

APR 16 2019

Office of Administrative Law Judges  
San Francisco, Ca

**UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

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

Plaintiff,

v.

ORACLE AMERICA, INC.,

Defendant.

OALJ Case No. 2017-OFC-00006

OFCCP No. R00192699

**DECLARATION OF JONATHAN  
RIDDELL IN SUPPORT OF  
DEFENDANT ORACLE  
AMERICA, INC.'S UNOPPOSED  
MOTION TO SEAL LIMITED  
PORTIONS OF PLAINTIFF'S  
MOTION TO COMPEL  
HISTORICAL DATA OF  
COMPARATOR EMPLOYEES**

I, Jonathan Riddell, hereby declare as follows:

1. I am an attorney at Orrick, Herrington & Sutcliffe LLP, admitted to practice in the State of California, and serve as counsel to Oracle America, Inc. ("Oracle") in the above-captioned matter. I make this declaration in support of Defendant Oracle America, Inc.'s Unopposed Motion to Seal Limited Portions of Plaintiff's Motion to Compel Historical Data of Comparator Employees ("Motion to Seal"). I have personal knowledge of the facts set forth herein, and if called as a witness could competently testify thereto.

2. The portion of Exhibit 6 to Plaintiff's Motion to Compel Historical Data of Comparator Employees which Oracle seeks to seal includes information Oracle produced to OFCCP as Confidential pursuant to the Protective Order in this case. The Confidential information in Exhibit 6 quotes directly from ORACLE-HQCA0000070747, which is part of an Oracle data production that was designated confidential at the time it was produced.

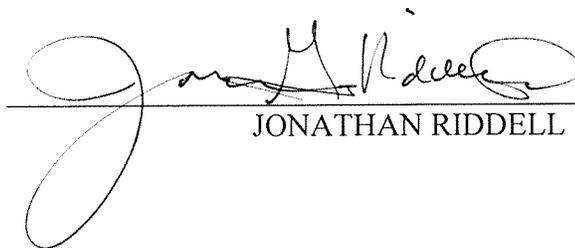
3. Although the May 26, 2019 Protective Order, adopted and amended by this Court's March 22, 2019 Protective Order, includes a provision which states "A motion under this provision

RIDDELL DECLARATION ISO  
UNOPPOSED MOTION TO SEAL  
CASE NO. 2017-OFC-00006

is not subject to the Court's pre-filing requirement," the parties have nevertheless met and conferred on Oracle's Motion to Seal. On April 16, 2019, Plaintiff's counsel advised me that OFCCP will not oppose Oracle's Motion to Seal the information as reflected in the redacted version of Exhibit 6 attached to the supporting Declaration of Kate Waggoner.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on April 16, 2019 in Sacramento, California.



JONATHAN RIDDELL