

**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 DAVID P.
FUAD IN SUPPORT ORACLE'S
MOTION COMPEL OFCCP TO
COMPLY WITH THE COURT'S
DISCOVERY ORDERS
REGARDING REDACTED
INTERVIEW MEMORANDA
AND 30(b)(6) TESTIMONY**

VOLUME 2 OF 2

RECEIVED

JUL 30 2019

**Office of Administrative Law Judges
San Francisco, Ca**

FUAD DECLARATION ISO ORACLE'S MTC OFCCP TO COMPLY WITH THE COURT'S DISCOVERY
ORDERS

CASE NO. 2017-OFC-00006

**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 DAVID P.
FUAD IN SUPPORT ORACLE'S
MOTION COMPEL OFCCP TO
COMPLY WITH THE COURT'S
DISCOVERY ORDERS
REGARDING REDACTED
INTERVIEW MEMORANDA
AND 30(b)(6) TESTIMONY**

I, David P. Fuad, 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 Memorandum of Points and Authorities in Support of Oracle's Motion to Compel OFCCP to Comply with the Court's Discovery Orders Regarding Redacted Interview Memoranda and 30(b)(6) Testimony. 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. Oracle and OFCCP met and conferred telephonically on July 16, 2019 and again on July 23, 2019 regarding, among other things, the various redactions to the 2015 and 2019

FUAD DECLARATION ISO ORACLE'S MTC OFCCP TO COMPLY WITH THE COURT'S DISCOVERY
ORDERS

interview memos that OFCCP produced. Oracle and OFCCP also exchanged extensive meet and confer correspondence regarding these issues, attached hereto as Exhibit E below.

3. Over the course of twelve document productions on July 5, 8, 9, 10, 11, 12, 22, 24, 25, 26, 28, and 29, OFCCP produced to Oracle: (1) witness interviews from 2019; (2) revised and less-redacted 2019 memos as part of the parties' meet and confer; (3) revised and less-redacted 2015 memos as part of the parties' meet and confer; (4) supplemental interrogatory responses; (5) a privilege log dated July 8, 2019; and (6) a privilege log dated July 15, 2019.

4. To the best of my knowledge, I understand there are over forty witness interview memos from 2015. To date, I understand OFCCP has re-done the redactions on approximately twenty-six of those 2015 memos. OFCCP first re-produced the 2015 memos on July 22, 2019.

5. Attached hereto as **Exhibit A** is a true and correct copy of selections of the redacted 2019 interview memoranda OFCCP produced in response to the Court's June 10 and July 2 Orders.

6. Attached hereto as **Exhibit B** is a true and correct copy of selections of the "less-redacted" interview memoranda OFCCP produced during the parties' meet and confer process.

7. Attached hereto as **Exhibit C** is a true and correct copy of OFCCP's privilege log dated July 8, 2019.

8. Attached hereto as **Exhibit D** is a true and correct copy of OFCCP's privilege log dated July 15, 2019.

//

//

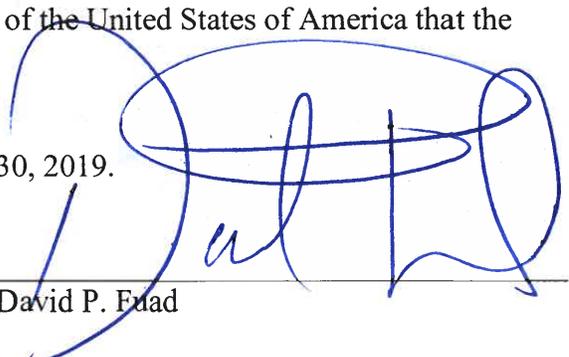
//

//

9. Attached hereto as **Exhibit E** is a true and correct copy of the meet and confer communications between OFCCP and Oracle regarding OFCCP's production of the interview memoranda.

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

Executed in Los Angeles, California on July 30, 2019.



David P. Fuad

EXHIBIT D

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40023		Produce - Redact	Communication from worker contacts	Government Informant	name; name and email; email addresses; name; name of recipient that would tend to reveal identity of current/former employee; name; info about pay and benefits; personal info about family that would identify informant; name of recipient that would identify informant; name; name and email; email of recipient	4/25/2019	Government Informant	Kiesha Cockett, Office of the Solicitor
40024		Produce - Redact	Communication from worker contacts	Government Informant	email; name; info about informant's employer; recipient/oracle employee's name; name and email; recipient/oracle employee's name; name and email; info about team composition and link to specific job posting; recipient/oracle employee's name and email; info about job posting; name; name and email; oracle employee name; info about coworkers that would specifically identify informant (3); info about job posting (3); name			
40025		Produce - Redact	Communication from worker contacts	Government Informant	info about coworkers that would specifically identify informant; info about available job; name and email; recipient's name; info about current employer and coworkers that would identify informant (3); date of email, oracle employee name and email, email; name; name of oracle employee; date of email, recipient name and email, email; name; name of oracle employee/recipient; name of oracle employee/recipient; info about employer that would identify informant; name; name; name			
40026		Produce - Redact	Communication from worker contacts	Government Informant	name; name and email; email addresses; name and email; name and email of recipient; info about salary and benefits that would identify informant; email of recipient; email; name; info about employer; recipient name; name and email; name of recipient; name; name and email of recipient; name and email	4/25/2019	Government Informant	Kiesha Cockett, Office of the Solicitor
40027		Produce - Redact	Communication from worker contacts	Government Informant	info about employment that would identify informant; link to job announcement with specific url; name of informant; name and email of recipient; info about employment; name and email of informant; name of recipient; info about coworkers that would identify informant (3); info about employment (name of division and title of position); name of informant; name and email of recipient; info about coworker; info about employment (division); name of informant; name of recipient; info about employer and coworkers that would identify informant; info about employment (division); name of informant; name and email of recipient; email of informant; name; recipient name			
40028		Produce - Redact	Communication from worker contacts	Government Informant	name and email; email of recipient; name of recipient; info about employer that would identify informant; name; name			
40029		Produce - Redact	Communication from worker contacts	Government Informant	name; title and attachment email includes irc number and name; name and email; irc number and name; email addresses; name and email; specific date and time stamp; name and email of sender; irc number and name; name	4/25/2019	Government Informant	Kiesha Cockett, Office of the Solicitor
40030		Produce - Redact	Letter	Government Informant	specific date; name and address; name; position title; salary	Year 2012	Joyce E. Westerdahl	Government Informant
40031		Produce - Redact	Letter	Government Informant	name and phone of oracle manager; specific date when the offer will close; irc number			
40032		Produce - Redact	Letter	Government Informant	name; address; city; county; state; zip; date of birth; ssn			
40033		Produce - Redact	Personal Information Form	Government Informant	name and signature and date			
40034		No redactions	Employee Eligibility Form					
40035		Produce - Redact	Employee Self Identification Form	Government Informant	name; date; position at oracle			
40036		Produce - Redact	Communication from worker contacts	Government Informant	name; name; name; link to document	5/2/2019	Government Informant	Kiesha Cockett, Office of the Solicitor
40037		Produce - Redact	Offer Letter	Government Informant	date; name and address; name; position title; monthly salary that would identify informant; annual rate that would identify informant; informant's manager name and contact; informant's hr representative name and contact; offer end date.	Year 1999	Rebecca R. Hawes	Informant
40038		Produce - Redact	Communication from worker contacts	Government Informant	name; email subject that would identify informant; prior sender that identifies informant; time; subject that reveals informant; name and email of informant; department; name of sender that identifies informant; name of individual inquiring about informant; name of sender and recipient that would tend to reveal identity of current/former employee; date; time; id number; specific offer details that reveal informant; informant manager name and email and recruiter name; justification for hire with identifying details; employee referral name and details about work schedule, vacation plan; job title, product, industry	4/19/2019	Government Informant	Daniel Chasek, Office of the Solicitor

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40039		Produce - Redact	Communication from worker contacts	Government Informant	salary info; name of manager; details about selection process and hiring decision-making revealing identity of informant.			
40040		Produce - Redact	Communication from worker contacts	Government Informant	details about selection process and hiring decision-making revealing identity of informant, continued from 40039			
40041		Produce - Redact	Communication from worker contacts	Government Informant	name; identifying info re attachment; name	4/23/2019	Government Informant	Nisha Parekh
40042		No redactions	Communication from worker contacts					
40043		Produce - Redact	Employee Self Identification Form	Government Informant	name; date and title			
40044		Produce - Redact	Employee Eligibility Form	Government Informant	name; signature; date			
40045		Produce - Redact	Employee Self Identification Form	Government Informant	signature; date			
40046		No redactions	Volunatry Self-ID of disability					
40047		No redactions	Post-Offer Invitation to Self-Identify for Protected Veterans					
40048		No redactions	Post-Offer Invitation to Self-Identify for Protected Veterans					
40049		Produce - Redact	Communication from worker contacts	Government Informant	name, attachment file name	5/3/2019	Government Informant	Kiesha Cockett, Office of the Solicitor
40050		Produce - Redact	Offer Letter	Government Informant	date; name and address; name; position title; manager name and contact; hr rep name and contact; date offer closes; reference number	Year 2016	Joyce Westerdahl	
40051		Produce - Redact	Communication from worker contacts	Government Informant	subject of email forwarded by informant; informant name; email subject; management name and email; date and time sent; subject matter; informant name and email; department; manager	4/19/2019	Daniel Chasek	Mary A. Hermsillo
40052		Produce - Redact	Communication from worker contacts	Government Informant	name of individual inquiring about informant; name of sender and recipient that would tend to reveal identity of current/former employee; date; time; id number; specific offer details that reveal informant; informant manager name and email and recruiter name, job title; justification for hire with identifying details; employee referral name and details about work schedule; salary; details about selection process and hiring decision-making revealing identity of informant.	Year 2019	Government Informant	OFCCP v. Oracle Litigation/RSOL
40053		Produce - Redact	Communication from worker contacts	Government Informant	date; time; manager name; details about selection process and hiring decision-making revealing identity of informant cont.			
40054		Produce - Redact	Communication from worker contacts	Government Informant	name; date; time; attachment identifying informer; name; date; time;			
40055		No redactions	Communication from worker contacts					
40056		Produce - Redact	Offer Letter	Government Informant	date; name; name; position title; salary; manager name and contact; date offer closes; reference number	Year 2014	Joyce Westerdahl	Government Informant
40057		Produce - Redact	Personal Information Form	Government Informant	name; street address; city and county; state; zip code; preferred name; date of birth; ssn; how informant learned of position		Government Informant	
40058		Produce - Redact	Employee Self Identification Form	Government Informant	name; name; date; position with oracle;	Year 2014	Government Informant	
40059		No redactions	Employee Self Identification Form					
40060		Produce - Redact	Employee Eligibility Form	Government Informant	name, signature, date	Year 2014	Government Informant	
40061		Produce - Redact	Offer Letter	Government Informant	date; name; position title; salary; document delivery date; date offer closes; name; reference number	Year 2006	Joyce Westerdahl	Government Informant
40062		Produce - Redact	Offer Letter	Government Informant	date; name and address; name; job title; job title; manager name; facility location; salary; date offer closes; manager name	Year 2005	Gabriel Toledano	Government Informant
40063		Produce - Redact	Terms and conditions of employment	Government Informant	name; date;	Year 2005		
40064				Government Informant	name; date; name			
40065		Produce - Redact	Offer Letter	Government Informant	name and address; name; position title; group; annual salary; monthly salary; bonus amount; stock options	Year 2012	Chantal Dumont	Government Informant
40066				Government Informant	manager contacts; date offer closes			
40067		Produce - Redact	Communication from worker contacts	Government Informant	name and address; date (month); date (month); salary; telephone number; signature and name	4/19/2019	government informant	Jeremiah Miller
40068		Produce - Redact	Offer Letter	Government Informant	date; name and address; name; position title; monthly salary; annual salary; hr contact name; manager contact name; date offer closes	Year 1996	Joyce Westerdahl	Government Informant
40069		Do Not Produce - Privilege Withhold	Communication from worker contacts	Government Informant	email from oracle server identifying informant			
40070		Produce - Redact	Communication from worker contacts	Government Informant	name; subject identifying informant and attachment; name; name; subject identifying informant; name; name and email; subject identifying informant; name	4/24/2019	Government Informant	Martin C. Santos
40071		Produce - Redact	Offer Letter	Government Informant	date; name and address; position title; salary; manager name and contact; date offer closes; reference number	Year 2016	Joyce Westerdahl	Government Informant
40072		Produce - Redact	Termination letter	Government Informant	date; name and address; name; date; date; date; hr name and contact	Year 2019	Anje Dodson	Government Informant
40073		Produce - Redact	Communication from worker contacts	Government Informant	name; subject and attachment identifying informant; name	4/24/2019	Government Informant	Martin C. Santos
40074		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	[2018]		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40075		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant			
40076		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018	Oracle employee	team members
40077		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40078		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40079		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40080		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40081		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40082		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40083		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40084		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40085		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40086		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40087		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40088		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40089		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40090		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40091		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40092		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40093		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40094		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40095		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40096		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40097		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40098		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40099		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40100		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40101		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40102		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40103		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40104		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40105		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40106		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40107		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40108		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40109		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40110		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40111		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40112		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40113		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40114		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40115		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40116		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40117		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40118		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40119		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40120		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40121		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40122		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40123		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40124		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40125		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40126		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40127		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40128		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40129		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40130		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40131		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40132		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40133		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40134		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40135		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40136		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40137		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40138		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40139		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40140		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40141		Do Not Produce - Privilege Withhold	Attachments from email, identifying informant	Government Informant	email from oracle server identifying informant	UNDATED		
40142		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40143		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40144		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40145		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40146		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40147		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40148		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40149		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40150		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40151		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40152		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40153		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40154		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40155		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40156		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40157		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40158		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40159		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40160		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40161		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40162		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40163		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40164		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40165		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40166		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40167		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40168		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40169		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40170		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40171		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40172		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40173		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40174		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40175		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40176		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40177		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40178		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40179		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40180		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40181		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40182		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40183		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40184		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40185		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40186		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40187		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40188		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40189		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40190		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40191		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40192		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40193		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40194		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40195		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40196		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40197		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40198		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40199		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40200		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40201		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40202		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40203		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40204		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40205		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40206		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40207		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40208		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40209		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40210		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40211		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40212		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40213		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40214		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40215		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40216		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40217		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40218		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40219		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40220		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40221		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40222		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40223		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40224		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40225		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40226		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40227		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40228		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2016		
40230		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40231		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40232		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40233		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40234		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40235		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40236		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40237		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40238		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40239		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40240		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40241		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40242		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40243		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40244		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40245		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40246		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40247		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40248		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40249		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40250		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40251		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40252		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40253		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40254		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40255		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40256		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40257		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40258		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40259		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40260		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40261		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40262		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40263		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40264		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40265		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40266		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40267		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40268		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40269		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40270		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40271		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40272		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2017		
40273		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40274		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2018		
40275		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; attachment description of position; specific information about team and coworkers; coworkers' locations; identifies skip-level supervisor; name of supervisor; info about team and coworkers, specific to informant; name	4/24/2019	Government Informant	Martin C. Santos
40276		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2019		
40277		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2019		
40278		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2019		
40279		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2019		
40280		Do Not Produce - Privilege Withhold	Email from Oracle server (connected to 40073)	Government Informant	email from oracle server identifying informant	Year 2019		
40281		Produce - Redact	Offer Letter	Government Informant	date; informant name and address; informant name; position details; salary; salary; stock options; relocation program; relocation program; oracle contact;	Year 2006	Larry Lynn	Government Informant
40282		Produce - Redact	Offer Letter Cont.	Government Informant	date offer closes			
40283		Produce - Redact	Offer Letter Cont.	Government Informant				
40284		Do Not Produce - Privilege Withhold	Photograph of award	Government Informant	recognition by oracle identifying informant			
40285		Produce - Redact	W-2	Government Informant	redactions identified by w-2 form	Year 2018		
40286		No redactions	W-2 cont.					
40287		Produce - Redact	Oracle pay slip	Government Informant	date; redactions identified by form	Year 2019		
40288		No redactions	Oracle pay slip					
40289		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; attachment; identifying attachments; team details; dates; date; management details; management details; manager name; name; name; team details; informant name and contact; forwarded email from oracle server	2/19/2019	Government Informant	Hailey McAllister
40290		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant	Year 2019		
40291		Produce - Redact	W-2	Government Informant	redactions identified by w-2 form			
40292		Produce - Redact	W-2 cont.	Government Informant	redactions identified by w-2 form			
40293		Produce - Redact	Oracle Profile document	Government Informant	name; name; title; email; phone; phone; info about badges earned; page url			
40294		Produce - Redact	Oracle Profile document	Government Informant	name; name and title; redactions identified by document; page			
40295		Produce - Redact	Oracle Profile document	Government Informant	name; redactions identified on document			
40296		Produce - Redact	Oracle Profile document	Government Informant	name; name, title, contact info; name and job details; badge; manager name; page			
40297		Produce - Redact	Oracle Profile document	Government Informant	name; names; name and patent info; redactions identified on document; page			
40298		Produce - Redact	Oracle Profile document	Government Informant	name; address; suite; page			
40299		Produce - Redact	Oracle Profile document	Government Informant	name; name and contact info; job details; team details; manager; reports and page			
40300		Produce - Redact	Oracle Profile document	Government Informant	name; faces; redactions identified on document; page			
40301		Produce - Redact	Payslip	Government Informant	name; address; office address; page url			
40302		Produce - Redact	Payslip	Government Informant	payslip number; redactions identified by document; page			
40303		Produce - Redact	Payslip	Government Informant	redactions identified by document; page			
40304		Produce - Redact	W-2	Government Informant	redactions identified by document			
40305		Produce - Redact	Oracle Profile document	Government Informant	name; name; job title and address; email; phone; phone; identifying job details; identifying job details; identifying job details;			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40306		Produce - Redact	Oracle Profile document	Government Informant	name; identifying job details; badges; manager name and title; links; internal sites and page			
40307		Produce - Redact	Oracle Profile document	Government Informant	name; internal sites; tags; redactions identified on document; page			
40308		Produce - Redact	Oracle Profile document	Government Informant	name; page			
40309		Produce - Redact	Offer Letter	Government Informant	date; informant name and address; informant name; position details; salary; salary; stock options; relocation program; relocation program; oracle contact; date offer closes	Year 2006	Larry Lynn	Government Informant
40310		Produce - Redact	Offer Letter cont.	Government Informant	date offer closes	Year 2006		
40311		No redactions	Offer Letter cont.			Year 2006		
40312		Produce - Redact	Oracle Profile document	Government Informant	name; name; name and photo; chain of command; name, contact info, title, photo; contact info; identifying job details; mobile number; address; building			
40313		Produce - Redact	Employee signature block	Government Informant	name, title, contact			
40314		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; date; time; subject and attachment; email from oracle server	2/19/2019	Government Informant	Hailey McAllister
40315		Produce - Redact	Email from Oracle Server	Government Informant	email correspondence from oracle server provided by informant	Dec. 2018		
40316		Produce - Redact	employee signature block	Government Informant	name; contact; address			
40317		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant re hr complaint	Year 2019		
40318		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant re hr complaint	Year 2019		
40319		Produce - Redact	employee complaint	Government Informant	date; redactions identified by document	Year 2019		
40320		Produce - Redact	employee complaint cont.	Government Informant	date; incident occurrence; identifying details about incident	Year 2019		
40321		Do Not Produce - Privilege Withhold	Photograph of award	Government Informant	recognition by oracle identifying informant			
40322		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; date; time	Year 2019	Government Informant	Hailey McAllister
40323		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; subject; identifying attachment; date of complaint and identifying details; identifying personal detail; name; forwarded email correspondence from oracle server provided by informant	2/28/2019	Government Informant	Hailey McAllister
40324		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40325		Produce - Redact	employee complaint	Government Informant	date; redactions identified by document	Year 2019		
40326		Produce - Redact	employee complaint	Government Informant	date; incident occurrence; identifying details about incident	Year 2019		
40327		Do Not Produce - Privilege Withhold	Photograph of award	Government Informant	recognition by oracle identifying informant			
40328		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; identifying attachments; date; date; date; date; job title; date; date; job history; specific location; chain of command; date and specific job history details; description of current role; name and contact; informant name;	2/11/2019	Government Informant	Hailey McAllister
40329		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; cell number; informant name; informant name			
40330		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and contact; team details; job title; date of hire; date; photo info; date; school; start date; school and graduation date; degree; team specifics; date (month); title; identifying work history details; salary salary and attachment; identifying work history details; number of Years; manager name; identifying work history details; team details; manager name; manager name; identifying details re work experience; cell phone; name and contact			
40331		Produce - Redact	Communication from Worker Contact	Government Informant				
40332		No redactions	Communication from Worker Contact					
40333		Produce - Redact	Offer Letter	Government Informant	date; informant name and address; informant name; position details; salary; salary; stock options; relocation program; relocation program; oracle contact; date offer closes	Year 2006	Larry Lynn	Government Informant
40334		No redactions	offer Letter cont.					
40335		No redactions	offer Letter cont.					
40336		Do Not Produce - Privilege Withhold	Photograph of award	Recognition by Oracle identifying informant	recognition by oracle identifying informant			
40337		Produce - Redact	W2	Government Informant	redactions identified by document	Year 2018		
40338		No redactions	W2					
40339		Produce - Redact	payslip	Government Informant	date; date; redactions described by document; page			
40340		Produce - Redact	payslip	Government Informant	date; redactions identified by document; page			
40341		Produce - Redact	Communication from Worker Contact/email forwarded from Oracle server	Government Informant	informant name; subject; email correspondence from oracle server provided by informant	5/2/2019	Government Informant	Bruce Brown
40342		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40343		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40344		Produce - Redact	Communication from Worker Contact/email forwarded from Oracle server	Government Informant	informant name; subject; email correspondence from oracle server provided by informant	5/2/2019		
40345		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40346		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40347		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40348		Produce - Redact	Communication from Worker Contact/email forwarded from Oracle server	Government Informant	informant name; subject; email correspondence from oracle server provided by informant	5/2/2019		
40349		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40350		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40351		Produce - Redact	Email from Oracle server	Government Informant	email correspondence from oracle server provided by informant			
40352		Produce - Redact	Communication from Worker Contact	Government Informant	name of informant; date; time; informant contact;	Year 2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40353		Produce - Redact	Communication from Worker Contact	Government Informant	informant name/contact; informant name contact;	5/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40354		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; informant name and contact	5/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40355		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant contact; informant name; informant name	5/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40356		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; tenure at oracle; job title and group; phone number; address; informant name	5/6/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40357		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; tenure at oracle, informant name; informant name and contact	5/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40358		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; tenure at oracle; phone number; informant name	5/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40359		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	5/3/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40360		No redactions	Communication from Worker Contact					
40361		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; phone number;	5/2/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40362		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; informant name; informant name			
40363		Produce - Redact	Communication from Worker Contact	Government Informant	informant name/email; informant name; informant phone number; informant name			
40364		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; tenure at oracle; informant name	5/2/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40365		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	5/2/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40366		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; job title; tenure at oracle; informant name	5/2/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40367		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name informant phone; period at oracle; job title; informant name	5/2/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40368		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant phone; informant name; informant name;	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40369		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; identifying details re employment; job title; job title; informant name	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40370		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; informant name	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40371		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; informant name; informant name and email; informant name	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40372		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40373		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; group and dates; informant name	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40374		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; phone number; informant name	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40375		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40376		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; employment dates; position; informant name and phone number	5/1/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40377		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; employment dates at oracle; informant name	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40378		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name;	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40379		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40380		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40381		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40382		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; info about hiring circumstances; informant name; informant name and email	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40383		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; info about employment; informant name	4/30/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40384		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email address; email address; dates of employment; informant name	4/29/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40385		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; dates of employment; informant name	4/29/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40386		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; informant name	4/29/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40387		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of contact; first name; last name; phone number; dates of employment; informant name	4/29/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40388		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; group within oracle; date of employment; phone number; informant name	4/29/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40389		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; dates of employment; phone number; phone number; informant name	4/29/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40390		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; employment group; salary info; informant name	4/28/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40391		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant contact info	4/28/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40392		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; employment info; informant name	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40393		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; phone number; informant name; dates of employment; informant name; informant name	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40394		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; phone number; informant name	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40395		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; informant name;	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40396		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; phone number; informant name	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40397		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40398		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40399		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; email address; name	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40400		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; informant email addresses	4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40401		No redactions	Communication from Worker Contact			4/26/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40402		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; employment info; specific location of employment; informant name	4/24/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40403		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email; dates of employment and info about positions; titles; salary information; salary history;	4/24/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40404		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name	4/24/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40405		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; position info; informant name	4/24/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40406		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; informant name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40407		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40408		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40409		No redactions	Communication from Worker Contact			4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40410		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40411		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40412		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40413		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40414		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number;	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40415		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; employee number; dates of employment; employment history including titles and dates; name; address	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40416		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40417		No redactions	Communication from Worker Contact			4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40418		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40419		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; employment info; name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40420		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email; dates of employment; dates of employment; information about employment; job title; name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40421		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; dates of employment; name	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40422		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; specifics about hiring; name and email	4/23/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40423		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email; dates of employment; dates of employment; information about employment; job title; name	4/22/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40424		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; salary history; name	4/22/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40425		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; identifying attachments; date; date; date; date; job title; date; date; job history; specific location; chain of command; date and specific job history details; description of current role; name and contact; informant name;	4/22/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40426		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; attachment identifying informant; email address; phone number; name	4/22/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40427		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and address	4/4/2019	Jeremiah Miller	Government Informant
40428		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; work location; phone number	4/22/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40429		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; current residence; dates of employment; name	4/22/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40430		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and address; name	4/4/2019	Jeremiah Miller	Government Informant
40431		No redactions	Communication from Worker Contact					
40432		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; division; title; name	4/21/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40433		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/21/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40434		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; name	4/21/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40435		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; position info; informant name	4/21/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40436		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; info about employment history; dates of employment; dates of employment; name and phone number	4/21/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40437		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; dates of employment; group; phone numbers and best times to call; name	4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40438		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; employment info re position; name	4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40439		No redactions	Communication from Worker Contact			4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40440		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40441		No redactions	Communication from Worker Contact			4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40442		No redactions	Communication from Worker Contact			4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40443		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; position at oracle phone number; phone number; name	4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40444		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40445		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; info about position at oracle; name	4/20/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40446		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; employment group; race; dates of employment; phone number; name	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40447		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name and contact info	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40448		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name and contact info; phone number	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40449		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; employment history at oracle; name	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40450		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40451		No redactions	Communication from Worker Contact			4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40452		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; dates of employment; email address of informant	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40453		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment, dates of employment; phone number	4/19/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40454		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; phone number	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40455		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; phone number	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40456		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; employment history; name; address and contact info	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40457		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; date of employment; info about position; salary info; salary info; phone number; signature block	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40458		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40459		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40460		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name of supervisor	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40461		Produce - Redact	Communication from Worker Contact	Government Informant	information name; work title; phone number	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40462		Produce - Redact	Communication from Worker Contact	Government Informant	information; dates of employment, position at oracle; employer; employer; educational history; personal info; name	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40463		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; Years of employment; description of employment; name of informant	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40464		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; position; name; dates of employment; race; description of employment history; name and contact	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40465		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; name	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40466		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40467		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; employment group; name	4/18/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40468		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; informant name; dates of employment; email; cell; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40469		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; attachment identifying informant; employment history details; employment dates; salary history; dates of employment; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40470		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; phone number; date of return; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40471		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40472		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; dates of employment; dates of termination; title; employment history; time periods and salary history; coworkers identified; details about employment; details of employment; details of duties; phone number; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40473		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; name and email; name; name; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40474		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; phone number; name; name and email; supervisor; name; name and address; names of coworkers in workgroup	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40475		Produce - Redact	Communication from Worker Contact	Government Informant	names of coworkers; description; name of group; name of former supervisor; manager; project name; manager; coworkers; coworkers; coworkers; coworkers; coworkers; coworkers; manager; manager; manager; manager; manager; personal information; date reminder sent; supervisor; supervisor; coworker description; manager; information about activities of informant; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40476		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name and contact info	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40477		No redactions	Communication from Worker Contact			4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40478		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; phone number; dates employed by oracle; workgroup; job title; current employer; current job title; race identification; prior employer info; position name; position name; workgroup name; information about prior employment; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40479		No redactions	Communication from Worker Contact			4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40480		No redactions	Communication from Worker Contact			4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40481		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; date of hire; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40482		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; name; title; phone number; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40483		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; name; name; name and email; phone number; phone number;	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40484		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name and email; manager; name; name; name and address; names of coworkers; description; name of group; name of former supervisor; manager; project name; manager; coworkers; coworkers; coworkers; coworkers; coworkers; coworkers; coworkers;	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40485		Produce - Redact	Communication from Worker Contact	Government Informant	manager; manager; manager; manager; manager; personal information; date reminder sent; supervisor; supervisor; coworker description; manager; information about activities of informant; name	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40486		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name and phone number	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40487		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; title; dates of employment	4/17/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40488		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; email address; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40489		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40490		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40491		No redactions	Communication from Worker Contact			4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40492		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40493		No redactions	Communication from Worker Contact			4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40494		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; position title; information about salary; phone number; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40495		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; race; workgroup	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40496		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; title of email with name; date of email; description of specific complaint; position at oracle; position at oracle; work history; work history; work history; work history; work history; description of specific complaint; phone number; name and contact; email from oracle server redacted in its entirety	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40497		Produce - Redact	Communication from Worker Contact	Government Informant	email correspondence from oracle server provided by informant	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40498		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name and contact info	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40499		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40500		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name and contact info	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40501		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40502		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40503		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; name and email	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40504		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; name and email	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40505		Produce - Redact	Communication from Worker Contact	Government Informant	phone number; name; name and email	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40506		Produce - Redact	Communication from Worker Contact	Government Informant	name; job title; name	4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40507		No redactions	Communication from Worker Contact			4/16/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40508		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40509		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; position info; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40510		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; phone number; name and email; supervisor; name; name; name and address; coworker name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40511		Produce - Redact	Communication from Worker Contact	Government Informant	names of coworkers; description; name of group; name of former supervisor; manager; project name; manager; coworkers; coworkers; coworkers; cowers; coworkers; coworkers; manager; manager; manager; manager; manager; personal information; date reminder sent; supervisor; supervisor; coworker description; manager; information about activities of informant; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40512		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; supervisor; name; name; names of coworkers; description; name of group; name of former supervisor; manager; project name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40513		Produce - Redact	Communication from Worker Contact	Government Informant	manager; coworkers; coworkers; coworkers; cowers; coworkers; coworkers; manager; manager; manager; manager; manager; personal information; date reminder sent; supervisor; supervisor; coworker description; manager; information about activities of informant; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40514		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; attachment name identifying informant; name and address; names of coworkers; description; name of group; name of former supervisor; manager; project name; manager; coworkers; coworkers; coworkers; coworkers; coworkers; manager	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40515		Produce - Redact	Communication from Worker Contact	Government Informant	manager; manager; manager; manager; personal information; date reminder sent; supervisor; supervisor; coworker description; manager; information about activities of informant; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40516		Produce - Redact	Screenshot regarding appraisals	Government Informant	informant name; supervisors; dates of appraisal creation dates; info about period start and end; supervisor initiating review; dates of appraisal creation; info about period start and end	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40517		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40518		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	title of document by file string on the bottom	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40519		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	title of document by file string on the bottom	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40520		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40521		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40522		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40523		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40524		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40525		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40526		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40527		Produce - Redact	Oracle Self-Service Human Resources: Details: Appraiser	Government Informant	redactions identified by the form; with specific details that identify informant; title of document by file string	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40528		Do Not Produce - Privilege Withhold	Email from Oracle server, provided by informant	Government Informant	email correspondence from oracle server provided by informant	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40529		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; workgroup; phone number; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40530		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment, dates, dates; information about specific work history; race; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40531		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; number; name and email address; race; workgroup; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40532		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; race; dates of employment; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40533		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email address; race; workgroup; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40534		No redactions	Communication from Worker Contact			4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40535		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40536		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/15/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40537		No redactions	Communication from Worker Contact			4/14/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40538		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; title; dates of employment; race; workgroup; name	4/14/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40539		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; dates of employment; race; degree; salary info; title; title; title; software application; address; email; phone number; name	4/14/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40540		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; dates; name	4/14/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40541		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/12/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40542		No redactions	Communication from Worker Contact			4/12/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40543		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/12/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40544		Produce - Redact	Communication from Worker Contact	Government Informant	phone number; name; name	4/12/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40545		Produce - Redact	Communication from Worker Contact	Government Informant	name and email; name; title; name	4/12/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40546		No redactions	Communication from Worker Contact			4/12/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40547		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40548		No redactions	Communication from Worker Contact			4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40549		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40550		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; job title; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40551		No redactions	Communication from Worker Contact			4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40552		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; email; email; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40553		No redactions	Communication from Worker Contact			4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40554		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; email address; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40555		No redactions	Communication from Worker Contact			4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40556		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40557		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; dates of employment; current employer; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40558		No redactions	Communication from Worker Contact			4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40559		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40560		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; Years of employment; name	4/11/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40561		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; email; name	4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40562		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; phone number; name; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40563		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; dates of employment; name; name of employment	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40564		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40565		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40566		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; name and email; phone number	4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40567		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40568		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; dates of employment; name; name and email	4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40569		No redactions	Communication from Worker Contact			4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40570		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number	4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40571		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40572		No redactions	Communication from Worker Contact			4/10/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40573		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40574		Produce - Redact	Communication from Worker Contact	Government Informant	name and email; dates of employment; name; name and email	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40575		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40576		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40577		Produce - Redact	Communication from Worker Contact	Government Informant	informant name and email; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40578		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; details about work experience; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40579		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40580		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40581		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40582		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name; name and email; dates of employment; date; degree; school; salary info; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40583		Produce - Redact	Communication from Worker Contact	Government Informant	name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40584		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40585		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name; name and email; dates of employment; date; degree; school; salary info; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40586		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40587		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; name; name and email	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40588		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40589		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40590		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40591		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; name	4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40592		No redactions	Communication from Worker Contact			4/8/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40593		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; race; dates of employment; job title; workgroup; salary info; name	4/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40594		No redactions	Communication from Worker Contact			4/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40595		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; title; workgroup; title; title and description of benefits for that title; date; name; name and contact info	4/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40596		No redactions	Communication from Worker Contact			4/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40597		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; title; name	4/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40598		No redactions	Communication from Worker Contact			4/7/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40599		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; personal info that would identify informant	4/6/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40600		No redactions	Communication from Worker Contact			4/6/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40601		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; phone number; email; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40602		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40603		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40604		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40605		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; description of work experience regarding complaint	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40606		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40607		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40608		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; race; workgroup; title; workgroup; Year of hire; salary info; Years of employment; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40609		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40610		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; dates of employment; email; phone number; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40611		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; phone number; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40612		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40613		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name and email address	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40614		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40615		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40616		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40617		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40618		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40619		No redactions	Communication from Worker Contact			4/5/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40620		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; dates of employment; title and workgroup; specific salary info during negotiations; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40621		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40622		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40623		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; status of work; race; workgroup; name; name and email	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40624		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40625		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40626		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40627		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40628		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40629		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; national origin; school; phone number; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40630		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40631		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40632		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40633		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40634		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; supervisor; name and email; race; workgroup; Year; salary info; personal work interaction that specifically identifies informant; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40635		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40636		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; supervisor; name and email; race; workgroup; Year; salary info; personal work interaction that specifically identifies informant; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40637		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40638		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; Years; name and contact info	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40639		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40640		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40641		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; dates of employment; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40642		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40643		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40644		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40645		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40646		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40647		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40648		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup title; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40649		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40650		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; job title; supervisor position; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40651		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40652		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL
40653		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov /RSOL

