	Case5:11-cv-02509-LHK Document4:	18-2 Filed05/10/13 Page1 of 18
1 2 3 4 5 6 7 8 9 10 11	Richard M. Heimann (State Bar No. 63607) Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260) Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298) Anne B. Shaver (State Bar No. 250298) Lisa J. Cisneros (State Bar No. 251473) LIEFF CABRASER HEIMANN & BERNST 275 Battery Street, 29th Floor San Francisco, California 94111-3339 Telephone: 415.956.1000 Facsimile: 415.956.1008 Joseph R. Saveri (State Bar No. 130064) Lisa J. Leebove (State Bar No. 130064) Lisa J. Leebove (State Bar No. 186705) James D. Dallal (State Bar No. 277826) JOSEPH SAVERI LAW FIRM 255 California, Suite 450 San Francisco, California 94111 Telephone: 415.500.6800 Facsimile: 415.500.6803	TEIN, LLP
12	Lead Counsel for Plaintiff Class	
13	Leaa Counsel for Flaining Class	
14	UNITED STAT	ES DISTRICT COURT
15	NORTHERN DIS	TRICT OF CALIFORNIA
16	SAN JO	OSE DIVISION
17		
18	IN RE: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION	Master Docket No. 11-CV-2509-LHK
19	THIS DOCUMENT RELATES TO:	DECLARATION OF LISA J. CISNEROS IN SUPPORT OF PLAINTIFFS' NOTICE
20 21	All Actions	OF SUPPLEMENTAL MOTION AND SUPPLEMENTAL MOTION FOR CLASS CERTIFICATION, AND MEMORANDUM
22		OF LAW IN SUPPORT
23		Date: August 8, 2013 Time: 1:30 pm Courtroom: 8, 4 th Floor
24		Judge: Honorable Lucy H. Koh
25		
26	I, Lisa J. Cisneros, declare:	
27		rm of Lieff, Cabraser, Heimann & Bernstein, LLP, a
28	member of the State Bar of California, and an	m admitted to practice before the United States
	1095912.3	CISNEROS DECLARATION NO. 11-CV-2509-LHK

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1	District Court for the Northern District of California. I am one of the counsel for the Plaintiffs in		
2	this action. I make this declaration based on my own personal knowledge. If called upon to		
3	testify, I could and would testify competently to the truth of the matters stated herein.		
4	I. <u>Deposition Testimony</u>		
5	A. <u>Adobe</u>		
6	2. Attached hereto as Exhibit A is a true and correct copy of the excerpts for the		
7	March 15, 2013 deposition of Bruce Chizen, former Chief Executive Officer.		
8	3. Attached hereto as Exhibit B is a true and correct copy of the excerpts for the		
9	March 1, 2013 deposition of Digby Horner, Senior Vice President of Engineering.		
10	4. Attached hereto as Exhibit C is a true and correct copy of the excerpts for the		
11	March 28, 2013 deposition of Rosemary Arriada-Keiper, former Manager of Global		
12	Compensation.		
13	5. Attached hereto as Exhibit D is a true and correct copy of the excerpts for the		
14	August 21, 2012 deposition of Donna Morris, Senior Vice President Global Human Resources.		
15	6. Attached hereto as Exhibit E is a true and correct copy of the excerpts for the		
16	February 28, 2013 deposition of Shantanu Narayen, Chief Executive Officer.		
17	7. Attached hereto as Exhibit F is a true and correct copy of the excerpts for the Apri	1	
18	5, 2013 deposition Debbie Streeter, Vice President, Total Rewards.		
19	8. Attached hereto as Exhibit G is a true and correct copy of the excerpts for the		
20	October 5, 2012 deposition of Jeffrey Vijungco, Vice President Worldwide Talent Acquisition.		
21	B. <u>Apple</u>		
22	9. Attached hereto as Exhibit H is a true and correct copy of the excerpts for the		
23	March 5, 2013 deposition of David Alvarez, Recruiting Manager and former Research Manager.		
24	10. Attached hereto as Exhibit I is a true and correct copy of the excerpts for the		
25	March 1, 2013 deposition of Darrin Baja, former Recruiting Manager.		
26	11. Attached hereto as Exhibit J is a true and correct copy of the excerpts for the		
27	March 7, 2013 deposition of Richard Bechtel, Director of Executive Recruiting.		
28			

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1	12.	Attached hereto as Exhibit K is a true and correct copy of the excerpts for the	
2	August 23, 2012 deposition of Mark Bentley, former Director of Executive Recruiting and		
3	Interim Human Resources Director.		
4	13.	Attached hereto as Exhibit L is a true and correct copy of the excerpts for the	
5	February 26,	2013 deposition of Patrick Burke, former Technical Recruiter and Staffing Mana	ger.
6	14.	Attached hereto as Exhibit M is a true and correct copy of the excerpts for the	
7	March 15, 20	13 deposition of Steven Burmeister, Senior Director of Compensation.	
8	15.	Attached hereto as Exhibit N is a true and correct copy of the excerpts for the	
9	March 20, 20	13 deposition of Tony Fadell former Senior Vice President, Ipod Division, and	
10	advisor to Ste	eve Jobs.	
