UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY M. GJOVIK,)
)
Plaintiff,)
)
vs.) Case No.
) 23-cv-04597-EMC
APPLE INC.,)
)
Defendants.)
_____)

REMOTE DEPOSITION OF
ALEKS KAGRAMANOV
VIDEO-RECORDED VIA ZOOM
Thursday, April 16, 2026

Stenographically Reported By:
Vesna Walter, CSR, RPR, CCRR
CSR No. 11989
Job No. 10188334

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY M. GJOVIK,)
)
Plaintiff,)
)
vs.) Case No.
) 23-cv-04597-EMC
APPLE INC.,)
)
Defendants.)
_____)

Deposition of ALEKS KAGRAMANOV, taken on behalf of Plaintiff, with all parties appearing remotely, beginning at 8:03 a.m. and ending at 10:53 a.m. Pacific time, on Thursday, April 16, 2026, before VESNA WALTER, Certified Shorthand Reporter No. 11989.

APPEARANCES (All parties appearing remotely)

For the Plaintiff:

AM GJOVIK CONSULTING, LLC
By: ASHLEY M. GJOVIK
In Pro Per
2108 N Street
Suite 4553
Sacramento, California 95816
(415) 964-6272

For the Defendants:

ORRICK, HERRINGTON & SUTCLIFFE LLP
By: MELINDA S. RIECHERT
Attorney at Law
1000 Marsh Road
Menlo Park, California 94025
(650) 614-7423
Mriechert@orrick.com

ALSO PRESENT:

PHILIP SCHECTER

(Video-recorded via Zoom by Ms. Gjovik)

I N D E X

WITNESS
ALEKS KAGRAMANOV
Examination by: Page
MS. GJOVIK 5

E X H I B I T S

Exhibit	Description	Page
Exhibit A	Emails	22
Exhibit C	Correspondence	84
Exhibit D	LinkedIn profile	49
Exhibit F	Email	88
Exhibit G	Email	78
Exhibit I	Complaint	104
Exhibit K	Privilege log	116
Exhibit L	Emails	56
Exhibit S	Settlement agreement	109

Page 5

Thursday, April 16, 2026
8:03 a.m. - 10:53 a.m.

THE REPORTER: Good morning. My name is Vesna Walter. I am a California Certified Shorthand Reporter and the deposition officer for today's deposition. My CSR license number is 11989.

ALEKS KAGRAMANOV,

having been administered an oath, was examined and testified as follows:

EXAMINATION

BY MS. GJOVIK:

Q And this -- hopefully you were given notice, Mr. Kagramanov -- already messed it up. So sorry -- Kagramanov. We're recording this on Zoom, as well as there's a video recording, and then we'll have the transcript as well. And all of that will be provided to Orrick and Apple's and yourself, if you would like it too.

I'll just start. So good morning. My name is Ashley Gjovik. I am the plaintiff in this matter. I have a law degree, but I'm not an attorney. I'm representing myself pro se. I'm going to ask you some questions today. And before we get started, I wanted to go over some foundational matters to ensure

Page 6

we're on the same page.

You were just sworn in by the court reporter. Do you understand that you're now under oath the same as if you were testifying in a courtroom before a judge and jury?

A I do.

Q And you understand that means you're required to give truthful answers to my questions today?

A I do.

Q You understand that even though we're on Zoom and not in a formal office, I'm in a motel, this might feel informal, but giving false testimony under oath can still subject you to penalties of perjury?

A I do.

Q And then, now, you see the court reporter. She's taking down everything you say today, every question I ask and every answer you give. It's going to be made into a written transcript. Because she can only take down words, I need you to give me verbal answers. So if your answer is yes, please say yes rather than nodding your head.

Can you do that for me?

A Yes.

Q Thank you.

Page 7

Along the same lines -- sorry. Is that an echo or is someone saying something?

Okay. Along the same lines, please try to let me finish my question before you start your answer, and I'll do my best to let you finish your answer before I ask my next question. That way we don't talk over each other and the court reporter can get a clean record.

Is that fair?

A Yes.

Q Thank you.

If at any point you don't understand a question I've asked, I want you to tell me and I'll rephrase it.

Will you do that, please.

A Yes.

Q Thank you.

Is it fair to say that if you answer one of my questions, I'm entitled to assume that you understood it?

A Yes.

Q If you need to take a break at any point to use the bathroom, get some water, stretch, that's fine. Just let me know. The only thing I ask is, if there's a question pending, that you please answer it

Page 8

before we go off the record.

Is that agreeable?

A Yes.

Q Thank you.

Is there any reason you might not be able to give your best testimony today? Are you feeling okay? Ill? Distracted?

A No.

Q Thank you.

Are you currently under the influence of any medication, drug, or alcohol that might affect your ability to understand my questions or give truthful answers?

A No.

Q Did you meet with anyone to prepare for today's deposition?

A I did.

Q Did you review any documents in preparation for today's deposition?

A No. Emails.

Q Can you describe what the emails are.

A The two emails that we exchanged.

Q Thank you.

Okay. So I'd like to get started with your role and professional background at Apple. It sounds

Page 9

like you have since left Apple. I'm going to be primarily focusing my questions on your role in 2021, around September 2021 when we had those email exchanges.

But just for the record, can you first state your full name and then any of the roles you held at Apple and roughly what year duration those roles were.

A Yeah. Full name, Aleks Kagramanov. Held the same role essentially since I started with Apple since 2020. Two -- dual role, threat assessment in the workplace and employee relations business partner.

Q Were those overlapping or different roles?

A Yeah. It's -- I primarily was an employee relations business partner with also assisting with threat assessment in the workplace.

Q Threat assessment.

What is threat assessment in the workplace?

A Target -- like, targeted workplace violence.

Q Okay. And then employee relations, so who was your -- did you report to Tony Lagares?

A Yes, for a time.

Q Okay. You said the whole time?

A No. For a short time.

Page 10

Q For a short time.

Who were your supervisors and in what periods?

A I believe one of them was Julie Potter, and then Tony.

Q And then when did you leave Apple?

A 2023, I believe.

MS. GJOVIK: Ms. Court Reporter, is that loud enough for you to hear? It's a little muffled for me.

THE REPORTER: Yeah. I can hear.

BY MS. GJOVIK:

Q Before joining Apple, what kind of role did you hold?

A HR.

Q And what is your current occupation?

A Also with HR.

Q Who's your current employer?

A Microsoft.

Q And where did you work before you joined Apple?

A Google.

Q All the big tech companies.

Why did you leave Apple?

A So sorry. Say that one more time.

Page 11

Q Why did you leave your employment at Apple?

A Had a different opportunity.

Q Do you remember what -- roughly what month you left Apple in 2023?

A I don't recall.

Q What's your educational background?

A Criminal justice, criminology.

Q In your roles at Google and Microsoft, did you also hold roles -- you said HR, but similar to something with criminal justice or workplace violence, those type of topics?

A I've held security roles.

Q What kind of security roles are in HR?

A Not specifically within HR, but prior to HR, I also held security roles.

Q What kind of roles?

A Like, global security.

Q Do you hold any certifications or licenses related to investigations, threat assessment, security, or law enforcement?

A I previously had a security card and interview training.

Q Okay. And then can you -- as of September 2021, what was your official job title at Apple?

Page 12

A Employee relations business partner and threat assessment lead.

Q And threat assessment team?

A Lead.

Q Lead. Lead.

So that's the lead for all threat assessment for Apple?

A Specifically to the employee relations side of things.

Q Employee relations.

Can you please describe that function at Apple.

MS. RIECHERT: Which function are we speaking about, ER or threat assessment?

MS. GJOVIK: Threat assessment for employee relations at Apple.

THE WITNESS: Yeah. So threat assessment, we partner with many different teams, specifically kind of with employee relations. We also take partnership with security, HR, benefits, depending on the nature of the situation.

BY MS. GJOVIK:

Q Can you tell me more about the, like, workplace violence and threat assessment part of that. That's something that's kind of new to me to

Page 13

hear as part of HR, and I would like to understand more of what that capacity looks like.

A Yeah, any targeted workplace violence. This could be just general threats to the workplace. It could be workplace domestic violence issues, suicidal ideations, suicides.

Q That's a rough job. Okay. Thank you.

And then did you have anyone else doing that kind of function with you at Apple or you were the primary person or only person?

A I had partners just with, you know -- kind of, like, a team within security, benefits, HR.

Q Okay. And that was primarily, like, your exclusive role. It wouldn't be just normal employee relations investigations. It would be stuff that also touches upon the threat assessment and workplace violence issues?

A Correct.

Q Okay. Makes sense.

And as of September 2021, your direct supervisor was Mr. Lagares; is that correct?

A I don't recall if it was Tony -- yeah, I don't recall who it was at that specific time.

Q So it would have either been Mr. Lagares or Ms. Potter?

Page 14

A Or it could have been Cory. I forget Cory's last name, but it could have been her.

Q Okay. Can you walk me up the chain of command from you, like, up to executive when the issue you're investigating is a workplace violence issue. I assume you have -- like, you have your direct reporting structure, but you may also have stakeholders and different organizations like global security.

MS. RIECHERT: Objection. Assumes facts not in evidence.

BY MS. GJOVIK:

Q Okay. You can answer. Please go ahead.

A Can you clarify, like, what you mean. Like, reporting structure for my team?

Q Let me rephrase. Can you walk me through what a typical process is when you're assigned a case as an employee relations business partner specializing in workplace violence, threat assessment, kind of, like, start to finish. What does that look like?

A I mean, it's very case by case, depending on stakeholder engagement. So it would be hard to -- it's not kind of, like, a one-size-fits-all approach. I mean, I have my management team. They're always

Page 15

involved and, you know, assigning the case work. We do an assessment and determine who needs to be engaged.

Q Okay. So what are some of the factors or variables you might consider to decide how you would design -- or how about this: Do you track your investigations in any kind of system or create any documents or plans related to your investigations?

A Yeah. We have an internal confidential case management system.

Q And do you create, like, reports and documents of your findings and the outcomes from your investigations?

MS. RIECHERT: Objection. Assumes facts not in evidence.

MS. GJOVIK: It's a question.

MS. RIECHERT: I know. We keep talking about him doing investigations, like, what he was doing in ER.

MS. GJOVIK: That was his job, though; right?

MS. RIECHERT: To do ER, yes, employee relations.

MS. GJOVIK: So what facts are not in evidence?

Page 16

MS. RIECHERT: That he did investigations.

BY MS. GJOVIK:

Q Mr. Kagramanov, did you do investigations in your role?

MS. RIECHERT: On violence issues. Sorry.

BY MS. GJOVIK:

Q Mr. Kagramanov, did you do investigations into workplace violence matters as part of your role?

A As part of it.

Q Yeah. Thank you.

And so did you create documents, reports, or outcomes from those investigations?

A Yes.

Q Who did you generally share those with?

A Again, depends on the stakeholders involved. It varies case by case.

Q What might be some of the variables that would help you decide what kind of stakeholders would be, like, the type of threat or violent -- like, you said suicide versus domestic violence. Those two might have different stakeholders.

A I mean, also engagement with the business, depending on the business and who's involved.

Q Okay. So instead of saying, like, the specific names, it would maybe, like, the -- a

Page 17

business leader, an HR representative? Could you maybe describe that process with more generalized terms versus having to identify a specific name.

A Yeah. I mean, the HR business partners aligned to that specific business would be informed, security is always a close partner in those matters, and of course, just our management team.

Q Do you ever engage, like, police also?

A Me directly, no.

Q When you create your reports, is it -- do you anticipate those reports might be used in criminal enforcement or legal matters due to the nature of what you were investigating?

A Potentially.

Q Can you give me -- without disclosing anything confidential -- and it sounds like what you work on is probably very confidential -- can you give me some examples of kind of facts of what a case might look like that you might get assigned and investigate -- that you have investigated at Apple, without disclosing anyone's name or organization or anything that might identify them, just to help me understand what some of your typical cases might look like?

A We do intakes with employees to understand

Page 18

the circumstances of whatever situation they're going through and then make an assessment of, from some of what they shared, how do we ensure safety in the workplace for them and everybody else involved.

Q So do -- sometimes the employees are the ones that ask for the investigation?

A Correct. Depend -- like, let's say a domestic violence situation, an employee experiencing a situation that may have a nexus to the workplace and they need assessment and protection in the workplace to ensure they feel safe coming in. So that's where we also engage with security.

Q Interesting.

Okay. And then how were cases generally assigned to you when you were in that role around 2021?

A Sometimes I get notifications through email, sometimes through our -- whoever is managing a queue through my manager, and then we get huddled into the cases.

Q First of all, for that work -- I know you've probably done a lot to help ensure safety, but complex issues, things can get pretty complicated.

A Yes.

Q Yeah.

Page 19

Was there any written policies or standard operating procedures for your team's investigations, and specifically the threat assessment and workplace violence function?

A We had a process flow and kind of -- but again, every case is unique. So, you know, there's outliers, but we have kind of a fundamental process.

Q Is there anything you can explain about what that process looks like?

A I don't recall specifically.

Q Can you give me any examples or circumstances when you or your team might be asked to investigate an employee -- an active employee under the threat assessment and workplace violence function.

A Can you clarify that. Do you mean, like, how we get looped into that?

