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 Case #20CV372366  
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 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 10 COUNTY OF SANTA CLARA

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 12 DEPARTMENT OF FAIR EMPLOYMENT  
 AND HOUSING, an agency of the State of  
 13 California,

14 Plaintiff,

15 v.

16 CISCO SYSTEMS, INC., a California  
 Corporation; SUNDAR IYER, an individual;  
 17 RAMANA KOMPELLA, an individual,

18 Defendants.

Case No. 20CV372366

**DECLARATION OF RAMANA  
 KOMPELLA IN SUPPORT OF  
 DEFENDANTS SUNDAR IYER AND  
 RAMANA KOMPELLA’S OPPOSITION  
 TO PLAINTIFF CALIFORNIA  
 DEPARTMENT OF FAIR  
 EMPLOYMENT AND HOUSING’S  
 MOTION TO PROCEED USING A  
FICTITIOUS NAME**

Date: January 26, 2021  
 Time: 9:00 a.m.  
 Dept: 2  
 Judge: Hon. Drew C. Takaichi

Action Filed: October 16, 2020  
 Trial Date: None set.

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**DECLARATION OF RAMANA KOMPELLA**

I, Ramana Kompella, declare as follows:

1. I am a Distinguished Engineer and Head of Research in the Emerging Tech and Incubation Group at Cisco Systems, Inc. (“Cisco”). I am also an individual defendant in this case. The matters set forth in this Declaration are based on my personal knowledge and if called as a witness, I could and would testify competently thereto.

2. In this lawsuit filed by the California Department of Fair Employment and Housing (“DFEH”) on behalf of John Doe (“Doe”), a colleague of mine at Cisco, the DFEH wrongfully claims that I subjected Doe to unfair treatment because he is a member of the lowest caste in the Indian caste system.

3. The DFEH grounds these absurd accusations solely on the fact that I was born into an upper social caste, Brahmin, and therefore must actively support caste hierarchy in my personal and professional lives. This is untrue.

4. Although I was born into a Brahmin family, I have never supported or advanced caste hierarchy. The entirety of my professional career has been spent in the United States, where I have worked with colleagues of different races, ethnicities, religions, and cultures harmoniously. I have never condoned or participated in any type of discrimination whatsoever. Caste identity has never influenced my personal or professional actions. To say or think that caste has somehow found its way into my thought process after 20 years of embracing diversity is just plain absurd.

5. Doe and I both joined Cisco at approximately the same time at the same Principal Engineer level. Around November 2016 I was made the (titular and temporary) Head of Engineering to lead the engineering team and deliver the product. This was not a promotion nor did it come with any additional benefits or compensation. However, this changed our dynamic from a peer status to a supervisor status. During the course of my role as titular Head of Engineering, it became apparent that Doe had little interest in timely completing tasks, choosing instead to be insubordinate, confrontational, and create a disruptive working environment. In one such instance, a critical release was delayed because Doe neglected to address a software bug for which he was responsible. Luckily, another engineer was able to formulate a workaround for the

1 issue.

2           6.       In approximately February 2018, Sundar Iyer stepped down as the head of the  
3 project on which I worked with Doe. As a result, I became the interim head of the project until a  
4 permanent replacement could be located. My manager instructed me to maintain the status quo  
5 during this transition period, avoiding any major organizational decisions. I subsequently  
6 approached my manager to discuss a strategy in handling Doe's poor work ethic, which resulted  
7 in a conversation between Doe, my manager, and me. During that conversation, my manager  
8 suggested to Doe that he submit weekly reports to ensure transparency in his work. This was my  
9 manager's suggestion and decision, not mine, and had absolutely nothing to do with caste. Doe  
10 does not allege that he filed a complaint with Cisco against my manager or me concerning this  
11 management decision, clearly demonstrating that he did not believe it was harassment.

12           7.       I was unaware of Doe's caste status prior to his complaint with the DFEH. Doe  
13 did not share his caste with me, nor did anyone else share it with me. I did not inquire about  
14 Doe's caste nor try to ascertain it in any way. Accordingly, it would have been impossible for me  
15 to make any decisions based on Doe's caste, which was unknown to me during the relevant time  
16 period.

17           8.       Now, after one fifteen minute interview with me, the DFEH has filed this lawsuit  
18 on behalf of Doe, subjecting me to public ridicule and embarrassment while Doe hides behind his  
19 anonymous status. Doe's baseless accusations, amplified by the fact that a powerful state entity  
20 such as DFEH stands by them even without any credible evidence, have caused both my family  
21 and me substantial stress. I resigned my employment with Cisco in September 2019 in part to  
22 escape and recuperate from the stress of Doe's unsubstantiated accusations. I have since rejoined  
23 Cisco and I am now concerned with how this lawsuit, and the DFEH's relentless media campaign,  
24 will affect my career, regardless of the fact that Doe's baseless allegations will soon be revealed  
25 as exactly that.

26           9.       I find it particularly concerning that a state agency such as the DFEH, created to  
27 protect people from discrimination and harassment, would be so quick to adjudicate us guilty  
28 without any evidence. Even if DFEH was eager to prosecute us, why have they not granted

1 Sundar Iyer and me the same level of anonymity that they are requesting to protect Doe? The  
 2 DFEH could have very well referred to us as Doe Supervisors without diminishing their ability to  
 3 litigate on behalf of Doe. Instead, they chose to subject us to public commentary and ridicule,  
 4 adversely affecting our reputations and consequently our career opportunities, all without any  
 5 regard for the anxiety and burden placed upon us, let alone any material proof to support Doe's  
 6 allegations. It is therefore imperative that Doe should publicly stand behind these allegations and  
 7 not setup an unfair fight by hiding behind the cloak of anonymity.

8 I declare under penalty of perjury under the laws of the State of California that the  
 9 foregoing is true and correct.

10 Executed this 12th day of January, 2021, in Cupertino, California.

11 DocuSigned by:  
 12 *Ramana Kompella*  
 13 020C3428DCE04A1...

14 Ramana Kompella

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