11	16.	Attached hereto as Exhibit O is a true and correct copy of the excerpts for the	
12	April 11, 201	3 deposition of Bob Mansfield, Senior Vice President of Technologies and forme	r
13	Head of Mac	intosh Product Design Group.	
14	17.	Attached hereto as Exhibit P is a true and correct copy of the excerpts for the	
15	February 27, 2013 deposition of Ron Okamoto, Vice President of Developer Relations.		
16	C.	Google	
16 17	C. 18.	Google Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the	
	18.		
17	18.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the	
17 18	18. March 27, 20 19.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations.	
17 18 19	18. March 27, 20 19.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the	
17 18 19 20	18. March 27, 20 19. March 19, 20 20.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder.	
17 18 19 20 21	18. March 27, 20 19. March 19, 20 20.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder. Attached hereto as Exhibit S is a true and correct copy of the excerpts for the	
17 18 19 20 21 22	18. March 27, 20 19. March 19, 20 20. January 1, 20	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder. Attached hereto as Exhibit S is a true and correct copy of the excerpts for the	
 17 18 19 20 21 22 23 	18. March 27, 20 19. March 19, 20 20. January 1, 20 Operations. 21.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder. Attached hereto as Exhibit S is a true and correct copy of the excerpts for the 13 deposition of Shona Brown, former Senior Vice President of Business	
 17 18 19 20 21 22 23 24 	18. March 27, 20 19. March 19, 20 20. January 1, 20 Operations. 21.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder. Attached hereto as Exhibit S is a true and correct copy of the excerpts for the 13 deposition of Shona Brown, former Senior Vice President of Business Attached hereto as Exhibit T is a true and correct copy of the excerpts for the	
 17 18 19 20 21 22 23 24 25 	18. March 27, 20 19. March 19, 20 20. January 1, 20 Operations. 21. February 27, 22.	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder. Attached hereto as Exhibit S is a true and correct copy of the excerpts for the 13 deposition of Shona Brown, former Senior Vice President of Business Attached hereto as Exhibit T is a true and correct copy of the excerpts for the 2013 deposition of Alan Eustace, Senior Vice President of Engineering.	d
 17 18 19 20 21 22 23 24 25 26 	18. March 27, 20 19. March 19, 20 20. January 1, 20 Operations. 21. February 27, 22. April 3, 2013	Attached hereto as Exhibit Q is a true and correct copy of the excerpts for the 13 deposition of Laszlo Bock, Senior Vice President of People Operations. Attached hereto as Exhibit R is a true and correct copy of the excerpts for the 13 of deposition of Sergey Brin, Co-Founder. Attached hereto as Exhibit S is a true and correct copy of the excerpts for the 13 deposition of Shona Brown, former Senior Vice President of Business Attached hereto as Exhibit T is a true and correct copy of the excerpts for the 2013 deposition of Alan Eustace, Senior Vice President of Engineering. Attached hereto as Exhibit U is a true and correct copy of the excerpts for the	d

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1	23.	Attached hereto as Exhibit V is a true and correct copy of the excerpts for the	
2	March 13, 2013 deposition of Jonathan Rosenberg, Advisor to the Office of CEO and former		
3	Senior Vice President of Product Management (2002 – 2011).		
4	24.	Attached hereto as Exhibit W is a true and correct copy of the excerpts for the	
5	deposition E	ric Schmidt, Executive Chairman, member of the Board, and former CEO (2001-	
6	2011).		
7	25.	Attached hereto as Exhibit X is a true and correct copy of the excerpts for the	
8	deposition Fi	ank Wagner, Director of Compensation.	
9	D.	Intel	
10	26.	Attached hereto as Exhibit Y is a true and correct copy of the excerpts for the	
11	November 21	1, 2012 deposition of Deborah Conrad, Senior Vice President of Human Resources.	
12	27.	Attached hereto as Exhibit Z is a true and correct copy of the excerpts for the	
13	March 15, 20	13 deposition of Randall Goodwin, Technology Development Manager.	
14	28.	Attached hereto as Exhibit AA is a true and correct copy of the excerpts for the	
15	March 22, 20	13 deposition of Renee James, Manager of the Software and Services Group.	
16	29.	Attached hereto as Exhibit BB is a true and correct copy of the excerpts for the	
17	March 20, 20	13 deposition of Daniel McKell, Compensation and Benefits Specialist.	
18	30.	Attached hereto as Exhibit CC is a true and correct copy of the excerpts for the	
19	February 14,	2013 deposition of Patricia Murray, Senior Vice President and Director of	
20	Leadership S	trategy and former President of Human Resources.	
21	31.	Attached hereto as Exhibit DD is a true and correct copy of the excerpts for the	