Q Yeah. So we talked about you sometimes will investigate employee concerns. So they might have a concern in the workplace. Maybe they're dating someone who's a coworker or something and there's domestic violence issues. I'm speculating there. But when you need to investigate an employee versus maybe investigate someone who's, like, maybe not an employee but stalking an employee or something is

Page 20

probably, I assume, different -- so if you need to investigate an employee in that job function, what does that generally look like, the step process?

A Yeah. I mean, similarly, just doing intakes with respective parties, getting perspectives from everybody involved, getting a comprehensive understanding of the matter, determining potential interim measures if there needs to be a level of separation, whatever it may be, and then making an assessment from there.

Q Makes sense.

Let's see. So I'm going to pivot a little bit from what you've been describing as your typical job function and ask more about the confidentiality investigations because that was kind of the nature, I think, of our interaction that I'm aware of. I was never under investigation for anything related to workplace violence.

So when would you or your team typically be asked to investigate a matter related to confidential information?

A Employee relations doesn't investigate confidentiality aspects. We act as a support -- kind of a support mechanism through the process.

Q Okay. How does that fall under the umbrella

Page 21

of the workplace violence team?
A So I'm also operating also from an employee relations business partner lens. So I get looped into normal employee relations situations as well, in addition to the threat assessment piece.
Q Oh, so you would do typical employee relations investigations, you would not just workplace violence or threat assessment?
A Correct. So both, on both sides.
Q Both.
Okay. Do you ever consider how an employee might perceive being contacted by someone, though, whose official title says workplace violence and threat assessment?
MS. RIECHERT: Objection. Lacks foundation.
BY MS. GJOVIK:
Q Okay. Let's go to -- pause, and I'll come right back to that.
I'm going to share Exhibit A.
MS. GJOVIK: Oh, Melinda, can you see the exhibits I shared, the Google Drive folder in the chat?
MS. RIECHERT: I'll look in the chat right now.
MS. GJOVIK: I'll re-share it in case it got

Page 22

out.
MS. RIECHERT: I see the chat.
MS. GJOVIK: See what I've shared in the chat?
MS. RIECHERT: Let me click on that link.
MS. GJOVIK: And I'm going to share -- just to Melinda's point, I'm going to share this Exhibit A.
And, Ms. Court Reporter, I shared these with you as well.
(Exhibit A was marked for identification.)
BY MS. GJOVIK:
Q So this was -- this is an email that I received from you, Mr. Kagramanov, on September 9th, 2021. Does this look like the email -- you said you were reviewing, it sounds like, these emails. Does this look like the email you sent? Does this look accurate?
A Yes.
Q Sorry. Can you say it again.
A Yes.
Q Yes. Thank you.
And so your signature is Alex Kagramanov. As someone -- no one can say my last name. So I apologize. I struggle with yours.

Page 23

It says employee relations and then AMR. Is that Americas?
A Correct.
Q Threat assessment and workplace violence, acronym TAT, T-A-T, and then Apple. And that's your -- the signature you used around that time at Apple?
A Correct.
Q Thank you.
And then -- okay. So I'm going to reask the question then since we now have evidence of what your signature was. Melinda is actually kind of helping me.
MS. GJOVIK: Thanks, Melinda.
BY MS. GJOVIK:
Q Did you consider how an employee might perceive being contacted by your team -- yourself -- let me ask again. Sorry.
Did you ever consider how an employee who was contacted by you, under your typical employee relations job function, might perceive your email signature when you contacted them if it included threat assessment and workplace violence in the signature?
A I mean, I can't speculate how employees are

Page 24

going to react or feel.
Q Have you ever received comments or questions about that function when you were engaging with employees in the typical employee relations business function?
A No.
Q To your knowledge, have you or your team been asked to investigate an employee for social media posts?
A I can't recall a specific instance.
Q So you said that confidentiality matters would be a different team, that you guys don't necessarily, like, leaking; that's right? So that would probably be global security, or what team would you expect would do the investigation about leaking confidential information?
A Global security investigations.
Q And then if you were to investigate something like social media posts, would that be something like domestic violence threats or something like that might fall under the umbrella?
A It could be part of an assessment. Social media can be part of an assessment.
Q Would you ever make an assessment yourself of whether information shared was confidential or

Page 25

not?
A I don't make those investigations.
Q Thank you for your patience. This is I think my fourth deposition ever. I've just been doing them the last two weeks, and I'm learning as I go. Let's see.
Okay. So it's kind of weird. I'm going to ask you about me, but I'm going to do third person because it feels a little more professional than, like, us having a conversation as if we're just talking.
So when did you first become aware of Ashley Gjovik, the Apple employee?
A September of 2021.
Q Do you remember what date?
A I believe it was September 7th.
Q Do you remember how you became aware?
A I think I got looped in by my leadership team or management team on the case.
Q Do you remember the context or request or any other details about how you got looped in?
A No. I don't recall.
Q It was a while ago.
Do you remember the name of the person who first asked you to look into the Ashley Gjovik

Page 26

matter?
A I don't recall.
Q Do you recall if there was any kind of written email, referral, ticket, or other documentation about initiating that investigation?
A I don't recall exactly.
Q When you were referred to investigate or contact Ashley Gjovik, was that under your typical employee relations function or was that under the workplace violence and threat assessment function?
A Typical employee relations function.
Q And were you told that this involved alleged disclosures of confidential information?
A Correct, just employee confidential investigation.
Q And so you had said you don't normally investigate leaks yourself. So did someone tell you that there was already an investigation and some sort of determination that there was a leak, and then you were to do something in addition to what was already done prior?
A I don't recall exactly the process leading up to it.
Q Do you recall what you were asked to investigate?

Page 27

MS. RIECHERT: Objection. Assumes facts not in evidence.
MS. GJOVIK: It's just his memory. I'm asking his memory, if he remembers what he was asked to investigate.
THE WITNESS: I wasn't asked to investigate.
BY MS. GJOVIK:
Q Oh, what were you asked to do?
A To support global security in their investigation.
Q Can you help me understand the distinction.
A We don't lead -- employee relations does not lead confidential leaking of information. That's led by global security. We act as a support to them. So we help coordinate meetings and act as a support.
Q So if you contacted Ashley Gjovik and said there was an investigation into disclosures of confidential information, that investigation you'd be referring to would not be your own investigation. That would be a global security investigation; is that correct?
A Yeah. I would be involved in that investigation, but I don't lead that investigation.
Q And what would your involvement look like?
A Coordinating the meeting, providing

Page 28

expectations, making sure the employee understands the process.
Q Okay. And do you remember what the plan was when you contacted me?
A To coordinate time with you for the investigation with the investigator from global security.
Q Do you remember who the investigator was in global security?
A I believe it was Sophi -- Sophi Jacobs.
Q What was her role?
A She's a global security investigator.
Q Okay. Do you remember when she contacted you about Ashley Gjovik?
A I do not recall.
Q Do you remember anything she told you about the investigation into Ashley Gjovik?
A I don't recall.
Q Do you remember ever disclosing to Ashley Gjovik that the investigation was being conducted by Sophi Jacobs?
A I don't recall that.
Q When you were asked to -- what was the terminology you used about the service you provided global security in these type of exchanges?

Page 29

A Yeah. We help provide support to employees, coordinate the meetings, talk through the process, expectations of the process.

Q And when you say support employees, would you mean someone like Ashley Gjovik or an employee like Sophi Jacobs?

A Ashley.

Q Oh.

So -- so the stuff you just said prior, you would be supporting Ashley Gjovik by -- you said explaining the process was one of the things you said?

A That's correct.

Q What kind of explanation would you normally provide about how the process works?

A I talk about confidentiality expectations, non-retaliation expectations, and what the process entails, and then typically turn it over to the investigator to discuss their process and proceed with, you know, their line of questioning.

Q So if you had shared that information with Ashley Gjovik, could you describe, like, what you would have said to her about those topics you just listed.

A Yeah. In terms of confidentiality, we

Page 30

typically would say, you know, that we keep these conversations confidential, not to discuss this beyond, you know, the individuals involved in this process, protect the integrity of the investigation to ensure that others are not influenced in any way and have natural recollections of, you know, if other folks are being pulled into the investigation.

Also, non-retaliation expectations in that, you know, typically employees are entitled to raise good-faith concerns without any kind of adverse action being taken against them. So we talk about non-retaliation piece.

And then expectations around, like, devices. If we need to collect devices for any reason, that investigator may need to review that and then turn it over to the investigator.

Q Okay. And then you said you'd cover non-retaliation policy. You'd say that to an employee who's under investigation for some sort of alleged misconduct?

A Correct, for any involved party.

Q Okay. And can you describe, to the best of your recollection, just a general summary of what you recollect the allegation was against Ashley Gjovik at the time that you were providing support.

Page 31

A Yeah, posting -- my understanding was posting confidential information. I believe it was on the Glimmer app.

Q Posting where?

A In the Glimmer app.

Q Posting -- like, publishing where? What was the platform?

A I'm not sure.

Q Okay. And it was -- you said Glimmer app?

A I believe that was my recollection.

Q Like, just generally or --

A Yeah. I didn't -- I don't have insight into the actual -- the full concern.

Q Okay. So would you say that, to the best of your recollection so far, probably the person who would have the most information about the investigation would be this Ms. Jacobs?

A I believe so. I don't know the level of information she had at that time.

Q Okay. Did you have any background on how long that investigation had been going by the time you were brought in?

A No.

Q When you contacted Ms. Gjovik, were you aware if she was on administrative leave?

Page 32

A No.

Q When you contacted Ms. Gjovik, were you aware that employee relations was investigating her complaints about the workplace?

A No.

Q When you contacted Ms. Gjovik, were you aware she had filed charges with government agencies -- state and federal government agencies against Apple?

A No. I believe that's what you shared with me in the email.

Q So you weren't aware she filed an EEOC complaint?

A No.

Q What about California DFEH?

A No.

Q California DAR, for Department of Labor violations?

A No.

Q U.S. Department of Labor Whistleblower Protection Program?

A No.

Q Complaints to the U.S. EPA?

A No.

Q To the California EPA?

Page 33

A No.
Q The U.S. Securities and Exchange Commission?
A No.
Q The FBI?
A No.
Q The NLRB?
A No.
Q Are you sure?
A I believe you shared that with me in the email.
Q Okay. And is there any kind of process or protocol, either written or just how you would do it yourself, when you need to contact an employee under investigation by Apple for something but that had filed open charges or investigations with the government agency?
A Sorry. Can you clarify that.
Q Yeah.
You kind of went over your typical approach of contacting employees and providing support. Is there anything you would do differently if you did know that the employee had open charges and cases with a government agency against Apple at the time you were contacting them?
A Not to my knowledge.

Page 34

Q Do you have any background or training about the National Labor Relations Act?
A No.
Q Have you ever been involved in NLRB proceedings?
A No.
Q Are you sure?
A I don't recall ever being involved.
Q Do you recall ever being named in any NLRB complaints?
A No.
Q And let me be specific. Not just Apple. Maybe Google.
A I'm not aware of being involved in a Google NLRB complaint.
Q Okay. If an employee disclosed to you that they did have open charges or complaints, is that something that might trigger you to learn more to ensure you can support that employee with their charges and complaints?
A I'm not familiar with that process; so I can't speak on that.
Q Okay. Do you recall anything about having knowledge that Ms. Gjovik had spoken to the press and was being interviewed by the press and had articles

Page 35

published about her complaints about Apple at the time you reached out?
A No.
Q So there was a lot going on, it sounds like, you had no knowledge of when you reached out to Ms. Gjovik. So would you maybe characterize your support function, if global security asked you to reach out to an employee, more as, like, just coordinating a meeting versus actually doing any investigation?
A That's correct.
Q Okay. I'm just going to have to ask some of these just to get it on the record that you didn't know; so sorry to be repetitive.
Were you aware that Ms. Gjovik's complaints to the U.S. EPA in 2021 triggered the EPA to request an on-site inspection of her office in August 2021?
A No.
Q Were you aware her office was on a U.S. EPA Superfund site?
A No.
Q Do you know what that is?
A No.
Q It's a federally overseen toxic waste cleanup site.

Page 36

Did you have any background on that about Ashley's office?
A No.
Q When you contacted Ms. Gjovik, were you aware that the EPA had inspected and found some concerns that were documented and asked to have corrected prior to you contacting her?
A No.
Q Okay. So no -- there was no investigation into Ashley Gjovik that you led or were privy to; is that correct?
A That's correct.
MS. RIECHERT: Objection. Compound as to led and privy to.
MS. GJOVIK: Okay. He already answered he didn't lead it. So I'll just say -- so just --
BY MS. GJOVIK:
Q You were not privy to the details of any investigation into Ashley Gjovik; is that correct?
A Correct.
Q Okay. I'm going skip over a bunch of these questions because you're just going to say you don't know for all of them.
Did you -- I guess I'll ask a couple of these. You might still say no.

Page 37

Did you ever see the supposed social media posts or whatever the leak was that Ashley Gjovik did that Sophi Jacobs alleged?

A No.

Q Do you know what the Glimmer app is?

A No.

Q Did you ever find out what the alleged leaking was?

A No.

Q Were you aware of any review of Ms. Gjovik's online or digital activities prior to the investigation?

A No.

Q Did you speak with any other witnesses as part of your support for this investigation?

