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6 Attorney for Respondent-Wife
7 Gloria Hejna

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA,
9 IN AND FOR THE COUNTY OF SANTA CLARA

10
11 In Re the Marriage of

12 Donald J. Hejna,
13 Petitioner-Father,
14 vs.
15 Gloria G. Hejna,
16 Respondent-Mother.

No. 1-02-FL110873

DECLARATION OF DAN
WILEY

17
18 I, DON WILEY, do hereby declare the following:

19 1. I have known Gloria Hejna for about four years. I first met her when we worked
20 together at Oracle Corporation as part of a sales and development team, and established a social
21 friendship with her outside of the workplace. Through Gloria I met her husband Don Hejna, and
22 over the years my significant other and I would get together socially with Gloria and Don from
23 time to time. The four of us have gone out to dinner, gone to movies, met for coffee, and have
24 been to each others' homes on a social basis. Generally when we would go on outings together or
25 when we would socialize, we would fall into the stereotypical pattern of Gloria and my
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1 significant other talking among themselves and Don and I talking among ourselves for significant
2 portions of our time together. During the time I spent with Don and Gloria, I consider myself to
3 have become equally friendly with them both.

4 2. During our outings as couples, Don would sometimes verbally berate and criticize
5 Gloria in front of my significant other and me for things like the children's behavior or for
6 statements she had made with which he disagreed. I found his put-downs of her inappropriate
7 and embarrassing. Gloria looked as if she were embarrassed too. Because of the constant
8 belittling of Gloria in our presence, my significant other and I eventually reduced the amount of
9 time we spent with them as a couple.

10 3. I specifically recall on one occasion when Gloria was still a board member of
11 Enounce, Don's company, that we were having a discussion about how to market the Enounce
12 products as that was considered to be my area of speciality when I was working with Oracle.
13 Gloria had, in my opinion, good suggestions about market analysis and target opportunities but
14 Don only chastised Gloria and minimized her input. I was very uncomfortable in this situation
15 and didn't try to have those conversations with the two of them together again. Gloria was
16 markedly upset by Don's criticisms and I remember thinking to myself "is this the same person
17 that I actually work with" because she was so cautious and guarded around Don where in her
18 employment arena she is gregarious, outgoing and not afraid to voice her opinion.

19 4. In the summer of 2003, I contacted Gloria after leaving Oracle and having not
20 spoken with her or Don for some time, to ask if she would mind if I contacted Don to coordinate a
21 presentation of Enounce's products to a potential client of mine. After I had left Oracle and
22 Gloria and I no longer had an employment relationship, I and my significant other made the
23 conscious decision not to further pursue a couples friendship with Don and Gloria because of the
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1 mounting tension between Don and Gloria that we were experiencing during our outings and get
2 together. I had heard that Don and Gloria were going through a separation/divorce and I no
3 longer had Don's contact information and had hoped that she would facilitate the contact between
4 he and I. Gloria was extremely gracious at my helping Don out with the professional opportunity
5 and gladly gave me Don's contact information. She thanked me for thinking of him and
6 expressed her hope that the connection would prove to be positive for Don and his company. I
7 was impressed with her support of Don despite what I had heard were contentious legal
8 proceedings.

9
10 5. I contacted Don and arranged for Enounce to make a presentation to my client.

11 6. The presentation was set for December of 2003. After the presentation, Don hung
12 around and he and I started to catch up. I brought up the subject of the divorce proceedings
13 because I wanted to share with Don my own experiences as a divorced father and hopefully
14 provide some advice about how I had handled things in my situation that might be helpful to him.
15 During our conversation, I mentioned that I understood, because of my own prior divorce
16 experience, how difficult it must be for Gloria and him right now concerning the custody of their
17 children. I advised him, though, that he had to put his own interests aside and think of what was
18 best for the children and further, that exposing the children to contentious litigation was never, in
19 my opinion, best for the children. To my surprise, he responded that he wasn't fighting for
20 custody because he truly did want primary custody of the children, but was doing it just because
21 he wanted to "get at" Gloria. As we engaged in this discussion, Don became increasingly
22 agitated. He stated that he wanted to punish Gloria for leaving the marriage and that he wanted to
23 ruin her financially. I kept trying to help Don understand that there is no winning or losing in
24 these kinds of situations but he was adamant that he was going to win and further that he was
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1 going to get even with Gloria by taking away from her whatever she loved the most – referring to
2 their children. I asked him if he was prepared to be a “single” father raising two children and he
3 stated that he didn’t care about that, hadn’t really given it much thought and that if he had to
4 figure out how to accomplish this task to the detriment of the children just to make Gloria
5 understand that she should never have tried to do this to him, he was perfectly willing to spend
6 their entire savings to get his point across. When I asked him how he thought the boys would fare
7 if their mother was in Arizona and they were in California he simply said “she should have
8 thought of that; I guess they’ll just miss her.”

10 7. As a father, this conversation unsettled me and I have not spoken to Don since that
11 time.

12 I make this declaration under penalty of perjury of the laws of the State of California.

14 Dated: _____

_____ Dan Wiley

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