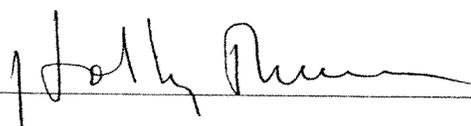
CERTIFICATE OF REPORTER

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 December 17, 2008.



HOLLY THUMAN, CSR No. 6834