A No.

Q Did you prepare any written report of your participation in this investigation?

A No.

Q Was there any kind of tracking ticket or record of your participation in this investigation?

MS. RIECHERT: Objection. Vague.

BY MS. GJOVIK:

Q Other than the emails you sent to me and assumably sent with Ms. Jacobs as well, was there any

Page 38

other record, like, documented record of your participation in this investigation?

A I don't -- I don't recall, outside of the two emails.

Q Did you work with any Apple attorneys on this?

A Yes.

Q What are their names?

A I don't recall their names.

Q Do you recall what department?

A Just our legal team, Apple legal team.

Q That's a big team, though.

Like, was it products team or HR team or --

A I don't recall.

Q So -- okay. Are you aware that Ms. Jacobs is a former criminal prosecutor?

A No.

Q Do you have any knowledge of what Ms. Jacobs planned to say to Ms. Gjovik during the call you were to arrange?

A No.

Q And was Ms. Gjovik told beforehand that Ms. Jacobs was going to be on this call you were arranging?

A Say that one more time.

Page 39

Q Did you ever tell Ms. Gjovik that Ms. Jacobs was going to be on this call you were trying to arrange with Ms. Gjovik?

A I don't -- I don't think so.

Q Is that typical for you to not disclose the global security or legal folks that would be on the call with the employee when asking the employee to join the call?

A I don't recall the exact process there.

Q Do you recall any involvement from outside counsel at that point regarding Ashley Gjovik?

A No.

Q Do you recall any interaction with the law firm Orrick at that time when you were supporting the Ashley Gjovik matter?

A No.

Q What about O'Melveny & Myers?

A No.

Q Are you aware that O'Melveny & Myers lawyers contacted Ms. Gjovik around September 15, 2021, after she was terminated?

A No.

Q And then do you recall any interaction with the law firm McDermott, Will & Emery regarding the Ashley Gjovik matter when you were supporting?

Page 40

A No.

Q These were apparently already three law firms retained at the time that you contacted Ms. Gjovik by Apple in response to her complaints. That's why I'm asking.

Okay. On September 9th, 2021, you sent Ms. Gjovik an email that we just looked at, Exhibit A; is that correct?

A Correct.

Q I'm going to share that again so we can just look at it.

This is the Exhibit A email. It didn't have a subject line. Is it typical for you to send emails for these type of things without a subject line?

A I'm not sure. I don't recall. I mean, typically, there could be a subject line.

Q Might this reflect that you were in a rush? Do you remember if someone asked you to do this very quickly?

A I mean, it's been in partnership with our legal counsel.

Q So you're saying it's privileged? You can't answer that question because it's privileged?

A This email is not privileged, but I've taken partnership with legal counsel.

Page 41

Q You testified a little bit earlier that you were first engaged, you think, around September 7th, 2021, and this would be two days later. Does that sound correct?
A Yes. That sounds correct.
Q Okay. Do you recall any background that you are able to share about sending this email such as, did anyone help you draft it? Why did you choose the language you chose? Anything like that?
A Again, it was in partnership with our legal counsel.
Q I'm going to ask for the formal privilege objection if you're claiming privilege. I think Melinda has to do that.
MS. GJOVIK: Melinda, do you want to do that?
MS. RIECHERT: Certainly. To the extent that he had communications with counsel about this email, I instruct him not to answer if you ask about those communications on grounds of attorney-client privilege.
MS. GJOVIK: Thank you, ma'am. I'm going to oppose those later, but I need them on the record.
BY MS. GJOVIK:
Q Okay. So I'm going to -- I'm just going to

Page 42

read this because it's -- I want to kind of break it down.
So you said, no subject line: Hi, Ashley. This is Aleks Kagramanov from employee relations. We're looking into a sensitive intellectual property matter that we would like to speak with you about. We would like to connect with you as soon as possible today, within this hour, and you should see an iCal come through shortly. We sincerely appreciate you prioritizing this call and being flexible. If you absolutely cannot make this time, please propose a few other times for us to connect today. I wanted to send this introductory email so you know who I am when I set it up. I can share more details when we meet. As part of Apple's policy, your cooperation and participation is imperative. Thank you in advance, and talk soon.
Is that a correct reading of that email?
A That sounds correct.
Q Do you recall why the meeting that you were requesting had to occur that day?
A I don't recall why exactly.
Q And was the instructions from Apple legal that it had to occur that day?
MS. RIECHERT: That sounds like a

Page 43

communication with counsel. So I'll object and instruct him not to answer based on attorney --
MS. GJOVIK: Yeah.
BY MS. GJOVIK:
Q Sorry. We have to go through this dance.
Okay. And then the terminology "sensitive intellectual property matter," is that also something that Apple legal told you to use those -- that phrase?
MS. RIECHERT: Same objection. You're talking about based on attorney-client privilege if he was told to use that language by counsel.
BY MS. GJOVIK:
Q Mr. Kagramanov, how often would you send employees emails like this that you request a same-day response?
A I don't recall. It would be case by case.
Q Can you think of any other examples other than Ashley Gjovik?
A Can't recall.
Q What about asking for a response within this hour? Can you recall any other examples of emailing, contacting employees requesting a response within the hour?
A I can't recall a specific case.

Page 44

Q But Ashley Gjovik was one?
A Correct.
Q And you had testified earlier that you support the employee under investigation. So is it true that this email is sent to Ashley Gjovik to support Ashley Gjovik?
A Correct, to coordinate a time to meet with the investigator.
Q And you have testified that you will share kind of the details of the process of these investigations with the employee. And in this email, you're saying you would do that on the call; is that correct?
A I would do that on the call.
Q Is there a reason you would not share that in email?
A It's part of the process.
Q What process?
A The investigative process.
Q Is there a formal policy where it says that?
A I don't recall a specific policy.
Q Okay. Do you remember, as part of the process, not to share the details of that process with the employee until a call?
A I don't recall that.

Page 45

Q Okay. Is there a reason, when you send an email like this to -- to Ashley Gjovik where it's referencing intellectual property concern, that you'd still use the email signature that says threat assessment and workplace violence?
A That's my standard signature line.
Q But just to confirm, you weren't contacting Ashley Gjovik for a matter related to threat assessment and workplace violence?
A Correct.
Q And you said you worked for employee relations and at some point Mr. Lagares. Did your coworkers include Mr. Ekelemchi Okpo?
A Correct.
Q So you guys had the same manager?
A For a period of time.
Q What about Jenna Waibel?
A She was a manager. I believe she may have been an employee relations partner. I can't recall.
Q And at least to my recollection as of, like, July and August 2021, Ms. Waibel also reported to Mr. Lagares, I believe. So would that make her a coworker of yours at that time?
A Correct.
Q And were you privy to both of their

Page 46

investigations into Ms. Gjovik?
A No.
Q Did you know that they were investigating Ms. Gjovik's concerns at all?
A No.
Q Was Mr. Lagares aware of your assignment to contact Ms. Gjovik on September 9th?
A I don't recall.
Q Would it be typical for your supervisor to not know what you're working on?
A It's case by case. I mean, depends on the case.
Q Can you think of any other examples where an employee had made complaints and requested an investigation, employee relations had opened an investigation and were investigating, but then some allegation was made against the employee, triggering a need for kind of, like, a cross-investigation?
A Can you clarify that, the beginning part of that.
Q Yeah.
Can you think of any other examples where you were involved in a case where the employee had already made complaints, requested an investigation of their own complaints, but then Apple's requesting

Page 47

an investigation into the employee now?
A I can't recall a specific case.
Q So assuming facts not in evidence that Ms. Gjovik had opened investigations with employee relations into her concerns, would that be, like, the one case that you can give an example of that you were involved in of investigating the employee with the concerns?
MS. RIECHERT: Objection. Assumes facts not in evidence that he knew about the investigation.
BY MS. GJOVIK:
Q Still have to answer.
A I was not aware of any other investigation.
Q If you were, would you do anything differently?
MS. RIECHERT: Objection. Hypothetical, speculation.
BY MS. GJOVIK:
Q I mean, part of the job description, I think, of, you know, managing these complexes issues, and if an employee has an open investigation, their concerns, government complaints filed and stuff, one would think that if the employer is going to then contact the employee and investigate the employee, it would be some kind of consideration for the employee

Page 48

relations team of how to handle that conflict.
So if you were aware that there was already investigation into the employee's concerns, including reports of retaliation, would you do anything differently if you were asked to then investigate the employee while that initial one was occurring?
MS. RIECHERT: Same objections.
BY MS. GJOVIK:
Q Okay. Still answer.
A I can't recall a specific process.
Q Were you aware that while you were contacting Ms. Gjovik, she was actively signing her EEOC charge and submitting Department of Labor whistleblower protection documents?
A No.
MS. RIECHERT: Objection. Asked and answered.
MS. GJOVIK: No. It was a more specific question than the prior one.
BY MS. GJOVIK:
Q Let's see. Okay. Let's look at -- I'll share another document.
Oh, I'd like you to also, please, if you will, authenticate this copy of your LinkedIn profile I gathered a little while back. If you want to

Page 49

please review it. And we can go page by page. Let me know when you've read each page, and if is that looks accurate to you, let me know.
THE WITNESS: Okay.
MS. RIECHERT: This is Exhibit D?
MS. GJOVIK: Exhibit D.
(Exhibit D was marked for identification.)
THE WITNESS: Okay. Next page. Okay. Next page. Next page. Next page. Okay.
BY MS. GJOVIK:
Q Does that look accurate?
A Yeah.
Q And when I grabbed it, it said your title was senior ER BP. That's employee relations business partner; correct?
A Correct.
Q And threat assessment workplace violence and supporting global security, Americas; is that right?
A That's correct.
Q So you had mentioned that you'll do typical employee relations investigations in addition to the threat assessment and workplace violence work. And it's my understanding that the employee relations business partners will be assigned to certain organizational units. At least that's what Mr. Okpo

Page 50

testified in his deposition. Were you assigned a business unit to provide more typical employee relations support to?
A Yes, global security.
Q Security.
So I worked in hardware engineering at that time. It's a team called product integrity. But that's not global security.
So would it be more you're supporting employee -- or global security investigations versus, like, global security employees asking for investigations?
A I support both.
Q Oh, so if a global security employee said they had, like, a retaliation concern or something, they could file that and request an investigation. You would be assigned probably by default?
A Correct.
Q I see.
So if -- and at that time, I had Ms. Waibel investigating. She had said she was assigned to hardware engineering. And then Mr. Okpo was assigned after I complained about Ms. Waibel.
Do you know why you were assigned to a hardware engineering employee if you were supposed to

Page 51

be supporting the employee but you say that you were assigned to global security employees?
A I don't recall why.
MS. RIECHERT: Objection. Misstates his testimony.
MS. GJOVIK: Sorry. What?
MS. RIECHERT: Misstates his testimony.
BY MS. GJOVIK:
Q How often were you assigned to support employees in investigations of the employees in organizations outside global security?
A I don't recall.
Q Can you think of any other example other than Ashley Gjovik?
A I can't recall.
Q I mean, you can recall examples where you were assigned to global security employees for this sort of thing?
A I don't recall a specific example.
Q Okay. If you had to kind of pick a percentage, how much of your job was supporting employees with more typical employee relations functions versus doing the threat assessment and workplace violence work?
A I can't give you a percentage. I don't

Page 52

recall the delineation of the work.
Q Would you say the majority was one or the other?
A I can't recall the data on that.
Q Okay. I'm going to share something else.
Okay. I'm going to share Exhibit L.
MS. RIECHERT: I forgot what letter you said. B or D?
MS. GJOVIK: I believe that was D. Let me check.
MS. RIECHERT: D?
MS. GJOVIK: That was his LinkedIn?
MS. RIECHERT: Yeah.
MS. GJOVIK: Yeah. That was D. Okay.
MS. RIECHERT: D for dog or B for boy.
MS. GJOVIK: D as in dog.
MS. RIECHERT: Thank you.
BY MS. GJOVIK:
Q Okay. Before I go to the next one, which will be Exhibit L, Mr. Kagramanov, do you recall how Ashley Gjovik responded to your initial email that we looked at?
MS. RIECHERT: I don't see Exhibit L. Do we have it up?

Page 53

MS. GJOVIK: That would be 88, L.
MS. RIECHERT: I still don't see an exhibit.
MS. GJOVIK: Yeah. Let me see.
MS. RIECHERT: I can see your face.
MS. GJOVIK: Oh, I'm not sharing it.
MS. RIECHERT: Oh, okay.
MS. GJOVIK: All right. Are you saying it wasn't in the folder? No. It's in the folder. I'm just not sharing it.
MS. RIECHERT: No. I'm just saying you weren't sharing an exhibit.
MS. GJOVIK: I was going to say, before we go to that one, I actually just wanted to ask something.
BY MS. GJOVIK:
Q Mr. Kagramanov, do you recall, after that initial email you sent Ms. Gjovik, which was Exhibit A that we looked at earlier, what Ms. Gjovik's response was to you?
A I don't recall specifically unless I see it.
Q Okay. We'll look at it.
Do you recall anything about how that exchange ended up with Ms. Gjovik, what the outcome was?
A I recall that we ended up not meeting.

