

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
WARRINGTON PARKER IN
SUPPORT OF DEFENDANT
ORACLE AMERICA INC.'S
SECOND MOTION TO COMPEL
PLAINTIFF OFCCP TO
PRODUCE DOCUMENTS AND
FURTHER RESPOND TO
INTERROGATORIES**

RECEIVED

MAY 03 2019

I, WARRINGTON PARKER, hereby declare as follows:

1. I am an attorney admitted to practice in the State of California, I am a Partner at Orrick, Herrington & Sutcliffe LLP ("Orrick") and counsel to Oracle America, Inc. ("Oracle") in the above matter. I make this declaration in support of Oracle's Second Motion to Compel Plaintiff OFCCP to Produce Documents and Respond to Interrogatories. I have personal knowledge of the facts set forth herein, except where stated on information and belief, and, if called as a witness, could competently testify thereto.
2. On April 18, 2019 and on May 2, 2019, I participated in a telephonic meet and confer conference with Abigail Daquiz of OFCCP regarding Oracle's Request for Production, Set Two, as amended, and Oracle's Interrogatories, Set Two.
3. Attached hereto as **Exhibit 1** is a true and correct copy of Oracle's Request for Production, Set One, served on February 8, 2017.
4. Attached hereto as **Exhibit 2** is a true and correct copy of Oracle's Interrogatories, Set One, as amended, served on May 16, 2017.

PARKER DECLARATION ISO
ORACLE'S SECOND MOTION TO COMPEL
CASE NO. 2017-OFC-00006

5. Attached hereto as **Exhibit 3** is a true and correct copy of OFFCP's Objections and Answers to Oracle's Request for Production, Set One, dated March 6, 2017.
6. Attached hereto as **Exhibit 4** is a true and correct copy of OFFCP's Objections and Answers to Oracle's Interrogatories, Set One, as amended, dated June 12, 2017.
7. Attached hereto as **Exhibit 5** is a true and correct copy of OFCCP's Supplemental Objections and Responses to Oracle's Request for Production, Set One, dated October 11, 2017.
8. Attached hereto as **Exhibit 6** is a true and correct copy of OFCCP's Supplemental Objections and Responses to Oracle's Interrogatories, Set One, as amended, dated October 11, 2017.
9. Attached hereto as **Exhibit 7** is a true and correct copy of Oracle's Request for Production, Set Two, dated February 26, 2019.
10. Attached hereto as **Exhibit 8** is a true and correct copy of Oracle's Request for Production, Set Two, as amended, dated March 12, 2019.
11. Attached hereto as **Exhibit 9** is a true and correct copy of Oracle's Interrogatories, Set Two, dated March 15, 2019.
12. Attached hereto as **Exhibit 10** is a true and correct copy of OFFCP's Responses to Oracle's Request for Production, Set Two, as amended, dated April 5, 2019.
13. Attached hereto as **Exhibit 11** is a true and correct copy of OFFCP's Responses to Oracle's Interrogatories, Set Two, dated April 9, 2019.
14. Attached hereto as **Exhibit 12** is a true and correct copy of relevant meet and confer correspondence between Oracle and OFCCP regarding Oracle's Request for Production of Documents, Set Two, as amended, and Interrogatories, Set Two.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the documents produced by OFCCP to Oracle under the Bates numbers DOL000000805-839.

16. Attached hereto as **Exhibit 14** is a true and correct copy of a letter sent by the Department of Labor to Ramesh Chakravarthula on April 4, 2019.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the article entitled “J&R Baker Farms Sued by EEOC for National Origin and Race Discrimination against American Workers”, dated August 24, 2014 and available at <https://www.eeoc.gov/eeoc/newsroom/release/8-28-14.cfm>.

18. Attached hereto as **Exhibit 16** is a true and correct copy of the article entitled “New Oracle chief’s Kerala roots,” dated January 11, 2015 and available at <https://www.thehindu.com/business/Industry/new-oracle-chiefs-kerala-roots/article6775912.ece>

19. Attached hereto as **Exhibit 17** is a true and correct copy of Oracle’s 10-K filing for the fiscal year 2014, available at <https://www.sec.gov/Archives/edgar/data/1341439/000119312514251351/d725622d10k.htm>.

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

Executed in San Francisco, California on May 3, 2019.



Warrington Parker