

**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 MOTION TO
SEAL PORTIONS OF PLAINTIFF
OFCCP'S MOTION TO COMPEL
ORACLE'S COMPENSATION
ANALYSES**

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JUL 02 2019

I, Jonathan Riddell, hereby declare as follows:

Office of Administrative Law Judges
San Francisco, Ca

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 Motion to Seal Portions of Plaintiff's Motion to Compel Oracle's Compensation Analyses ("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 portions of Exhibit 3 to the accompanying Declaration of Laura C. Bremer which Oracle seeks to seal is material Oracle produced to OFCCP, and that Oracle designated as Confidential at the time it was produced pursuant to the Protective Oracle in this case.

3. The portions of Exhibit 46 to the accompanying Declaration of Laura C. Bremer which Oracle seeks to seal is material Oracle produced to OFCCP, and that Oracle designated as Confidential at the time it was produced pursuant to the Protective Oracle in this case.

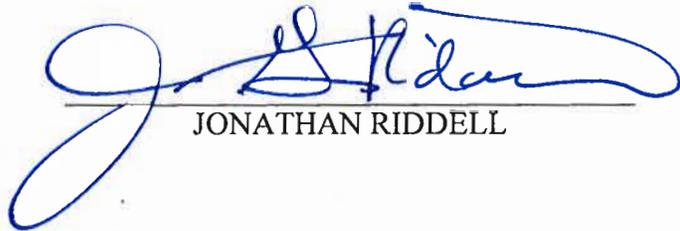
4. Although the May 26, 2019 Protective Order, adopted and amended by this Court's March 22, 2019 Protective Order, includes a provision which states "A motion under this

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

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 June 26, 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 46 to the Bremer Declaration, attached to the supporting Declaration of Victoria Thrasher as Exhibit B. Plaintiff's counsel indicated it will oppose Oracle's Motion to Seal as related to AAP Data material in Exhibit 3 to the Bremer Declaration, attached to the Declaration of Victoria Thrasher as Exhibit A.

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

Executed on July 2, 2019 in Sacramento, California.



JONATHAN RIDDELL