Page 54

Q If you had to -- if you had to come up with a number of how many investigations you think you've supported like this one, where you're contacting an employee for an employee -- for a global security investigation into the employee, how many times do you think you have contacted employees like you contacted Ms. Gjovik?
A I can't recall a number.
Q Like, 1 or 12 or 600?
A I can't speculate on the number.
Q Do you think it's more than one?
A Likely.
Q It's more than a dozen?
A I can't say.
Q How long did you hold that role?
A I think for about three years.
Q Three years.
And you're not sure if you sent an email to an employee about a global security investigation -- that employee more than a dozen times?
A I can't recall the exact number or an approximate number.
Q I'm not asking for exact. That's why -- is it more than a dozen or is this kind of -- I'm trying to figure out if this is more of unusual. Because

Page 55

over three years, one would think it would be more than a dozen.
A It could be, but I can't -- I don't know an exact number.
Q Okay. I guess, till we figure it out, can you explain to me what your day to day might look like in your role. Is it only doing these types of investigation support or is there other stuff that filled your day with other types of work?
A I mean, every day is different with employee relations and threat assessment work.
Q So would you say you had a workload other than being assigned cases to support investigations or conduct investigations?
A Yeah. I mean, every day is different. Sometimes I work on, potentially, projects. I can't recall what projects, but there could be projects on the side.
Q What kind of projects? Like, a process-type thing or --
A Could be, yeah, improving processes, flows.
Q Okay. So I'm going to share Exhibit L, and this is the chronological -- so the one -- the original one we looked at, Exhibit A, is this bottom. It's the bottom. And in Pacific time, it's 2:08 p.m.

Page 56

That sounds correct.
And then the response to this email chain was from me via my iCloud account at 2:10 p.m. That's two minutes later. And I wrote: Hi, Aleks. Happy to help. Please send any questions/updates via email so we can keep everything written, please. I will respond via email as quickly as I can. Thanks, exclamation point.
Does that -- do you recall a response like that from me?
A Yes.
(Exhibit L was marked for identification.)
BY MS. GJOVIK:
Q And you said you reviewed emails before this deposition. Does this look like the email you reviewed prior to the deposition?
A Correct.
Q How often would an employee respond within two minutes?
A I can't recall any response times.
Q Do you recall if employees generally respond immediately volunteering to participate?
A I don't recall employees responses.
Q When you saw this response from Ms. Gjovik, this 2:10 p.m. response, what was your reaction to

Page 57

that response?
A I don't recall what my reaction was at that moment.
Q Okay. In your professional capacity, doing this for years, looking at that email, would you characterize that email as refusal to cooperate?
A I would determine that as refusal.
Q Can you tell me why.
A Because we don't facilitate investigations over email.
Q Is that an official policy?
A I don't recall what the specific policy is.
Q Is there any written policy that Apple has that says that?
A I don't recall a specific policy.
Q And refusal to cooperate, is that an allegation of misconduct by the employee that it's being made against?
A Refusal to cooperate, we typically go off of the information we have.
Q So is it misconduct by the employee to refuse to cooperate or that's just something that changes the direction of the investigation process?
MS. RIECHERT: Objection. Lack of foundation.

Page 58

BY MS. GJOVIK:
Q Can you think of -- I'm going to withdraw that one and try again.
Can you think of other examples where employees ask to keep communications in writing?
A I can't recall an instance.
Q Okay. Can you recall any instructions to -- from anyone at Apple to you or your team to not have communications with employees in writing?
A I don't recall a specific instance.
Q You said the process is getting on the call and not have it -- not having the email. So the refusal to cooperate is having the only written record. Do you know who communicated that process, or is that a process that you created?
A I can't recall who owns that process.
Q So your understanding that a refusal to get on a call and a request to keep things in writing was a refusal to cooperate, what were you basing that on if there was no written policy or formal policy that things had to be only on a call?
MS. RIECHERT: Objection. Improper hypothetical.
MS. GJOVIK: I don't think so.
///

Page 59

BY MS. GJOVIK:
Q But go ahead.
A I mean, I decided that, you know, you not engaging in a live process is refusal to participate.
Q So that was just your unilateral view and assessment?
A It was -- so it was my determination but also in partnership with our legal counsel.
Q Also in partnership.
Did you make your own determination prior to the determination by legal counsel?
A I don't recall what -- what that process was, actually.
Q Okay. So you say you determined that it's refusal to cooperate by asking to have things in writing. Can you explain why asking to have things in writing is a problem.
A Yes. I mean, the intention for having a live conversation is to ensure that we have a natural recollection of, you know, whatever the discussion is at hand relating to the investigation. It also allows for natural follow-up questions in the moment and also to kind of just gauge tone, behavior in the call where we have that natural live dialogue.
Q Mr. Kagramanov, are you aware that all of

Page 60

the content that Apple has subsequently alleged was leaked or improperly disclosed was all already published social media posts or commentary and participation in press articles; so -- and under the employee's own name; so there was not much for them to actually investigate?
MS. RIECHERT: Objection. Assumes -- he's already said he doesn't know anything about any of the allegations. So...
MS. GJOVIK: I just kind of want him to have to say no.
BY MS. GJOVIK:
Q That's a no?
A No.
Q If you had known -- and you said Glimmer. So let's say it was just the Glimmer thing, and again facts not in evidence. But they keep pointing to photos I shared with "Verge" of just my face taken by an app. And I was complaining of surveillance because it was taking pictures of me in my home and naked and stuff, and I thought that was wrong. So it was just my face.
If you had known that what they were concerned was an article published -- it was August 30th; so almost, like, a week and a half

Page 61

prior -- and I had said I was the one sharing it and complaining about it, would you still say it was refusal to cooperate for Ashley Gjovik to ask for things in writing?

A I mean, the process, like I said, is to -- cooperation means participating in a live discussion.

Q Did you ever define that to Ashley Gjovik?

A In the email, in what we requested in iCal, to coordinate a time in the iCal.

Q Yeah. But did you say it was mandatory it had to be without written record?

A I believe I responded that we determined that you refused to participate.

Q But did you ever say the only way to participate that Apple will accept will be getting on a call?

A I don't recall making that specific comment.

Q Do you think it's reasonable for an employee to assume that's a rule without that being stated?

MS. RIECHERT: Objection. Lacks foundation.

MS. GJOVIK: Still has to answer.

MS. RIECHERT: Speculation.

THE WITNESS: Sorry. You still want me to answer that?

///

Page 62

BY MS. GJOVIK:

Q She said lacks foundation, but you still have to answer.

A Sorry. Repeat the question again.

Q Do you think it's reasonable for an employee to assume that rule exists without that rule being stated to the employee?

MS. RIECHERT: Also assumes facts not in evidence.

MS. GJOVIK: There's no evidence because that was never stated.

THE WITNESS: I'm sorry. Do you still want me to respond to that?

BY MS. GJOVIK:

Q Yeah. Sorry. Go for it.

A Yes. That expectation is that employees participate live and that it's reasonable for them to know that we're scheduling an iCal and coordinating an iCal, that the participation is live.

Q Do you think it's reasonable for the employee to assume that if they were to ask for a written record of the conversation, that it would be seen as refusal to cooperate?

MS. RIECHERT: Same objections.

THE WITNESS: The employee would be informed

Page 63

that if they refused to participate live or refused to participate, that we will go off of the information that we have.

BY MS. GJOVIK:

Q So would it be reasonable to tell the employee that the only way to participate is live; so if then they refused live, then it's refusing to participate?

A Correct.

MS. RIECHERT: Same objections.

BY MS. GJOVIK:

Q Okay. So then looking at this same exhibit, Ms. Gjovik then also responded to you: FYI -- this was at 2:27. So she sent that -- actually, okay. Sorry. Withdraw that.

2:10 p.m., she sent that email we were just talking about, and you did not respond by 2:27. Do you recall what was happening after she sent that email to you, that 2:10 email?

MS. RIECHERT: I think you said he did not respond by 2:27. I think you meant he did respond at 2:27.

MS. GJOVIK: The 2:27 was my email.

MS. RIECHERT: You're right.

MS. GJOVIK: That's okay.

Page 64

MS. RIECHERT: You're right.

MS. GJOVIK: It was a lot of stuff happening really quick.

BY MS. GJOVIK:

Q So Ms. Gjovik responded at 2:10, saying she wanted a written record. And at least by 2:27, you had not responded. Do you recall what you were doing during those 17 minutes?

A I do not recall.

Q Do you recall when you saw her response?

A I don't recall.

Q Okay. Do you recall when you decided that she was refusing to participate?

A I don't recall the time, specific time.

Q Based on this 2:10 email, would this 2:10 email itself, where she says she's insisting everything stays written, be the basis of a determination of refusal to cooperate?

A I can't recall when I actually saw that email.

Q Sorry. I mean just that email itself, though, without any of the other stuff we're going to look at that came after.

If that email says insisting on a written record, is that itself enough to determine refusal to

Page 65

cooperate?
A Correct.
Q And then Mr. Gjovik responded at 2:27 and said, FYI, I forwarded your email and my reply to the investigator on my NLRB case. So he's aware you just reached out to me the day before my affidavit is supposed to be taken. This feels a little like witness intimidation, et cetera, dot, dot, dot.
Do you recall that response?
A I recall.
Q How did you respond -- sorry. Go ahead.
A No. Just from what you shared, yeah, I recall.
Q Do you recall how you responded?
A Yes.
Q How did you respond?
A Do you want me to read my response there?
Q Oh, sorry. Not, like, an email yet. But, like, when you saw that, did you change your determination on cooperation? Did you want to find more information? Like, what was your internal response to that email?
A I can't recall what my internal response was.
Q Okay. And in your role, if an employee

Page 66

discloses to you directly that they have an open case with the government against Apple while you're contacting them to arrange an investigation, does that change your approach of supporting that employee for the investigation?
A I don't recall what -- like, a process or change in approach.
Q Okay. And you had said that part of your process for supporting the employees was reassuring them that there would not be any retaliation; is that correct?
A Correct.
Q And so this email complains of something that feels a little like witness intimidation, which is a criminal statute that also includes retaliation. So would you say this email was complaining to you that it felt like Apple might be retaliating against Ashley Gjovik, per Ashley Gjovik?
A I can't speculate as to what your reception was to that email.
Q So when you read Ashley Gjovik emailing you saying, this feels a little like witness intimidation, how did you interpret that?
A I don't recall what my thought process was at that time.

Page 67

Q Okay. Do you recall any other cases where you saw something like that?
A I can't recall a specific case.
Q Okay. And as a professional, if you see something like that, would it cause you to want to gather more information or talk to other Apple counsel or maybe change the way that you're strategizing your support?
A I recall partnering with our legal counsel on this, but I don't recall what -- you know, what was specifically discussed in that scenario.
Q Do you remember which legal counsel?
A I do not recall.
Q Do you remember if it was, like, HR or global security or product?
A I don't recall who specifically was involved.
Q Okay. And are you aware of NLRB laws and cases about how to interact with employees when they have lodged NLRB complaints against the employer and are requesting certain conditions related to a requested interview with them?
A No.
Q Do you think that when you contacted -- based on whatever lawyers -- Apple lawyers you were

Page 68

discussing this matter with, was there at least an Apple HR lawyer involved?
MS. RIECHERT: Objection. Asked and answered.
BY MS. GJOVIK:
Q Specific for these emails, I'm trying to gather whether Apple HR legal, who should be aware of the NLRB expectations, was aware of this response during this exchange.
MS. RIECHERT: He already answered he didn't know what --
MS. GJOVIK: He what?
MS. RIECHERT: He already said he didn't know whether it was product, legal -- or I mean, employment or what. He didn't know.
MS. GJOVIK: He had no idea who the lawyers were? Just lawyers? That's -- it's kind of a leading objection. I would like to ask him directly, please.
THE WITNESS: I don't recall who the specific lawyer or lawyers were involved.
BY MS. GJOVIK:
Q Okay. And this exchange very quickly led to a termination of employment of an employee. And in those type of cases where you're supporting these

Page 69

investigations, is it typical to have HR legal involved in that process?

A I mean, I don't recall a specific instance. I think it's all case by case.

Q Can you recall any other examples where you're emailing an employee and the employee was terminated within the day that you requested a meeting?

A I also don't recall a specific example.

Q Okay. So Ashley Gjovik would then be the only example you recall?

A I was not aware that you were terminated.

Q You were never notified that I was terminated on September 9th?

A I was not involved in that process.

Q That's interesting. Okay. Thank you.

And then looking at the same exhibit, we have at 2:50 p.m. an email from you, and it wrote: We are investigating allegations that you improperly disclosed Apple confidential information. Since you have chosen not to participate in the discussion, we will move forward with the information that we have, and given the seriousness of these allegations, we are suspending your access to Apple systems. Best, Aleks Kagramanov.

Page 70

You sent that email?

A Correct.

Q Can you share any information or context of why you chose the language you chose in that email?

MS. RIECHERT: Don't give any information provided by counsel. Instruct you not to answer based on attorney-client privilege.

THE WITNESS: Yeah, I do not recall how it was formulated.

BY MS. GJOVIK:

Q Did you write this email?

A It was sent by me.

Q Did you draft the words used or did you send something someone else wrote?

MS. RIECHERT: So again, objection to the extent you're asking to the role of legal in drafting this language, and in terms of attorney-client privilege, I'd instruct him not to answer.