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40654		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; workgroup; dates of employment;	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40655		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40656		Produce - Redact	Communication from Worker Contact	Government Informant	informant name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40657		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40658		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40659		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40660		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; position title; Year; position; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40661		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40662		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; phone number; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40663		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40664		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; dates of employment; salary info; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40665		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40666		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; email address; email address; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40667		Produce - Redact	Communication from Worker Contact	Government Informant	informant name; name; race; dates of employment; name	4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40668		No redactions	Communication from Worker Contact			4/4/2019	Government Informant	OFCCPvOracleLitigation@dol.gov / RSOL
40762		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	4/22/2019	Kiesha Cockett	
40763		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	dates of employment and type of departure; current employer; job title; job title; employment history; employment history; employment history; employment history; employment history;			
40764		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa; citizenship/visa			
40765		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire month; job description; recruitment process; educational info; educational info; educational info; educational data; educational data; educational data; educational data; job title; recruiting history; salary information; salary information			
40766		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; employment history; employment dates; job title; supervisor; educational history; job description; supervisor; project description; supervisor's name, title & race; supervisor's name and title; supervisor name; employment history; job description; supervisor name; employment history; employment history; employment history; employment history; employment history; employment history; jo and salary information; job title			
40767		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; salary information; salary information; employment history; employment history; employment; history; employment history; employment history; employment history; employment history; salary information; employment history; employment history; employment history; race; employment history; employment history; job title; job title; employment history; employment history; employment history; supervisor; employment history			
40768		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; supervisor name; employment history; type of departure			
40769		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	current employer; type of departure			
40770		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	4/30/2019	Nisha Parekh	
40771		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40772		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; race; citizenship/visa status; name of current employer; job title and area of current work; job description; job description; job description			
40773		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job description; current employer and type of departure; departure time period; current employer; current employer; current employer; specific salary; specific compensation; specific salary; specific salary; timing of raise; job title; unique identifying information; job title			
40774		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific salary; specific salary; date of hire; timing of departure; job title; job title; job title; previous employer; identity of work at oracle;			
40775		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	prior salary; specific salary; supervisor name; job title, recruiting information; recruiting information			
40776		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; recruiting information; recruiting information; job title; job projects and description; job description; job description; job description; job description; job description; job description; specific work location, specific work location; supervisor name and citizenship/visa; supervisor specific tenure			
40777		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name and job title; current employer of top supervisor; supervisor name; supervisor name; organization's name; supervisor name; job description; specification of unique job information; number of team members; job title; job title; specification of unique job information; specification of unique job information; specification of unique job information;			
40778		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; job title; identifying job duties; specification of unique job information; name of closely-associated coworker; job title			
40779		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; raise timing; supervisor name; supervisor name;			
40780		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specification of unique job information; job description job description; job description; job title; name; name; name; identifying information of co-worker; name			
40781		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	raise timing; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; job assignment			
40782		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job organization; name of closely associated coworker; job title; job title; name of closely associated coworker; supervisor name; job description			
40783		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; supervisor name; supervisor name; identifying personal information;			
40784		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	organization identifier; job assignment; supervisor name; supervisor name; supervisor name; type of departure			
40785		No redactions	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40786		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email	4/9/2019	Jessica Flores	
40787		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; supervisor name; specific date of departure from oracle and reason for departure from oracle; specific information identifying employee's team; name; information identifying supervisor; specific information regarding employee work status; specific information identifying team; specific information identifying team and supervisor; specific information regarding employment history			
40788		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific information identifying supervisor			
40789		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; citizenship/visa status; specific information relating to employment history and citizenship/visa status; educational history; specific identifying information regarding activities at oracle			
40790		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40791		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date of hire, citizenship/visa;			
40792		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; employment history; job title; Years of employment at oracle; specific team information; specific job duties; name of supervisor			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40793		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific information identifying team members; information regarding team demographics that would tend to identify informant; information regarding team demographics that would tend to identify informant; information regarding team demographics that would tend to identify informant; information regarding team demographics that would tend to identify informant; information regarding team demographics that would tend to identify informant; supervisor name; identifying information regarding closely associated colleagues; supervisor name			
40794		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40795		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40796		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number	4/22/2019	Dan Chasek	
40797		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name of current employer; current job title			
40798		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; citizenship/visa status			
40799		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date of hire; name of previous employer; date of hire; type of departure; job title; previous employer			
40800		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; specific project information and dates of position change; job title; project name; dates in specific job position; supervisor name; job duties; supervisor title; supervisor name; supervisor name; job title; area title; name; job title; specific project information; dates in specific position; supervisor names and; identifying information regarding supervisor and informant names			
40801		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific job duties; specific job duties; supervisor name; name of closely associated colleague; name; name; specific salary of closely associated colleague; specific salary of informant; name of closely associated colleague; specific information identifying team			
40802		No redactions	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40803		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	type of departure			
40804		No redactions	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40805		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email	4/15/2019	SOL Attorney	
40806		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; reporting information; employment tenure			
40807		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status			
40808		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date; job title; job title; prior employment history; prior employment salary; specific salary offer; specific salary offer; specific current salary; job category; specific job description; previous employment history; specific job description; prior employment history; prior employment history; job category; employment history			
40809		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific job description; supervisor name; supervisor name; supervisor name; organization's name; job description; supervisor name; supervisor name; supervisor name; job description; team's identifying information; supervisor name; supervisor name; specific identifying information of closely-associated colleague; specific identifying information of closely associated colleague			
40810		No redactions	Attorney notes of contacts with confidential third parties					
40811		No redactions	Attorney notes of contacts with confidential third parties					
40812		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product				
40813		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; address	4/29/2019	Keisha Cockett	

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40814		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40815		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; current employer; job title			
40816		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific salary; hire date; job title; job description			
40817		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific salary information; job category; specific job assignment; dates of employment; employment history; supervisor name; job assignment; supervisor name; specific bonus information; identifying unique team information			
40818		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; project assigned; date of assignment; supervisor name			
40819		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; specific role on team; specific salary; raise timing; identifying team information; job category; specific job assignment; dates of assignment; supervisor name; supervisor name; identifying team information			
40820		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	identifying team information; identifying team information; supervisor name; employment history; supervisor name; job category; global career level			
40821		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product				
40822		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40823		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; employment history; race	2/19/2019	Hailey McAllister	
40824		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; termination date; termination reason; supervisor name; employment history; employment history			
40825		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name and title			
40826		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor's chain of command			
40827		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40828		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number	4/26/2019	Norm Garcia	
40829		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant	job title			
40830		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40831		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race information; citizenship/visa status; employment dates;			
40832		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment dates; citizenship/visa status			
40833		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific job description; specific identifying project information; supervisor name and identifying information; specific identifying job duties; supervisor name and identifying information; supervisor name; supervisor name; supervisor name; colleague identifying information; supervisor name; colleague identifying information; colleague identifying information; colleague identifying information; date of specific salary information; employment date range; colleague identifying information			
40834		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40835		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific identifying team information; race information			
40836		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific name of oracle attorney who communicated with her - likely to identify witness			
40837		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; job title; race; prior employer; prior employer; prior employer and salary information; job category; employment history; employment history and job title; job title; salary information and job responsibilities; job category and employment history	4/16/2019	Ana Hermosillo	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40838		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary information; salary information, job category and employment history; job category, organization structure, information on co-workers; salary information; job category; geographic location; identifying organization; identifying team information; identifying team information and job duties;			
40839		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title, job category; co-worker information, employment history; job assignment			
40840		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	4/22/2019	Cris Santos	
40841		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40842		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; current (non-hqca) location; race; citizenship/visa			
40843		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; job category; employment tenure; employment history; employment history; job assignment; salary information; salary information; job category; salary information; salary information; salary information; salary information; employment history; salary information; salary information; hire date and identifying information.			
40844		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; employment history			
40845		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; job assignment; employment history; employment history; supervisor name and location; supervisor name; job assignment; supervisor name; supervisor name; supervisor name; employment history; supervisor name; supervisor name; Year of educational degree;			
40846		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job assignment; race			
40847		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; job category; job category; job title and job category; job description; employment history; job duties; supervisor name; supervisor name; specific team-identifying information; specific identifying information; raise timing; specific team-identifying information			
40848		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific team-identifying information; job title and job category; job assignment; employment history; supervisor names; job category; supervisor name; supervisor name; supervisor name; job category; specific team-identifying information; specific team-identifying information; job title and job category; job assignment; specific current non-hqca location; specific employment month; supervisor name; job category; supervisor name; job category; specific team-identifying information; specific team-identifying information; specific identifying information; salary information; salary information			
40849		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; job category; specific identifying incident information; specific identifying employment history; specific identifying incident information; specific identifying employment history; race; supervisor name; specific identifying employment history information;			
40850		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific current non-hqca location			
40851		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name/supervisor/specific identifying event information; name/supervisor/identifying team information; identifying team information; identifying team information; identifying team information; identifying team information/specific identifying event information; identifying team information; specific identifying event information/supervisor; name/identifying team information; identifying team information; identifying event information	4/8/2019 4/24/2019	Laura Bremer	
40852		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific identifying event/identifying team information; specific identifying event; identifying team/supervisor/educational details/job title; supervisor; specific identifying event information; specific identifying event/identifying team/job duties; specific identifying event; specific identifying event			
40853		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product				

