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MAY 24 2019

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

Office of Administrative Law Judges
San Francisco, Ca

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 PORTIONS
OF PLAINTIFF'S MOTION TO
COMPEL DEPOSITION OF
ORACLE AMERICA, INC.
PURSUANT TO 41 § 60.30.11 AND
FEDERAL RULE OF CIVIL
PROCEDURE 30(B)(6)**

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 Motion to Compel Deposition of Oracle America, Inc. Pursuant to 41 § 60.30.11 and Federal Rule of Civil Procedure 30(b)(6) (hereinafter Plaintiff's Motion to Compel referred to as "Motion"), I have personal knowledge of the facts set forth herein, and if called as a witness could competently testify thereto.

2. The portions of Plaintiff's Motion, and Exhibit H to the Declaration of Jeremiah Miller in support thereof ("Miller Decl."), 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 Plaintiff's Motion and Exhibit H contains images from ORACLE-

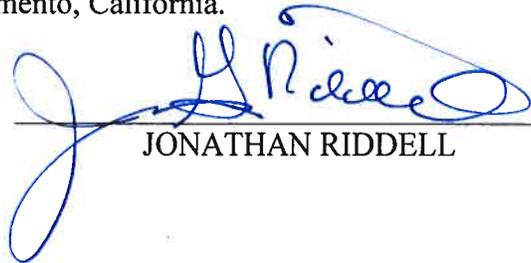
RIDDELL DECLARATION ISO
UNOPPOSED MOTION TO SEAL
CASE NO. 2017-OFC-00006

HQCA0000056242, which is part of an Oracle document 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 is not subject to the Court's pre-filing requirement," the parties have nevertheless met and conferred on Oracle's Motion to Seal. On May 20, 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 Plaintiff's Motion and Exhibit H to the Miller Decl. which are attached to the supporting Declaration of Victoria Thrasher.

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 May 23, 2019 in Sacramento, California.



JONATHAN RIDDELL