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United States District Court
Western District of Washington

KATHERINE MOUSSOURIS, HOLLY
MUENCHOW, and DANA PIERMARINI
on behalf of herself and a class of those
similarly situated,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 15-cv-1483 (JLR)

DECLARATION OF HEIDI BOEH

I, Heidi Boeh, declare as follows:

1. I am a woman residing in Seattle, Washington.
2. I have personal knowledge of the facts set forth in this Declaration, and

could and would testify competently under oath if called as a witness. I understand that a class
action lawsuit alleging employment discrimination has been filed against Microsoft Corporation

1 (“Microsoft”), and that this Declaration may be used by the plaintiffs in connection with this case.

2 3. I was employed in the Redmond, Washington office of Microsoft from
3 approximately 1999 to 2006 and 2010 to 2014. In January 2010, I was hired as a Senior Program
4 Manager, Level 62. I became a Senior Content Project Manager, Level 62, in September 2010.
5 In September 2011, I was promoted to Level 63. After leaving the company in 2014, I returned to
6 Microsoft’s Seattle, Washington office in 2016, where I am currently employed in a role outside
7 Engineering.

8 4. I have been provided with a copy of the Second Amended Complaint and
9 am familiar with the allegations it sets forth in the class action against Microsoft. I believe that
10 my own experiences at Microsoft are similar to those described in the Complaint.

11 5. I believe that Microsoft discriminated against me during my time in
12 Engineering by denying me a promotion that I should have been granted. Specifically, in
13 approximately 2010, I had recently returned from maternity leave. I believe I should have
14 received a promotion in that year’s review cycle because my performance warranted one.
15 However, my manager, Stuart Macrae, told me he understood that I would want to “time” my
16 children to be close in age, so he did not want to “waste” a promotion on me in case I became
17 pregnant again. As a result of this discrimination, Microsoft denied me a promotion that it
18 provided to similarly-situated men.

19 6. I believe that Microsoft also discriminated against me in the way it
20 compensated me. By keeping me at a level below the one for which I was qualified in 2010, I
21 was denied a higher salary and the corresponding opportunity to move up faster. A compensation
22 issue has arisen again in my position outside Engineering. Although I have received excellent
23 performance evaluations and am a member of the “Leadership Team” (LT) for my Group in the
24 Supply Chain and Operations Management profession, I have been held at a level 62 while I
25 believe my male peers are above my current Level. Additionally, I believe this is a systemic
26 problem at Microsoft, because I was recently tasked with hiring two full-time employees for the
27 same role. The candidates I chose to hire were a man and a more experienced woman. Recruiting
28 initially suggested offering the man higher stock award than the woman even though the man had

1 less experience than her.


2 7. I believe that Microsoft maintains a culture that is uncomfortable and
3 unfriendly toward women and that complaining to HR about it only subjects the complainant to
4 more pain. For example, in or around 2002, I was sexually harassed by a male co-worker. I
5 sought advice from the Human Resources Department regarding the situation, but HR failed to
6 properly address the harassment while increasing the pain and stress of my situation.

7 8. I believe that making complaints about pay and promotion bias to
8 Microsoft's Human Resources Department will not make any difference. I complained to HR in
9 2010 about my manager's failure to promote me due to his belief that I would become pregnant
10 again. HR failed to respond to my request for a meeting or follow up with me in a timely manner.
11 I also recently complained to HR about the gender disparity in initial compensation offers I
12 noticed between the two people I hired around July 2017. To date, I have not received a response
13 from HR.

14
15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct to the best of my knowledge.

17 Executed this 27th day of October, 2017, in Seattle, Washington.

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Heidi Boen