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40854		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40855		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name/geographic information; phone number; name; period of employment; job title; job title; name; job title; size of team; job duties; supervisor; supervisor; supervisor; name/specific identifying event information/supervisor; name; job title; specific identifying event; name; supervisor; supervisor; identifying team information; supervisor; specific identifying event			
40856		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job duties; supervisor; salary; salary; date; specific identifying event information/supervisor; identifying team information; identifying team information; name; name			
40856.1		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	4/30/2019	Kiesha Cockett	
40857		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40858		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race information; citizenship status			
40859		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; date; employment history; specific job duties; salary; date; employment history/former employer			
40860		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	former employer; employment history/former employer			
40861		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; employment history; employment dates; supervisor name/race; job duties; supervisor name/job title/race; supervisor's name/race; specific identifying team information, specific identifying team information; specific identifying team information			
40862		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific identifying team information; specific identifying team information; specific identifying team information; specific identifying team information; specific identifying employment history; specific identifying team information; identifying personal information;			
40863		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date of specific raise			
40864		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40865		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40866		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40867		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employee name	5/3/2019	SOL Attorney	
40868		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40869		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job position; race; citizenship/visa status; successor employer; successor job title;			
40870		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	successor employer; salary; salary; salary; hire date; position title; college name;			
40871		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific ic code			
40872		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific job assignment; start date; supervisor name and supervisor description; supervisor description; identifying info of closely-associated colleague; specific job title; date of raise; date of raise			
40873		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa status; same			
40874		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40875		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific date of identifying work event; same;			
40876		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40877		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; type of separation; precise day of separation; type of separation; precise day of separation; citizenship/visa status; same; specific job title	4/9/2019	Karina Wegman	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40878		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; citizenship/visa status; former employer; citizenship/visa status; citizenship/visa status; citizenship/visa status; citizenship/visa status; citizenship/visa status; hire date; job title; specific product line; prior employer; product line			
40879		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name and title; job classification; job classification; job classification; job classification; date; supervisory chain; product line; specific date of assignment change, supervisory name; product line specific date of transfer; specific date of identifying event; job title; specific assignment; specific dates of assignment; supervisor name; specific assignment; supervisory name and identification; same; same			
40880		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	identifying info for closely related colleague; product line; product line; job title reference; date of identifying job event; same; same; same; same; supervisor name; job classification; supervisor name; identifying information for closely-related colleague; same; race; identifying characteristics of team assignment; specific project assignment; date of assignment; name of supervisor; same and chain of command;			
40881		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name of closely associated colleague; citizenship/visa status; same; identifying characteristic of team;			
40882		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; job title; employment history; job title; team name; job category; employment history; employment history; supervisor; employment history; supervisor; team name; supervisor; team description; job title; job title	4/22/2019	Bruce L. Brown	
40883		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; salary information; team name; team name; employment history; employment history; employment history; recruiting history; job title; recruiter; employment history; salary information; recruiter; salary information; job title; team description; team description; colleague name; unique event			
40884		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	recruiter; job title; job title uniqueness; supervisor; supervisor; supervisor; supervisor; unique event; supervisor; unique event; unique event; colleague name; colleague name; supervisor; supervisor			
40885		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor			
40886		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email	4/22/2019	Ian Eliasoph	
40887		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40888		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40889		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; job description; employment history; job title; race information; citizenship/visa status; citizenship/visa status/employment history			
40890		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; date			
40891		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history			
40892		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date; employment history; employment history/date; employment history; date; date; date; employment history; supervisor names and dates of supervision changes; job duties; date of transfers; supervisor name; supervisor name; timing of identifying event; dates of identifying job events; date of identifying event			
40893		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary/date; salary; employment history; employment history			
40894		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40895		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40896		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date; date; date; salary			
40897		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; email	4/24/2019	Dan Chasek	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40898		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific dates of employment; hire date; specific job title; supervisor name; name; identifying team information; project assignment; job title/identifying date; date and specific identifying job event; date and specific identifying job event; identifying information about job assignment			
40899		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race information; citizenship/visa information; identifying personal information			
40900		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date			
40901		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40902		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40903		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40904		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job assignment; job assignment;			
40905		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary information; identifying personal information; salary information; supervisor name;			
40906		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email	5/8/2019	Kiesha Cockett	
40907		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40908		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history/dates; race; citizenship/visa status; name of current employer; description/area of work			
40909		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary information; date of hire; job title			
40910		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	prior employment; prior employment title; starting oracle salary; starting job category; team name; employment history			
40911		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor titles and names; supervisor titles and names; job description; supervisor; employment history; supervisor; team description; employment history; job category			
40912		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	identification of job assignment; team description; job titles			
40913		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; employment tenure; supervisors; job duties			
40914		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; job category; employment history; job category; job category			
40915		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job category; personal descriptor; job category; job category; job title			
40916		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40917		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name;	4/24/2019	Ana Hermosillo	
40918		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40919		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; job title; coworker name; job title; geographic information; geographic information; geographic information; employment history; employment history; name; name; name; employment history; employment history; coworker name; employment history; name; employment history; employment history; salary; specific identifying information; employment history; name; job title; salary; employment history; geographic information; geographic information; employment history; employment history; employment history; employment history; job title; salary; employment history; job title; salary; salary			
40920		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	coworker name; job title; supervisor name; supervisor name; supervisor name; coworker name; coworker email; job duties/description; employment history; supervisor; employment history; name; supervisor; employment history			
40921		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40922		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
40923		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40924		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40925		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40926		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40927		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40928		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email	4/26/2019	Kiesha Cockett	
40929		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40930		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status			
40931		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	current job title; manager status; employment history; salary information; date of hire; job title			
40932		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	prior employment; prior employment; starting oracle salary; starting job category; team name			
40933		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment tenure and prior job title; supervisor; team name; supervisor; supervisor; team/position description			
40934		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; employment history; job title; position description; dates of employment; supervisors; supervisor; supervisor; supervisor job duties			
40935		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	description of duties; supervisor; supervisor; description of duties; supervisor; supervisor; supervisor			
40936		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	personal performance data; job category; supervisor			
40937		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40938		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; specific identifying information; phone number; email	4/17/2019	Ana Hermosillo	
40939		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	geographic identifying information; start date; employment history; geographic identifying information; employment history; employment history; employment history; employment history; job title; date of job title; identifying global career level; job description; supervisor name; identifying time period; supervisor name/title			
40940		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; citizenship/visa status; citizenship/visa status; employment history; salary information; salary information; employment history; employment history; salary information; supervisor; employment history; employment history; job title; job title; identifying team information; employment history; race; race; race; employment history; employment history; employment history; employment history; employment history; supervisor name; employment history; supervisor name; employment history/job title			
40941		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history/job title; employment history; employment history; employment history; employment history; supervisor name; specific identifying information; supervisor name; employment history; employment history; employment history/supervisor name/race; supervisor name/employment history/race; date; employment history; employment history; employment history; employment history; identifying dates of employment; date; date; supervisor name; supervisor title; supervisor name; employment history; employment history; employment history; identifying team member information; identifying team member information; supervisor name; employment history; supervisor name; salary; identifying team member information; identifying team member information			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40942		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor title; job description; job description; job description; job description; job description; educational history; employment history; employment history; employment history; employment history; date; job title/date; job title; employment history/date; job title; employment history/date; date; employment history; job title; job title; date; job title; employment history; salary			
40943		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary			
40944		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40945		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40946		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40947		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; address	4/24/2019	Nisha Parekh	
40948		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40949		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; employment history; employment history; employment history; employment history			
40950		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; salary information; salary information; salary information; employment history; dates of employment; employment history; dates of employment; employment history; citizenship/visa status; salary information; date of hire; timing of hiring; citizenship/visa status; employment history; employment history; salary information			
40951		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; employment history; employment history; employment history; job title; employment history; employment history; employment history; job title; job title; job title; employment history; citizenship/visa status			
40952		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa status; employment history; employment history; citizenship/visa status; citizenship/visa status; citizenship/visa status; citizenship/visa status; supervisor; citizenship/visa status; citizenship/visa status; supervisor; citizenship/visa status; citizenship/visa status; citizenship/visa status; citizenship/visa status; citizenship/visa status			
40953		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; start date; supervisor; employment history; supervisor; supervisor; supervisor; employment history; employee name; employee name; supervisor; employment history; employment history; supervisor; supervisor; supervisor; supervisor; supervisor's title; supervisor; supervisor			
40954		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history			
40955		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor; supervisor; supervisor; supervisor; supervisor; employment history; supervisor; supervisor; supervisor			
40956		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; name; employment history; salary information; employment history; employment history; employment history; salary information			
40957		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40958		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; race; citizenship/visa status; dates of employment; employment history	5/1/2019	Karina Wegman	
40959		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa status; citizenship/visa status; citizenship/visa status; citizenship/visa status; employment history; citizenship/visa status; team name; supervisor; citizenship/visa status; citizenship/visa status; citizenship/visa status; job title; employment history; salary information; job location; employment tenure; supervisor; employment tenure supervisor; employment history; supervisor; citizenship/visa status; employment history; supervisor; employment history; employment history; employment history; salary information; supervisor; supervisor; citizenship/visa status; citizenship/visa status			
40960		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; salary information; supervisor; supervisor; citizenship/visa status; citizenship/visa status			
40961		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; job title; employment history			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40962		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email	4/9/2019	Jessica Flores	
40963		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	personal hr matter; personal hr matter; job duties			
40964		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40965		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire Year; recruiting history; recruiting history; recruiting history;			
40966		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date; employment history; employment history; job title; job title and employment history; employment history; job title and employment history; job history; employment history; same; personal hr matter; personal hr matter; type of departure; employment history; personal non-work activity; employment history; employment history; recruiting history; job assignment; job assignment; job duties; job title; employment history; employment history and job title; employment history; employment history; personal non-work activity; employment history; personal non-work activity; employment history; employment history;			
40967		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; salary information; employment history; employment history and job title; job assignment; supervisor name; supervisor name; supervisor name; employment history; supervisor name; employment history; supervisor name; team number; team number; employment history; employment history; organisational name; job assignment			
40968		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	team number; employment history; team number; citizenship/visa; employment history; employment history; job assignment; employment history; employment history; personal identifying traits; personal identifying traits; personal hr matter; specific salary; specific salary;			
40969		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40970		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; race; salary information			
40971		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40972		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone; email; address	5/1/2019	Kiesha Cockett	
40973		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40974		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; current employer			
40975		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary information; salary information; employment history; employment history; employment history; job title			
40976		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	previous company; citizenship/visa status; salary information; employment history; salary history; salary history; employment history; employment history; salary information; salary information; salary information; employment history and title; job group			
40977		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; supervisor; job title and job description; employment history; job category; supervisor; supervisor name and location; supervisor; supervisor; team name; supervisor and job group; supervisor name and race plus team descriptors			
40978		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; citizenship/visa status; citizenship/visa information; citizenship/visa information; employment history; job title			
40979		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; team name; employment history; supervisor and location; supervisor job title; supervisor; supervisor and location; supervisor job title; supervisor; employment history; team description; team description; team description; team description; job title			
40980		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; supervisor; supervisor; supervisor; supervisor; supervisor; team description; team description; employment history; employment history; employment history			
40981		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
40982		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history			
40983		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number	4/19/2019	SOL Attorney	
40984		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	current employer; job title; job title;			
40985		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40986		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa;			
40987		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date, termination month; job title; name human resources employee;			
40988		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title and job category; employment history; supervisor name; job duties; supervisor name; organizational name; supervisor name; team composition; job title; employment history, supervisor name; supervisor name;			
40989		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	co-worker name, salary information; supervisor name; employment history; another employer; supervisor name; salary history; salary history; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; employment history; supervisor name; supervisor name; employment history; supervisor name; employment history; team composition;			
40990		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40991		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; supervisor name; employment history; supervisor name; supervisor name			
40992		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40993		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; job title; job title; race; citizenship/visa	4/24/2019	Karina Wegman	
40994		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; employment history; salary information; previous employer; job assignment; employment history; job category; job category; supervisor names; supervisor name; supervisor name; job group; salary information; supervisor name; personal conversation with supervisor; group name; employment history; employment history; group name; supervisor names and employment history; supervisor names; supervisor names; supervisor names and employment history; employment history; supervisor name; salary information; employment history; supervisor name; employment history; job assignment; employment history; supervisor name; employment history;			
40995		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; unique event; salary information; supervisor name; salary information; unique event; employment history; employment history; employment history; supervisor name; job category and job title; supervisor name; co-worker information; name; o-worker information; name; supervisor name; supervisor name; name; job duties; employment history; supervisor name; supervisor names; name; name; supervisor name; job assignment; employment history; employment history; name; supervisor name; unique event; unique event; employment history and supervisor name; job assignment; name; name; job description; name; job assignment; name			
40996		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job description; supervisor name; name; supervisor name; employment history; team description; supervisor name; job assignment; organization name; job assignment; colleague name; job category; salary information; salary information			
40997		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	5/3/2019	Nisha Parekh	
40998		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
40999		No redaction	Attorney notes of contacts with confidential third parties					
41000		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; current employer; job title; current employer; job assignment; current employer;			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41001		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary information; employment tenure; current employer; salary information; compensation information; compensation information; hire date; employment tenure; job title; current employer; current employer; current employer; current employer;			
41002		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa status; citizenship/visa status; acquired company name; date of acquired company; acquired company name; current employer; acquired company name; current employer; current employer; employment tenure; employment tenure; current employer; current employer; current employer; specific salary; specific salary; current employer; current employer; salary information; dates of employment; current employer; salary information; current employer; current employer; salary information; salary information			
41003		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	identifying job titles; job category; job category; job category; job category; job assignment; job assignment; job description; job description; employment tenure; job assignment			
41004		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment tenure; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor's current employer; number of team members; race; citizenship/visa; citizenship/visa;			
41005		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	number of team members; number of team members; race; number of team members; race; visa/citizenship, employment tenure			
41006		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa; citizenship/visa; current employer employment tenure; current employer			
41007		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41008		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; employment history; job title; same; same; same; same; identifying of specific benefits tied to job title; information likely to identify witness; current job title which could identify witness	4/11/2019	Karina Wegman	
41009		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	current employer; job title; race; citizenship/visa status; dates of employment (identifying in this context); employment history; job title; job title; job title; information identifying job title; recruiter name;			
41010		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor's name; supervisor's area; name; supervisor's name and supervisor's area; job title; employment history; employment history; job title; project title; job description; employment history; supervisor's name and position; supervisor's name; team members' names; supervisor's name; job title; identifying demographics of team			
41011		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	identification of closely associated person to witness; identification of closely associated person to witness			
41012		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	informant name			
41013		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; address	4/24/2019	Cris Santos	
41014		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41015		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; job title; job category; job description; salary information; job duties; date of hire; supervisor name; supervisor's name; educational background; job description; job description; hire date; job title; salary information; salary information; employment history; salary information; employment history; employment history and salary information			
41016		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; salary information; job category; citizenship/visa; specific identifying information; employment history; employment history; employment history; employment history; employment history/type of departure			
41017		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; employment history; specific identifying information; employment history			
41018		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history/type of departure; employment history/type of departure.			
41019		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product				
41020		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product				

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41044		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; job title; information tending to identify the informant; salary information; job category; job assignment; job title; employment history; supervisor name			
41045		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; supervisor name; job title; salary information; salary information; employment history; information about co-workers; citizenship/visa; hire date; supervisor name; information tending to identify the informant			
41046		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; information tending to identify the informant; job category; job title; job category; employment history; supervisor name; job assignment; supervisor name; supervisor name; information tending to identify the informant; information about co-workers that would tend to identify the informant			
41047		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; information tending to identify the informant; information tending to identify the informant; supervisor name			
41048		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	information tending to identify the informant; information tending to identify the informant			
41049		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	4/25/2019	Ana Hermosillo	
41050		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41051		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	month of departure; job title; job description; race; citizenship/visa			
41052		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; job assignment and employment history; employment history; employment history; employment history; employment history; employment history; job category; employment history; job title; employment history; job category and employment history; job title; job title; job title; job title; job title; job title; employment history; job title; employment history; job title and employment history; number of people; job title; number of people; job title, employment history and number of people;			
41053		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; salary information; job title, employment history and number of people; number of people; job assignment; salary information; job description; salary information; job title; gender and race; information about co-workers; gender and race; job description; information about co-workers; job description; salary information; job title; job assignment; information about co-workers; information about co-workers			
41054		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	human resources personnel; salary information; information tending to identify the informant; employment history; supervisor name; iemployment history; information tending to identify the informant; job title; supervisor name; supervisor name and job assignment; employment history; supervisor name; supervisor name; supervisor name			
41055		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; supervisor name; supervisor name; supervisor name; employment history; employment history; information tending to identify the informant; supervisor name, supervisor names; employment history with supervisor name;			
41056		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41057		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41058		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41059		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41060		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	information tending to identify the informant			
41061		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job assignment; job assignment; job assignment; job assignment; job assignment;			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41062		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; employment history; race	4/19/2019	Karina Wegman	
41063		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa; hire date; location and salary information; job title; job category; employment tenure; supervisor name; supervisor name; specific job duties; specific job duties; specific job duties; specific job duties; supervisor name; supervisor title; supervisor name; supervisor name; number of people; supervisor name and number of people; supervisor name; supervisor name; information about co-workers; information about team; information about team; information about team; information about team; information about co-worker; information about co-worker;			
41064		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	information about co-worker; salary information; salary information and supervisor name; supervisor name; salary information; salary information; information about co-worker; information about co-worker; information about co-worker; co-worker name; supervisor name; information about co-worker; information about co-worker; information about co-worker; supervisor name; information about co-worker; supervisor name; employment history; employment history;			
41065		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; employment history; supervisor name and personal identifying information; personal identifying information; personal identifying information; co-worker names; salary information and supervisor's name, communications and actions; supervisor name and salary;			
41066		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; race; citizenship; hire date; salary; job title and classification; specific job and project assignment and job classification;	5/7/2019	Karina Wegman	
41067		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date; date of salary change; same; salary information; same and date of compensation change; date of compensation change; same; specific performance information tending to identify the informant; same; identification of type of separation; same; identification of current employment; salary info;			
41068		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41069		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name/job title; phone number; job title/job description;	4/19/2019	Hailey McAllister	
41070		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	tenure information; supervision chain			
41071		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa; citizenship/visa			
41072		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date; personal identifying information; employment history; job title; educational information; educational information; educational information; citizenship/visa; former employer; citizenship/visa; job title; former employer; salary; salary; former employer; personal identifying information; salary			
41073		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; salary; identifying team member information; identifying team member information; identifying team member information; identifying team member information; identifying team member information/employment history; identifying team member information; employment history; employment history			
41074		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; job title; job description; date; supervisor name; job description; supervisor name; supervisor name; supervisor name; identifying job information			
41075		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; personal identifying information; identifying team member information; geographic information; job title; geographical information; employment history; supervisor name; job duties; geographic information			
41076		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job description; job title; job identifier; employment history; supervisor name; job duties; supervisor name; supervisor name; supervisor name; identifying team member information/job title; employment history			
41077		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; employment history; supervisor name; supervisor name; job duties; identifying team member information; geographic information			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41078		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history			
41079		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; supervisor name; employment history; identifying team member information; employment history; identifying team member information; race; identifying team member information			
41080		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employment history; supervisor name; identifying team member information; identifying team member identification			
41081		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email;	10-Apr-19	Kiesha Cockett	
41082		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employer name; job title; job titles and Years; month of termination;			
41083		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; hiring manager name; Years in company; specific salary information; comparator salary information; job title, specific salary information; name of prior employer			
41084		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date; job title; specific salary information; specific salary information			
41085		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	dates of hire; job description; name of prior employer; job title; citizenship/visa; citizenship/visa job title; specific salary information.			
41086		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job titles; dates of employment; job title; supervisor name; job description; supervision name; supervisor name; supervisor name; location of coworkers; race of specific coworker; specific salary information; citizenship/visa; Year of raise; specific salary information; job title; specific job assignment; number of female workers			
41087		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job description; dates of job assignments; supervisor information; job duties; job duties; job duties; job duties; supervisor information; supervisor information; geographic identifier; racial identifier; specific salary information; citizenship; date of pay raise; specific pay information; job duties; co-worker information			
41088		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41089		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	type of departure; health information; private family information			
41090		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; telephone number; job title	4/19/2019	Karina Wegman	
41091		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship status; citizenship/visa hire date; job title; geographic identifier; job description			
41092		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	prior job history; job title; organization; hire date; supervisor information; supervisor information; timing of identifying event; timing of identifying event;			
41093		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41094		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41095		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; job description;	4/22/2019	Karina Wegman	
41096		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship status; citizenship status; citizenship status; date of hire; specific pay information; job identifier; specific pay information; job title; job title; job title; job title; department			
41097		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job hire date and month of separation; separation information; supervisor name; supervisor name; specific information about team; hired month; race; race; race; name of co-worker;			
41098		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41099		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email address;	7/2/2019	Nisha Parekh	
41100		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; hire date; job title; supervisor name; employment history; specific job duty; same; same; same with additional of date range for job duty; name of closely associated colleague; job title; name; name; name of closely associated colleague;			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41101		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date of assignment; product name; job assignment/duty; supervisor name; same; same; same; job classification; same; same; job title; identifying job assignment;			
41102		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; same;			
41103		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	hire date; supervisor name and dates of supervisor; same; job titles; same; date and salary; date of raise; salary; date of raise; date of raise and salary; date of raise; date of raise and salary; date of raise; date of raise and salary; date of raise; specific salary; supervisor name; salary info; job title;			
41104		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41105		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41106		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; supervisor name; identifying characteristic of manager; supervisor name; identifying characteristic of supervisors; supervisor name; same; name and supervisor name; supervisor name; same; name; supervisor name; identifying job assignment details; supervisor name; name; supervisor name; name; supervisor name; name; supervisor name; name; supervisor name; supervisor names; supervisor name; name; supervisor names; supervisor name; name			
41107		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	details regarding identifying work event; same; product name and details regarding assignment; name;			
41108		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific product assignment name; same; salary info; detail of identifying work event; same; same; same; same; same; same; same; same and details of specific duty and product assignment;			
41109		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	type of separation; specific date of identifying work event; same; detailed information regarding identifying work event; type of separation; specific date of separation; detailed information regarding identifying conversation; same; same; personal identifying information; same; name of closely associated colleague; name; name of supervisor; name of closely associated colleague; name; supervisor name;			
41110		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; citizenship/visa status; race; specific job title; job classification; salary; employment history; name of employer; same; salary; job title; employer history name; specific job assignment; dates of assignment; job title; job classification; employer name; salary; hiring manager name; salary; name of supervisor; identifying information regarding specific assignment; racial composition; supervisor name; dates of specific assignment; job title/assignment; date of specific work event; name of supervisor; names in supervisory chain; same; same; date and identification of specific identifying work event; same; supervisor name; supervisor name and identifying information re supervisor; name; supervisor name; same; same; dates of specific work assignment; job title; job classification	5/2/2019	Bruce Brown	
41111		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	supervisor name; information regarding identifying aspect of assignment; precise department assigned; dates of specific job assignment; job title; job classification; name of supervisor; date of identifying work event; name of supervisor; identifying information from assignment; name of supervisor; same; same; same; same; supervisory chain and supervisor name; job classification; employment history; employer name and salary; citizenship/visa status; same;			
41112		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	salary and hire date; date of identifying work event; supervisor name; same; precise assignment name; precise group name; salary;			
41113		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number; email; address	5/2/2019	Cris Santos	
41114		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	race; citizenship/visa status; name of current employer; specific job title; identifying job duties; salary rate; same; Year of hire; name of previous employer; job title;			
41115		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	employer name; citizenship/visa status; salary; job classification; job title; hire date; supervisor names; supervisor name; same; same;			
41116		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product				