BY MS. GJOVIK:

Q How about this. Mr. Kagramanov, the email that you sent here at 2:50 p.m., did someone else write the content of that email?

MS. RIECHERT: Same objection.

MS. GJOVIK: I'm not asking who.

MS. RIECHERT: If other than legal, then you're welcome to ask him. But if he worked on it with legal, then you're not entitled to ask him.

Page 71

MS. GJOVIK: I think he can say whether he wrote it or not.

MS. RIECHERT: I'll instruct him not to answer if it was legal that was involved in helping him write this.

BY MS. GJOVIK:

Q Okay. And, Mr. Kagramanov, now, instead of sensitive intellectual property matter, it says disclosed Apple confidential information. What was the Apple confidential information that was disclosed, to your knowledge?

A Because I don't lead that investigation, I don't know. I wasn't aware.

Q And the suspension of access to Apple systems in your message, is that something that you coordinated to suspend access to Apple systems?

A I don't recall who was -- who was responsible or involved in that.

Q Do you recall when the access to Apple systems was suspended?

A I don't recall.

Q Okay. And when it says Apple systems, which systems?

Page 72

A I also am not aware.

Q Okay. Do you recall any other examples -- so you had sent the original email at 2:08 p.m. per Exhibit A. And in this one, this response where you're suspending access to systems was sent at 2:50 p.m. So this would be 42 minutes later.

Do you recall any other examples of contacting an employee for initial conversation and suspending all their account access in less than an hour?

A I don't recall a specific example.

Q So Ashley Gjovik would be the only one?

A Correct, that I can recall.

Q Thank you.

And then the next one, this is at 3:07 p.m. So this is still within one hour of the initial email you sent. Ms. Gjovik responds: Hi, Aleks. As mentioned, I'm definitely willing to participate in your investigation. I only asked that the discussion be kept to email. I said nothing about not participating in the discussion at all. I offered to help via email to ensure we have a documented record of our conversations considering everything that's currently going on with my investigation and my complaints to the government. I have been speaking

Page 73

out about work conditions, about workplace safety, concerns about discrimination and retaliation, and about concerns about intimidation and corruption, as reported to the government in public record. I'm very concerned about what you're calling serious allegations. Can you please provide me additional detail on what these allegations are? And when you say move forward, are you simply suspecting -- but I meant suspending -- my access to Apple system or are you doing something more, and if so, what? Your email is very unexpected, and I'm caught quite off guard if this is a real issue. I'd like the opportunity to remedy any actual issues. Please let me know what the issues are so I can make a good-faith attempt at that. In the meantime, without additional context or effort to communicate with me in email, this really does feel like intimidation and additional retaliation, and I will consider it as such. Best, Ashley.

Do you recall that response?

A Yes. Seeing it, I recall it.

Q Do you recall how you -- how you responded, like, internally to reading that, if it would change your approach with the support for this investigation?

Page 74

A I don't recall my interpretation.

Q Did you share these emails with anyone at the time?

A I don't recall.

Q Is it typical for you, if you're helping global security do an investigation into an employee, to share those emails with global security as the employee is responding?

A I don't recall the specific process or I -- it would be case by case.

Q Okay. And if an employee was to disclose to you here that the government complaints were made, there's the LMB case, that there was concern retaliation was occurring, would you, like, escalate that and have that investigated to see if Apple might actually be retaliating against the employee?

A I don't recall what the process there would be.

Q Okay. So have you ever seen a situation where an employee was complaining that the investigation into them might be retaliation, other than the Ashley Gjovik case?

A Yeah, I don't recall another example.

Q And as a professional in your field, if the corporation was retaliating against the employee,

Page 75

because sometimes that happens, wouldn't it be a due diligence concern to ensure that that employee's complaint was investigated to ensure that whatever that investigation was wasn't retaliation?

MS. RIECHERT: I think that's an improper hypothetical and lacks foundation.

MS. GJOVIK: Okay. He still has to answer.

THE WITNESS: I can't speculate or I can't recall a specific process in this scenario.

BY MS. GJOVIK:

Q So I looked at your LinkedIn, and you've been doing this for a very long time and you've worked at these very large companies, and you're saying you have no professional opinion if an employee was to complain that the investigation into them appeared to be retaliation, of how you would handle that and whether you would actually investigate if it could be retaliation or ask someone to?

MS. RIECHERT: Objection. Asked and answered. And same prior objections.

BY MS. GJOVIK:

Q Okay. So no? No thoughts whatsoever.

And is it accurate that you never replied to this email?

Page 76

A I can't recall if I responded or not.

Q I never got a response.

Do you recall what happened after this response from Ms. Gjovik?

A I do not recall.

Q Okay. And you communicated, like, accounts are being suspended, but then you testified that you didn't know Ms. Gjovik was terminated. So do you recall if maybe you just ended your participation, your support for this investigation after that last exchange we reviewed?

A I cannot recall my exact involvement after that.

Q Okay. Just a few hours later --

MS. RIECHERT: We've been going an hour and a half now.

MS. GJOVIK: Do you want to take a break?

MS. RIECHERT: I'm fine, but I'm sure -- the court reporter usually likes a break --

MS. GJOVIK: Sorry. I can't hear you. What are you saying?

MS. RIECHERT: Yeah. The court reporter usually likes a break after an hour and a half.

MS. GJOVIK: Okay. Want to take five minutes?

Page 77

MS. RIECHERT: Fine with me.
MS. GJOVIK: Okay. Let's come back in five.
(Recess taken.)
BY MS. GJOVIK:
Q Okay. So we just finished looking at those exchanges, and I'm just going to show you something here.
Mr. Kagramanov, do you remember the involvement of anyone named Megan Bowman while you were supporting this investigation?
A I do not recall her involvement.
Q I'll share -- and did you say -- do you recall -- any recollection of what information was supposedly shared or where it was shared?
MS. RIECHERT: Objection. Vague.
BY MS. GJOVIK:
Q The supposedly leaked information by Ashley Gjovik.
A I do not recall specifically.
Q So this is Exhibit G. This is a document produced by Apple previously, and this is an email from Megan Bowman.
Do you know who Megan Bowman is? Do you remember?
A I do not recall her role.

Page 78

(Exhibit G was marked for identification.)
BY MS. GJOVIK:
Q Okay. Do you know who Yannick Bertolus is?
A No.
Q So Megan emailed Yannick here. So this was September 9th at 6:20 p.m. And we looked at that last email that Ashley Gjovik sent you was the 3:07 p.m. that it was in response to. And so then we have 6:20. It's a little over three hours later.
Megan Bowman wrote to Yannick: Sophi Jacobs and Alex Kagramanov -- I'm finally getting this -- I had to say your name like 40 times to finally get this. I'm so sorry. Members of our global security and ER teams reached out to Ashley to talk with her about allegations that she had disclosed confidential product-related information on Twitter. Ashley chose not to talk with the team and asked for all communications to be in writing. She was informed that because she chose not to participate in the discussion, Apple would move forward with the information that we had, and that due to the seriousness of the allegations, her system access would be suspended. Ashley disclosed confidential product-related information on Twitter, and this conduct on its own warrants termination. In addition, she failed to cooperate in Apple's investigative process today and during the ER investigation into her workplace concerns. More specifically, she failed to accurately and completely provide information, including actively redacting relevant information from documents she presented to Apple's ER investigator. Based on her conduct, which violates Apple policies, the people team recommends that her employment be terminated.
So it seems here that this -- Ms. Bowman is alleging that the refusal to cooperate with the insisting on a written record was misconduct by the employee. Have you ever seen employees disciplined for asking for a written record?
A I cannot recall a specific example.
Q Other than Ashley Gjovik?
A Correct.
Q And are you aware that -- no. You already said you weren't aware there was an investigation into her concerns.
And this allegation is apparently about sharing information on Twitter, and you said you weren't aware of any of the actual content shared.
So the main -- based on the conduct, which violates Apple policies -- based on your support of

Page 79

Page 80

the investigation into Ashley Gjovik, are there any Apple policies that you yourself could identify that Ashley Gjovik potentially violated in her exchanges with you?
A I cannot recall specific policy.
Q And if the termination of Ashley Gjovik was partially based on Ashley Gjovik's request to have a written record of her communication with you, would you say that's a reasonable justification to terminate an employee's employment?
MS. RIECHERT: Objection. Lacks foundation.
MS. GJOVIK: Still has to answer.
THE WITNESS: Refusal to participate would be considered misconduct.
BY MS. GJOVIK:
Q That could justify termination?
A Could be.
Q Would it be reasonable to provide the employee notice that they could be disciplined if they refused to get on a call?
A I cannot recall a process for that.
Q And have you ever had employees request to, like, record the call so they can at least have a recording of the phone call?
A I cannot recall a specific instance of that.

Page 81

Q If Ashley Gjovik had said, if she can't have a written record, she'll get on the call if she can have a witness or record that call, would you have allowed that?
A I cannot recall a specific policy or expectation for that.
Q Would you have said no?
A Me personally, when I facilitate interviews, I do not recall the meetings.
Q What about if an employee asked to have a witness there with them?
A We do not allow witnesses in confidential interviews.
Q What if they want to bring their own lawyer?
A In my experience, typically, we wouldn't include anyone as a witness, even including a lawyer, in a confidential investigation.
Q So then in that case, if there's any dispute about what was said during the call, there would be no record to actually compare what was discussed to?
A I tell employees they can take their own notes.
Q But there's no recording or actual, like, admissible evidence, like, definitively saying what was actually said?

Page 82

MS. RIECHERT: Objection. Lacks foundation as to what evidence is admissible.
MS. GJOVIK: Sorry. The evidence was too concrete. I'll withdraw that part.
BY MS. GJOVIK:
Q Okay. So Ms. Bowman sent that email at 6:20.
Mr. Bertolus responded at 6:26 p.m.: Understood. I agree with the termination decision.
And then Ms. Bowman responded again: Here are the attachments you can send Ashley in the email notifying her of the termination. We will also send this via FedEx tonight. Here is her email address. Below is a text and subject line you can use. Please copy on the email you send to her.
And you don't recall if Ms. Bowman was involved in your participation in this investigation?
A I do not know who Megan is.
Q Okay. And then here, she wrote at 6:20 -- no. That was the same email.
It says: Yes, I agree. And then she sends that.
And so Mr. Bertolus then sent a letter terminating Ms. Gjovik's employment.
And just to confirm, you were not aware that

Page 83

Ms. Gjovik was then terminated that same day that you reached out?
A That's correct.
Q Did you ever discover that Ms. Gjovik had been -- had her employment terminated by Apple related to this investigation prior to being called for this deposition?
A I do not recall. Yeah, I don't recall.
Q Do you recall ever seeing any news coverage or social media discussion about Ms. Gjovik's complaints and disclosures?
A I don't recall that.
Q And then I'm now going to share Exhibit H. This is the letter from Mr. Bertolus to Ms. Gjovik, September 9th, saying: Termination of employment. Apple has determined that you have engaged in conduct that warrants termination of employment, including but not limited to violations of Apple policies. You disclosed confidential product-related information in violation of Apple policies and your obligations under the intellectual property agreement. We also found that you failed to cooperate and to provide accurate and complete information during the Apple investigatory process. Your access to Apple systems has been suspended as of today, and your employment

Page 84

will terminate September 10, 2021.
So now facts in evidence that there was a termination.
And there was one other -- another version of this without Apple's redactions. They love to redact everything. This is the same letter without the redactions. This is the one that I got. At the end of this one -- this is Exhibit C, the unredacted version, my version.
Exhibit C ends: You are also obligated to return to Apple all Apple-owned equipment or devices. You will receive a prepaid FedEx box to ensure prompt return of Apple devices. If you need assistance, please contact Aleks Kagramanov at, it looks like your Apple email.
Is that your Apple email?
A That looks correct, yeah.
(Exhibit C was marked for identification.)
BY MS. GJOVIK:
Q So that's to you -- to reach out to you.
So you're saying you didn't know the employee was terminated, yet you were to be the point of contact for the employee if they had questions about the termination process. Is that --
A Yeah. I don't -- I don't recall what the

Page 85

involvement there was for me --
MS. RIECHERT: Object that that misstates the -- what the email says. It's about return of the equipment --
MS. GJOVIK: Oh, just returning equipment.
BY MS. GJOVIK:
Q Mr. Kagramanov, are you typically the point of contact for employees when they're terminated when there's an investigation of them for the return of equipment?
A It's case by case on that as well.
Q Can you think of any other examples where you were provided as the point of contact for returning equipment?
A I can't recall a specific case or example.
Q Other than Ashley Gjovik?
A Correct.
Q And so if you weren't aware that she was terminated, then if she reached out to you about returning equipment, that would be how you would be notified she had been terminated, by her saying, I was just terminated; is that fair?
A Yeah. Based on this notification, yeah.
Q And then that letter that we read to you said something about redacting information provided.