22	January 29, 2	2013 deposition of Paul Otellini, Chief Executive Officer of Intel and Member of the	
23	Google Boar	d of Directors.	
24	Е.	Intuit	
25	32.	Attached hereto as Exhibit EE is a true and correct copy of the excerpts for the	
26	February 5, 2	2013 deposition of Bill Campbell, Chairman of Intuit Board of Directors, Co-Lead	
27	Director of A	apple, and "advisor" to Google.	
28			
		CISNEROS DECLARATION	

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1	33.	Attached hereto as Exhibit FF is a true and correct copy of the excerpts for the
2	March 20, 20	13 deposition of Chris Galy, Director of Talent Acquisition.
3	34.	Attached hereto as Exhibit GG is a true and correct copy of the excerpts for the
4	February 2, 2	2013 deposition of Michael McNeal, Vice President of Talent Development, former
5	Vice Presider	nt of Talent Strategy (2008 – 2010), Vice President of Talent Acquisition (2007),
6	Director of T	alent Acquisition (2006) and Manager of Executive Recruitment (2003 – 2006).
7	35.	Attached hereto as Exhibit HH is a true and correct copy of the excerpts for the
8	February 14,	2013 deposition of Chuong Nguyen, Executive Recruiter and former Technical
9	Recruiter (20	02 – 2006).
10	36.	Attached hereto as Exhibit II is a true and correct copy of the excerpts for the
11	March 29, 20	13 deposition of Mason Stubblefield, Vice President of Human Resources.
12	37.	Attached hereto as Exhibit JJ is a true and correct copy of the excerpts for the
13	March 14, 20	13 deposition of Sherry Whiteley, Senior Vice President, Chief of Human
14	Resources.	
15	F.	Lucasfilm
15 16	F. 38.	Lucasfilm Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the
15 16 17	38.	
16	38. February 21,	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the
16 17	38. February 21,	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003),
16 17 18 19	38. February 21, former Presic 39.	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), lent and Member of the Board of Directors (2003 – 2012).
16 17 18 19 20	38. February 21, former Presic 39.	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the
 16 17 18 19 20 21 	38. February 21, former Presid 39. November 1,	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the
 16 17 18 19 20 21 22 	38. February 21, former Presic 39. November 1, Resources. 40.	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), lent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the 2012 deposition of Sharon Coker, former Director and Senior Director of Human
 16 17 18 19 20 21 22 23 	38. February 21, former Presid 39. November 1, Resources. 40. March 20, 20	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the 2012 deposition of Sharon Coker, former Director and Senior Director of Human Attached hereto as Exhibit MM is a true and correct copy of the excerpts for the
 16 17 18 19 20 21 22 23 24 	38. February 21, former Presic 39. November 1, Resources. 40. March 20, 20 Controller, C	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the 2012 deposition of Sharon Coker, former Director and Senior Director of Human Attached hereto as Exhibit MM is a true and correct copy of the excerpts for the 2013 deposition of Steven Condiotti, Finance Manager for Distribution, Corporate
16 17 18	38. February 21, former Presic 39. November 1, Resources. 40. March 20, 20 Controller, C	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the 2012 deposition of Sharon Coker, former Director and Senior Director of Human Attached hereto as Exhibit MM is a true and correct copy of the excerpts for the 013 deposition of Steven Condiotti, Finance Manager for Distribution, Corporate hief Accounting Officer, Vice President of Finance and Chief Accounting Officer,
 16 17 18 19 20 21 22 23 24 25 	38. February 21, former Presid 39. November 1, Resources. 40. March 20, 20 Controller, C and VP of Fir 41.	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the 2012 deposition of Sharon Coker, former Director and Senior Director of Human Attached hereto as Exhibit MM is a true and correct copy of the excerpts for the 013 deposition of Steven Condiotti, Finance Manager for Distribution, Corporate hief Accounting Officer, Vice President of Finance and Chief Accounting Officer, nance and Chief Financial Officer.
 16 17 18 19 20 21 22 23 24 25 26 	38. February 21, former Presid 39. November 1, Resources. 40. March 20, 20 Controller, C and VP of Fir 41.	Attached hereto as Exhibit KK is a true and correct copy of the excerpts for the 2013 deposition of Micheline Chau, former Chief Financial Officer (1991 – 2003), dent and Member of the Board of Directors (2003 – 2012). Attached hereto as Exhibit LL is a true and correct copy of the excerpts for the 2012 deposition of Sharon Coker, former Director and Senior Director of Human Attached hereto as Exhibit MM is a true and correct copy of the excerpts for the 013 deposition of Steven Condiotti, Finance Manager for Distribution, Corporate hief Accounting Officer, Vice President of Finance and Chief Accounting Officer, nance and Chief Financial Officer. Attached hereto as Exhibit NN is a true and correct copy of the excerpts for the 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman of the Board, Film Producer and 013 deposition of George Lucas, former Chairman for the Board, Film Producer and 014 deposition of George Lucas, former Chairman for the Board for Director 015 deposition for the 015 deposition of George Lucas, former Chairman for the 015 deposition for 015 depositio

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1	42.	Attached hereto as Exhibit OO is a true and correct copy the excerpts for the
2	February 12,	2013 deposition of Michelle Maupin, Senior Manager, Compensation
3	43.	Attached hereto as Exhibit PP is a true and correct copy of the excerpts for the
4	February 5, 2	013 deposition of Jan Van der Voort, Chief Administrative Officer.
5	G.	<u>Pixar</u>
6	44.	Attached hereto as Exhibit QQ is a true and correct copy of excerpts for the March
7	19, 2013 depo	osition of Dana Batali, Vice President of RenderMan Products.