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
41117		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	citizenship/visa status; supervisor name; job title; job classification; job title; job classification; dates of specific job assignment; identifying job duty assignment; name of supervisor; name of supervisors; same; same; identifying detail of specific team assignment;			
41118		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name of closely associated colleague;			
41119		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; supervisor name			
41120		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	name; phone number	4/30/2019	Nisha Parekh	
41121		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41122		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific job title; race; citizenship/visa status; specific form of separation; specific job assignment; same; same; same;			
41123		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific form of separation; personal identifying information; hire date; specific separation date; specific job assignment; specific job title; hire date; salary			
41124		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	detail of specific assignment; name;			
41125		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	specific job titles			
41126		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	job title; product assignment; division assignment; product assignment; identification of specific Years on specific assignment; job duties; specific assignment; same; same; dates of specific identifying job events; identifying details regarding job assignment and specific salary; identifying detail of work assignment;			
41127		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	identifying nickname; identification of supervisor and time for identifying event; same; identifying characteristics of team; same; same;			
41128		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney Work Product	date of identifying work event; same; identifying date range; description of specific job assignment; same; same; same			
41129		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product				
41130		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; physical address	4/26/2019	Ana Hermosillo	
41131		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41132		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41133		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job title; former employer; recruiting information; job title; job title; former employer; specific salary; former employer; specific salary; Note, the GI redaction on right hand edge of page was in error, there is nothing covered up by this redaction.			
41134		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; specific salary; specific salary; specific compensation; compensation timing; specific ratings; job assignment; supervisor names; supervisor name; job assignment and location of co-workers; supervisor name and title; supervisor unique identifying action; race; supervisor name; unique identifying supervisor information; supervisor name; supervisor names; supervisor name; supervisor name			
41135		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title and unique identifying actions; supervisor name; supervisor name; number of works by location; number of works by location; supervisor name; supervisor name; former employer			
41136		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; job category; precise work location address; unique identifying information			
41137		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; unique co-worker information; specific salary, former employer, citizenship/visa			
41138		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41139		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41140		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41141		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/25/2019	Kiesha Cockett	
41142		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41143		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; race; citizenship/visa; current employer			
41144		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; hire date; departure month; job title			
41145		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer; job title; specific salary; specific salary; job category; job title; job category; job category; job title			
41146		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; hire date; departure month; supervisor name; job duties; supervisor name, and title, race; supervisor information; supervisor name and race; job title; job assignments; co-worker race and countries; co-worker race; co-worker countries			
41147		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41148		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41149		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
41150		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41151		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	4/27/2019	Norm Garcia	
41152		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	departure month; job title			
41153		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41154		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41155		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; employment history; employment history;			
41156		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job assignment and job duties; human resources person's name; human resources person's name and job duties; job duties;			
41157		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41158		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41159		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
41160		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41161		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name	5/2/2019	Ian Eliasoph	
41162		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41163		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41164		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41165		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job assignment; employment history; job title, employment tenure, specific salaries; employment history; specific salary; employment history; job category; job category			
41166		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; employment history; job duties; job duties; employment history; supervisor name and job assignment			
41167		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history			
41168		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment history; employment history; employment history; supervisor names; job duties			
41169		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; co-worker number; unique co-worker information; unique co-worker information; unique co-worker information; employment history; employment history			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41170		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; employment history; specific salary; employment history; unique identifying information; unique identifying information;			
41171		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41175		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; current employer; job title; employment history; specific employment date; unique work location; supervisor location; personal history; unique work location; unique work location; personal history; hire date; job title; job title; job title; job title	UNDATED	RSOL Attorney	
41176		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment and unique work location; citizenship/visa			
41177		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa (Note: redaction includes an attorney question); citizenship/visa			
41178		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41179		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa			
41180		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique work location information; citizenship/visa			
41181		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41182		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; phone number; internet address	4/24/2019	Ana Hermosillo	
41183		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, job category; hire date; employment history; specific employment date			
41184		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; specific employment date; personal history; job category; job category; job assignments; unique team identifying information			
41185		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; job category; job title; employment history; supervisors names and titles			
41186		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41187		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41188		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41197		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; specific mailing address	4/22/2019	Dan Chasek	
41198		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41199		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment position; employment history; employment tenure; employment history; race; citizenship/visa			
41200		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employer name and information; job description; job title; former employer name, employer name; specific employment date; specific salary; specific salary; former employer name; hire date			
41201		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment history; former employer; job title; personal history			
41202		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category, job title; job category; specific salary and compensation information; job category; precise work location; employment tenure; supervisor job title and job category; job duties; job duties; supervisor name and job category; co-worker employment history; name; race			
41203		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; specific compensation information; job assignment; employment history			
41204		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41205		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history; co-worker employment information; job title; supervisor title			
41206		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41207		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/29/2019	Kiesha Cockett	
41208		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41209		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; employment status			
41210		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job title; job category			
41211		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; specific salary; job title; employment history			
41212		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; specific duties; supervisor name; supervisor name; job assignments; country of coworker; country of coworker			
41213		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; position start date; position end month and day; supervisor name; job duties; supervisor name; supervisor name; supervisor name and race; identifying information about make-up of the team			
41214		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation; specific salary; specific salary; specific salary			
41215		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure; personal identifying information			
41216		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
41217		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/29/2019	Kiesha Cockett	
41218		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41219		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; race; citizenship/visa; employment status			
41220		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; employment tenure; job duties; job assignment; specific salary; position start date; job title; job title			
41221		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Employment history; job assignment; specific salary; specific salary; job category; job assignment; job tenure			
41222		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Supervisor name; job assignment; job assignment; supervisor name; supervisor name; identifying information; job tenure; unique identifying event			
41223		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; unique identifying information; supervisor; unique identifying information; job duties			
41224		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
41225		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41232		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/9/2019	Sue Kumli	
41233		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; supervisor name			
41234		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41235		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job title; job title; specific salary; specific salary; type of departure; type of departure; job history; specific salary; job category; hire date; job title; job history; specific salary			
41236		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job title, citizenship/visa; job title; specific salary, job title; departure date; type of departure; citizenship/visa; job history; job history			
41237		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job title; employment history; supervisor name; supervisor name; supervisor name; supervisor name			
41238		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job tenure; coworker information; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa			
41239		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; unique identifying information; unique identifying information; job title; job category; job category; supervisor name; job duties; supervisor name; supervisor name; unique identifying information; unique identifying information; unique identifying information; unique identifying information			
41240		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41241		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Personal identifying information			
41242		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address	4/19/2019	Cris Santos	

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41243		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	start date; end date; employment history; employment history; job title; job duties; job duties			
41244		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; supervisor name; hire date; educational information, citizenship/visa; employment history			
41245		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job title; job assignment; job assignment; identifying job assignment information; employment history, job title; employment history; employment history; job title; job title; job assignment; employment history; supervisor name			
41246		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; supervisor name; supervisor title; supervisor title; supervisor name and title; personal identifying information; personal identifying information; job duties; employment history; employment history; personal identifying information; identifying hiring information; educational information; unique identifying co-worker information; personal identifying information, identifying co-worker information, citizenship/visa; job category			
41247		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job duties; supervisor name; supervisor name; job title; identifying co-worker information; employment history			
41248		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41256		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; physical address	4/26/2019	Cris Santos	
41257		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41258		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title; job duties			
41259		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; specific salary; hire date; job title; job duties; job title; employment history; name of acquired company; job title; name of acquired company;			
41260		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	first GI redaction in error, part errantly redacted is "1 promotion;" job assignment; third redaction is in error, part errantly redacted is "Redwood Shores;" employment tenure; job duties; supervisor name and title; supervisor title; supervisor name; supervisor name; last GI redaction in error, part errantly redacted is "promoted once"			
41261		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	First GI redaction is in error, part errantly redacted is "india;" race; Third GI redaction is in error, part errantly redacted is "Chinese;" race; job title; sixth GI redaction after " "(Doesn't remember" is in error, parr errantly redacted is "IC number);" job assignment; eighth redaction is in error, part errantly redacted is "Redwood Shores;" employment history; job duties			
41262		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; supervisor title; supervisor name; co-worker race; employment history; co-worker race; race; race			
41263		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	classification of first GI redaction is in error, should be "WP: AQ;" identifying co-worker information; name; name of acquired company; employment history; employment history; employment history; supervisor title; supervisor title			
41264		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; physical address	4/26/2019	Cris Santos	
41265		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41266		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title; job duties			
41267		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; current employer and specific salary; specific salary; hire date; job title; job title; employment history; name of acquired company; job title; name of acquired company			
41268		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment tenure; job duties; job duties; supervisor name and title; supervisor title; supervisor name; supervisor name; last GI redaction is in error, part errantly redacted is "10"			
41269		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; unique identifying information; ujob title; fourth GI redaction after " "(Doesn't remember" is in error, parr errantly redacted is "IC number);" job assignment; job duties			
41270		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; supervisor title; supervisor name; co-worker race information; co-worker race information; race; race			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
41271		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying co-worker information; salary information; salary information			
41290		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; race; citizenship/visa; job title; employment history; identifying personal information	5/1/2019	Karina Wegman	
41291		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; prior employer, job title; prior employer; specific salary information; specific salary; specific salary; job assignment; supervisor name; supervisor job title; supervisor name; supervisor job title; supervisor job category; employment history; identifying salary information; employment history; supervisor name; supervisor name; supervisor name; identifying co-worker information; identifying co-worker job category; identifying co-workers' employment histories; co-worker name; co-worker job category; co-worker job title			
41292		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; identifying employment history information; identifying co-worker information; supervisor name; identifying job title information; co-worker name			
41293		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	6/4/2019	Nisha Parekh	
41294		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41295		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41296		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; hire date, departure month; job title; employment history; employment history; employment history; employment history			
41297		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history; employment history; employment history; unique identifying event; personal identifying information; personal identifying information			
41298		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job category; job category; job category; co-worker information; job category; job duties; job assignment			
41299		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; personal identifying information; personal identifying information; co-worker information; co-worker information, job category; co-worker information, job category			
41300		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race; co-worker information, job category; co-worker information, race, job assignment			
41301		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41302		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41303		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; co-worker information; unique identifying event; co-worker information; unique identifying event; unique identifying event; co-worker information; unique identifying event; unique identifying event; co-worker information			
41304		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41305		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	5/10/2019	Charles Song	
41306		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41307		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job category			
41308		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation; hire date; job title; job category; employment history; job assignment; employment history; employment history; citizenship/visa			
41309		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; unique identifying event; employment history; unique identifying event; job assignment; employment tenure; supervisor name; co-worker information, race; co-worker information, race			
41310		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment tenure; supervisor name			
41311		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race			
41312		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41313		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; job title; job duties; race	4/23/2019	Karina Wegman	
41314		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; type of departure; personal identifying information; personal identifying information; personal identifying information; specific salary; specific salary; hire date; job title; job category; employment history; employment history; specific salary; job assignment; employment tenure; job duties, job title			
41315		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; employment tenure; supervisor name; supervisor name; supervisor name; job title; job title; job assignment; employment tenure, hire date; supervisor name, co-worker information, supervisor name, supervisor name, co-worker information, supervisor name, co-worker information, supervisor name; supervisor name; supervisor name, co-worker information; supervisor name; co-worker information; personal identifying information; unique identifying event; supervisor name; specific salary; unique identifying event; specific compensation, specific salary; unique identifying event; specific compensation, specific salary; unique identifying event; unique identifying event; job title; job assignment			
41316		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; supervisor name; supervisor name; specific compensation; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; unique identifying event; supervisor name; supervisor name; employment tenure			
41317		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; co-worker information; co-worker information			
41318		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	5/21/2019	Sue Kumli	
41319		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41320		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties, personal identifying information; race; citizenship/visa, employment history			
41321		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history, job title; employment history; employment history; employment history, job title; employment history, job title; personal identifying information, job title, job duties; employment history; employment history, job title; employment history, job duties; specific salary; specific salary; unique identifying event; employment history; specific salary; specific compensation; specific compensation; unique identifying event; specific salary; employment tenure; specific salary; specific salary; employment tenure; co-worker information, race; co-worker information, race; specific compensation; specific compensation; employment history; employment history; unique identifying event; unique identifying event; co-worker information, race; supervisor name			
41322		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information, unique identifying event; unique identifying action; co-worker information; unique identifying action; unique identifying event; job category; job duties; job title; job title, unique identifying event; job title; job title, unique identifying event; job title, unique identifying event; job title; job title, unique identifying event; job title; unique identifying action; unique identifying event; unique identifying event			
41323		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; specific salary; specific salary; job assignment; personal identifying information; employment history; employment history; employment history, citizenship/visa; citizenship/visa; specific salary; specific salary			
41324		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category, job title; job assignment; hire date; supervisor name; co-worker information; supervisor name, co-worker information; supervisor name, supervisor name; hire date; unique identifying event; personal identifying information; co-worker information, race; unique identifying event			
41325		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race; citizenship/visa; citizenship/visa; citizenship/visa			
41326		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41327		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, job category, personal identifying information, unique identifying event; co-worker information; co-worker information; co-worker information; unique identifying event; job title, job category			
41328		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; unique identifying event			
41329		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	5/2/2019	Nisha Parekh	
41330		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; unique identifying information; name of acquired company; unique identifying event; unique identifying event; personal identifying information, race; unique identifying event, job category, job title			
41331		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; job category; name of acquired company; job assignment; job duties; personal identifying information, unique identifying event; type of departure; unique identifying information, job title; job category; job category; unique identifying event; unique identifying event, job category; job category; type of departure; unique identifying event; type of departure; type of departure, personal identifying information; job category; unique identifying event			
41332		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; name of acquired company; unique identifying event; race; type of departure, unique identifying event; job category; specific compensation			
41333		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41334		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41335		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41336		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41337		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41338		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41339		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41340		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; job titles; hire date	5/31/2019	Karina Wegman	
41341		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; supervisor name; employment history; employment history; job title; job title; employment history; former employer; recruiter name; recruiter name; recruiter name and employment history; former employer; specific salary; specific salary; employment history and compensation information; specific compensation; employer name; specific salary; specific compensation information; employment history; unique identifying employment information; specific employment date; job assignment; specific salary; job assignment; unique employment information; specific salary; specific salary; specific employment date; specific salary; specific compensation; job assignment and duty; supervisor name			
41342		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisors name; specific employment date; former employer; specific employment date; specific salary; supervisor name; supervisor name; supervisors titles; employment history; name; employment history; supervisor name; name; supervisor name; employment history; unique identifying team information; supervisors names and locations; unique team identifying information			
41343		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisors title; name; former employer; job category; supervisor title and job category; unique identifying employment information			
41344		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/30/2019	Cedrick Richardson	
41345		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41346		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; specific employment date; race; citizenship/visa			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41347		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job categories; specific salary; job category, job title			
41348		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; unique work location; personal history; specific salary; job category; job assignment; employment tenure			
41349		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job duties; supervisor name; supervisor name and title; supervisor name; unique team identifying information			
41350		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying employment information; unique identifying employment information			
41351		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41352		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job categories; specific employment date			
41353		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	5/31/2019	Nisha Parekh	
41354		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41355		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41356		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties; specific salary; hire date; job title; unique employment information; job category at hire; job category; unique monetary information			
41357		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer; job title; employment history; unique action taken by him; former employer; specific salary; employment history and salary information; employment history			
41358		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category and information; job title; job category; job category; job assignment; supervisor name; unique identifying team information; employment history			
41359		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique action taken by him; employment history; employment history; specific employment information			
41360		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41361		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41362		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; specific employment date; employment history; employment history			
41363		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job category; job category; citizenship/visa; race; race			
41364		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41365		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; job title; hire date; specific salary; employment history; employment history; job title; former employer; specific salary; job assignments; employment tenure; supervisor name; supervisor name; personal history; employment history; coworker name; co-worker name	4/29/2019	Karina Wegman	
41366		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer; specific salary; job assignments; employment tenure; supervisor name; supervisor name; personal history; employment history; coworker name; co-worker name			
41379		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; address	4/30/2019	Cris Santos	
41380		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41381		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title, job category; job category; job duties;			
41382		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job assignment; employment tenure; supervisor name; supervisor name; specific salary; hire date; job title; job history;			
41383		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; specific salary; job category; hire date; supervisor name; supervisor name			
41384		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job titles; employment tenure			
41385		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41386		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41387		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Name; phone number	4/26/2019	Norm Garcia	
41388		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job title,			
41389		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41390		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41391		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Job tenure; job history; job history; job history; citizenship/visa; job title; specific salary			
41392		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; start and end dates; job assignments; coworker race; supervisor race; country; unique coworker information; unique supervisor information			
41393		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41394		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
41395		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41396		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; citizenship/visa; race; type of departure; job position; job category; specific salary; job history; specific salary; start date; job title; specific salary; job category; supervisor name and title	4/26/2019	Bruce Brown	
41397		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor date; name; supervisor name; supervisor name; supervisor name; supervisor name; race; job title; unique identifying event; unique identifying event; identifying information about the make-up of the team; job assignment; type of departure; job assignment; unique identifying information about the team; unique identifying information; citizenship/visa; citizenship/visa; citizenship/visa			
41398		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa; specific salary; specific salary			
41399		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	6/7/2019	Nisha Parekh	
41400		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
41401		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure; race; citizenship/visa			
41402		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	start date; job title			
41403		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor title; supervisor title; name; name; name; name; supervisor department; supervisor department; supervisor name			
41404		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; job history; citizenship/visa			
41405		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; citizenship/visa; specific salary; race; name			
41406		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41407		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41408		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41409		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name			
41410		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; type of departure; name; name; identifying information			
41416		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	6/4/2019	Nisha Parekh	
41417		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41418		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job title; job title; race; citizenship/visa; job title; job location			
41419		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; specific salary; hire date; job title; specific salary; job title; unique identifying event			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41420		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	previous employer; job title; unique identifying event; unique identifying event			
41421		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; employment history; specific salary; specific salary; specific salary; employment history			
41422		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41423		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying employment information; unique identifying event			
41424		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41425		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41426		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying employment information; identifying employment information; identifying employment information; race of supervisor			
41427		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary			
41428		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/14/2019	Cedrick Richardson	
41429		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41430		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41431		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	First redaction noted as WP-AQ should have been GI - job title; hire date; job title			
41432		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job category			
41433		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; hire date; job duties; supervisor name; supervisor name; supervisor name; job history			
41434		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; employment tenure; job category; job category			
41435		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure			
41436		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event; personal identifying information			
41437		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41438		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; address	5/17/2019	Cris Santos	
41439		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41440		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; hire date; job title			
41441		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; specific salary; job title; employment tenure; supervisor name; supervisor name			
41442		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; job title; job assignment; employment history; supervisor name			
41443		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job assignment; hire date; type of departure; supervisor name; supervisor name; employment history			
41444		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event			
41456		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/9/2019	Karina Wegman	
41457		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title			
41458		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
41459		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job assignment; job title; job category; job assignment; employment history; employment history; supervisor name; job title; job assignment; employment history; supervisor name and title; job duties; supervisor name and title			
41460		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; specific salary; specific salary; unique identifying information; specific salary; specific salary; race and supervisor names			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41461		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race and supervisor title; unique identifying information; supervisor name; unique identifying information; previous employer; previous employer; name; employment history; employment history; name; employment tenure; supervisor title and name; name; name; supervisor name			
41462		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; unique identifying event	4/25/2019	Ana Hermosillo	
41463		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41464		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job title; job category; race; citizenship/visa			
41465		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job title; previous employer; employment history; employment history; employment history; employment history; specific salary; employment history; employment history; specific salary; employment history; specific salary; employment history			
41466		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; unique identifying information; supervisor name; employment history; employment history; supervisor name; supervisor name; supervisor name; employment history; unique identifying information; employment history; employment history; supervisor name; supervisor name; supervisor name and race; supervisor information; name; name, education, employment history; unique identifying information and job assignment; unique identifying information			
41467		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor information; citizenship/visa and unique identifying information			
41468		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
41469		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41470		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41471		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41472		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41473		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; race; previous employer; employment history; hire date; job title; job category; employment history; job category; job location; subsequent employer; subsequent employer; job history; job history; citizenship/visa; personal identifying information		Ian Eliasoph	
41479		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	5/3/2019	Kiesha Cockett	
41480		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41481		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; race; citizenship/visa			
41482		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, job title; job category, job category; job duties; specific salary; hire date, hire date; job title			
41483		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information, employment history; employment history, job title; specific salary; job category; job assignment			
41484		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure, personal identifying information, unique identifying event; supervisor name, co-worker information, supervisor name, co-worker information, supervisor name, co-worker information; supervisor name; unique identifying event			
41485		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category, job title; job title; co-worker information; personal identifying information, unique identifying event; supervisor name, race, co-worker information, supervisor name, race, co-worker information, supervisor name, co-worker information			
41486		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; co-worker information, race; job category; job assignment; employment tenure; supervisor name, co-worker information, race; supervisor name, race, co-worker information, supervisor name, race; supervisor name, race; supervisor name, race, supervisor name, supervisor name, co-worker information, race; job duties			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41487		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race; employment history, job title, job assignment; co-worker information, race, co-worker information, co-worker information; job duties; co-worker information; co-worker information, race; unique identifying event, supervisor name, job assignment, supervisor name, unique identifying event, job title; unique identifying event, supervisor name, supervisor name			
41488		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; unique identifying event; job category			
41489		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	5/3/2019	Dan Chasek	
41490		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41491		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41492		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job title; job duties; specific salary; unique identifying event, hire date; job title; name of acquired company			
41493		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event, name of acquired company; job title, employment history; specific salary; unique identifying event; job category; job assignment			
41494		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date, departure date; supervisor name, co-worker information; job duties; supervisor name; supervisor name, co-worker information; citizenship/visa, unique identifying event, supervisor name			
41495		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa, unique identifying event; job category, unique identifying event; job duties, citizenship/visa; job category; job assignment; hire date			
41496		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job duties, job title; supervisor name, co-worker information; supervisor name, co-worker information; co-worker information; co-worker information, race; specific compensation; supervisor name; co-worker information, race, citizenship/visa			
41497		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; race; race			
41498		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa			
41499		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name, job title, job assignment; phone; email; name of acquired company; name of acquired company, unique identifying event, name of acquired company, name of acquired company, unique identifying event	4/24/2019	Hailey McAllister	
41500		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company, employment history, name of acquired company, unique identifying event; unique identifying event, name of acquired company; unique identifying event; job assignment; name of acquired company; unique identifying event, supervisor name; job title; job category; job assignment; unique identifying event; unique identifying event; unique identifying event; job category; job assignment; unique identifying event; employment tenure; job category; unique identifying event, job category, job title, unique identifying event job category, job title; job duties; unique identifying event; job duties			
41501		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job duties; job duties; unique identifying event; co-worker information; job title; co-worker information; co-worker information; co-worker information; job assignment; supervisor name; unique identifying event; unique identifying event; supervisor name; unique identifying event; co-worker information; co-worker information			
41502		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; personal identifying information; personal identifying information; personal identifying information; personal identifying information; job category; job duties, job assignment; co-worker information; name of acquired company; supervisor name; co-worker information; supervisor name, job duties; personal identifying information; job title			
41503		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job duties			
41504		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41505		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event, employment history			
41513		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address;	6/6/2019	Cedrick Richardson	
41514		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41515		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment and employment history; race; citizenship/visa			
41516		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job title and job assignment; specific salary; hire date; job category; unique identifying information			
41517		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; previous employer; specific salary; job category; job assignment; employment history; supervisor name			
41518		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; supervisor name and title; supervisor name; salary information; co-worker race			
41519		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	salary information; job category; job category; unique identifying information; job title; job assignment; employment tenure; supervisor name and employment tenure; job assignment; supervisor name and title; supervisor name and title; supervisor name and title; co-worker race			
41520		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history			
41521		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41532		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	6/11/2019	Dan Chasek	
41533		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41534		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; current employer			
41535		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; current employer information; specific salary information; specific salary; specific salary; employment history; current employer; specific salary; hire date and start date; job title			
41536		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa			
41537		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job assignment; employment tenure; supervisor name; supervisor name and title; supervisor name; supervisor name; job title			
41538		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; citizenship/visa; job title; job title			
41539		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41540		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41541		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history			
41542		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; employment history	4/23/2019	Ian Eliasoph	
41543		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41544		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41545		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; former employer; specific employment date			
41546		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job titles; employment tenure			
41547		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; supervisor name; unique identifying action done by her; supervisor name; unique team identifying information; unique team identifying information; specific salaries; employment history and specific salary; job category; specific compensation information			
41548		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41549		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41550		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary compensation information; specific salary compensation information; job category; unique identifying action done by her; unique identifying action done by her			
41551		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41552		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; employment tenure, job assignments, specific salaries, job category, employment history, race	5/3/2019	Ian Eliasoph	
41553		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; unique work location; employment history; employment history; employment history			
41554		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salaries and date; specific salary; former employer; job title; employment history and specific employment date; employment history; specific employment date; specific salary information; employment history and specific employment date; employment history; supervisor name; supervisor name; unique action taken against her; supervisor name and unique team identifying information; job category; job assignment; supervisor name; personal history; specific salary; specific salary			
41555		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; race/gender; co-worker name and specific employment date; employment history; personal history; job assignment; employment history; unique identifying action; supervisor name; specific employment date; specific compensation information; specific compensation information; unique action taken by her; job duty			
41556		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title			
41557		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duty; employment and personal history, specific salaries; employment history and specific salary; hire date; job title			
41558		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history			
41559		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41560		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	4/23/2019	Hailey McAllister	
41561		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41562		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; specific employment date; supervisor title and job assignment; supervisor job assignment			
41563		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job titles, job assignments, specific employment dates; former employer			
41564		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former job duties; unique work location, former employer			
41565		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41566		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41567		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41568		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; former employer, employment history; job titles, job assignments, specific employment dates; specific employment date, unique employment action; specific employment date, job assignment, job duties; supervisor name; supervisor name; unique team identifying information; unique team identifying information; specific salary; employment history and specific salary			
41569		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor race and gender; unique team identifying information; job assignment			
41570		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name	4/30/2019	Charles Song	
41571		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41572		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title			
41573		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title and duties; specific salary; current employer and specific salary; hiring month; job title; employment history and previous employer; employment history; employment history			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41574		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	previous employer, job title; specific salary			
41575		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; supervisor name; job duties; identifying supervisor information; supervisor name; Please note that the third dark bullet in the series of three dark bullets in a row mistakenly redacted both the question and the answer when the answer should have been redacted GI - the basis of this should have been GI redaction is supervisor name			
41576		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary			
41577		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	There is a unlabeled mistaken redaction of the letter "u" in the middle of the word surprise; personal identifying information; personal identifying information			
41578		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41579		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41580		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; two phone numbers; internet address; race, citizenship/visa; employment tenure; unique work location; former employer; specific employment date; employment history and specific employment dates; specific employment date; specific employment date; employment history and unique work location; employment history and specific employment dates	6/7/2019	Karina Wegman	
41581		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job assignment; employment history; unique work location; job title; job category; job assignments; employment history; supervisor name and title; job category; employment history; supervisor name; supervisor name; supervisor name and title, employment history; supervisor name			
41582		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique former co-work information			
41583		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; two phone numbers; internet address; race; citizenship/visa; job title; job category; employment tenure; specific salaries; employment history and job title	5/21/2019	Karina Wegman	
41584		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment history; supervisor name; job assignment; employment history; job assignments; supervisors names and dates; supervisor name; job category; co-worker job title, races, and job category; job assignments; employment history; supervisor name; job assignment; employment history; supervisor name; job category; job category; employment history and job category; job category; employment history and job category; job category; supervisor name and job title			
41585		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name, supervisor employment history, job assignments, supervisors names; job assignment, supervisor title, employment history, supervisor name; specific employment date, employment history, supervisors titles, supervisor names; supervisor name, employment history			
41586		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, supervisor title; specific salary and date; employment history; specific employment date and salary; job assignment; personal information and contact information			
41587		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; citizenship/visa, race; employment tenure; job title; job category, specific salary and compensation information; employment history; employment history and job title; job title; employment history, former employer, and job titles; job title; specific salary; supervisor name and title; supervisor name; supervisor name; supervisor employment history; supervisor name; job title; supervisor name	4/23/2019	Bruce L. Brown	
41588		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Note: unlabeled redaction is GI and employment history; employment history; job title; job category; job duties; supervisor name; unique team identifying information; employment history; job title; job assignment; job category; job duties and unique team identifying information; unique team identifying information; supervisor name; specific employment date; specific salary; employment history; job assignments, job category; employment and supervisor history; job duties; job assignment; job duties; unique action taken by her, specific salaries, job assignment			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41589		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique employment action taken against her, personal history; employment history; employment tenure; specific salaries and dates; supervisor name; specific employment date; employment tenure; employment and personal history			
41590		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/19/2019	Ana Hermosillo	
41591		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; personal history; specific salary; job title; employment history; specific employment date; job category; personal history; job category and employment history; unique employment action; job assignment; race; employment history			
41592		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41593		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; specific salary information, employment history	5/17/2019	Ian Eliasoph	
41594		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41595		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; Note: incorrect redaction marked NR--should be WP-AQ and GI and is citizenship/visa information			
41596		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; job title and specific employment date			
41597		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer; job title; employment history; specific salary; job title; employment history			
41598		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history and job titles; job title and date; job title; job title; job title; job assignment and duties; unique work location and description; supervisor name and dates; job assignment; job assignment; employment history; supervisor name; supervisor name			
41599		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title and supervisor name; unique supervisor information; category of employees; job duties; job title; supervisor name; supervisor name; supervisor name; job title; job titles; supervisor name; job title; specific salaries			
41600		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and date; job duty; specific compensation information; supervisor name and title; supervisor name			
41601		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; supervisor name			
41602		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job title; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; unique employment event; specific employment dates			
41603		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41604		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	6/3/2019	Norm Garcia	
41605		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; employment history; work location			
41606		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41607		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; the two NR redactions on this page were mislabeled and should be GI: the redaction basis for them are: citizenship/visa; citizenship/visa			
41608		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date;			
41609		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job category; employment history; employment history; job assignment; job title; job assignment; employment history; supervisor name, race and title; supervisor name; co-worker races, locations and numbers; specific salary; specific salary; supervisor name; supervisor name, title, job category; job category; employment history; specific salary; employment history			
41610		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41611		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; internet address			
41612		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41619		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; e-mail address	7/1/2019	Daniel Chasek	

