

UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES

OFFICE OF FEDERAL CONTRACT  
COMPLIANCE PROGRAMS, UNITED  
STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

GOOGLE, INC.,

Defendant.

OALJ Case No. 2017-OFC-00004

OFCCP No. R00197955

**PLAINTIFF'S SECOND SET OF REQUESTS FOR ADMISSION TO DEFENDANT  
GOOGLE INC.**

*Case Subject to Expedited Proceedings under 41 C.F.R. § 60-30.31*

Pursuant to 41 C.F.R. § 60-30.9(b), Plaintiff Office of Federal Contract Compliance Programs, United States Department of Labor ("OFCCP") propounds the following requests for admission on Defendant Google Inc.

**DEFINITIONS**

1. The terms "YOU" or "YOUR" refer to Defendant Google Inc.
2. The term "RESELLER" refers to any entity that markets, sells, or otherwise offers YOUR services, including, but not limited to, those entities identified on your "Partner Community" directory, available at <https://cloud.google.com/partners/directory/>.

**REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 30:**

Admit that YOU provide services to the federal government through RESELLERS, including Onix Networking, Inc.; Sada Systems, Inc.; and DLT Solutions, LLC.

**REQUEST FOR ADMISSION NO. 31:**

Admit that YOU provide services to the federal government pursuant to reseller agreements, such as that shown on pages 11-19 of Exhibit A to this set of requests for admission.

**REQUEST FOR ADMISSION NO. 32:**

Admit that, from June 2, 2014 through the present, YOUR revenues for services YOU provided to the federal government through RESELLERS has exceeded \$15 million.

**REQUEST FOR ADMISSION NO. 33:**

Admit that, from June 2, 2014 through the present, YOUR revenues for services YOU provided to the federal government through RESELLERS has exceeded \$25 million.

**REQUEST FOR ADMISSION NO. 34:**

Admit that the data YOU produced in Excel spreadsheets YOU provided to OFCCP on November 24, 2015; December 29, 2015; February 5, 2016; April 8, 2016; August 1, 2016; and January 1, 2017 are stored electronically in a database.

**REQUEST FOR ADMISSION NO. 35:**

Admit that data on the job and salary history for the employees included in the Sep. 1, 2015 snapshot and the requested Sep. 1, 2014 snapshot are stored electronically in a database.

Date: March 20, 2017

NICHOLAS C. GEALE  
Acting Solicitor of Labor

JANET M. HEROLD  
Regional Solicitor

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MARC A. PILOTIN  
Trial Attorney

**CERTIFICATE OF SERVICE**

I am a citizen of the United States of America. I am over eighteen years of age and am not a party to the within action. My business address is 90 7th Street, Suite 3-700, San Francisco, California 94103.

On March 20, 2017, I served the attached **PLAINTIFF'S SECOND SET OF REQUESTS FOR ADMISSION TO DEFENDANT GOOGLE INC. AND EXHIBIT A TO THAT SET** on Defendant Google Inc. through serving its attorneys below via electronic mail, pursuant to the parties' agreement:

Duff, Daniel V., III (Daniel.Duff@jacksonlewis.com);  
Camardella, Matthew J. (CamardeM@jacksonlewis.com);  
Sween, Lisa Barnett (Lisa.Sween@jacksonlewis.com);  
Raimundo, Antonio (Antonio.Raimundo@jacksonlewis.com);  
Suits, Eric (Eric.Suits@jacksonlewis.com)

I declare under the penalty of perjury that the foregoing is true and correct and that this declaration was executed in San Francisco, California on March 20, 2017.



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MARC A. PILOTIN  
Trial Attorney