8	45.	Attached hereto as Exhibit RR is a true and correct copy of the excerpts for the
9	January 24, 2	013 deposition of Edward Catmull, President.
10	46.	Attached hereto as Exhibit SS is a true and correct copy of the excerpts for the
11	August 2, 201	2 deposition of Lori McAdams, Vice President of Human Resources and
12	Administratio	n.
13	47.	Attached hereto as Exhibit TT is a true and correct copy of excerpts for the August
14	3, 2012 depos	ition of James Morris, General Manager and Executive Vice President of
15	Production ar	d former Head of Production.
16	48.	Attached hereto as Exhibit UU is a true and correct copy of the excerpts for the
17	November 3,	2012 deposition of Pamela Zissimos, Senior Recruiter.
18	49.	Attached hereto as Exhibit VV is a true and correct copy of the excerpts for the
19	March 5, 201	3 deposition of Stephanie Sheehy, Manager of Human Resources Analysis.
20	II. <u>Depos</u>	ition Exhibits
21	50.	Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs' Exhibit 8,
22	LUCAS0001	4721.
23	51.	Attached hereto as Exhibit 119 is a true and correct copy of Plaintiffs' Exhibit 119,
24	PIX00001263	
25	52.	Attached hereto as Exhibit 129 is a true and correct copy of Plaintiffs' Exhibit 129.
26	53.	Attached hereto as Exhibit 137 is a true and correct copy of Plaintiffs' Exhibit 137,
27	PIX00003974	
28		
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1	54. Attached hereto as Exhibit 139 is a true and correct copy of Plaintiffs' Exhibit 139,
2	PIX00004883.
3	55. Attached hereto as Exhibit 173 is a true and correct copy of Plaintiffs' Exhibit 173,
4	GOOG-HIGH-TECH-00193034.
5	56. Attached hereto as Exhibit 175 is a true and correct copy of Plaintiffs' Exhibit 175,
6	GOOG-HIGH-TECH-00061 040.
7	57. Attached hereto as Exhibit 176 is a true and correct copy of Plaintiffs' Exhibit 176,
8	GOOG-HIGH TECH-00000004.
9	58. Attached hereto as Exhibit 186 is a true and correct copy of Plaintiffs' Exhibit 186,
10	GOOG-HIGH TECH-00008964.
11	59. Attached hereto as Exhibit 187 is a true and correct copy of Plaintiffs' Exhibit 187,
12	231APPLE002149.
13	60. Attached hereto as Exhibit 192 is a true and correct copy of Plaintiffs' Exhibit 192,
14	GOOG-HIGH TECH-000001 07.
15	61. Attached hereto as Exhibit 199 is a true and correct copy of Plaintiffs' Exhibit 199,
16	231APPLE002140.
17	62. Attached hereto as Exhibit 202 is a true and correct copy of Plaintiffs' Exhibit 202,
18	76526DOC000011.
19	63. Attached hereto as Exhibit 210 is a true and correct copy of Plaintiffs' Exhibit 210,
20	ADOBE_000611.
21	64. Attached hereto as Exhibit 216 is a true and correct copy of Plaintiffs' Exhibit 216,
22	ADOBE_050720.
23	65. Attached hereto as Exhibit 223 is a true and correct copy of Plaintiffs' Exhibit 223,
24	231APPLE002143.
25	66. Attached hereto as Exhibit 250 is a true and correct copy of Plaintiffs' Exhibit 250,
26	231APPLE006876.
27	67. Attached hereto as Exhibit 268 is a true and correct copy of Plaintiffs' Exhibit 268,
28	231APPLE009277.
	1095912.3 - 7 - CISNEROS DECLARATION

1095912.3

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1	68. Attached hereto as Exhibit 278 is a true and correct copy of Plaintiffs' Exhibit 278,
2	231APPLE002150.
3	69. Attached hereto as Exhibit 279 is a true and correct copy of Plaintiffs' Exhibit 279,
4	231APPLE002151.
5	70. Attached hereto as Exhibit 295 is a true and correct copy of Plaintiffs' Exhibit 295,
6	Adobe_052076.
7	71. Attached hereto as Exhibit 331 is a true and correct copy of Plaintiffs' Exhibit 331,
8	LUCAS00061414.
9	72. Attached hereto as Exhibit 359 is a true and correct copy of Plaintiffs' Exhibit 359,
10	LUCAS00024981.
11	73. Attached hereto as Exhibit 360 is a true and correct copy of Plaintiffs' Exhibit 360,
12	LUCAS00188912.
13	74. Attached hereto as Exhibit 369 is a true and correct copy of Plaintiffs' Exhibit 369,
14	PIX00003599.
15	75. Attached hereto as Exhibit 391 is a true and correct copy of Plaintiffs' Exhibit 391,
16	76583DOC003750.