Page 86

Do you have any -- did you hear anything about investigating her for redacting information?
A Sorry. Can you say that one more time.
Q Yeah.
The list -- Bowman's list of Ms. Gjovik's misdeeds listed redacting information provided. Do you know anything about that?
A No.
Q And it also said she wasn't providing complete or accurate information. Do you know anything about that?
A I do not.
Q Do you know anything about what was going to be asked of Ms. Gjovik during the phone call you were supposed to arrange?
A No.
MS. RIECHERT: By him or by Sophi?
MS. GJOVIK: Either.
MS. RIECHERT: I think it was asked and answered as far as what he was going to ask her.
MS. GJOVIK: Okay.
MS. RIECHERT: He said he didn't know what Sophi was going to talk about. So it's asked and answered.
///

Page 87

BY MS. GJOVIK:
Q Mr. Kagramanov, when you've set up calls like this with global security when they're investigating employees, have you had cases where the employee is terminated on those phone calls?
A I can't -- I can't recall a specific case.
Q What kind of outcomes generally happen during these phone calls?
A I don't recall a specific outcome that was discussed in a specific case.
Q Okay. So as far as you know, these phone calls generally result in some kind of next step but not the termination of the employee during the call?
A Yeah, I don't -- I don't recall the specific outcome in a live call.
Q Are you generally present at the live call?
A Yes. I'm present, yeah.
Q Does Apple record their own version of the call so they have a record?
A I can't recall a specific call being recorded.
Q I don't have any of that stuff.
Mr. Kagramanov, do you have any -- you said you didn't know about Ms. Gjovik's office being a Superfund site or EPA or any of that stuff; so you're

Page 88

probably going to say you don't know about this, but I'm going to show it to you anyways.
This is Exhibit F. This is an email from Jenna Waibel on your team.
(Exhibit F was marked for identification.)
MS. RIECHERT: Did you say S, as in Sam?
MS. GJOVIK: F, as in fund.
MS. RIECHERT: Oh, F. Okay.
BY MS. GJOVIK:
Q September 9th. It's weird time zones. This looks like around maybe 12:24; so probably a couple hours before you reached out. And it was -- do you know who Elizabeth Schmidt is?
A I do not recall that person.
Q She works in EHS and real estate.
And she -- your coworker, Jenna Waibel, was providing -- she says: I'm providing notes to you from our last meeting with Ashley Gjovik as her EHS concerns, which occurred on 7/7/2021. Antone is copied since he was present at the meeting. He can answer additional questions you may have.
So this is your coworker, Jenna Waibel, emailing -- I believe Elizabeth is a director or senior manager -- these notes about Ms. Gjovik making EHS complaints and concerns, raising concerns just a

Page 89

couple hours before you were asked to contact Ms. Gjovik.

Do you have any awareness of Ms. Waibel communicating this or opening EHS complaints for Ms. Gjovik or Ms. Schmidt being involved or any concurrent investigation going on at the time you were asked to reach out to Ms. Gjovik?

MS. RIECHERT: I think that misstates the testimony. He said he reached -- he was told to reach out on September 7th (audio distortion).

MS. GJOVIK: Sorry. Can you say it again.

MS. RIECHERT: Yeah. I thought he testified he was told about -- to reach out on September 7th, not the 9th.

MS. GJOVIK: Oh, September 7th. That's right.

Let's go back to that, actually. Thanks, Melinda.

BY MS. GJOVIK:

Q Do you recall what you were told on September 7th about this matter? Were you asked to contact Ms. Gjovik or something else that you were told at that point?

A I recall being looped in to help support the global security investigation on September 7th.

Page 90

Q On September 7th, were you asked to reach out to Ms. Gjovik?

A I don't recall what the request was at that time.

Q Do you recall what day you were asked to reach out to Ms. Gjovik?

A I don't recall the exact date.

Q So for the -- when you were working on this September 7th, September 8th, do you have any recollection of what you were doing with regards to this matter?

A I do not recall what was happening.

Q Okay. And then you testified your role in this was basically just setting up a meeting for Ms. Gjovik?

A That's correct.

MS. RIECHERT: That misstates his testimony, but --

MS. GJOVIK: I can ask him again, but then you'll say asked and answered.

MS. RIECHERT: Right. I mean, he told you what he was going to say during the meeting; so...

BY MS. GJOVIK:

Q Yeah. So I'm just trying to understand what your role was in the investigation two days prior to the 9th, if you didn't have any background what the investigation was about or the employee's complaints or cases or the other employee relations investigations or any of that. So --

MS. RIECHERT: That's a lot of premises in there that --

BY MS. GJOVIK:

Q Well, this -- no recollection whatsoever what your role was on September 7th or 8th; is that correct?

MS. RIECHERT: Misstates testimony too.

BY MS. GJOVIK:

Q Can you please characterize any recollection you have whatsoever of your role, anything requested of you, any activity you had regarding Ashley Gjovik on September 7th or 8th.

A I have no recall of the level of involvement.

Q And do you communicate with Ms. Waibel or Mr. Okpo, your coworkers?

MS. RIECHERT: Generally?

BY MS. GJOVIK:

Q Yeah.

A Can you clarify, like, what do you mean by that question.

Page 92

Q Do you guys talk about your work, share updates on stuff if there are intersecting issues or investigations?

A Yeah. I mean, I don't recall the specific nature of our interactions or discussions at that time.

Q Okay. And if there is open investigations related to an employee with some of your other coworkers and then you would get one -- another one that's still with the same employee, is there any policy or practice or standard of trying to coordinate amongst your coworkers for the -- those multiple investigations?

A I don't recall a specific process.

Q Okay. I'd like to talk a little bit about what you were planning to say to Ashley Gjovik during that phone call. Could you share to me what you might say about -- you were saying things about keeping things confidential, not sharing what's discussed. Can you, like, say to me what you might have said to me on that call if I called on that call.

MS. RIECHERT: Objection. Asked and answered.

MS. GJOVIK: I'd like the actual rules, the

Page 93

work rules he was planning on sharing.
MS. RIECHERT: Same. Asked and answered.
BY MS. GJOVIK:
Q Mr. Kagramanov, during that call, when you said -- you indicated that you were going to say that the investigation was confidential and not to share it with anyone. And the employee has a complaint with the government and says that they're giving an affidavit the next day, would your statement imply or expressly say that the employee is not allowed to share with the government investigator during the affidavit what occurred during that interview?
A I can't -- I can't, like, speculate what would have been said at that time.
Q So based on the rules -- you said your job is, like, to share these rules with employees to support them. So it's, like, you must do that a bit.
The employee in this case says, I have this case, and I'm about to give an affidavit tomorrow. You're insisting employee get on the phone call. You said you would tell them that it's confidential, they can't tell anyone.
So if the employee says -- if I say, well, I have an affidavit tomorrow and I want to testify about what happens here, am I allowed, what would

Page 94

your response be?
MS. RIECHERT: Objection. Hypothetical, speculation.
MS. GJOVIK: Still has to answer.
THE WITNESS: If you were -- if you could just clarify the question. If you were saying -- you're saying that if you disclose in a live discussion with me and the investigator that you have an affidavit, if that would change the confidentiality expectations?
BY MS. GJOVIK:
Q It was disclosed in the email; so you already knew that.
I'm asking, if I asked for clarification -- if you're saying -- when you say it's confidential and you can't share with anyone, and I said, does that apply for my affidavit to the government, what your answer would be?
MS. RIECHERT: Same objections. Hypothetical, speculation.
MS. GJOVIK: Okay. He still has to answer.
THE WITNESS: I would probably take partnership with my management team because I'm not familiar with that process.
///

Page 95

BY MS. GJOVIK:
Q Okay. So the employee said that in the emails that they had that affidavit coming up and was concerned, but I believe you testified that you did not recall ever escalating that or asking for feedback with the management team or anyone else; is that correct?
A My recollection is that the -- I had legal counsel in partnership in that scenario.
Q Oh, so you're saying that the email about the affidavit, that was shared with Apple legal?
MS. RIECHERT: Objection. Instruct him not to answer. Attorney-client privilege.
MS. GJOVIK: This lawsuit is like a sodoku puzzle with your privilege claims, Melinda. I'm trying to put this together.
BY MS. GJOVIK:
Q So okay. If we're in that -- we're in that meeting and I ask that question point blank, you said you'd bring it to your management team. Would that imply that you'd then cancel or pause that meeting so you could talk to them and figure out what to do?
A I don't recall what the specific involvement was at that specific stage.
Q So you just said, if the employee said, I

Page 96

would like guidance if Apple is going to claim that the details of its investigation, this call, are confidential, if I can share that during any affidavit, and you testified you would need to talk to management about that and see what to do because you didn't have expertise on that. If that's occurring during a live phone call on September 9th, how would you handle that?
MS. RIECHERT: First of all, objection that that's not what your email to him said. You didn't ask if you could share it with the government in the affidavit.
MS. GJOVIK: That's what I'm saying. That's the problem, that if I have to raise that at the call and ask and the call is already occurring and he's saying he has to talk to management, who are already on the call, what he's going to do then with that call.
THE WITNESS: Yeah. I would probably --
MS. RIECHERT: You can answer, but the same objections that it's hypothetical. But you can answer the question.
THE WITNESS: Yeah. If you brought that up in realtime during the call, I wouldn't, you know, commit to a specific response. I would probably take

Page 97

some counsel.
BY MS. GJOVIK:
Q Yeah.
What about if I said I would attend but I want to bring a witness, maybe a coworker with me just to have a witness with me? What would you have said?
A I would have declined that request.
Q Okay. And if I had requested to do an audio recording of what's discussed so I have a copy of what's discussed, what would you say?
A I would have declined that request.
Q Okay. Same if I asked for, like, a video recording, like Apple tools, so we could both have a copy of what's discussed, what would your response be?
A I would also have declined that request.
Q And let's say we do have the call and there is discussion and then I go on Twitter about it and complain that Apple is retaliating against me and talk about what's discussed but you had said it was confidential, would you find that's probably a breach of your confidentiality rules if I'm complaining and sharing details of what's discussed?
MS. RIECHERT: Objection. Hypothetical,

Page 98

speculation.
BY MS. GJOVIK:
Q Please answer.
A You know, I can't control -- we can't control how -- you know, what you post on social media. And I think you have discretion to talk about your workplace conditions and experience, but posting something that's confidential would be a violation of our policies.
Q And you're saying that the entire interview that you were trying to schedule would be confidential by default?
A Correct. It's confidential.
Q So if that discussion included complaints about workplace conditions, you're saying that would be confidential?
A The workplace conditions is separate from the actual investigation that was going to be facilitated.
Q Mr. Kagramanov, are you aware that the stated reason for firing me by Apple includes an article that includes the photos of my face from the Glimmer app and a "Verge" article called "Apple Cares About Privacy Unless You Work At Apple," and the Twitter post reference, we're also sharing that

Page 99

article. And there was a number of Apple employees coming together to complain about their work conditions that they felt were invasions of their privacy by Apple using Apple's tools and processes.
And you can answer -- you don't know that, you already said. You weren't aware of that; right?
A No.
Q Assuming facts not in evidence that that is true, then the conversation for that investigation would, by its very nature, be all about work conditions. And so then the rule of not sharing what's discussed then would include work conditions. And then if I was to complain about it later based on the rule you just shared and testified to, that would be violating the confidentiality rule that Apple created; is that correct?
MS. RIECHERT: Objection. Calls for a legal conclusion.
MS. GJOVIK: He created a confidentiality --
MS. RIECHERT: And also hypothetical -- improper hypothetical and speculation.
MS. GJOVIK: Still has to answer.
THE WITNESS: Again, discussing workplace conditions, you know, you have that discretion. Discussing the confidential nature of the actual

Page 100

investigation would be in violation.
BY MS. GJOVIK:
Q So are you standing by your prior testimony that anything that was discussed during that call then would be considered confidential and the employee is not to share it?
A The nature of that investigation and the meeting would be confidential.
Q Okay. What if the employee was to go to Twitter and complain that Apple's called them to a meeting and said they thought it was intimidation and retaliation and was complaining about some prior posts they made in generalities? Would you say that is a violation of the confidentiality rule you created for that meeting?
MS. RIECHERT: Objection. Improper hypothetical and speculation.
BY MS. GJOVIK:
Q You can still answer.
MS. RIECHERT: And vague. I'm not sure exactly -- if you can perhaps repeat the question.
MS. GJOVIK: You know that's what I do, Melinda.
BY MS. GJOVIK:
Q Please answer.

Page 101

A Again, the actual nature of the investigation was discussed in the meeting. The investigation would be confidential.

Q And if an employee asks you for an agenda of one of these calls beforehand, is that something that you'll provide if requested?

A I don't recall ever doing something like that.

Q So, like, in this case, if the employee asked for the details of what allegations are being made against them so they know what's going to be discussed, is it typical for you to say no and deny that request?

A I would say, yes.

Q Mr. Kagramanov, are you aware that the NLRB and NLRA, National Labor Relations Act, has case law that gives employees something called Johnny's Poultry rights?

A I do not.

Q Are you aware that if an employee has a charge filed with the NLRB and there are proceedings underway, an investigation, and all of a sudden the employer wants to call them in and talk to them about stuff that is related to or intersected with the protected activity in charge, that they have rights

Page 102

to ask for agendas and ask for eyewitnesss and reassurances that that meeting would be used for retaliation or to interfere with their participation in board proceedings?

A I'm not aware.

Q And if that is -- assuming that's true -- and you have to take my word for it for this sake so Melinda can do her objections -- wouldn't it seem reasonable that if an employee raises that they have an open proceeding with you, that it would be reasonable to engage labor counsel or get more information to ensure Apple is not violating labor laws in its investigation into that employee?

