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1 IN RE:

2 THE MATTER OF ORACLE'S PROPOSED ACQUISITION OF PEOPLESOFT

3 CIVIL INVESTIGATIVE DEMAND NO. 22722

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7 Washington, D.C.

8 Tuesday, December 16, 2003

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13 Videotaped Deposition of KEITH BLOCK, a witness

14 herein, called for examination in the above-entitled matter,

15 pursuant to notice, taken at the offices of the United States

16 Department of Justice, Antitrust Division, 600 E Street NW,

17 Suite 9500, Washington, D.C., 20530, beginning at 10:10 A.M.

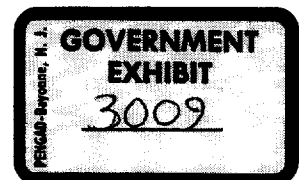
18 before Christina Anderson Smith, RPR, a Registered

19 Professional Reporter and Notary Public in and for the

20 District of Columbia.

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PROCEEDINGS

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(10:10 A.M.)

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(Government's Exhibit 1 was

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marked for identification.)

5 EXAMINATION BY COUNSEL FOR THE DEPARTMENT OF JUSTICE

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BY MR. SCOTT:

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Q All right, sir. Could you state your name

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for the record, please.

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A Keith Block.

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1 Q All right. So now you understand that we'll
2 be asking you a series of questions today designed to
3 elicit information pursuant relating to the proposed
4 acquisition of PeopleSoft by Oracle.

5 A Right.

6 Q And you are required to, as you are under
7 oath, to respond to those questions as truthfully as
8 possible.

9 A Uh-huh.

10 Q You have to say yes or no for the record.

11 A Yes.

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18 Q All right, sir. Could you give us -- tell us

19 who you're currently employed by.

20 A Oracle Corporation.

21 Q All right, sir. And what's your work

22 address?

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1 A 1000 Winter Street, Waltham, Massachusetts.

2 Q And how long have you been with Oracle?

3 A Since 1986.

4 Q All right, sir. And very briefly, could you
5 describe your educational background?

6 A I have a Bachelor's and a Master's Degree from
7 Carnegie-Mellon University.

8 Q And what are those degrees in?

9 A Bachelor's Degree in Information Systems and a
10 Master's Degree in Management and Public Policy.

11 Q All right, sir. Beginning in 1986 and coming
12 forward to today, could you describe for me briefly the
13 positions you've held at Oracle.

14 A Sure. I started out with Oracle consulting as
15 a consultant, and worked my way up through the
16 management chain holding various management positions,
17 running geographic practices; got promoted to vice
18 president, moved up the vice president chain running
19 industry-specific practices, the CPG industry
20 particularly. And about a year ago I was asked to run
21 both the licensed sale software sales organizations
22 North America, as well as the North American consulting

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1 organization.

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6 Q All right, sir. And the current position

7 that you hold, your title is what?

8 A Executive Vice President North America.

9 Q And your duties and responsibilities, could

10 you describe those briefly for us?

11 A I'm responsible for the software sales in the

12 North American commercial account base, as well as the

13 consulting, both government and commercial, in North

14 America.

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19 Q You may have said this earlier, so I

20 apologize. When did you take the -- when did you --

21 were you put in this position?

22 A Approximately a year ago.

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16 Q All right, sir. Now, then you said under
17 the -- in addition to the strategic accounts, there's
18 an applications group?

19 A Uh-huh.

20 Q You have to say yes or no for her.

21 A Yes. I'm sorry.

22 Q And the applications group, could you

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1 describe for me, first of all, who is in charge of it,

2 and then under that person how it's organized.

3 A Okay. Paul Ciandrini is responsible for the

4 applications group. And he has an eastern North

5 American applications group, a western North American

6 applications group, and he has responsibility for the

7 applications business group which I mentioned earlier.

8 Q And that applications -- how does that

9 applications business unit relate to Mr. Ciandrini's

10 sales efforts?

11 A They're deep product experts, and so they'd be

12 brought in on a sales cycle to demonstrate deep product

13 knowledge or competitive knowledge.

14 Q So, this group would have, under Mr.

15 Ciandrini, salesmen, I take it, that go out and call on

16 individual accounts?

17 A Yes, that's correct.

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