17	76. Attached hereto as Exhibit 392 is a true and correct copy of Plaintiffs' Exhibit 392,
18	76583DOC003888.
19	77. Attached hereto as Exhibit 393 is a true and correct copy of Plaintiffs' Exhibit 393,
20	76583DOC002007.
21	78. Attached hereto as Exhibit 397 is a true and correct copy of Plaintiffs' Exhibit 397,
22	76583DOC008097.
23	79. Attached hereto as Exhibit 398 is a true and correct copy of Plaintiffs' Exhibit 398,
24	76579DOC005956.
25	80. Attached hereto as Exhibit 399 is a true and correct copy of Plaintiffs' Exhibit 399,
26	76582DOCb00004.
27	81. Attached hereto as Exhibit 400 is a true and correct copy of Plaintiffs' Exhibit 400,
28	765825DOC001211.
	1095912.3 - 8 - CISNEROS DECLARATION NO. 11-CV-2509-LHK

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1	82. Attached hereto as Exhibit 416 is a true and correct copy of Plaintiffs' Exhibit 416,
2	Declaration of Donna Morris of Adobe Systems Inc. In Support of Defendants Opposition to
3	Plaintiffs' Motion for Class Certification.
4	83. Attached hereto as Exhibit 420 is a true and correct copy of Plaintiffs' Exhibit 420,
5	PIX00006025.
6	84. Attached hereto as Exhibit 424 is a true and correct copy of Plaintiffs' Exhibit 424,
7	PIX00009182.
8	85. Attached hereto as Exhibit 458 is a true and correct copy of Plaintiffs' Exhibit 458,
9	76616DOC007593.
10	86. Attached hereto as Exhibit 472 is a true and correct copy of Plaintiffs' Exhibit 472,
11	GOOG-HIGH-TECH-00195005.
12	87. Attached hereto as Exhibit 478 is a true and correct copy of Plaintiffs' Exhibit 478,
13	76616DOC012164.
14	88. Attached hereto as Exhibit 557 is a true and correct copy of Plaintiffs' Exhibit 557,
15	GOOG-HIGH-TECH-00293087.
16	89. Attached hereto as Exhibit 563 is a true and correct copy of Plaintiffs' Exhibit 563,
17	231APPLE073139.
18	90. Attached hereto as Exhibit 597 is a true and correct copy of Plaintiffs' Exhibit 597,
19	GOOG-HIGH-TECH-00056882.
20	91. Attached hereto as Exhibit 608 is a true and correct copy of Plaintiffs' Exhibit 608,
21	GOOG-HIGH-TECH-00255349.
22	92. Attached hereto as Exhibit 614 is a true and correct copy of Plaintiffs' Exhibit 614,
23	GOOG-HIGH-TECH-00379327.
24	93. Attached hereto as Exhibit 616 is a true and correct copy of Plaintiffs' Exhibit 616,
25	GOOG-HIGH-TECH-00210242.
26	94. Attached hereto as Exhibit 621 is a true and correct copy of Plaintiffs' Exhibit 621,
27	GOOG-HIGH-TECH-00336877.
28	

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1	95.	Attached hereto as Exhibit 648 is a true and correct copy	of Plaintiffs' Exhibit 648,
2	GOOG-HIGH	I-TECH-00265514.	
3	96.	Attached hereto as Exhibit 650 is a true and correct copy	of Plaintiffs' Exhibit 650,
4	GOOG-HIGH	I-TECH-00265638.	
5	97.	Attached hereto as Exhibit 651 is a true and correct copy	of Plaintiffs' Exhibit 651,
6	GOOG-HIGH	I-TECH-00058868.	
7	98.	Attached hereto as Exhibit 653 is a true and correct copy	of Plaintiffs' Exhibit 653,
8	GOOG-HIGH	I-TECH-00058495.	
9	99.	Attached hereto as Exhibit 660 is a true and correct copy	of Plaintiffs' Exhibit 660,
10	GOOG-HIGH	I-TECH-00246586.	
11	100.	Attached hereto as Exhibit 661 is a true and correct copy	of Plaintiffs' Exhibit 661,
12	GOOG-HIGH	I-TECH-00059839.	
13	101.	Attached hereto as Exhibit 666 is a true and correct copy	of Plaintiffs' Exhibit 666,
14	GOOG-HIGH	I-TECH-00248307.	
15	102.	Attached hereto as Exhibit 668 is a true and correct copy	of Plaintiffs' Exhibit 668,
