

**\*\*Deposition of Erna Wiggins\*\***

**\*\*Date:\*\* August 1, 2024**

**\*\*Time:\*\* 9:00 AM**

**\*\*Location:\*\* Hawkins LLP, Conference Room B**

**\*\*Attorneys Present:\*\***

- **\*\*For Plaintiff:\*\* Ryan Backstroem, Esq.**

- **\*\*For Defendant:\*\* Jennifer Ryan, Esq.**

**\*\*Court Reporter:\*\* Sarah Johnson**

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**\*\*Ryan Backstroem, Esq.:\*\* Good morning, Ms. Wiggins. Could you please state your full name for the record?**

**\*\*Erna Wiggins:\*\* My name is Erna Marie Wiggins.**

**\*\*Ryan Backstroem, Esq.:\*\* Thank you. Ms. Wiggins, where do you currently reside?**

**\*\*Erna Wiggins:\*\* I live at 123 Maple Street, Philadelphia, Pennsylvania.**

**\*\*Ryan Backstroem, Esq.:\*\* Let's start with your employment history. Where were you employed on January 15, 2020?**

**\*\*Erna Wiggins:\*\*** On January 15, 2020, I was employed at Tech Solutions Inc. as a Senior Project Manager.

**\*\*Ryan Backstroem, Esq.:\*\*** And how long had you been with Tech Solutions Inc. by that date?

**\*\*Erna Wiggins:\*\*** I started working there on March 1, 2015.

**\*\*Ryan Backstroem, Esq.:\*\*** Can you describe your responsibilities at Tech Solutions Inc.?

**\*\*Erna Wiggins:\*\*** I was responsible for overseeing project timelines, managing a team of 10, and ensuring that all projects were completed on schedule and within budget.

**\*\*Ryan Backstroem, Esq.:\*\*** Were you involved in any specific projects in 2020?

**\*\*Erna Wiggins:\*\*** Yes, I was leading the development of the new client management software, which we started on February 10, 2020.

**\*\*Ryan Backstroem, Esq.:\*\*** When was this project scheduled to be completed?

**\*\*Erna Wiggins:\*\*** The initial deadline was set for December 1, 2020.

**\*\*Ryan Backstroem, Esq.:\*\*** Did you meet that deadline?

**\*\*Erna Wiggins:\*\*** No, we encountered several delays. The project was eventually completed on March 15, 2021.

**\*\*Ryan Backstroem, Esq.:** What caused these delays?

**\*\*Erna Wiggins:** We faced several issues, including a server crash on April 5, 2020, and a key team member, Alex Johnson, left the company on June 20, 2020.

**\*\*Ryan Backstroem, Esq.:** How did you address the server crash?

**\*\*Erna Wiggins:** We had to bring in an external IT consultant, who started working on April 7, 2020, and resolved the issue by April 15, 2020.

**\*\*Ryan Backstroem, Esq.:** And how did you handle Alex Johnson's departure?

**\*\*Erna Wiggins:** We hired a replacement, Sarah Lee, who joined us on July 10, 2020.

**\*\*Ryan Backstroem, Esq.:** Were there any other significant events that impacted the project?

**\*\*Erna Wiggins:** Yes, we had a major software bug that was discovered on September 1, 2020, which took until October 15, 2020, to fix.

**\*\*Ryan Backstroem, Esq.:** Did you have any meetings to address these issues?

**\*\*Erna Wiggins:** We had weekly status meetings every Monday at 10:00 AM, and we held an emergency meeting on September 2, 2020, to discuss the bug.

**\*\*Ryan Backstroem, Esq.:** Who attended the emergency meeting?

**\*\*Erna Wiggins:\*\*** The meeting was attended by myself, the IT consultant, Sarah Lee, and our CTO, Michael Brown.

**\*\*Ryan Backstroem, Esq.:\*\*** What was the outcome of that meeting?

**\*\*Erna Wiggins:\*\*** We decided to allocate additional resources to fix the bug and extended the project deadline to March 15, 2021.

**\*\*Ryan Backstroem, Esq.:\*\*** Were there any other notable events during this period?

**\*\*Erna Wiggins:\*\*** Yes, we had a team-building retreat on November 5, 2020, to boost morale, and we received a major client feedback on December 10, 2020, which required some changes to the software.

**\*\*Ryan Backstroem, Esq.:\*\*** How did you handle the client feedback?

**\*\*Erna Wiggins:\*\*** We incorporated the changes into our development plan and completed them by January 20, 2021.

**\*\*Ryan Backstroem, Esq.:\*\*** Did you have any other significant interactions with clients?

**\*\*Erna Wiggins:\*\*** Yes, we had a client presentation on February 5, 2021, where we demonstrated the updated software.

**\*\*Ryan Backstroem, Esq.:\*\*** How was the presentation received?

**\*\*Erna Wiggins:\*\*** The clients were very pleased with the updates and gave us the green light to proceed with the final testing phase.

**\*\*Ryan Backstroem, Esq.:\*\*** When did the final testing phase begin?

**\*\*Erna Wiggins:\*\*** It began on February 10, 2021, and lasted until March 10, 2021.

**\*\*Ryan Backstroem, Esq.:\*\*** Were there any issues during the final testing phase?

**\*\*Erna Wiggins:\*\*** We encountered a minor bug on February 25, 2021, which was fixed by March 1, 2021.

**\*\*Ryan Backstroem, Esq.:\*\*** And the project was completed on March 15, 2021?

**\*\*Erna Wiggins:\*\*** Yes, we delivered the final product to the client on that date.

**\*\*Ryan Backstroem, Esq.:\*\*** Thank you, Ms. Wiggins. I have no further questions at this time.

**\*\*Jennifer Ryan, Esq.:\*\*** I have a few questions. Ms. Wiggins, can you describe the nature of the client feedback received on December 10, 2020?

**\*\*Erna Wiggins:\*\*** The clients requested additional features for data analytics and a more user-friendly interface.

**\*\*Jennifer Ryan, Esq.:\*\*** How did your team respond to these requests?

**\*\*Erna Wiggins:\*\*** We held a brainstorming session on December 12, 2020, and integrated the new features into our development plan.

**\*\*Jennifer Ryan, Esq.:** Were there any additional costs associated with these changes?

**\*\*Erna Wiggins:** Yes, the additional features increased the project budget by 15%, which was approved by our finance department on December 20, 2020.

**\*\*Jennifer Ryan, Esq.:** Thank you, Ms. Wiggins. No further questions.

**\*\*Court Reporter:** The time is now 10:30 AM. This concludes the deposition of Erna Wiggins.