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41620		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41621		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title			
41622		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; specific salary;hire date; job title			
41623		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; specific salary information; employment history; supervisor name			
41624		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; supervisor name; supervisor name; supervisor name; coworker information; coworker information			
41625		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment history; job duties; supervisor name; job duties;			
41626		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41627		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Specific salary, type of departure, unique identifying event, and specific compensation			
41628		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; race; citizenship/visa; job title; start date, departure month; specific salary; specific salary; current employer; specific salary; job title; job category	6/7/2019	Karina Wegman	
41629		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job assignment; employment history; supervisor name; identifying co-worker information; job title; job category; job assignment; employment history; identifying salary event; identifying job event; name; supervisor name; name; name; identifying salary event; compensation; specific compensation information, job assignment, co-worker information			
41630		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa, identifying personal information; citizenship/visa; salary information, co-worker salary			
41631		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	5/14/2019	Nisha Parekh	
41632		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41633		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	start date; employment tenure; job title; race; citizenship/visa; current employer; job title; job title, job duties			
41634		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	prior employer; prior employer; job title; job assignment; job assignment, job duties; job duties			
41635		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41636		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; specific salary; unique identifying job event; compensation information; identifying co-worker information			
41637		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41638		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41639		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying job event; job duties; job duties; job duties, unique identifying job assignment information, supervisor name; unique identifying job assignment information, job duties; job duties; co-worker salary information, educational information			
41640		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41641		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41642		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; race; start date; employment history; start date; departure month	5/13/2019	Karina Wegman	
41643		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker name; job assignment; specific salary; job title, job assignment			
41644		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job duties; job duties; salary information; salary information; employment history; job title; job category; job assignment; employment history; co-worker name; employment history; specific salary; specific salary; specific salary; employment history, job assignment; identifying job duty; job duties; employment history; employment history, job title			
41645		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; employment history, job title; identifying salary event; specific salary; identifying salary event; salary information; salary information; unique identifying job event; job category; co-worker race			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41646		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/7/2019	Dan Chasek	
41647		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
41648		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title			
41649		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; specific salary; type of departure, departure date; specific salary; job history; current employer; hire date; job title			
41650		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job category; job assignment; employment history			
41651		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor title; job duties; supervisor name; identifying employment information, job assignment			
41652		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; hire date, departure date; type of departure; supervisor names; job duties; supervisor names; co-worker information			
41653		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history			
41654		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; personal identifying information, unique identifying event, supervisor name; unique identifying event; job assignment, job title; hire date; type of departure; departure date; supervisor name; job history; supervisor name; job history; identifying employment information; identifying employment information			
41655		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying employment information; identifying employment information; supervisor names, job assignment, identifying employment information			
41656		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/23/2019	Hailey McAllister	
41657		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure; employment history; job assignment; job assignment, job description; employment history; employment history, job location employment history; job title; job assignment; job assignment, employment history; employment history; unique identifying event; employment history, job location; job title; job location; employment history; employment history; specific salary; employment history; supervisor name, supervisor title; citizenship/visa, employment history; type of departure; specific salary; employment history, specific salary; employment history; specific salary, job assignment			
41658		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
41659		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date, job location; job location; employment history; job title			
41660		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job assignment; employment history, job assignment, employment history, job assignment; supervisor names; job duties, job assignment; job location			
41661		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job location; employment history; employment history; job category, job title, job category, job title, job category, job title, job category, job title; employment history			
41662		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, employment history; employment history; job assignment; employment history; employment history; employment history; job title; job assignment; job assignment, employment history; supervisor names and titles; citizenship/visa			
41663		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa; employment history, job title; employment history, job title; job description; job assignment; supervisor names; employment history; co-worker information; supervisor name			
41664		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	no GI			
41665		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41666		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41667		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; address; race, employment history, unique identifying event, personal identifying information, unique identifying event	5/21/2019	Cris Santos	