MS. RIECHERT: Objection on many bases. Calls for legal opinion, calls for a hypothetical, calls for speculation (audio distortion) and its employee might do.

BY MS. GJOVIK:

Q Yep. Yep. Still answer.

A Yeah. I'm not familiar with that process. So I can't speak about it.

Q Is it your understanding that the National Labor Relations Act applies to Apple and Apple employees?

A I'm not aware.

Page 103

Q Not aware.

Do you know what the National Labor Relations Act is?

A I've heard of it. I don't know exactly what.

Q Are you familiar with any California labor laws?

MS. RIECHERT: Vague.

THE WITNESS: Not specifically.

BY MS. GJOVIK:

Q Are you familiar that California labor laws protect employees' ability to talk about work conditions and protest work conditions?

A Correct. Yeah, from what I mentioned earlier.

Q Are you aware that in California, that even private employees have a constitutional right to privacy under the California Constitution that includes a constitutional right to protest invasions of privacy by their employer?

A I am not aware.

Q Are you aware that California Labor Code also says that based on constitutional rights like that, an employee has a right to talk publicly and with coworkers about their work conditions arising

Page 104

from the constitutional rights?

A I'm not aware of that.

Q Yeah.

So I'm going to share Exhibit I, as in igloo.

Mr. Kagramanov, are you aware that the NLRB issued a complaint against Apple for unlawfully suspending me and terminating my employment?

A I am not aware.

(Exhibit I was marked for identification.)

BY MS. GJOVIK:

Q This is Exhibit I. There's been some changes and back-and-forth on what's the scope of the charges, but this is the one that was issued on -- where's the date on this one? -- December 18, 2024. And this is based on Charges 282142 and 283161. These were filed -- the first one August 26, 2021. Mr. Kagramanov, is that prior to you contacting Ms. Gjovik?

A Correct. Yeah.

Q And Ms. Gjovik told you she had charges -- an NLRB charge filed against Apple when you contacted her. That's correct; right?

MS. RIECHERT: Objection. Document speaks for itself.

Page 105

MS. GJOVIK: Uh-huh. He can still answer that one or does that one block me?
MS. RIECHERT: Go ahead.
BY MS. GJOVIK:
Q Okay. And then the next charge -- let's see. This charge -- I'm asking Melinda for legal advice just like a professor. She's done this for a really long time. She's very smart.
Okay. So then the second charge is 283161, and that one was filed by me on September 16, 2021, and included the termination of my employment. And your emails to me also were something I complained about, which I told you in email.
Are you aware that a charge was filed over that?
A I was not aware.
Q Yeah.
And so that was filed while you were still working at Apple; right? You said you didn't leave Apple till 2023; is that correct?
A From my recollection, yes, somewhere around 2023.
Q And so just to confirm, Apple never notified you that this case you worked on resulted in LOB proceedings?

Page 106

A I don't recall being notified of this.
Q Okay. And did Jenna Waibel and Ekelemchi Okpo -- you said these were your coworkers; right?
A Correct.
Q And they're named in this complaint.
There's a number of complaints I made that they -- the NLRB took action on. And it includes in -- let's see. What was this one? -- paragraph 8 on page 4, Section D: About September 9th, 2021, respondent discharged its employee, Gjovik. And then E, respondent engaged in the conduct described in paragraphs 8C and 8D including that termination because Gjovik engaged in the conduct described in paragraphs 8A and B, which is the NLRB -- the National Labor Relations Board, saying Apple suspended or terminated Gjovik. Because of employee Gjovik concertedly complained to respondent regarding the wages, hours, and working conditions of respondent's employees by inter alia, raising workplace health and safety concerns, and engaged in the concerted activities for the purpose of mutual aid and protection by inter alia circulating in the petition amongst employees regarding return-to-work concerns, talking to newspaper outlets about employees' workplace complaints and concerns, posting

Page 107

about workplace complaints and concerns on social media, as well as respondent's Slack channel platform.
Are you aware of any of this?
A I was not aware.
Q And the NLRB says: By the conduct described, respondent has -- Apple has been interfering with, restraining, and coercing employees in the exercise of rights guaranteed in Section 7 of the Act of Section 8(a)(1) of the act.
And then the NLRB's complaint also was going to ask Apple to reinstate my employment, Ashley Gjovik's employment. Are you aware of that?
A I was not aware.
Q And this complaint was -- the NLRB was going to sue Apple and ask Apple to, among other things, send a letter to Gjovik apologizing for suspending and terminating her.
Were you aware of that?
A I was not aware.
Q Do you think that if Apple's conduct in this case could result in such a complaint and legal action, that perhaps Apple should have been more careful about how it handled this investigation that you were asked to support into this employee while

Page 108

this employee was complaining about the NLRB proceeding while you were communicating with her?
MS. RIECHERT: Objection. Assumes facts not in evidence, lack of foundation, calls for a legal conclusion.
BY MS. GJOVIK:
Q Please answer.
A I cannot speak to Apple's position on this matter.
Q In retrospect, do you feel like perhaps you have -- should have asked more questions or escalated this matter or been more careful in how you handled it?
A In retrospect, I mean, I -- you know, I made the determination we determined in partnership with our legal counsel.
Q That's all you want to say on that?
A Yes.
Q Okay. And now I'd like to look at Exhibit S, as in salmon. This is Apple's very first national settlement agreement with the National Labor Relations Board. This is for Charge 284428 filed by me in October 2021 over Apple's national employment policies, work policies, and including its intellectual property agreements, at least the

Page 109

version it was using with me and other employees back to 2015. And Apple had a charge filed by the NLRB over this matter, alleging that their policies and work rules that were outlined, the specific ones, violated national labor laws, specifically the NLRA. And Apple decided to settle it and voluntarily withdraw problematic terms and agree to not enforce the terms that the NLRB had alleged were unlawful.

Were you aware of this, Mr. Kagramanov?

A I was not aware.

(Exhibit S was marked for identification.)

BY MS. GJOVIK:

Q And as part of this, Apple had to post a three- page notice posting for its employees with a long list of things it promises it will not do going forward as part of the settlement agreement. This is page 1, page 2.

MS. RIECHERT: I will object to your characterizations of what this agreement said. The agreement speaks for itself. Just because you characterized it a certain way doesn't mean that that's accurate.

You're just asking the witness if he's aware of this?

MS. GJOVIK: Your objection is just

Page 110

characterization; right?

MS. RIECHERT: No. It's -- I'm objecting that the document speaks for itself and you're not properly -- necessarily properly paraphrasing the document.

BY MS. GJOVIK:

Q Okay. And then this document is signed. The MLS is Apple's lawyers that they hired from Martin Lewis. And the AMG, that's me. So I signed it with Apple and NLRB. It's called a trilateral national settlement agreement, and it applies to all of Apple's national employment policies. And that was signed -- what's the date on this one? This was in April 2025. And there was a lot of press coverage about it, actually. And did you see any press coverage about this?

A I do not recall seeing any press coverage on this.

Q And as part -- so as part of one these things Apple promises it will not do anymore, it says: We will not promulgate, maintain, or enforce a misconduct or discipline policy that fails to reiterate employee rights during investigations that Apple may conduct regarding alleged unfair labor practices under the National Labor Relations Act

Page 111

and/or contains overly broad restrictions on photography and recording.

Were you aware that Apple agreed that it would change its policies regarding recording in employee investigations?

A I was not aware.

Q Yeah.

MS. RIECHERT: I think he was gone by Apple -- from Apple, if I'm not mistaken.

MS. GJOVIK: I can't hear you.

MS. RIECHERT: I think he was gone by that point from Apple, he said, by this -- 2025.

MS. GJOVIK: Yeah.

BY MS. GJOVIK:

Q But now, in retrospect, would you maybe reconsider your prior stated position on recording, considering this?

MS. RIECHERT: Objection. Improper hypothetical, speculation.

BY MS. GJOVIK:

Q Still answer.

A Our position at the time was our position at the time.

Q Okay. You have very little information to provide. It sounds like you're being cooperative,

Page 112

and I appreciate you showing up and answering my questions. And it sounds like you probably just were not provided much information at all of what was going on. So I'm sorry you were put in that position.

And I'm going to try to think of more questions to ask because I want to use my time. But while I'm looking at my list also, is there anything you would like to add to the record or share?

A No.

Q Regarding the confidentiality rules for investigations, have you -- do you recollect any other employees -- any employees complaining about the assertion that the investigation itself should be considered confidential?

A I don't recall a specific instance.

Q And you said you were generally present on these calls for these investigations?

A That's correct.

Q Do you recall any of these calls where an employee complained that they thought that the investigation was pretext or retaliation?

A I can't recall a specific instance of that.

Q Do you recall any of these types of phone calls with the investigation into the employee where

Page 113

Apple tries to get the employee to agree to voluntarily leave the company during the call?

A I don't recall a specific instance of that as well.

Q And were you ever, that you recall, provided any information -- because you -- sorry. Back up.

You had said that you -- generally, your employee relations function was assigned to the global security organization. So if a global security employee has an employee relations issue, concern, you'd be the default one to investigate it. But then you may also be called in for the workplace violence and threat assessment stuff for any other organization at Apple in the Americas; is that correct?

A That's correct.

Q Okay. And then were you provided any context, any information of why you were being brought in to support a hardware engineering employee who was being subject to an investigation that you testified was not related to workplace violence or threat assessment?

A I don't recall being -- being told any kind of context.

Q Do you recall any other cases where you were

Page 114

being asked to support an investigation into a non-global security employee who was being investigated by global security?

A I can't recall a specific case for that.

Q Other than Ashley Gjovik.

A That's correct.

MS. GJOVIK: Do you want to take, like, ten minutes? I'm going to walk my dog and think if I can see any more questions because I'm going to pay this court reporter a lot of money anyways; so I'm going to think of more questions. We can take a little break.

MS. RIECHERT: Fine with me to take a break.

MS. GJOVIK: What was that?

MS. RIECHERT: Fine with me. We can take a break.

MS. GJOVIK: Okay. So we can come back, let's say, 10:30?

MS. RIECHERT: Okay.

MS. GJOVIK: Thank you, guys.

(Recess taken.)

MS. GJOVIK: Okay. So we can go back on the record.

BY MS. GJOVIK:

Q I did think of one other thing I'd like to

Page 115

do. So I'd like to share Exhibit K with you. This is Apple's privilege log.

So of course, I'm not asking you to disclose anything that's protected by privilege. And Melinda will, of course, object to anything that touches that. So I don't want to know the content of what's shared.

But this is a privilege log that Apple provided during the litigation, and -- for this case, and there are eight references to your name. And I thought it might help you recollect perhaps the people you were talking to or messages sent about the case. And maybe this helps -- this is information that Apple's counsel already shared in a privilege log. So maybe not sharing more than this, if this is protected by privilege, but you could maybe remember which specific people you were talking to.

So with the first one, this is row -- it's really small. I'm sorry. They use, like, size 8 font. This row 261 on September 9, there's a row for communications on messages app with attachments between Isela Perez, Adelmise Warner, Alex Kagramanov, and Joni Reicher. And it says direct message with Warner, Kagramanov, and two others.

Do you recall texting with those three other

Page 116

people on September 9th about this matter?

A I do not recall texting.

(Exhibit K was marked for identification.)

BY MS. GJOVIK:

Q Okay. Is it typical for you to text with HR or legal when you're assisting with investigations?

A I think it's case by case on those situations.

Q Okay. And this text message does not include Sophi Jacobs from what I can tell. So do you recall communicating with HR and legal but not including Sophi regarding this matter on the 9th?

A I do not recall the nature of that exchange.

Q Do you have any thought about what you would be talking to regarding this matter to HR legal without including Sophi?

A Yeah, I do not recall what that exchange would have been.

Q And let's go -- just so you recall who people are, this is Apple's little chart, actually.

So they have you as an employee relations business partner. And Isela Perez is listed as corporate attorney manager for legal-HR. Joni Reicher is listed as employee relations senior director for people support ops.

Page 117

So in that thread, you'd have -- you'd be messaging with both legal executives and HR executives but without Sophi Jacobs. And you have no recollection of what that was about?

A Yeah, I don't recall the nature of that exchange.

Q Okay. And then on row 273 of Exhibit K, between September 7th and September 9th, there's 20 replies in an email with attachments sent by you, Adelmise Warner, Isela Perez, and Debbie Rice.

Do you remember Debbie Rice too, maybe the title?

A I don't recall her exact title. I believe it was legal.

Q Senior director, legal-HR?

A Yeah.

Q In your experience, when you were supporting these investigations, is it typical for you to work with directors and senior directors in HR and legal?

A I would say it's case by case.

Q Can you recall any other cases where you were messaging directly with senior directors about the case?

A I cannot recall a specific case.

Q Other than Ashley Gjovik?

Page 118

A Correct.

Q And let's see. So for this one, we can go back to that 9/7 one. Where did that go?

So on the 9/7 to 9/9, we have emails sent by yourself and Ms. Warner and Perez and Rice, all these executives, and the thread also had this Melissa Polinsky and Sophi Jacobs on it with 20 replies.

Does that help your recollection that's maybe the email where you got looped in on this investigation on the 7th?

A I don't recall specifically. Could be when I got looped in.