16	GOOG-HIGH	I-TECH-00248336.	
17	103.	Attached hereto as Exhibit 674 is a true and correct copy	of Plaintiffs' Exhibit 674,
18	GOOGcHJGH	H-TECH-00252601	
19	104.	Attached hereto as Exhibit 690 is a true and correct copy	of Plaintiffs' Exhibit 690,
20	LUCAS00013	3705.	
21	105.	Attached hereto as Exhibit 710 is a true and correct copy	of Plaintiffs' Exhibit 710,
22	LUCAS00194	4841.	
23	106.	Attached hereto as Exhibit 711 is a true and correct copy	of Plaintiffs' Exhibit 711,
24	Declaration of	f Michelle Maupin In Support of Defendants Opposition to	Plaintiffs' Motion for
25	Class Certific	ation.	
26	107.	Attached hereto as Exhibit 715 is a true and correct copy	of Plaintiffs' Exhibit 715,
27	LUCAS00188	8708.	
28			
	1095912.3	- 10 -	CISNEROS DECLARATION NO. 11-CV-2509-LHK

	Case5:11-cv-02509-LHK Document418-2 Filed05/10/13 F	age11 of 18
1	108. Attached hereto as Exhibit 716 is a true and correct co	nny of Plaintiffs' Exhibit 716
2		py of Flammins Exhibit 710,
2		ony of Plaintiffs' Exhibit 727
4		py of Fidments' Exhibit 727,
5		ony of Plaintiffs' Exhibit 728
6		py of Finite 20,
7		opy of Plaintiffs' Exhibit 729.
8		F) 01 1 1 1 1 1 2 , 1 1 1 1 2 , 1
9		ppy of Plaintiffs' Exhibit 730,
10) LUCAS00199904.	
11	113. Attached hereto as Exhibit 781 is a true and correct co	ppy of Plaintiffs' Exhibit 781,
12	2 76596DOC01701 0.	
13	3 114. Attached hereto as Exhibit 872 is a true and correct co	ppy of Plaintiffs' Exhibit 872,
14	GOOG-HIGH-TECH-00264994.	
15	5 115. Attached hereto as Exhibit 912 is a true and correct co	ppy of Plaintiffs' Exhibit 912,
16	5 INTUIT_040817.	
17	116. Attached hereto as Exhibit 914 is a true and correct co	ppy of Plaintiffs' Exhibit 914,
18	3 INTUIT_001614.	
19	9 117. Attached hereto as Exhibit 944 is a true and correct co	py of Plaintiffs' Exhibit 944
20) LUCAS00061513.	
21	118. Attached hereto as Exhibit 945 is a true and correct co	py of Plaintiffs' Exhibit 945,
22	2 LUCAS00189276.	
23	3 119. Attached hereto as Exhibit 959 is a true and correct co	ppy of Plaintiffs' Exhibit 959,
24	LUCAS00188708.	
25	5 120. Attached hereto as Exhibit 1107 is a true and correct c	opy of Plaintiffs' Exhibit
26	5 1107, INTUIT_007865.	
27	121. Attached hereto as Exhibit 1130 is a true and correct c	opy of Plaintiffs' Exhibit
28	3 1130, 231APPLE099371.	
	1095912.3 - 11 -	CISNEROS DECLARATION NO. 11-CV-2509-LHK

	Case5:11-cv-02509-LHK Document418-2 Filed05/10/13 Page12 of 18
1	122. Attached hereto as Exhibit 1158 is a true and correct copy of Plaintiffs' Exhibit
2	1158, ADOBE_005661.
3	123. Attached hereto as Exhibit 1159 is a true and correct copy of Plaintiffs' Exhibit
4	1159, ADOBE_019278.
5	124. Attached hereto as Exhibit 1160 is a true and correct copy of Plaintiffs' Exhibit
6	1160, ADOBE_009652.
7	125. Attached hereto as Exhibit 1250 is a true and correct copy of Plaintiffs' Exhibit
8	1250, ADOBE_011976.
9	126. Attached hereto as Exhibit 1305 is a true and correct copy of Plaintiffs' Exhibit
10	1305, PIX00049042.
11	127. Attached hereto as Exhibit 1306 is a true and correct copy of Plaintiffs' Exhibit
12	1306, PIX00012996.
13	128. Attached hereto as Exhibit 1308 is a true and correct copy of Plaintiffs' Exhibit
14	1308, Pixar Salary Analysis.
15	129. Attached hereto as Exhibit 1309 is a true and correct copy of Plaintiffs' Exhibit
16	1309, PIX00049648.
17	130. Attached hereto as Exhibit 1376 is a true and correct copy of Plaintiffs' Exhibit
18	1376, 231APPLE039426.
19	131. Attached hereto as Exhibit 1600 is a true and correct copy of Plaintiffs' Exhibit
20	1600, 2004 Google Salary Ranges.
21	132. Attached hereto as Exhibit 1606 is a true and correct copy of Plaintiffs' Exhibit
22	1606, GOOG-HIGH TECH-00036287.
23	133. Attached hereto as Exhibit 1609 is a true and correct copy of Plaintiffs' Exhibit
24	1609, GOOG-HIGH-TECH-004 75237.
