

**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

**UNOPPOSED MOTION TO FILE  
REPLY TO OPPOSITION TO  
ORACLE'S MOTION TO  
COMPEL PLAINTIFF OFCCP TO  
DESIGNATE AND PRODUCE  
30(b)(6) WITNESSES**

**RECEIVED**

**JUN 13 2019**

Office of Administrative Law Judges  
San Francisco, Ca

**ORACLE'S UNOPPOSED MOTION TO FILE REPLY ISO MOTION TO COMPEL  
PLAINTIFF OFCCP TO DESIGNATE AND PRODUCE 30(b)(6) WITNESSES**

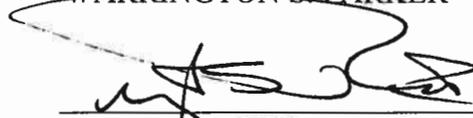
CASE NO. 2017-OFC-00006

Pursuant to the rules of Practice for Administrative Proceedings to Enforce Equal Opportunity Under Executive Order 11246 and in accordance with 41 C.F.R. § 60-30.8 and Section III.A.2 of the Court's February 6, 2019 Prehearing Order, Defendant Oracle America, Inc. hereby moves for leave to file a reply to OFCCP's Opposition to Oracle's Motion To Compel Plaintiff OFCCP To Designate And Produce 30(B)(6) Witnesses, to be due Thursday, June 20, 2019. OFCCP does not oppose Oracle's request. *See* Ex. A (June 13, 2019 email correspondence).

Respectfully submitted,

June 13, 2019

GARY R. SINISCALCO  
ERIN M. CONNELL  
WARRINGTON S. PARKER



---

ORRICK, HERRINGTON & SUTCLIFFE LLP

The Orrick Building

405 Howard Street

San Francisco, CA 94105-2669

Telephone: (415) 773-5700

Facsimile: (415) 773-5759

Email: grsiniscalco@orrick.com

econnell@orrick.com

wparker@orrick.com

Attorneys for Defendant

ORACLE AMERICA, INC.

# EXHIBIT A

[REDACTED]

---

**From:** Bremer, Laura - SOL <Bremer.Laura@dol.gov>  
**Sent:** Thursday, June 13, 2019 9:29 AM  
**To:** Fuad, David; Miller, Jeremiah - SOL; Garcia, Norman - SOL; McAllister, Hailey - SOL  
**Cc:** Connell, Erin M.; Siniscalco, Gary R.; James, Jessica R. L.; Kaddah, Jacqueline D.; Parker, Warrington  
**Subject:** RE: OFCCP v. Oracle America, Inc.- Opposition to Motion to Compel 30(b)(6)

Mr. Fuad,

OFCCP does not oppose Oracle's request for a reply to the motion to the above-referenced motion.

Sincerely,

Laura C. Bremer  
Senior Trial Attorney  
Office of the Solicitor  
U.S. Department of Labor  
90 7<sup>th</sup> Street, Suite 3-700  
San Francisco, California 94103  
(415) 625-7757

**THIS IS A PROTECTED COMMUNICATION--DO NOT DISCLOSE OUTSIDE OF THE DEPARTMENT OF LABOR:** *This email contains attorney work product and may include privileged material protected by the attorney client privilege, the deliberative process privilege, the government informer privilege, and other applicable privileges. This email may not be disclosed to third parties without the express consent of the Solicitor's Office. If you think you received this e-mail in error, please notify the sender immediately.*

---

**From:** Fuad, David <dfuad@orrick.com>  
**Sent:** Thursday, June 13, 2019 4:59 AM  
**To:** Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; McAllister, Hailey - SOL <mcallister.hailey@DOL.GOV>  
**Cc:** Connell, Erin M. <econnell@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; James, Jessica R. L. <Jessica.james@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Parker, Warrington <wparker@orrick.com>  
**Subject:** RE: OFCCP v. Oracle America, Inc.- Opposition to Motion to Compel 30(b)(6)

Counsel,

Thank you for the opposition. Oracle seeks leave to file a reply to it. Please let us know if OFCCP opposes such a request. Thank you.

Best,

**David P. Fuad** | Partner  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
777 South Figueroa Street, Suite 3200  
Los Angeles, California 90017  
(213) 612-2369 | [dfuad@orrick.com](mailto:dfuad@orrick.com)



---

**From:** McAllister, Hailey - SOL <[mcallister.hailey@DOL.GOV](mailto:mcallister.hailey@DOL.GOV)>  
**Sent:** Wednesday, June 12, 2019 3:28 PM  
**To:** Connell, Erin M. <[econnell@orrick.com](mailto:econnell@orrick.com)>; Siniscalco, Gary R. <[grsiniscalco@orrick.com](mailto:grsiniscalco@orrick.com)>; James, Jessica R. L. <[Jessica.james@orrick.com](mailto:Jessica.james@orrick.com)>; Kaddah, Jacqueline D. <[jkaddah@orrick.com](mailto:jkaddah@orrick.com)>  
**Cc:** Miller, Jeremiah - SOL <[Miller.Jeremiah@dol.gov](mailto:Miller.Jeremiah@dol.gov)>; Bremer, Laura - SOL <[Bremer.Laura@dol.gov](mailto:Bremer.Laura@dol.gov)>; Garcia, Norman - SOL <[Garcia.Norman@DOL.GOV](mailto:Garcia.Norman@DOL.GOV)>  
**Subject:** OFCCP v. Oracle America, Inc.- Opposition to Motion to Compel 30(b)(6)

Attached please find OFCCP's Opposition to Oracle's Motion to Compel OFCCP to Designate and Produce 30(b)(6) Witness and supporting declarations.

Thank you.

Hailey McAllister  
U.S. Department of Labor, Office of the Solicitor  
90 Seventh Street, Suite 3-700  
San Francisco, CA 94103  
Tel: (415) 625-2702 | Fax: (415) 625-7772

**THIS IS A PROTECTED COMMUNICATION.** This email contains attorney work product and may include privileged material protected by the attorney client privilege, the deliberative process privilege, the government informer privilege, and other applicable privileges. This email may not be disclosed to third parties without the express consent of the Solicitor's Office. If you think you received this e-mail in error, please notify the sender immediately.

---

**NOTICE TO RECIPIENT** | This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message from your system. Thank you in advance for your cooperation.

For more information about Orrick, please visit <http://www.orrick.com>.

In the course of our business relationship, we may collect, store and transfer information about you. Please see our privacy policy at <https://www.orrick.com/Privacy-Policy> to learn about how we use this information.