Q And the subject line is listed by Apple as AG forward internal application Glimmer/Gobbler, privileged and confidential, and then attachment is AG talkingpoints.pages.

Do you remember anything about that?

A I don't recall that specific attachment.

Q Okay. And then let's see. Where's the other one?

We have another email on the 9th. It's sent by you. So this column, sent by you. It's row 269, to Isela Perez, Debbie Rice, Adelmise Warner, Joni Reicher, and Deirdre O'Brien email with attachments and six pages. And it was titled AG emails, with a

Page 119

screenshot 2021/09/09. And this was just sent by you per Apple's record. So you would have screenshot something and sent a message called AG emails.

Does that help your recollection if you were sharing the emails you had with Ashley Gjovik with other people at Apple?

A I don't recall the specific nature of the attachments or the email exchanges.

Q Okay. Do you have any idea what else you would be sharing with them referencing AG emails at the same time you were emailing Ashley Gjovik?

MS. RIECHERT: Objection. Speculation.

THE WITNESS: Yeah, I do not.

BY MS. GJOVIK:

Q Okay. Is it typical for you to send updates about the supporting employees through these investigations by global security to Deirdre O'Brien?

A I don't recall a specific case.

Q Other than Ashley Gjovik?

A Correct.

Q And do you recall who Deirdre O'Brien is?

A I don't recall her specific title. I believe it was, like -- she was, like, the head of HR.

Q And retail, yes.

Page 120

Let's go find her actual -- we'll put that -- O'Brien -- O'Brien, senior vice president of people and retail.

Do you recall why you would be sending updates about the investigation into Ashley Gjovik just setting up a phone call with Sophi Jacobs -- sending updates to the senior vice president of HR and retail at Apple?

A I don't recall the nature of what led up to that.

Q And you're saying you don't recall what you were screenshoting in those messages you sent them that you attached here?

A That's correct.

Q And then we have another one on September 9th sent by you, email with attachments, two pages, to Tony DeMario and Sophi Jacobs.

Who's Tony DeMario?

A I believe he was Sophi's manager.

Q It says global security manager, investigations and child safety. Sound right?

A That sounds right.

Q And so it says you sent them messages, AG intro email draft with attachment AG intro email pages.

Page 121

Does that sound right?
A Yeah, that sounds right. I just don't recall the nature of what that entailed.
Q Okay. And are Tony or Sophi attorneys?
A I do not know.
MS. RIECHERT: Objection. Lacks foundation.
BY MS. GJOVIK:
Q What?
A I do not know.
Q Okay. And then let's see. We have another one here. You're on this one. This is another September 9th sent by Adelmise Warner and Sophi Jacobs to the larger group including yourself, email attachments, three pages. And it says confidential and privileged and then a bunch of UTF8 AshleyGjovik.VCF. Do you know what that is?
A I do not know what that is.
Q Does that sound like maybe, like, a contact information attachment, like, how to call Ashley if you want to call Ashley?
A I cannot speculate. I don't know what that is.
Q Okay. And did looking at any of these help you direct, like, any further details about your role in supporting this investigation?

Page 122

A Other than some of the names involved, no.
Q Okay. And you had previously mentioned that you weren't aware of the details of what the alleged disclosed information was, but that one subject line we saw said Glimmer/Gobbler. Is that -- do you recall if that's how you knew the general assertion of what was the asserted leak?
A Yeah. That was probably my extent at that time of knowledge.
Q Okay. I'll stop sharing.
So when you would handle these type of investigations, when you're asked to look into something, does sometimes, maybe by the nature of who's asking to have it investigated, like, if it's top execs, it seems like that it might be a more sensitive matter than a typical matter? So if you were being asked to give updates to the senior VP and senior directors directly, that this might seen unusual compared to your typical coordination of setting up meetings for global security investigations?
MS. RIECHERT: Objection. Improper hypothetical, assumes facts not in evidence.
MS. GJOVIK: Okay. He has to answer.
THE WITNESS: Again, I think it's case by

Page 123

case. It depends on -- sometimes if an executive, you know, pushes down an investigation, we assess and determine complexity, urgency, and develop a plan.
BY MS. GJOVIK:
Q Yeah.
So you said the executive pushes down on the investigation. So looking at this, does this kind of resemble a case -- you don't recall directly for this because you say you don't recall -- where maybe an executive asked for an investigation of the employee?
A I don't recall how it was actually initially escalated.
Q Okay. Can you think of a reason why you'd be giving, like, realtime updates to senior leadership unless they were the ones that asked for those updates?
A Yeah, I don't recall the prompting of that or --
Q Do you typically -- do you typically send senior executives just updates as stuff happens?
A It would be depending on the nature of the case.
Q What kind of cases would prompt you to send senior executives at Apple realtime updates on the support of employee investigations?

Page 124

A I'm not sure. I don't recall, like, a specific case of -- or what would be, you know, discussed in those situations.
Q Other than the Ashley Gjovik case?
A Correct.
Q So considering everything we've looked at now and reviewed and talked about, I'm going to ask again, is there anything that you want to add or supplement or correct from -- based on your prior testimony?
A No, nothing said.
Q Okay. And I guess, just again, now considering also reviewing that privilege log and those documents too and refreshing of who you were interacting with, certain things like the NLB cases and developments, if in retrospect you might have handled the situation with Ashley Gjovik differently had you been provided more information?
A I think the situation was handled in the manner that it was for the time in partnership with out legal counsel.
Q Even if that was found by the federal government to be unlawful?
MS. RIECHERT: Objection. Assumes facts not in evidence.

Page 125

MS. GJOVIK: Oh, no. We showed the complaint, though.
Sorry. Let me correct.
BY MS. GJOVIK:
Q The government found substantial evidence supports that the conduct violated federal labor laws specifically the NLRA.
MS. RIECHERT: Now -- (audio distortion).
(Reporter clarification.)
MS. RIECHERT: My recollection is that the government found that -- through the complaint, found that you were not fired for retaliation; that you were properly fired for the conduct you engaged in.
MS. GJOVIK: Speaking objection. You're not being deposed. That's not an actual objection. And that is after Apple got its own defense counsel appointed as the general counsel at the NLRB. So it's kind of tainted, Melinda. But I understand your position.
Okay. Let me just think if I have anything left.
BY MS. GJOVIK:
Q Can you think of any other cases where you were supporting a global security investigation and you say you don't have any insight into what the

Page 126

actual details of the investigation was or background but that you were providing updates to senior executives without the global security person who was leading the investigation?
A No. I can't recall a specific case of that.
Q Other than Ashley Gjovik?
A That's correct.
Q What was your relation with Sophi Jacobs?
MS. RIECHERT: Objection.
(Reporter clarification.)
MS. RIECHERT: Vague. Sorry.
BY MS. GJOVIK:
Q What was your working relationship with Sophi Jacobs? Like, did you interact regularly?
A If there was a case that came up, and depending on who was assigned to that case. It's not always Sophi that was assigned to a specific case.
Q You worked with her prior?
A Correct.
Q Do you recall if she had other investigations she asked for support with that requested a response within the hour from the employee?
A I don't have insight into her specific investigations.

Page 127

Q I mean the ones that you assisted with that you provided support for.
A Yeah, I don't recall a specific case.
Q Other than Ashley?
A Correct.
Q Than Ashley Gjovik.
Okay. And then is it typical that you are not made aware of the outcome of the investigations?
A I don't recall the process. I believe it would be typical in some cases to be made aware of an outcome.
Q Yeah.
Actually, so let's say global security is investigating the employee and does find that they violated some policy and thinks that some action should be taken against the employee. Assumably, they're going to go to HR, probably employee relations to try to facilitate that discipline process and -- because it wouldn't necessarily be the person's supervisor probably in, like, a functional unit that's, like, leaking.
So would it be more typical that if they do want to take action, they'd engage you or your team to help facilitate the discipline process?
MS. RIECHERT: There's a lot of assumptions

Page 128

in there that are improper.
MS. GJOVIK: That's fine.
You're still really muffled. Can you get closer to your computer.
MS. RIECHERT: Yes. I'm not sure why that is. Maybe it's the audio -- could you repeat your question or rephrase it.
MS. GJOVIK: It was long, and I already forgot.
BY MS. GJOVIK:
Q Oh, if global security is investigating an employee and does think that they leaked and violated some policy, so it's the -- global security wanted to discipline an employee rather than, like, the employee's supervisors, would the process be, like, global security would engage employee relations to help facilitate the discipline or termination process?
A Yeah, I don't recall the exact process there. But I mean, global security has their own policies that they investigate.
Q Can they just decide to fire employees themselves?
A Yeah, I don't recall that process.
Q And if someone at Apple wants to terminate

Page 129

an employee's employment, saying they violated some policy, are they supposed to go through employee relations?

A I don't recall the process.

Q Okay. Assumably, they would have to involve HR to, like, end the employment status; correct?

A Correct. There's a level of HR involvement.

Q And are there policies or protocols for someone reviewing the requested reason to terminate the employee within HR employee relations when someone wants to fire an employee?

MS. RIECHERT: Objection. Lacks foundation.

BY MS. GJOVIK:

Q Okay.

A Yeah, I don't recall the process.

Q So in this case, because there were, like, senior ER and HR executives involved getting updates on this, if someone in HR is facilitating that termination, safe to assume they skipped you because your superiors were already involved, the ones you were emailing?

MS. RIECHERT: Objection. Lacks foundation.

MS. GJOVIK: Still has to answer.

THE WITNESS: Yeah, I don't recall what or how it was prompted for my level of engagement.

Page 130

BY MS. GJOVIK:

Q And you say you worked in employee relations. So, like, Deirdre O'Brien was, like, your boss, right, top boss; is that correct?

A That would be correct.

Q Frozen. Sorry.

A It's frozen.

Q It's frozen.

But you said that Deirdre O'Brien -- so under Tim Cook, Deirdre O'Brien would be the highest-level person that you reported up under?

A Yeah. I believe that would be the case.

Q Okay. Did you regularly provide updates on any other cases or activities that you were working on to Deirdre O'Brien, that you recall?

A No. I don't recall a specific case.

Q Other than Ashley Gjovik?

A That's correct.

Q Did you have any, like, updates you'd provide her? Status updates? Any meetings you'd have with her regularly, ongoing? Any regular communication with Deirdre O'Brien?

A No.

Q Do you recall any other communication you had had with Deirdre O'Brien in those three years you worked in that role?

A No. I don't recall any since.

Q Other than the noted emails about Ashley Gjovik?

A That's correct.

MS. GJOVIK: Well, that's cool. So when you had to meet Deirdre O'Brien, it was about me.

Okay. We're at 10:52. I thank you for your time. I know you don't work there anymore. I appreciate you answering the subpoena and answering all my questions. Again, it sounds like you just weren't provided a lot of information about this stuff. So I appreciate you answering what you could answer, and thank you again for your time.

MS. RIECHERT: So I'd like to reserve the right of the witness to read and correct the transcript once he receives a copy of it.

MS. GJOVIK: Within the rules allowed under federal and California laws. He can't just completely change responses. You can correct errors and stuff, of course, within allowances, yeah.

MS. RIECHERT: And I'd like an expedited and a rough, please.

MS. GJOVIK: And, like, I'm filing my summary judgment motion in, like, a week. So you're

Page 132

definitely not going to -- would you plan to have any corrections you're going to have before the deadline for me filing my motion or are you going to claim that I can't use this as evidence until you file whatever corrections?

MS. RIECHERT: You do what you think you should do. I can't -- I can't answer that question.

MS. GJOVIK: Okay. This is the first time you've said that you're, like, planning on correcting anything. Can you share if you already noticed things that you want to have corrected?

MS. RIECHERT: Not at all.

MS. GJOVIK: Okay. She's a lot of fun. Melinda keeps me on my toes.

Okay. Thank you, everyone.

(Deposition concluded at 10:53 a.m.)

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and date herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were duly sworn; that a record of the proceedings was made by me using machine shorthand, which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [X] was [ ] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: 04/18/2026

Vesna Walter
RPR, CCRR, CSR No. 11989

DECLARATION UNDER PENALTY OF PERJURY

Case Name: Ashley Gjovik
vs. Apple Inc.
Date of Deposition: 04/16/2026
Job No.: 10188334

I, ALEKS KAGRAMANOV, hereby certify under penalty of perjury under the laws of the State of _____ that the foregoing is true and correct.

Executed this _____ day of _____, 2026, at _____.

ALEKS KAGRAMANOV

NOTARIZATION (If Required)
State of _____
County of _____
Subscribed and sworn to (or affirmed) before me on this _____ day of _____, 20__,
by_____, proved to me on the basis of satisfactory evidence to be the person who appeared before me.
Signature: _____ (Seal)

DEPOSITION ERRATA SHEET

Case Name: Ashley Gjovik
vs. Apple Inc.
Name of Witness: Aleks Kagramanov
Date of Deposition: 04/16/2026
Job No.: 10188334

Reason Codes: 1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page _____ Line _____ Reason _____
From _____ to _____

DEPOSITION ERRATA SHEET

Page _____ Line _____ Reason _____
From _____ to _____

_____ Subject to the above changes, I certify that the transcript is true and correct

_____ No changes have been made. I certify that the transcript is true and correct.

ALEKS KAGRAMANOV