25	134. Attached hereto as Exhibit 1613 is a true and correct copy of Plaintiffs' Exhibit
26	1613, GOOG~IGH-TECH-00473658.
27	135. Attached hereto as Exhibit 1618 is a true and correct copy of Plaintiffs' Exhibit
28	1618, GOOG-HIGH-TECH-00474897.
	1095912.3 - 12 - CISNEROS DECLARATION NO. 11-CV-2509-LHI

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1	136. Attached hereto as Exhibit 1625 is a true and correct copy of Plaintiffs' Exhibit
2	1625, GOOG-HIGH-TECH-00506628.
3	137. Attached hereto as Exhibit 1629 is a true and correct copy of Plaintiffs' Exhibit
4	1629, GOOG-HIGH-TECH-00509662.
5	138. Attached hereto as Exhibit 1753 is a true and correct copy of Plaintiffs' Exhibit
6	1753, GOOG-HIGH-TECH-00325500.
7	139. Attached hereto as Exhibit 1760 is a true and correct copy of Plaintiffs' Exhibit
8	1760, INTUIT _052803.
9	140. Attached hereto as Exhibit 1761 is a true and correct copy of Plaintiffs' Exhibit
10	1761, INTUIT _049796.
11	141. Attached hereto as Exhibit 1854 is a true and correct copy of Plaintiffs' Exhibit
12	1854, 2231APPLE100673.
13	142. Attached hereto as Exhibit 1855 is a true and correct copy of Plaintiffs' Exhibit
14	1855, Declaration of Steven Burmeister In Support of Defendants' Opposition to Plaintiffs
15	Motion for Class Certification.
16	143. Attached hereto as Exhibit 1856 is a true and correct copy of Plaintiffs' Exhibit
17	1856, 231APPLE1 05342.
18	144. Attached hereto as Exhibit 1858 is a true and correct copy of Plaintiffs' Exhibit
19	1858, 231APPLE098912.
20	145. Attached hereto as Exhibit 1859 is a true and correct copy of Plaintiffs' Exhibit
21	1859, 231APPLE1 05324.
22	146. Attached hereto as Exhibit 1868 is a true and correct copy of Plaintiffs' Exhibit
23	1868, GOOG-HIGH-TECH-00550729.
24	147. Attached hereto as Exhibit 1869 is a true and correct copy of Plaintiffs' Exhibit
25	1869, GOOG-HIGH-TECH-00550725.
26	148. Attached hereto as Exhibit 1870 is a true and correct copy of Plaintiffs' Exhibit
27	1870, GOOG-HIGH-TECH-00550726.
28	

	Case5:11-cv-02509-LHK Document418-2 Filed05/10/13 Page14 of 18	
1	149. Attached hereto as Exhibit 1871 is a true and correct copy of Plaintiffs' Exhibit	-
2	1871, GOOG-HIGH-TECH-00061052.	
2	150. Attached hereto as Exhibit 1872 is a true and correct copy of Plaintiffs' Exhibit	
4	1872, GOOG-HIGH-TECH-00550723.	
5	151. Attached hereto as Exhibit 2030 is a true and correct copy of Plaintiffs' Exhibit	-
6	2030, Declaration of Danny McKell In Support Of Opposition to Class Certification.	
7	152. Attached hereto as Exhibit 2033 is a true and correct copy of Plaintiffs' Exhibit	
8	2033, 76657DOC004599.	
9	153. Attached hereto as Exhibit 2035 is a true and correct copy of Plaintiffs' Exhibit	
10	2035, 76657DOC019261.	
11	154. Attached hereto as Exhibit 2084 is a true and correct copy of Plaintiffs' Exhibit	
12	2084, LUCAS00218268.	
13	155. Attached hereto as Exhibit 2088 is a true and correct copy of Plaintiffs' Exhibit	
14	2088, LUCAS00218299.	
15	156. Attached hereto as Exhibit 2002 is a true and correct copy of Plaintiffs' Exhibit	
16	2092, LUCAS00217253.	
17	157. Attached hereto as Exhibit 2094 is a true and correct copy of Plaintiffs' Exhibit	
18	2094, LUCAS00218283.	
19	158. Attached hereto as Exhibit 2096 is a true and correct copy of Plaintiffs' Exhibit	
20	2096, LUCAS00217124.	
21	159. Attached hereto as Exhibit 2100 is a true and correct copy of Plaintiffs' Exhibit	
22	2100, LUCAS00217547.	
23	160. Attached hereto as Exhibit 2135 is a true and correct copy of Plaintiffs' Exhibit	
24	2135, INTUIT_034255.	
25	161. Attached hereto as Exhibit 2140 is a true and correct copy of Plaintiffs' Exhibit	
26	2140, INTUIT_039756.	
27	162. Attached hereto as Exhibit 2142 is a true and correct copy of Plaintiffs' Exhibit	
28	2142, INTUIT_039793.	