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41668		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; race; employment history; job title; job category; job location; employment tenure, job description; specific salary; job assignment; employment history; job title; supervisors names; job title, identifying employment information, co-worker name			
41669		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; identifying employment information; job title; co-worker names; co-worker name; co-worker name; specific compensation; supervisor name; specific compensation; employment history; supervisor name; supervisor name; specific compensation; specific compensation; job title, identifying employment information; identifying employment information; employment history, job title; job title, job description; personal identifying information			
41670		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job assignment; employment history; supervisor name; supervisor name			
41671		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, job title, employment history, job title, employment history, job title; supervisor name; unique identifying event; name; identifying employment information; identifying employment information; identifying employment information, personal identifying information			
41672		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; identifying employment information; job title; identifying employment information; identifying employment information; job duties, supervisor name, job duties; supervisor name; unique identifying event; supervisor name; title; employment history; employment history, supervisor name; supervisors' names			
41673		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; email	4/24/2019	Dan Chasek	
41674		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific dates of employment; hire date; specific job title; supervisor name; name; identifying team information; project assignment; job title/identifying date; date and specific identifying job event; date and specific identifying job event; identifying information about job assignment			
41675		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race information; citizenship/visa information; identifying personal information			
41676		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date			
41677		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41678		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41679		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41680		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job assignment;			
41681		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	salary information; identifying personal information; salary information; supervisor name			
41682		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	6/4/2019	Nisha Parekh	
41683		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41684		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; identifying employment information; identifying employment information; departure date; race			
41685		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; hire date			
41686		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	recruitment information			
41687		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job categories; supervisor name, identifying employment information			
41688		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job duties; specific salary; specific salary			
41689		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41690		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41691		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying employment information; employment history; employment history; employment history; supervisor name; employment history			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41692		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; employment history; employment history; job category; employment history; identifying employment information			
41693		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; job title, job duties; unique identifying event; supervisor title; job category; job category; employment history; job title; job title; name of acquired company			
41694		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; co-worker name; personal identifying information; co-worker information; co-worker information			
41695		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41696		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; race; job category; specific salary; hire date; job title; personal identifying information; recruiting information; personal identifying information; specific salary; personal identifying information; hire year; personal identifying information; specific salary; co-worker information	4/23/2019	Bruce Brown	
41697		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment history; co-worker information; identifying employment information; co-worker information; co-worker information; identifying employment information; employment history; employment history; specific salary; employment history; specific salary; identifying employment information			
41698		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa; citizenship/visa; co-worker information; citizenship/visa; citizenship/visa			
41699		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; citizenship/visa; race; job assignment; job category; specific salary; employment tenure; hire date; job assignment; personal identifying information; unique identifying event; specific salary; specific salary; job category; job category; personal identifying information; supervisor name; supervisor title; unique identifying information about team;	4/26/2019	Bruce Brown	
41700		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Start date; job title; job category; specific salary; employment tenure; specific salary; job tenure; job history; specific salary; job history; job tenure; job title, job category; personal identifying information, supervisor name; specific salary; supervisor name; supervisor name; job category; supervisor name and job title; supervisor name and job title; unique identifying event; job category; job tenure; job assignment; unique identifying event; specific salary; personal identifying information			
41701		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job tenure; job title, job assignment; unique identifying event; unique identifying event; job assignment; specific salary; hire date; employment history; job title; specific salary; job history; specific salary; job history; job history; job assignment, job category; specific salary; job history; job category; job history; job category			
41702		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; unique identifying event			
41703		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; physical address	5/7/2019	Kiesha Cockett	
41704		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41705		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer			
41706		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; hire date; job title			
41707		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; former employer; citizenship/visa; unique identifying information; specific salary; job category; job assignment			
41708		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; supervisor name, gender, race, and title; supervisor name, gender, race, and title; supervisor name, gender, race and title; supervisor name, race, gender, title; co-worker race; race; race			
41709		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa; promotion date; citizenship/visa; job category;			
41710		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41711		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41712		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41713		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	5/8/2019	Ana Hermosillo	
41714		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41715		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job history; position title; job history; job assignment; job title; job duties; supervisor name; supervisor name; supervisor title; unique identifying information about team make up; unique identifying information about team make up; job assignment; supervisor name; job history; supervisor name; specific salary; supervisor name; specific salary			
41716		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information			
41717		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information			
41718		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41719		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41720		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41721		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41722		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41723		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address; job title; race	5/8/2019	Ana Hermosillo	
41724		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job category; inadvertent redaction of "least"; job history, job title; job history; job history; job history; job history; unique identifying information; specific salary; specific salary; supervisor name; name; supervisor name; supervisor name; supervisor name			
41725		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; unique identifying information about team make up; unique identifying information about team make up; unique identifying information about team make up; race; unique identifying information about team make up; ; unique identifying information about team make up; unique identifying information; personal identifying information			
41726		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	4/22/2019	Kiesha Cockett	
41727		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41728		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job category; job history; job category; job assignment; job assignment			
41729		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41730		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job title; unique identifying information; specific salary; specific salary			
41731		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date			
41732		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job history; supervisor name; unique identifying information about team; unique identifying information about team; supervisor name			
41733		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41734		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41735		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41736		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41737		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; internet address;	4/23/2019	Hailey McAllister	
41738		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41739		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41740		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job title; job category; job assignment; specific salary; job history; job history; unique identifying event; job history; job title; job history; job history;			
41741		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary, job history			
41742		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; unique identifying information; job history; job history; job history			
41743		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job history, job title; supervisor name; job tenure; job category; job assignment; job duties; job tenure; supervisor name; job duties; supervisor name; supervisor name; job tenure; job title; job duties, job assignment, unique identifying information about project; job history; supervisor name; job tenure; specific compensation;			
41744		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; supervisor name; job history; job assignment; supervisor name; supervisor name; supervisor name; job history; job history; job history; job history;			
41745		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	no GI			
41746		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41747		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; physical address; job title; hire date; race; specific salary;	4/24/2019	Cris Santos	
41748		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41749		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job category			
41750		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job assignment; hire date; employment history; supervisor name, title; supervisor name, title; employment history; supervisor name; hire date; employment history; hire date			
41751		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; specific salary; job category; job assignment; job category; employment history; supervisor name; supervisor name			
41752		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; job category; employment history			
41753		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job title; job assignment; employment history; employment history supervisor name and title; employment history			
41754		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	GI redaction in error, should be WP, therefore no GI			
41755		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41756		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; physical address	4/24/2019	Cris Santos	
41757		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41758		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job category			
41759		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job assignment; hire date; employment history; supervisor name, title; supervisor name, title; employment history; supervisor name; hire date; employment history; hire date			
41760		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	recruitment information; citizenship/visa; specific salary; job category; job category; unique identifying information; supervisor name; supervisor name			
41761		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; job category; employment history			
41762		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job title; job assignment; employment history; employment history supervisor name and title; employment history;			
41763		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41764		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41765		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; job title; employment history; hire date; specific salary; specific salary; employment history	5/7/2019	Karina Wegman	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
41766		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; employment history; job category; job category; job category; employment history; job title; employment history; employment history; employment history; job title, job assignment; employment history; employment history; supervisor name and assignment; supervisor name; supervisor name and title; supervisor name; employment history; current employer; employment tenure; specific salary; specific salary; salary information; salary information; employment history; specific salary; co-worker information			
41767		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job title; employment history; job assignment; job category; job category; employment history; supervisor name; unique identifying informaton; supervisor name; co-worker information; co-worker information; co-worker information; supervisor name			
41768		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41779		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; current employer; job assignment; employment history; unique identifying event; unique identifying event; supervisor location; supervisor location; co-worker information; race; citizenship/visa	4/10/2019	Karina Wegman	
41780		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title job assignment; employment history supervisor name; unique identifying event; unique identifying event; unique identifying event; unique identifying event; supervisor name and title; supervisor name and title; supervisor name and title; supervisor name; supervisor name; supervisor name; co-worker information; unique identifying information; co-worker information			
41781		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	reason for departure; employment history; reason for departure; supervisor name and title; supervisor information; unique identifying event, co-worker name; supervisor name; employment history			
41782		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; current employer; employment tenure; specific salary information; job title; job category; job assignment	5/20/2019	Karina Wegman	
41783		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	previous employer; specific salary; specific salary; job assignment; job title; job title; employment history; employment tenure; employment history; co-worker information; co-worker job category, co-worker name; co-worker name; co-worker name; name; supervisor name; supervisor title; supervisor name; supervisor name; supervisor name and title; supervisor name; employment history; employment history; specific salary			
41784		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation; specific compensation; specific compensation; unique identifying employment event; unique identifying employment event; unique identifying employment information; specific salary; employment history			
41785		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; citizenship/visa; race; job title, job assignment; unique work location; job category, job title; specific salary; employment history; job category, job title; job assignment; personal identifying information; unique identifying action; job assignment; specific salary and compensation; job category; unique co-worker information; unique co-worker information	43622	Bruce L. Brown	
41786		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique co-worker information; race; employment history; job title; job category; unique identifying event; unique identifying location; unique identifying event; employment history; job title, job assignment; job assignment; job category; specific salary; job assignment; employment history; specific salary and compensation; employment history; job title; supervisor title; employment history; specific salary; personal identifying information, citizenship/visa; citizenship/visa			
41787		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa; co-workers location; unique identifying actions by him and to him			
41788		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	43575	Norm Garcia	
41789		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; unique work location; supervisors location			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41790		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41791		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship visa			
41792		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job title;			
41793		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job assignment; unique work location; employment history; unique team identifying information; unique team identifying information; personal identifying information; employment tenure; specific salary; specific salary; personal identifying information; unique team identifying information; job title; job assignment; unique work location			
41794		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; co-worker name; personal identifying information; employment tenure; specific salary; specific salary; unique team identifying information; unique team identifying information; job title; job category; job assignment; unique work location; employment history; supervisor name; job duties; supervisor title and name; unique team identifying information; unique team identifying information; employment tenure; specific salary; specific salary			
41795		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; unique team identifying information; supervisor title; specific salary; specific salary; employment history; personal identifying information; unique team identifying information			
41796		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; personal identifying information; personal identifying information			
41797		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41798		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; mailing address	43600	Cris Santos	
41799		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41800		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job title; job duties; job duties; specific salary and date; specific salary and compensation; hire date; job title; job title; job category; personal work history; job title			
41801		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer; job title; specific salary; specific salary; job category; job assignment; employment history; unique team identifying information; unique team identifying information; specific salary information; job category; specific compensation; job category, job title; job assignment and date; job assignment and date; job assignment and date; employment tenure; job duties; job duties; supervisors names; unique team identifying information			
41802		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; specific salary			
41803		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; specific salary			
41804		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41805		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; citizenship/visa; citizenship/visa; employment tenure; specific salary; specific salary; job title; job category	43613	Karina Wegman	
41806		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment tenure; job assignment and date; job category; job assignment and date; job category; employment history; employment history; specific salary; job assignment and date; job category; job duty; unique identifying employment history; unique identifying employment history; employment history; employment history; unique identifying team information; unique identifying team information; unique identifying team information;			
41807		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; personal history; personal history; employment and personal history; citizenship/visa; citizenship/visa; employment history; citizenship/visa; citizenship/visa; specific salary; specific salary; specific salary; employment history; supervisor name and position; employment history; specific salary			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
41808		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor title; supervisor title; name; supervisor title; job title; supervisor title; name; unique team identifying information; unique team identifying information; job category; unique team identifying information; job category; co-worker's job titles; unique identifying action by him			
41809		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; unique identifying contact history; phone number; internet address;	4/3/2019	Ana Hermosillo	
41810		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; job title; job title; precise work location address			
41811		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship visa; citizenship/visa; supervisor name; supervisor name; employment history and citizenship/visa			
41812		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; personal history; personal history; personal history and citizenship/visa; personal history; personal history; personal history and employment history			
41813		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; job title; job duty; job title; job duty; job duty; job title; specific salary; specific compensation; personal history			
41814		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; specific salary; precise work location address; supervisor name; job duties; job duties; supervisor name; supervisor name; personal history; name; citizenship/visa; supervisor name; supervisor name; supervisor name			
41815		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying team information; unique identifying team information; unique identifying team information			
41816		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41817		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker identifying information co-worker name; specific employment date			
41818		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; email address; race; citizenship/visa; job title; hire date; departure date; specific salary; compensation information; specific compensation; job assignment; job assignment; job assignment; job assignment; employment tenure; supervisor name; hire date; nature of separation; supervisor name; nature of separation, name of acquired company, unique identifying event; supervisor name; date of identifying event; unique identifying information; employment history; supervisor name; unique identifying event; coworker information; coworker information; coworker information, unique identifying event; supervisor name	4/29/2019	Karina Wegman	
41819		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, unique identifying event			
41820		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; citizenship/visa; race; job title, job assignment; job assignment; job title; job category; job category; specific salary; job assignment; employment history; education history, specific recruiting information; job duties; supervisor name; supervisor name; specific salary	4/22/2019	Bruce Brown	
41821		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job assignment; job duties; job assignment; supervisor name; job assignment; job assignment; employment history; employment history; job assignment; job title; job title; job duties; job duties; job assignment; supervisor name and identifying information; supervisor name; supervisor identifying information; supervisor identifying information; supervisor name; name; job title; unique identifying information; unique coworker information; coworker job title; coworker job category; coworker identifying information; coworker identifying information; coworker job category; coworker identifying information; coworker job category; supervisor job category			
41822		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	coworker tenure; job assignment; race; job assignment			
41823		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; email address	4/16/2019	Ana Hermosillo	
41824		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; departure date; job category; job category; job title; job category; job assignment; job title; job category; job assignment; job duties; precise work location address			
41825		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product				

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41826		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; employment history and personal identifying information; employment history; hire date; employment history; identifying event; job title; job category; job category; job category; employment history;			
41827		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41828		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; precise work location address; employment tenure; supervisor name; supervisor name; supervisor title; job duties; job duties; job duties; unique identifying information; supervisor name; supervisor name; unique identifying information; coworker job title; coworker job category; specific salary; job category; specific salary; specific salary; specific salary; place of previous employment; recruiting information; place of previous employment; specific salary; employment history; specific salary			
41829		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job duties; employment history; supervisor name; supervisor name; coworker information; coworker race; coworker information; coworker information; specific compensation; job duties; unique identifying information; competitor name; unique identifying event			
41830		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41831		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	4/23/2019	Ian Eliasoph	
41832		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41833		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; race; citizenship/visa; compensation information; date of departure;			
41834		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; hire date; job title			
41835		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; job assignment; employment tenure			
41836		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; supervisor name; citizenship/visa			
41837		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41838		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title			
41839		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product				
41845		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; email address	5/19/2019	Charles Song	
41846		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41847		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job category			
41848		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific compensation; employment history; job category; specific salary and recruiting information; employment history; job title and duties			
41849		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; employment history; job assignment; job category and employment history; supervisor name; supervisor name and identifying information; supervisor name; coworker information			
41850		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; unique identifying information; employment history; specific salary history; employment history; job title; job title and job category			
41851		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; unique identifying information; unique supervisor identifying information; job category			
41852		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41853		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary information and unique identifying events			
41854		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/11/2019	Nisha Parekh	
41855		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
41856		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job title; job duties; job duties; job duties; job assignment; job assignment; unique identifying actions related to job duty; supervisor name; supervisor title; supervisor title; job duties			
41857		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
41858		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job title; job title; job code; job title; job title; job category, unique identifying information of job category; job title; job title; identifying hiring information; identifying hiring information; specific salary; specific salary; job assignment; specific salary; specific salary; personal identifying information job category; job category; job title, job category; job category; unique identifying personal information; job category and job assignment; job category; job category; job category; unique identifying personal information; previous employer; job assignment; specific salary, date of raise; identifying date of salary event			
41859		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job duties; job duties; unique identifying prior work experience; job duties; job title; unique identifying job event; hire date; departure month; supervisor name; supervisor name; supervisor name; supervisor name; unique identifying assignment information; supervisor name; supervisor unique identifying work event; job duties			
41860		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker job titles; job assignment; job duties			
41861		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying job assignment information; race; unique identifying job assignment information; name; job duties			
41862		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/18/2019	Kiesha Cockett	
41863		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job title; identifying work location; identifying work location; unique identifying supervisor location			
41864		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
41865		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job title; specific salary			
41866		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; hire date; supervisor name; identifying supervisor location; supervisor name; supervisor name; supervisor name; supervisor name; unique identifying co-worker races; job title supervisor name; job duties; supervisor name and title; supervisor name and title; previous employer; identifying work location; unique identifying work location; job title; supervisor name; job duties; supervisor name and title; supervisors names			
41867		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying co-worker information; supervisor name; supervisor title; specific salary			
41868		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	salary information; specific salary; coworker name; citizenship/visa			
41869		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	5/2/2019	Nisha Parekh	
41870		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41871		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; unique identifying job duties; specific salary			
41872		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary, current employer; start and hire dates; departure month; current employer; job title; job category; job category; promotion date; current employer; current employer			
41873		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; personal identifying information; citizenship/visa; citizenship/visa; specific salary; identifying recruitment information; specific salary; unique co-worker information; race; race job duties; job assignment; start date; supervisor name; job duties; supervisor name; supervisor name; unique identifying job assignment information; job duties			
41874		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product				
41875		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product				
41876		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product				

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41877		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker name; co-worker name; current employer; co-worker name; current employer; unique identifying co-worker information			
41878		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying co-worker races; unique identifying job event date; citizenship/visa; unique identifying personal information; citizenship/visa; citizenship/visa; citizenship/visa; current employer; current employer, citizenship/visa; current employer; job titles; job categories			
41879		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41880		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job categories; employment history; employment history; citizenship/visa; citizenship/visa; citizenship/visa			
41881		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	current employer			
41882		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address	4/18/2019	Ana Hermsillo	
41883		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	departure date; departure date; job title, job category; employment tenure; identifying team location; supervisor name and title; identifying team information; job assignment, identifying co-worker information			
41884		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
41885		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; identifying recruitment information; specific salary information; specific salary; specific salary; previous employer; job title; co-worker specific salary; name; co-worker name; co-worker job title; co-worker job title			
41886		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	previous employer; job duties; job duties; job duties; job duties; precise work location address; employment tenure; co-worker name; unique co-worker information; identifying co-worker race; identifying co-worker race; co-worker name, race, information; identifying co-worker race; co-worker race and name; co-worker name			
41887		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor title; identifying supervisor race; supervisor name and title; specific salary; date of raise; co-worker name and unique identifying information			
41888		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41889		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41890		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; street address	5/2/2019	Kiesha Cockett	
41891		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41892		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history; race; citizenship/visa			
41893		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; unique identifying work location; identifying job assignment information; job duties; specific salary; hire date; job title			
41894		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; identifying recruitment information; personal identifying information; identifying recruitment information; identifying recruitment information; previous employer; identifying work experience			
41895		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary information; job title, employment history; job title, employment history; job title, employment history, job category; employment history, title, job category; employment history, job category; job title, job category; job assignment; unique identifying job information; employment history; supervisor name; supervisor title; supervisor name; supervisor name; supervisor identifying information; job duties			
41896		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job assignment; job duties; identifying job event date			
41897		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job titles; job category; job assignment; identifying work location; employment history; job duties; supervisor name; supervisor name; supervisor name; identifying co-worker information; identifying co-worker information; educational information; co-worker name; supervisor name and race			
41898		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker race; employment history; supervisor name; supervisor name			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41899		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; employment history; supervisor name			
41904		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address;	4/11/2019	Kiesha Cockett	
41905		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employer; job title; job title; supervisor unique identifying action; supervisor location			
41906		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa;			
41907		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41908		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; employment tenure; supervisor name; job duties; supervisor title and name; supervisor name; supervisor name; co-worker salary; specific salary; specific salary; specific salary; personal identifying information; unique identifying information; unique identifying information;			
41909		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure;			
41910		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41911		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41912		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/19/2019	Ana Hermosillo	
41913		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; job title; job category;			
41914		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; unique identifying event and type of departure			
41915		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; type of departure; specific salary; job assignment; supervisor name; job duties; job assignment; citizenship/visa;			
41916		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job duties; job duties; supervisor name; race; supervisor name; race; co-worker number; co-worker number; co-worker number; name; co-worker number; co-worker number; job title			
41917		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41918		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41919		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Co-worker name, salary and race; personal identifying information; personal identifying information; personal identifying information;			
41923		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; job title; hire date; job location; job duties;	5/1/2019	Karina Wegman	
41924		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job location; hire date; job title; job category; job assignment start date; job category; job title; job category; job title; job category; supervisor name; supervisor name; job title; job category; job assignment; job duties; job duties; job duties; job category; job title; specific salary; specific salary; specific salary;			
41925		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, supervisor name; specific salary;			
41926		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; job title, job assignment, supervisor name, job assignment; supervisor name; unique identifying information; supervisor name;	5/6/2019	Karina Wegman	
41927		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; job title, job date; job assignment; job assignment dates; unique job identifying event; job assignment start date, job title; job title; job assignment; job assignment start date; job assignment; job assignment date; job title; job title; job title; job assignment start date; job duties; job start date; job assignment; job start date; job assignment, job duties; departure month; type of departure; citizenship/visa;			
41928		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; employment tenure; specific salary dates; specific salary; specific salary; unique identifying event; job title, job assignment; job assignment; specific job assignment information; job assignment start date; supervisor name; co-worker;			
41929		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address;	4/19/2019	Charles Song	
41930		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique job identifying event; unique job identifying event; co-worker number; job title;			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41931		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; former employer; employment tenure; former employer;			
41932		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa;			
41933		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date, name of acquired company; unique job identifying event; employment tenure;			
41934		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, former employer, former employer, job title, job title; former employer, job title; job title; supervisor name and title; job duties; supervisor name and title; job assignment; co-worker; supervisor;			
41935		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; supervisor name and title, supervisor name and title; job title; job duties; job title; unique identifying information; race; race; job title; job assignment;			
41936		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; unique identifying information, citizenship/visa;			
41946		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/9/2019	Sue Kumli	
41947		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41948		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer			
41949		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title and employment history; job duties; specific salary; specific compensation information; specific salary; specific compensation information; job category; employment tenure; employment tenure; job title; employment history			
41950		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; personal and employment history; former employer; job title; citizenship/visa; citizenship/visa; citizenship/visa; personal history; specific salary; specific employment date; specific salary			
41951		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment history; employment history; supervisor name; supervisor name; supervisor employment history, name, race, citizenship/visa; job duties; supervisor name and title; supervisor name; supervisor names; unique team identifying information; supervisor name; citizenship/visa; unique salary information; unique salary information; citizenship/visa; citizenship/visa			
41952		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; specific salary information, job title			
41953		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job title and specific employment date; citizenship/visa; job categories			
41954		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name			
41955		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; personal history; personal history; race, employment history; employment history			
41956		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; employment history;	4/23/2019	Ana Hermosillo	
41957		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41958		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer and job title; employment history; employment history			
41959		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job category; specific salary; specific salary; citizenship/visa; employment history; job title; job category; job title; job category; job title; job category; employment history; job category; specific salary and employment history			
41960		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	recruitment information; unique identifying information; previous employer and title; citizenship/visa; unique identifying information; specific salary; specific salary			
41961		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, job assignment and current employer, employment history; supervisor name and title; employment history; citizenship/visa			
41962		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job titles; employment history; job title, job category and employment history; employment history			
41963		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; employment history; employment history; specific salary; co-worker number and race			
41964		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment history			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
41965		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41966		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	6/6/2019	Nisha Parekh	
41967		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI; bates stamp number was mistakenly redacted. It is 41967.			
41968		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; race; citizenship/visa			
41969		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; precise work location; employment history; employment history; employment history; employment history; employment history; employment history; job title and job duties			
41970		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; unique identifying event; unique identifying event; job category; job category; employment history and job title; specific salary; job category; specific salary; specific salary; specific salary and compensation; next three redactions are in error and should not have been redacted - the errantly redacted parts are "she," "she" and - which she did - ;" employment history; specific salary; job category and employment history; specific salary; job category, job title, specific salary, supervisor title; specific salary			
41971		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; unique identifying information; employment history; job title; specific salary; specific salary; specific salary; specific salary; unique identifying information; specific salary; unique identifying information; employment history; unique identifying event; name; specific salary; specific salary			
41972		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	previous employer; job title			
41973		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	recruiting information			
41974		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; co-worker information			
41975		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker job category; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker race, job assignment, co-worker race; co-worker information; co-worker information;			
41976		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information, unique identifying information; unique identifying information			
41977		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
41985		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; citizenship/visa; job title, job assignment; job category; specific salary; unique identifying information; specific compensation; former employer; former employer; unique identifying information; unique identifying event; employment tenure; job title, job assignment; former employer;	5/21/2019	Bruce Brown	
41986		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer, specific salary; supervisor name; job category; specific salary; supervisor name and location; supervisor name; specific identifying information; unique identifying information; job category; job category; job category; employment tenure; supervisor name; supervisor name and title; supervisor name; job assignment; unique identifying information; citizenship/visa, personal identifying information; specific salary; supervisor name; supervisor name;			
41987		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race, job assignment			
41988		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor information; name; phone number; internet address	4/8/2019	Ana Hermosillo	
41989		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job title; job title; hire date; name of acquired company; supervisor location; supervisor location; supervisor location			
41990		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
41991		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
41992		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job title; job assignment; job duties; employment history; employment tenure; supervisor name and location; job duties; supervisor name; supervisor name; co-worker information; job assignment			
41993		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; co-worker name; co-worker information; co-worker information; co-worker information; co-worker information; co-worker name; co-worker name; co-worker name; co-worker name; co-worker name; co-worker information; (last block of text errantly marked as GI. Should have been marked as WP- AQ			
41994		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; co-worker information; co-worker information; unique identifying information; specific salary; supervisor title			
41995		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary			
41996		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; co-worker information; job categories; citizenship/visa;	4/22/2019	Karina Wegman	
41997		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties; hire date; recruiting information; employment history; job assignment; employment history; supervisor name			
41998		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; employment history; supervisor location, co-worker information; co-worker information; job categories; citizenship/visa; employment history; employment history and specific salary; employment history			
41999		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; educational information; educational information; co-worker information			
42000		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; job title; job category; race	4/26/2019	Karina Wegman	
42001		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa, employment tenure; hire date; job title and job category; unique identifying information; job assignment; employment history; job title and job category; employment history; supervisor name; supervisor title and name; supervisor name and title; employment history; specific salary; specific salary; specific salary; specific salary; job assignment and employment history; job title, job category, employment history and supervisor name and title; supervisor title and name			
42002		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor title, name, job assignment; employment history and specific salary; job assignment, employment history; job title, employment history, job category, supervisor title and name; specific salary and employment history; job assignment and employment history; job title; unique identifying event and supervisor name; job assignment and employment tenure; supervisor name and titl; supervisor name and title; unique identifying information; unique identifying information;			
42003		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information			
42004		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; employment history; unique identifying information; supervisor titles; employment history; co-worker information, name and salary information	4/9/2019	Karina Wegman	
42005		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, supervisor name, co-worker name, name, specific salary, co-worker information, job assignment; salary information and employment history; salary information; employment history; supervisor title; name; supervisor titles; reason for departure and depature date; employment history; job title; supervisor names	5/23/2019		
42006		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; specific departure date; job category; job assignment; job assignment; employment history and specific salary; employment history; employment history; supervisor information; salary information; employment history; job title and job category; name			
42007		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42008		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42099		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; name; phone; internet address;	4/12/2019	Hermosilla	
42100		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date and citizenship/visa; unique identifying dates; departure month; current employer; job title; job title; job category; unique identifying information; job title; unique identifying information;			
42101		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor title; unique identifying date; unique identifying information; unique identifying information;			
42102		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship; visa; citizenship/visa; citizenship/visa; citizenship/visa;			
42103		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event; job title; unique identifying information; unique identifying information; specific salary; specific salary; unique identifying date; specific salary; specific salary; unique identifying information; specific compensation; unique identifying information;			
42104		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; citizenship/visa; citizenship/visa; job title; job duties; job assignment;			
42105		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job title; job title; departure year; job title; job category; job duties; job title; job duties; job duties; job location; job tenure; job title job duties; job duties; citizenship/visa; unique identifying event; citizenship/visa; unique identifying date; citizenship/visa; citizenship/visa; supervisor name; supervisor title; unique identifying information;			
42106		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; job title; job title; job category; job category; unique identifying information; unique identifying information; unique identifying information; unique identifying information; job assignment; job duties; job assignment; job category; job category; specific salary; unique identifying event; specific salary			
42107		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; job category; specific salary; specific salary; unique identifying event; unique identifying information; unique identifying information; employment tenure; job category; specific salary; specific salary; job location; citizenship/visa; unique identifying information; unique identifying event; unique identifying event; job assignment; job duties; job duties; job assignment; supervisor name; supervisor name; job duties;			
42108		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation			
42109		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42111		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; job title, employment history, race, salary information	5/2/2019	Ian Eliasoph	
42112		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	current employer; job title; job title			
42113		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42114		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship; visa; citizenship/visa; specific salary; salary information; employment history; employment history; employment history; citizenship/visa			
42115		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; employment history;			
42116		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; hire date; departure date; job assignment; location of supervisor; location of supervisor; job duties; employment history; supervisor title and location; supervisor name; workers on team; workers on team; workers on team and location; supervisor location; supervisor location; employment history, employment history; employment history; employment history; race; race			
42117		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42118		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history			
42119		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42142		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; hire date, departure date, specific salary, name of acquired company, unique identifying event, unique identifying event, specific salary, personal identifying information	5/30/2019	Ian Eliasoph	
42143		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42144		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; race; citizenship/visa; personal identifying information; personal identifying information, job title			
42145		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job duties; unique identifying event; unique identifying event; employment tenure; specific salary; specific salary; unique identifying event			
42146		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; unique identifying event			
42147		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; hire date; departure date; co-worker information; co-worker information; job duties; job duties; job duties; job category; job duties; unique identifying event; unique identifying event; job duties, job assignment; job duties, job assignment; co-worker information; unique identifying event			
42148		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; personal identifying information; personal identifying information; co-worker information; co-worker information; personal identifying information			
42149		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42150		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event;			
42151		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42152		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; personal identifying information; phone; email; address	5/24/2019	Kiesha Cockett	
42153		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42154		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42155		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties, job assignment; specific salary, specific salary; personal identifying information; hire date, specific salary; job title; personal identifying information; personal identifying information; personal identifying information			
42156		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, job title; employment history; specific salary; job category; job assignment; job assignment; hire date			
42157		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; co-worker information, race; job category; supervisor name, co-worker information; co-worker information, race; job category; supervisor name; co-worker information, race; job duties, job assignment; job duties; job duties; job duties; co-worker information; job assignment; co-worker information; co-worker information; unique identifying information; specific compensation; co-worker information, race; co-worker information, race; co-worker information; co-worker information, race; co-worker information, race			
42158		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race; citizenship/visa; employment history; employment history; personal identifying information; personal identifying information; personal identifying information			
42159		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42160		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; unique identifying event; unique identifying event; unique identifying event			
42161		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa			
42162		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; address; job category, race, specific salary, hire year	5/24/2019	Cris Santos	
42163		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42164		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job category; job duties; specific salary; hire date; supervisor name; supervisor name; supervisor name; supervisor name			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42165		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; co-worker information; hire date; job title; name of acquired company; job title; specific salary; job category			
42166		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
42167		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history			
42168		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
42169		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; race, name of acquired company, hire date, job title, specific salary, co-worker information	5/7/2019	Sue Kumli	
42170		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42171		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42172		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; unique identifying action; unique identifying action; job duties; specific salary; hire date; name of acquired company; name of acquired company; employment history			
42173		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; name of acquired company; name of acquired company; employment history; employment history; employment history; employment history; job title			
42174		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; job assignment; job assignment; co-worker information; hire date; supervisor name, co-worker information; job duties; supervisor name, co-worker information; supervisor name; supervisor name; co-worker information; co-worker information; co-worker information			
42175		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; specific salary; supervisor name; co-worker information			
42176		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; job duties; job duties; race, co-worker information; type of departure, co-worker information			
42177		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, co-worker information, personal identifying information			
42178		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, co-worker information; supervisor name, co-worker information; supervisor name; supervisor name; supervisor name; name; supervisor name; name; name; co-worker information; co-worker information; specific compensation; employment history			
42179		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; co-worker information, employment history, type of departure, unique identifying event	4/25/2019	Ana Hermosillo	
42180		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42181		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; departure month; hire date			
42182		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; job duties; specific salary; specific salary; employment history; specific salary; employment history; co-worker information, co-worker information; co-worker information; co-worker information; unique identifying event; co-worker information; job duties; job duties			
42183		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying action; co-worker information; supervisor name; co-worker information; co-worker information; supervisor name, co-worker information; race; job assignment; job assignment; job assignment			
42184		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42185		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42186		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42187		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42188		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42189		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; number; email	4/9/2019	Ana Hermosillo	

