

# EXHIBIT K

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

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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 AG AMERICA, INC., a	)
Delaware corporation,	)
TOMORROWNOW INC., a Texas	)
corporation, and DOES 1-50,	)
inclusive,	)
	)
Defendants.	)
	)

VIDEOTAPED DEPOSITION OF  
EDWARD SCREVEN

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November 30, 2009

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

REPORTED BY: DELAINE HALL, CSR 10164

JOB 1-424604

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02:06:49 1 A. It was called the Tools Group.  
02:06:52 2 Q. Tools Group. And how long were you in the  
02:06:54 3 Tools Group for?  
02:06:56 4 A. I was in the Tools Group until probably close  
02:07:01 5 to -- probably close to 1990.  
02:07:06 6 Q. And then you were in the Advanced Product  
02:07:09 7 Group, correct?  
02:07:10 8 A. Right, yeah.  
02:07:11 9 Q. And how long were you in that group?  
02:07:14 10 A. I think that was probably about 18 months or  
02:07:17 11 two years.  
02:07:21 12 Q. And then you were -- you talked about being  
02:07:23 13 part of the technical staff to Larry Ellison. About  
02:07:27 14 how long were you in that position?  
02:07:29 15 A. It's -- small number of years. It's hard for  
02:07:33 16 me to remember. I mean, eventually I became Chief  
02:07:36 17 Corporate Architect. So somewhere --  
02:07:37 18 Q. So that job just kind of transferred in to  
02:07:38 19 your job as Chief Corporate Architect?  
02:07:41 20 A. Right. There was a short period of time where  
02:07:45 21 another one of Oracle's very early employees created the  
02:07:50 22 job of Chief Corporate Architects reporting to Larry.  
02:07:51 23 And I reported to him for a short amount of time. And  
02:07:54 24 then he decided to retire and I became Chief Corporate  
02:07:57 25 Architect.

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02:07:59 1 Q. At any time during those job responsibilities  
02:08:02 2 that you have talked about, did you ever work on  
02:08:06 3 developing PeopleSoft products directly?  
02:08:10 4 MR. HOWARD: Objection; vague and ambiguous.  
02:08:12 5 THE WITNESS: Could you define what you mean  
02:08:15 6 by "work on developing"?  
02:08:16 7 MR. WILKES Q. Sure. Did you develop any of  
02:08:18 8 the PeopleSoft product lines?  
02:08:20 9 A. I never wrote PeopleSoft code, but I  
02:08:22 10 participated in many technical discussions about, you  
02:08:26 11 know, the way PeopleSoft products are built; the way  
02:08:30 12 they should be built; the way that we should -- the way  
02:08:33 13 that we should offer the same functionality in the  
02:08:36 14 future; the way those products should use Oracle  
02:08:39 15 technologies; the way they should integrate with other  
02:08:43 16 Oracle operations.  
02:08:44 17 Q. But you've never actually written any  
02:08:46 18 PeopleSoft code?  
02:08:50 19 A. No, I have never written any PeopleSoft  
02:08:52 20 programs.  
02:08:52 21 Q. And when you were talking about kind of this  
02:08:54 22 high-level understanding of work that you have done on  
02:08:57 23 the PeopleSoft product lines, what would you say your  
02:09:01 24 level of involvement was in those types of decisions?  
02:09:05 25 MR. HOWARD: Objection; overbroad, vague and

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02:09:06 1 ambiguous.  
02:09:09 2 MR. WILKES Q. You can answer.  
02:09:11 3 A. Well, I think it was significant. I mean, to  
02:09:15 4 help provide guidance the way the products are fitting  
02:09:18 5 together and the way the products should consume  
02:09:20 6 existing Oracle technologies; the way that they should  
02:09:25 7 be integrated with other important Oracle applications  
02:09:36 8 for our customers.  
02:09:36 9 Q. Is it fair to say that those responsibilities  
02:09:36 10 all were -- generally relate to the integration of the  
02:09:37 11 PeopleSoft products into the overall Oracle family of  
02:09:41 12 products?  
02:09:43 13 A. Part of it is related to integration of the --  
02:09:46 14 of the PeopleSoft applications and to the overall  
02:09:50 15 family. Part of it is the way we should exploit  
02:09:54 16 existing Oracle technologies to make the PeopleSoft  
02:09:57 17 applications better. Part of it is just, you know, the  
02:10:01 18 way applications should be built in general.  
02:10:07 19 Q. So let me ask you the same questions about JD  
02:10:10 20 Edwards. Have you ever worked on developing any of the  
02:10:12 21 JD Edwards products directly?  
02:10:15 22 A. The answer is the same. So, no, I've never  
02:10:19 23 directly written any JD Edwards program, right, but I've  
02:10:23 24 been in discussions and many times about the way JD  
02:10:28 25 Edwards programs should or could take advantage of

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02:10:31 1 existing Oracle technologies; the way that they could be  
02:10:36 2 integrated with other Oracle applications, you know; the  
02:10:38 3 way that we should -- we should modify the applications  
02:10:44 4 going forward to provide a better experience for  
02:10:46 5 customers.  
02:10:47 6 Q. And the same questions for Siebel. Have you  
02:10:51 7 ever been involved on developing any of the Siebel  
02:10:54 8 products?  
02:10:54 9 A. And the answer would be the same. So, no,  
02:10:57 10 I've never directly written any -- any Siebel program,  
02:11:00 11 although many times have been involved with and led  
02:11:05 12 discussions about how Siebel can or should be taking  
02:11:10 13 advantage of existing Oracle technologies. How it could  
02:11:13 14 or should be integrated with other Oracle applications,  
02:11:16 15 and, you know, how we can take advantage of what's in  
02:11:20 16 Siebel to have a better experience for the end customer.  
02:11:25 17 Q. Prior to joining Oracle in 1986, where did --  
02:11:29 18 can you give me a brief description of where you worked  
02:11:32 19 since college?  
02:11:33 20 A. I was in college before 1986.  
02:11:35 21 Q. Okay. So you joined Oracle right after you  
02:11:38 22 left college?  
02:11:39 23 A. That's right. That's right.  
02:11:40 24 Q. And so you never worked for PeopleSoft  
02:11:43 25 directly prior to the Oracle's acquisition of

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CERTIFICATE OF REPORTER

I, DELAINE HALL, 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 [X] 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 8, 2009  
DL Hall

DELAINE HALL, CSR No. 10164