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1	163. Attached hereto as Exhibit 2422 is a true and correct copy of Plaintiffs' Exhibit
2	2422, GOOG-HIGH-TECH-00328300.
3	164. Attached hereto as Exhibit 2425 is a true and correct copy of Plaintiffs' Exhibit
4	2425, GOOG-HIGH TECH-00625147.
5	165. Attached hereto as Exhibit 2426 is a true and correct copy of Plaintiffs' Exhibit
6	2426, GOOG-HIGH-TECH-00281629.
7	166. Attached hereto as Exhibit 2486 is a true and correct copy of Plaintiffs' Exhibit
8	2486, Declaration of Donna Morris of Adobe Systems Inc. In Support of Defendants Opposition
9	to Plaintiffs Motion for Class Certification.
10	167. Attached hereto as Exhibit 2487 is a true and correct copy of Plaintiffs' Exhibit
11	2487, ADOBE_100600.
12	168. Attached hereto as Exhibit 2501 is a true and correct copy of Plaintiffs' Exhibit
13	2501, ADOBE_009425.
14	169. Attached hereto as Exhibit 2735 is a true and correct copy of Plaintiffs' Exhibit
15	2735, GOOG-HIGH-TECH-00480249.
16	170. Attached hereto as Exhibit 2738 is a true and correct copy of Plaintiffs' Exhibit
17	2738, INTUIT_043557.
18	171. Attached hereto as Exhibit 2739 is a true and correct copy of Plaintiffs' Exhibit
19	2739, INTUIT_043560.
20	172. Attached hereto as Exhibit 2740 is a true and correct copy of Plaintiffs' Exhibit
21	2740, INTUIT _052841.
22	173. Attached hereto as Exhibit 2743 is a true and correct copy of Plaintiffs' Exhibit
23	2743, INTUIT_041933.
24	174. Attached hereto as Exhibit 2744 is a true and correct copy of Plaintiffs' Exhibit
25	2744, INTUIT 052826.
26	175. Attached hereto as Exhibit 2800 is a true and correct copy of Plaintiffs' Exhibit
27	2800, ADOBE_068264.
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1	I declare under penalty of perjury under the laws of the United States that the foregoing is
2	true and correct.
3	Executed May 10, 2013, in San Francisco, California.
4	/s/ Lisa J. Cisneros
5	Lisa J. Cisneros
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1	Richard M. Heimann (State Bar No. 63607)
2	Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260)
3	Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298)
4	Anne B. Shaver (State Bar No. 255928) Lisa J. Cisneros (State Bar No. 251473)
5	LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 Battery Street, 29th Floor
6	San Francisco, California 94111-3339 Telephone: 415.956.1000
7	Facsimile: 415.956.1008
8	Joseph R. Saveri (State Bar No. 130064) Lisa J. Leebove (State Bar No. 186705)
9	James D. Dallal (State Bar No. 277826) JOSEPH SAVERI LAW FIRM
10	255 California, Suite 450 San Francisco, California 94111 Talaphona: 415 500 6800
11	Telephone: 415.500.6800 Facsimile: 415.500.6803
12	Lead Counsel for Plaintiff Class
13	
14	UNITED STATES DISTRICT COURT
15	NORTHERN DISTRICT OF CALIFORNIA
16	SAN JOSE DIVISION
17	
18	IN RE: HIGH-TECH EMPLOYEE Master Docket No. 11-CV-2509-LHK ANTITRUST LITIGATION
19	THIS DOCUMENT RELATES TO:MANUAL FILING NOTIFICATION PURSUANT TO LOCAL RULE 5.1(f)
20	All Actions
21	
22	MANUAL FILING NOTIFICATION
23	Regarding: Exhibits A through VV and Plaintiffs' Exhibits attached to the Declaration of Lisa J.
24	Cisneros in Support of Plaintiffs' Supplemental Motion for Class Certification.
25	1. This filing is in physical form only, and is being maintained in the case file in the
26	Clerk's office. If you are a participant on this case, this filing will be served in hard-copy shortly.
27	2. For information on retrieving this filing directly from the Court, please see the
28	Court's main website at <u>http://www.cand.uscourts.gov</u> under Frequently Asked Questions (FAQ).
	1097431.1 MANUAL FILING NOTIFICATION NO. 11-CV-2509-LHK

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1	3. This filing was not efiled for the following reason(s):
2	Voluminous Document (PDF file size larger than efiling system allowances)
3	Unable to Scan Documents
4	Physical Object (description):
5	Non Graphical/Textual Computer File (audio, video, etc.) on CD or other media Item Under Seal
6	Conformance with the Judicial Conference Privacy Policy (General Order 53).
	<u>X</u> Other (description): <u>Pending Motion to Seal Filed on May 10, 2013</u>
7	Executed May 10, 2013, in San Francisco, California.
8	la Ling I Cimana
9	<u>/s/ Lisa J. Cisneros</u> Lisa J. Cisneros
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	1097431.1 - 2 - MANUAL FILING NOTIFICATION NO. 11-CV-2509-LHK