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42190		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure, personal identifying information; type of departure, departure date; job title; employment history; unique identifying event; co-worker information; co-worker information; co-worker information			
42191		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42192		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; personal identifying information; employment history; employment history; employment history; employment history; job title, job assignment, job category; job category; specific salary, specific compensation; employment history			
42193		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job assignment; type of departure, type of departure; employment tenure; supervisor name, co-worker information; specific salary, specific compensation; specific salary; supervisor name, co-worker information; co-worker information; supervisor name; supervisor name; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information			
42194		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; job title, job assignment			
42195		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties, job duties, job duties; supervisor name; job assignment; job duties; personal identifying information; unique identifying event; unique identifying action; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; job assignment; supervisor name; unique identifying event; job assignment; co-worker information; unique identifying action; supervisor name; co-worker information; unique identifying action; unique identifying action			
42196		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; co-worker information; co-worker information; specific compensation, type of departure; supervisor name			
42197		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	address			
42198		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, co-worker information; supervisor name; specific compensation; unique identifying event; supervisor name; co-worker information; co-worker information, supervisor name; co-worker information			
42199		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; hire date; job title, job assignment; race	UNDATED	Hailey McAllister	
42200		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; personal identifying information; personal identifying information; personal identifying information; citizenship/visa			
42201		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; job title; unique identifying event; job assignment; job duties; job duties; job duties; job duties; specific salary; supervisor name, co-worker information			
42202		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, supervisor name; supervisor name; co-worker information; supervisor name; co-worker information; co-worker information; co-worker information, job assignment; co-worker information, personal identifying information; unique identifying event; unique identifying event; unique identifying event; unique identifying event			
42203		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; job assignment; unique identifying event; citizenship/visa; personal identifying information; specific compensation; personal identifying information; personal identifying information; unique identifying event; personal identifying information, co-worker information; job assignment; co-worker information, job assignment			
42204		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; personal identifying information			
42205		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; type of departure	5/23/2019	Sue Kumli	
42206		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42207		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; departure month; personal identifying information			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42208		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; specific salary; hire date; job title; personal identifying information			
42209		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; citizenship/visa; citizenship/visa; specific salary; specific compensation; job category; job category			
42210		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; co-worker information; co-worker information; citizenship/visa; unique identifying event; citizenship/visa;			
42211		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job category; job category; unique identifying event; job category; unique identifying event; departure date; specific salary; specific salary			
42212		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42213		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42214		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	5/9/2019	Cedrick Richardson	
42215		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42216		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42217		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job assignment; job title; job category; personal identifying information; unique identifying event; job duties; specific salary; hire date; name of acquired company			
42218		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; specific salary; unique identifying event; personal identifying information; hire date			
42219		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name, co-worker information; supervisor name; unique identifying event; unique identifying event; co-worker information; co-worker information			
42220		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category			
42221		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42222		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42223		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; unique identifying event; name; phone; email	4/9/2019	Ana Hermosillo	
42224		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; job title; supervisor name			
42225		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; unique identifying event; supervisor name; unique identifying event			
42226		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date, departure date; unique identifying event; unique identifying event; supervisor name, unique identifying action, co-worker information; supervisor name; specific salary; job title; specific compensation; job category; job category; specific compensation; job duties; supervisor name; supervisor name; job title; personal identifying information; hire date			
42227		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; co-worker information; co-worker information; co-worker information; citizenship/visa, unique identifying event; employment history			
42228		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job category; co-worker information; job category; job category; co-worker information			
42229		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; job category; co-worker information; job category; supervisor name; unique identifying event; specific compensation; unique identifying event; supervisor name; unique identifying event; personal identifying information			
42230		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, supervisor name; co-worker information; co-worker information; co-worker information; co-worker information			
42231		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42232		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information			
42233		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name	4/30/2019	Charles Song	
42234		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42235		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title;			
42236		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title and duties; specific salary; current employer and specific salary; hiring month; job title; employment history and previous employer; employment history; employment history			
42237		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	previous employer, job title; specific salary			
42238		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; supervisor name; job duties; identifying supervisor information; supervisor name; Please note that the third dark bullet in the series of three dark bullets in a row mistakenly redacted both the question and the answer when the answer should have been redacted GI - the basis of this should have been GI redaction is supervisor name;			
42239		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary			
42240		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	There is a unlabeled mistaken redaction of the letter "u" in the middle of the word surprise; personal identifying information; personal identifying information			
42241		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42242		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42243		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; reference to address	4/24/2019	Ana Hermosillo	
42244		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42245		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; race; employment history, job title; job assignment			
42246		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment history and name of acquired company; job title and employment history; employment history; job assignment; employment history; job title; employment history; job title; job title; supervisor name and title; supervisor name; employment history; supervisor name; supervisor name; job duties; job duties; job assignment; job duties and unique identifying information			
42247		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title and name; unique identifying information; employment history; personalized information; supervisor names; supervisor name; unique identifying event; unique identifying information; employment history; employment history and job assignment; supervisor name			
42248		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42249		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42250		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42251		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; name; phone number; email address; employment history; job title, job category, date of hire; race	4/16/2019	Ana Hermosillo	
42252		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	coworker tenure; job assignment; race; job assignment			
42253		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; specific raise amount; nature of separation; employment history; compensation information; compensation information; employment history; supervisor name; job duties; supervisor name; supervisor job title; supervisor name; coworker job title; coworker job title			
42254		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	coworker job title; coworker race; coworker job title; coworker race; date of hire; employment history; personal identifying information; job category; job category			
42255		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; email address; physical address	5/29/2019	Kiesha Cockett	
42256		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42257		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa and employment history; name of current employer			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42258		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; specific salary; name of acquired company; date of hire; job title			
42259		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information, employment history; specific salary;			
42260		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; specific schedule; employment tenure; supervisor names; supervisor identifying information; supervisor name; supervisor name; specific job duties; specific job duties; coworker identifying information			
42261		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; date of hire; supervisor name; supervisor name; supervisor name; job duties			
42262		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job assignment; employment history; employment history; coworker identifying information; coworker identifying information			
42263		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name;			
42264		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42265		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; email address	4/11/2019	Nisha Parekh	
42266		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42267		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; date of hire; date of hire			
42268		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa and employment history; date of hire; name and location of former employer; job title; job duties; job title; employment history; employment history; specific compensation information			
42269		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job assignment; coworker job titles; coworker identifying information; coworker identifying information; employment history; specific salary; specific salary; specific salary; employment history; employment history; employment history; unique identifying information; hiring manager name; hiring manager identifying information; specific salary and hiring manager name; specific salary; specific salary			
42270		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; unique identifying event; unique identifying event			
42271		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; coworker identifying information; coworker identifying information			
42272		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; email address	4/16/2019	Ana Hermosillo	
42273		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	current employer; job title; job title; supervisor identifying information; supervisor name; supervisor title			
42274		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; unique identifying request and supervisor name; unique identifying action and supervisor response; citizenship/visa			
42275		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	date of hire; date of separation; specific salary; specific salary and compensation; unique identifying events and citizenship/visa; former employer; job title; job category; employment history; specific salary; employment history; specific salary; unique identifying information and supervisor name; unique identifying information			
42276		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; supervisor name; job duties; supervisor name and identifying information, coworker identifying information; supervisor name, title, and identifying information; supervisor name; coworker information; coworker information; coworker job category; coworker name; unique identifying information			
42277		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	no GI			
42278		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42279		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42280		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42281		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; phone number	4/22/2019	Ian Eliasoph	
42282		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42283		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; current employer; job title			
42284		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job title; job category; date of hire; job title			
42285		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; unique identifying event; specific salary; job assignment			
42286		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history;			
42287		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job category and employment history; job category and employment history; job assignment; job assignment and duties; employment history; supervisor name; job duties; supervisor name and employment history; supervisor name; supervisor name			
42288		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	coworker information; job assignment, employment history; supervisor name; supervisor name; personal identifying information			
42289		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event; unique identifying event			
42290		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42291		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; race; personal identifying information;	UNDATED	Nisha Parekh	
42292		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; hire date; job title and previous employer; previous employer and employment history; unique identifying information; unique identifying information; type of departure, date of departure; job assignment; job assignment; employment history; employment history; unique identifying information			
42293		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; employment history; employment history; job title and job duties; job duties; job assignment; employment history; co-worker information; employment history; employment history; supervisor name; name, employment history and job title; supervisor name; name; employment history; employment history; supervisor name; employment history; name; co-worker names; name; employment history; acquired company name, co-worker name; name; name; name; supervisor name; job title; name; employment history; specific salary; employment history specific salary; employment history; job duties; supervisor name; job assignment and job title, job duties			
42294		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; name; supervisor name; supervisor name; name; supervisor name repeated, name repeated, job duties, unique identifying information; unique identifying information; name, supervisor name, job assignment; employment history; employment history; specific salary; supervisor name; unique identifying information; unique identifying information; employment history; supervisor name; co-worker names; name; co-worker information; name; job title; unique supervisor information; job duties; supervisor name and information; employment history; name and employment history; name; employment history; employment history; personalized information; employment history; supervisor name; unique identifying information;			
42295		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job title; employment history; supervisor name; job duties and employment history; name and job title; co-worker information and name; employment history and type of departure; employment history; employment history; supervisor name; unique supervisor information; supervisor name; name; supervisor name; employment; history; supervisor name; supervisor name; type of departure; supervisor name; employment history; employment history; employment history; employment history; personalized information; employment history; name; employment history and job assignment; name; supervisor name and information; supervisor information; supervisor information; supervisor information; name; job duties			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			
					supervisor name and duration; supervisor name; supervisor name; supervisor name; reporting structure; description of supervisor; supervisor name; supervisor name; supervisor name; supervisor name; description of supervisor; supervisor location; supervisor name; supervisor name; description of reporting structure; supervisor name and duration; reporting structure; info about reporting structure; info about supervisors and work groups			
					info about informant pay; identified workgroup; job assignment; job assignment; job assignment; workgroup name; workgroup name; workgroup name; job duties; team member identified; team member identified; workgroup name; workgroup name; team members described; informant name; workgroup name; workgroup name; description of workgroup duties; team members identified; team member; description of team; team member; description of job duties and progression of work history; description of workgroup; description of workgroup; team member; job duties and informant name			
					team member; team member and description; description of team member duties; team member; team member; workgroup name; work group name; workgroup description; job duties described; team member identified; informant name and duration; team member name; team member name; supervisor name; team member names; team member name; race/citizenship status; supervisor name; supervisor status; supervisor status; location of hire; location of hire; workgroup name; workgroup name; workgroup name; location of hire; supervisor name and description of team including informant names, team emmber names and information about countries of origin, age, race, citizenship of team members; informant name; team member name; supervisor name; informant name; team member name; citizenship info			
					workgroup name; title of supervisor; race; description of supervisor; informant name; supervisor title; informant work environment; team member names			
					name; telephone; internet address	4/30/2019	Kiesha Cockett	
					no GI			
					race; job history; citizenship/visa;			
					job title; unique identifying information; start date; unique identifying information; job duties; start date; job title			
					job history; job history; specific salary; unique identifying information			
					job assignment; job assignment; job assignment; start date; supervisor name; supervisor name; job assignment; unique identifying information about make up of team; job title; job title; supervisor name; unique identifying information; unique identifying information			
					unique identifying information about team make up; citizenship/visa; citizenship/visa; job title; job title;			
					no GI			
					no GI			
					no GI			
					name; telephone; internet address	4/8/2019	Ana Hermosillo	
					type of departure; job title; hire date; job tenure; job duties; coworkers and countries; job history; job history; job history; unique identifying information about team; citizenship/visa;			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42317		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa;			
42318		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42319		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; supervisor name; job title; job assignment; citizenship/visa; citizenship/visa; job title; supervisor name; job title; job title; job title; job title; job history; job history and specific salary			
42320		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job titles;			
42321		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; unique identifying information; unique identifying information about team make up; unique identifying information about team make up, supervisor name; unique identifying information about team make up; unique identifying information about team make up;			
42322		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; type of departure; job history; job history; job assignment; specific compensation; supervisor name; job history; job assignment; job history; unique identifying information; job history; job history; job title			
42323		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Job title; unique identifying information			
42324		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; job tenure; specific salary; unique identifying personal information; specific salary; approximate departure month; specific salary	6/5/2019	Karina Wegman	
42325		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; start year and month; specific salary; job title, job category; job assignment; job start date and end month; job title and category; job assignment; job tenure; supervisor name; supervisor name; supervisor name; supervisor names; unique identifying information about supervisors; job assignment; job title; job tenure; job tenure; job history; specific compensation; specific compensation; job tenure; unique identifying information about compensation; unique identifying information about compensation; job history			
42326		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; identifying event; supervisor title; unique identifying action; unique identifying action; identifying information			
42327		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address; address	5/2/2019	Kiesha Cockett	
42328		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42329		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job history; job title; personal identifying information; job duties; race; citizenship/visa;			
42330		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job start date; job title, history; job title;			
42331		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job title; specific salary;			
42332		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job history; job history; supervisor name; supervisor name; supervisor name; job duties; supervisor name; supervisor name; supervisor name; job assignment; identifying information about team;			
42333		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation; specific compensation and job history; specific salary; job history; specific salary; job history; unique identifying information about team make up; unique identifying information about team make up;			
42334		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42335		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42336		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42337		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	5/3/2019	Ian Eliasoph	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42359		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment tenure; co-worker information; co-worker information; unique identifying event; supervisor name; job assignment; job assignment; supervisor name, co-worker information; co-worker information; supervisor name; name; name; co-worker information; co-worker information; name; name; specific salary; co-worker information; co-worker information, specific salary; name; supervisor name; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information, specific salary; co-worker information			
42360		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; supervisor name, co-worker information			
42361		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42362		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; job category; departure date; name of acquired company; personal identifying information; job title; job duties	4/19/2019	Karina Wegman	
42363		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; hire date; job title, job category; job title; job assignment; personal identifying information; employment tenure; supervisor name, co-worker information; supervisor name; co-worker information; supervisor name, co-worker information, job assignment; job assignment; supervisor name; supervisor name; supervisor name; job duties; job duties; job duties; job duties; co-worker information; personal identifying information; supervisor name			
42364		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; employment tenure; supervisor name; personal identifying information; personal identifying information; personal identifying information; specific compensation; specific compensation; personal identifying information; unique identifying event, specific compensation; unique identifying event, specific compensation			
42368		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; phone; internet address; job title, job title; job category; unique identifying event; unique identifying information; unique identifying information; hire date; hire date, job assignment end date; job title; job title; job category; supervisor name; supervisor name; supervisor name; co-worker name; supervisor name and title; personal identifying information, co-workers names and job titles; job assignment;	4/17/2019	Ana Hermonsillo	
42369		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone			
42370		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42371		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42372		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42373		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42374		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42375		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	5/3/2019	Ian Eliasoph	
42376		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42377		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; employment tenure			
42378		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; employment tenure; hire date; name of acquired company			
42379		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; job category			
42380		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment, job tenure, number of supervisors, name of acquired company, supervisor name and dates; specific salary; supervisor name and dates; supervisor name and dates; supervisor name and title; specific identifying date; supervisor title and name; unique identifying date; unique identifying date; specific salary; specific salary; specific salary; specific salary; specific salary; specific compensation; job category; job title; job category; unique identifying date; supervisor name and dates; supervisor title and name			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42381		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique job identifying information; unique job identifying information; unique job identifying information; unique job identifying information; unique identifying event; unique identifying information; supervisor name; name; unique identifying information; unique identifying information; supervisor name and title; unique identifying information			
42382		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42383		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42384		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; departure date; supervisor name; supervisor name			
42385		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event; employment tenure; name; phone; internet address; race; citizenship/visa; citizenship/visa; job title; job category; unique identifying information; unique identifying information; employment tenure			
42392		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event; employment tenure; name; phone; internet address; race; citizenship/visa; citizenship/visa; job title; job category; unique identifying information; unique identifying information; employment tenure	5/21/2019	Karina Wegman	
42393		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; job title; job category; job category; unique identifying information; specific salary; job assignment; job assignment; job assignment dates; supervisor title and name, supervisor name; unique identifying dates; job category; job title; unique identifying date; job category; job title; unique identifying date; job category; unique identifying date; job duties; specific compensation; unique identifying date; unique identifying date; specific salary; unique identifying date; specific salary; unique identifying date; unique identifying date; unique identifying date			
42394		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job duties; unique identifying information; unique identifying information; unique identifying information; job category			
42408		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email	5/20/2019	Dan Chasek	
42409		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42410		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, job duties; race; citizenship/visa			
42411		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; personal identifying information; personal identifying information; personal identifying information; job duties; specific salary; hire date; job title; job title; job title			
42412		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; specific salary; specific salary; job assignment; co-worker information; co-worker information; job duties; personal identifying information			
42413		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation; specific compensation, specific salary; job category; job assignment; personal identifying information; hire date; supervisor name; supervisor name, co-worker information; supervisor name, co-worker information; unique identifying action; supervisor name, co-worker information; supervisor name; co-worker information, race			
42414		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race; specific salary; specific salary; coworker information, race; job duties; job category; citizenship/visa			
42415		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42416		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; job category			
42417		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information			
42418		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; race; citizenship/visa; hire date; departure date; unique identifying event, specific salary, unique identifying event, specific salary, unique identifying event, specific salary; unique identifying event; specific salary	5/9/2019	Karina Wegman	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42419		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; unique identifying event, job assignment, job title; job category; unique identifying event, job title, job assignment; job category; unique identifying event; specific compensation; unique identifying event, specific compensation; unique identifying event, job title, job assignment; job category; unique identifying information; specific compensation; unique identifying event, supervisor name; unique identifying event, supervisor name; supervisor name, co-worker information; supervisor name, co-worker information; supervisor name, supervisor name; supervisor name; supervisor name; job category; personal identifying information, co-worker information, race; co-worker information, race; co-worker information; co-worker information; co-worker information			
42420		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying action			
42440		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address+D1036	4/30/2019	Dan Chasek	
42441		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42442		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job tenure; race; citizenship/visa; job history			
42443		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; specific salary; specific compensation; specific compensation; specific salary; specific salary; specific salary; job history; hire date; job title			
42444		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment			
42445		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	start date; supervisor name; supervisor name; job duties; supervisor name; supervisor title; supervisory name, job history, personal identifying information; unique identifying information about make up of team; job tenure; unique identifying information about make up of team; supervisor name; unique identifying information			
42446		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42447		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42448		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; supervisor name; supervisor title; supervisor name; supervisor name; supervisor name; unique personal information; unique personal information			
42449		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique personal information; unique personal information; unique identifying information about make up of team; unique personal information; job tenure			
42450		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	4/11/2019	Kiesha Cockett	
42451		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job title; job title;			
42452		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa;			
42453		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; departure month and day; unique identifying event; unique identifying information; job history; citizenship/visa; personal identifying information; job title; type of departure; unique identifying information; specific salary; job title; job title; personal information; citizenship/visa;			
42454		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; specific salary; job history; citizenship/visa; citizenship/visa; job history; salary information			
42455		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; hire date, departure month; supervisor name; supervisor history; supervisor name; supervisor history, supervisor history; supervisor title; supervisor name; supervisor identifying information; supervisor race; citizenship/visa; citizenship/visa; job tenure; specific salary, job tenure; job history; citizenship/visa; unique identifying information; salary; personal information; supervisor name; supervisor type of departure; supervisor history; supervisor history; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name			
42456		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying information about makeup of team; identifying information about makeup of team; citizenship/visa; identifying information about makeup of team; job assignment			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42487		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; unique identifying information; job history			
42488		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/25/2019	Dan Chasek	
42489		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42490		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; race; citizenship/visa			
42491		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; specific salary; hire date; job title			
42492		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, former employer and job title, personal history; specific salary; job category; employment history; supervisor name and title			
42493		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; unique employment event			
42494		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique employment event; job category; job assignment; employment history; supervisor name; unique work location; unique work location; supervisor name and title; employment history			
42495		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; employment tenure; supervisors name, title, and dates; supervisor name and title; supervisor name; supervisor name; supervisor name; job duties; supervisor name; supervisors names and title; job title; supervisors names; supervisor name; supervisor name; supervisors names and title; supervisor name and title; supervisor name; supervisor name; unique team identifying information; unique team identifying information; supervisor name; job assignment; job assignment; job assignment and team identifying information; job assignment; job assignment; job assignment; job assignment; job assignment; job assignment; supervisor name; race; race; job assignment; race; race			
42496		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name			
42497		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique employment event; employment history			
42498		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; Note: incorrect redaction marked as GI--this should be unredacted and information is the interview contact date on 5/8/2019; phone number; internet address; employment history and tenure	5/8/2019	Kiesha Cockett	
42499		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42500		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; specific employment date			
42501		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties; job duties; specific salary; employment history; job title			
42502		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; specific salary; job category; job title; employment history; employment history; supervisor name and race; supervisor name and title; race			
42503		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, title, and race; job duties; race; employment history and race; employment history; race and unique team identifying information			
42504		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Note: redaction marked WP-AQ in error, should be marked GI and is a specific employment date; employment history; Note: redaction marked WP-AQ in error, should be marked GI and is a job category; Note: redaction marked WP-AQ in error, should be marked GI and is a job category; job category; job assignment; employment history; job title; supervisors names, titles, and races; unique team identifying information; unique team identifying information			
42505		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; race; unique team identifying information; unique team identifying information; race; job title; job assignment; employment history; supervisors names, titles, and races; unique team identifying information; employment history; employment history			
42506		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42507		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42508		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; mailing address; job category, specific salaries, employment history	5/24/2019	Kiesha Crockett	
42509		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42510		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	current employer; race; citizenship/visa; current employer; job title			
42511		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; specific salary information; employment history; specific salary and compensation information; employment history; specific salary and compensation information; specific salary information; current employer; employment history; employment history; employment history; current employer; race			
42512		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; employment history; job title; job assignment; employment history and co-worker name; unique work location and date; former employers; employment history; former employer; job title and job assignment; job assignment; employment history; personal history; specific employment date			
42513		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; former employer; specific compensation information; specific compensation information; specific compensation information; specific salary; specific salary; specific compensation information; job category; job assignment; employment history; supervisors names and titles; job duties; job duties			
42514		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job category; unique team identifying information; unique team identifying information; race; unique team identifying information; race; unique team identifying information; race; race; race			
42515		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job titles; job category; job category; job categories and job titles; job assignment; employment history; supervisors names and titles; job assignment; job assignment and job duties			
42516		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; supervisor information; races; job titles and dates; job assignment; employment history; supervisors names and titles; job duties; job assignment; job duties; job duties and unique employment event; job duties; job duties; job duties			
42517		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history and unique team identifying information; employment history; employment history and specific employment date; specific salary information; unique team identifying information; race; race; employment history; employment history; employment history			
42518		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique employment event; employment history; name and employment history			
42519		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42520		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/6/2019	Dan Chasel	
42521		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42522		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; former employer; job title			
42523		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; specific employment date; specific salary; employer name and specific salary; specific salary; specific employment date and employment history; job title; employment history			
42524		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job assignment; unique work location; specific employment date; employment history			
42525		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; former employer and job duties; supervisor name; supervisor name; supervisor name; unique team identifying information; unique team identifying information; supervisor information; unique team identifying information; races			
42526		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job category; job category; supervisor information; supervisor information; supervisor information; job assignment; employment history; supervisor name; unique team identifying information; unique team identifying information; work location; unique team identifying information; unique team identifying information			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42527		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; race/gender; employment history; employment history; unique work location; race and work location; job title; job assignment; employment history; unique team identifying information; supervisor name; supervisor name; supervisor name; unique team identifying information; unique team identifying information; employment history			
42528		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name and information			
42529		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor information; employment history; employment history; job title; supervisor information; former employer; former employer; job title; job title; job categories; job categories; specific employment date; unique team identifying information; job assignment; supervisor name; supervisor name; unique team identifying information; unique team identifying information; unique team identifying information; unique team identifying information; specific employment date; supervisor name; specific salary information; specific compensation information; specific employment date; employer name; specific salary information; specific salary			
42530		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; type of phone number; phone number; citizenship/visa, race, gender; job title; unique work location; job category; specific salary; job title; former employer; employment history; employment history; specific employment date and employment history; employment history; job categories; job title; job assignment; specific salary information; specific salary information; job title; unique work location; unique work location; supervisor name	5/21/2019	Bruce Brown	
42531		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; unique work history; employment history; job title; job category; supervisor name; job title; job title; unique work location; supervisor name and employment history; unique team identifying information; unique team identifying information; supervisor name; unique team identifying information; unique team identifying information; information; race; unique team identifying information; job category and job title; job category; job title; job category; specific employment date; job categories; supervisor name; specific employment date; specific salary; specific employment date; employment history; specific employment date; specific salary; specific employment date; job categories; specific employment date; job categories; specific salary; supervisor name and job title; job category; specific salary			
42532		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42533		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; employment history	6/3/2019	Nisha Parekh	
42534		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42535		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; race; citizenship/visa; job title; job category information; job duties; specific salary			
42536		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment and personal history; personal history, former employer specific employment date; former employer; employment date; specific salary information; specific employment date; employment history; former employer; former employer; employment history; specific employment date; employment history			
42537		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product				
42538		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42539		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42540		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history; employment history			
42541		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42542		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; employment history, job category, specific salary; race; citizenship/visa; hire date; employment history; unique work location; specific salary; specific salary	4/30/2019	Karina Wegman	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
42543		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; citizenship/visa; personal history; personal history; citizenship/visa; job category; job category; specific salary; specific salary; job assignment; employment history; supervisor name; supervisor name; supervisor name; unique team identifying information; unique team identifying information; job categories; job category; race; job assignment; employment history; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; unique team identifying information; unique team identifying information			
42544		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job category; job category; supervisor name; supervisor name; supervisor name; employment history; salary information; supervisor name; job assignment; employment history; job assignment; current employer; specific salary; employment history			
42545		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address;	4/23/2019	Nisha Parekh	
42546		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42547		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; race; citizenship/visa			
42548		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job category; name of acquired company; unique identifying date; unique identifying information; unique identifying date; unique identifying date; specific salary; job category; job duties; job category; job duties; job assignment; specific salary ; unique identifying date; specific salary; unique identifying information; specific salary; unique identifying information; specific title; job category; job category			
42549		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; supervisor name; specific salary; unique identifying information; unique identifying information; unique identifying event; unique identifying event; unique identifying date; unique identifying information; unique identifying information; specific title; specific title; specific title; supervisory name; unique identifying date; race; supervisor title and name; race; supervisory name; supervisor title; unique identifying date; race; supervisor name; supervisor name; supervisor name; supervisor name; race;			
42551		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; address	5/6/2019	K. Cockett	
42552		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42553		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42554		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties; specific salary; hire date; job title			
42555		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; unique identifying information; unique identifying date; specific salary; job category; job assignment			
42556		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; supervisor name/title and race, supervisor name/title and race, supervisor name; unique identifying information; unique identifying information; unique identifying information; unique identifying information			
42557		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; unique identifying date; job category; job category; unique identifying date; unique identifying date; unique identifying information			
42558		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42559		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Job category			
42560		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; job category			
42561		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; job title; job category; race; citizenship/visa; citizenship/visa	4/17/2019	Karina Wegman	
42562		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; citizenship/visa; hire date; citizenship/visa; hire date; job title; job category; job title; job category; job assignment; hire date; job duties; supervisor name and title; supervisor name and title; supervisor name			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
42563		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; unique identifying information; unique identifying information; unique identifying information; unique identifying information			
42564		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; citizenship/visa; race; departure date; job assignment; job category; specific salary; current employer; specific salary; former employer; employment tenure; citizenship/visa; job assignment tenure; job title; job assignment; former employer; specific salary; former employer; supervisor name	5/7/2019	Bruce Brown	
42565		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; unique identifying information; supervisor name; unique identifying information ; unique identifying information; job assignment start date; job assignment; job category; supervisor name; supervisor name; supervisor departure date; supervisor departure date; supervisor name; former employer; citizenship/visa; citizenship/visa; specific salary; unique identifying date; unique identifying date; unique identifying date; specific salary			
42566		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42571		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; personal identifying information; phone; email; address; unique identifying event, job category, job category	5/31/2019	Kiesha Cockett	
42572		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42573		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa, unique identifying event			
42574		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties; specific salary; hire date; unique identifying event, job title			
42575		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event, personal identifying information, specific salary, specific compensation; specific salary; unique identifying event; unique identifying event; unique identifying event; specific salary; unique identifying event; specific salary; employment history, personal identifying information; unique identifying event; unique identifying event; unique identifying event, personal identifying information; unique identifying event; unique identifying event; unique identifying event; unique identifying event			
42576		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history, job title; citizenship/visa; unique identifying event; specific salary; unique identifying event, specific salary; unique identifying event; job category; unique identifying event; job category; job assignment; hire date, employment tenure			
42577		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, co-worker information; co-worker information, race; supervisor name; job duties; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information, race; co-worker information, race; co-worker information, race; co-worker information, race			
42578		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event, specific compensation; unique identifying event; specific compensation; citizenship/visa; personal identifying information; personal identifying information; unique identifying event; job category; unique identifying event; job duties; unique identifying action; supervisor name, co-worker information			
42579		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; job duties; job duties; job category; job assignment; hire date, employment tenure; supervisor name, unique identifying event; supervisor name; personal identifying information; supervisor name, co-worker information, race; unique identifying event; supervisor name; co-worker information; co-worker information; co-worker information; supervisor name; personal identifying information; unique identifying event, specific compensation; unique identifying event, specific compensation; unique identifying event; supervisor name; co-worker information; co-worker information, race; supervisor name, co-worker information, race; supervisor name; co-worker information			
42580		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event, specific compensation			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42581		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; supervisor name; co-worker information; supervisor name, unique identifying event; co-worker information; co-worker information; co-worker information, supervisor name, race; co-worker information; personal identifying information			
42582		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42583		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone numbers; internet address; mailing address; race, job category, employment history	5/16/2019	Cris Santos	
42584		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42585		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job category; job duties; job duties; job duties; specific salary; job assignment; employment history; supervisor name; supervisor name; unique team identifying information; unique team identifying information			
42586		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique team identifying information; race; employment history; job category and title; former employer; job title; citizenship/visa; specific salary; job category			
42587		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job duties; job duties; job duties; supervisor name; unique team identifying information; unique team identifying information; race; race; citizenship/visa; unique team identifying information; employment history			
42588		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; personal history; race			
42589		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/9/2019	Ana Hermosillo	
42590		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; employment tenure; current employer			
42591		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; hire date; hire date; personal history, citizenship/visa			
42592		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job title			
42593		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment and job duties; job title; employment history; supervisor name; supervisor title; supervisor name; supervisor name; supervisor name; supervisor title; supervisor name; job duties; job duties; job title; unique team identifying information; unique team identifying information and race; race; race; unique team identifying information; race and citizenship/visa; precise work location; employment history; job assignment; job title; personal history			
42594		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job title; specific salary; job title			
42595		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; address	5/6/2019	Kiesha Cockett	
42596		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42597		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; type of departure			
42598		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date, departure date, type of departure; job title, job assignment; personal identifying information			
42599		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, job duties; specific salary; specific salary; race, co-worker information; specific compensation; specific salary; job category, job assignment; job assignment			
42600		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; supervisor name; co-worker information, race; supervisor name; co-worker information, race; supervisor name; supervisor name, co-worker information, race; supervisor name; supervisor name, co-worker information; job duties; job duties; job duties; co-worker information; unique identifying event			
42601		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; co-worker information; co-worker information; supervisor name; citizenship/visa, supervisor name, supervisor name, supervisor name, unique identifying event; unique identifying event; job category			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
42602		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment tenure; supervisor name, race; supervisor name; job duties, job duties; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information, race; co-worker information; co-worker information; co-worker information, race; co-worker information			
42603		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; personal identifying information			
42604		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42605		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; employment tenure, unique identifying event, personal identifying information, job assignment	5/20/2019	Jeremiah Miller	
42606		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42607		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; job title, unique identifying event; unique identifying event; personal identifying information; job title; race			
42608		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date, job assignment; job title			
42609		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; job assignment; job assignment; unique identifying event; job assignment; employment tenure			
42610		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; personal identifying information; job duties; co-worker information; co-worker information; co-worker information, race; unique identifying event; personal identifying information			
42611		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; job title, job title, job title			
42612		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42613		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42614		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; name	4/30/2019	Nisha Parekh	
42615		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42616		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; personal identifying information; personal identifying information, job title; personal identifying information, job duties; specific salary; specific salary			
42617		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; employment tenure; job title; employment history, job duties, personal identifying information; personal identifying information; personal identifying information			
42618		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary, employment history; job category; job assignment; job assignment; job assignment; job assignment; job duties; job title; job category			
42619		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; personal identifying information; job duties; employment tenure; supervisor name; supervisor name; supervisor name; job duties			
42620		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; job assignment; job assignment; co-worker information, race; name; name; name			
42621		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job category; job category; job category; job category			
42622		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI	5/8/2019	Cris Santos	
42623		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; address			
42624		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42625		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job title; job duties; specific salary; job assignment; hire date			
42626		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; co-worker information, race; hire date; job title; personal identifying information; personal identifying information; personal identifying information; personal identifying information			
42627		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42628		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information, race			
42629		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; address; job category, job category, specific compensation, personal identifying information, unique identifying event	5/7/2019	Kiesha Cockett	
42630		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42631		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; employment history, personal identifying information			
42632		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history, job title; specific salary; specific salary; specific compensation; specific compensation; specific compensation; hire date; job title; job category			
42633		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; personal identifying information; personal identifying information; employment history; citizenship/visa; personal identifying information; specific salary			
42634		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job category; job assignment; hire date, departure date; supervisor name; co-worker information, race; job category; supervisor name; co-worker information, race; job duties; job duties; job category			
42635		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; specific compensation; specific salary; co-worker information; co-worker information; co-worker information, race; co-worker information, race; co-worker information, race; co-worker information, race; job category; job category			
42636		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job duties; job category			
42637		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42638		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42690		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name	4/23/2019	Ana Hermosillo	
42691		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	start date; departure month; job title; job category; identifying job location and employment history; employment history			
42692		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
42693		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; specific salary; specific salary; employment history; employment history; employment history; employment history; personalized information; employment history; employment history; specific salary; specific salary; current employer; specific salary; job category; job title; job title; job category; employment history			
42694		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; co-worker job numbers; identifying job assignment information; co-worker race; precise work location address; co-worker race; co-worker race; employment tenure; job assignment; co-worker race; supervisor name; supervisor race; supervisor name; supervisor race; supervisor name; identifying supervisor location; supervisor race and name; supervisor name; supervisor location; co-worker job category; co-worker job category; job category; citizenship/visa; citizenship/visa; educational history; educational history; supervisor history; supervisor name			
42695		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; personal identifying information			
42696		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42697		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying job assignment information; current employer			
42698		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; email; address	4/29/2019	RSOL Attorney	
42699		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42700		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; type of departure; race; citizenship/visa; type of departure			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42701		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; departure date; personal identifying information; job duties, job assignment; co-worker information; co-worker information; job duties; job duties; job duties; job assignment; job duties; specific salary; specific salary; specific compensation; supervisor name; specific compensation; co-worker information; specific compensation, co-worker information; co-worker information; co-worker information; job duties			
42702		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information, specific salary; unique identifying event; co-worker information; co-worker information; co-worker information, specific salary; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; unique identifying event; unique identifying event; unique identifying event; supervisor name; co-worker information; supervisor name; supervisor name; supervisor name; co-worker information, specific salary; co-worker information; co-worker information; supervisor name			
42703		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; co-worker information; supervisor name; hire date; job title; employment history; personal identifying information, employment history			
42704		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; supervisor name; co-worker information; supervisor name; supervisor name; supervisor name; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; job title; supervisor name; co-worker information; co-worker information; supervisor name; unique identifying event, supervisor name; co-worker information, unique identifying event			
42705		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific compensation, specific salary; employment history; specific compensation; specific compensation; supervisor name; co-worker information; co-worker information, specific salary; co-worker information, specific salary; name; supervisor name; supervisor name; name; name, supervisor name; supervisor name; supervisor name; unique identifying event; specific salary; supervisor name; specific salary; supervisor name; supervisor name; specific salary; supervisor name			
42706		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42707		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42708		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42709		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42710		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phones; internet address	5/2/2019	Ana Hermosillo	
42711		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	precise work location; job assignment; identifying supervisor location			
42712		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
42713		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific recruitment information			
42714		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; unique identifying job assignment information; employment history; job title; job assignment; identifying job assignment information; employment history; supervisor name; supervisor name; supervisor name; supervisor title; supervisor name			
42715		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job assignment; precise work location; employment history; supervisor name; supervisor name; supervisor name; supervisor name; co-worker names; co-worker name; co-worker job duties; supervisor name; identifying job assignment information; job duties; co-worker personal identifying information; identifying job assignment information; job assignment, job duties; supervisor name and title; supervisor name; supervisor title; supervisor name; supervisor titles; identifying job assignment information; identifying job assignment information; job duties			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
42716		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; identifying job assignment information; identifying job assignment information; supervisor name; co-worker salary; co-worker name; name; specific salary; supervisor name; specific salary event; supervisor name; supervisors names; supervisor name; specific salary information; supervisor name; supervisor name; supervisor title; supervisor name and job title; job duties; supervisor name; supervisor title; supervisor name; supervisor title; co-worker name; name; job assignment; co-worker name; co-worker job duties; co-worker job duties; co-worker job duties; name; co-worker name			
42717		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42718		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Note: incorrect redaction marked WP-AQ--correct redaction is GI and is a worker's name; Note: incorrect redaction marked WP-AQ--correct redaction is GI and is a phone number	4/17/2019	Ana Hermosillo	
42719		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42720		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42721		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42722		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42723		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42724		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42725		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; personal history and race	4/25/2019	Hailey McAllister	
42726		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; current employer; job title			
42727		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job duties; job duties; specific employment date; job title			
42728		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job assignment, job duties			
42729		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; personal history; unique work location; employment history; supervisor name and title; job duties; job assignment; unique team identifying information; job assignment			
42730		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42731		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42732		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job assignment and unique work location; race; unique team identifying information; unique team identifying information; personal history			
42733		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; job category; employment history; employment history; specific salary information, year of hire			
42734		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; name; job title; job category; employment history; job assignments; employment history; job assignments, job duties; employment history; supervisor name; supervisor name; specific salary information; identifying work event; identifying work event	6/27/2019	Karina Wegman	
42735		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phones	5/4/2019	Norm Garcia	
42736		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; employment history; start date			
42737		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42738		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42739		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; start date; identifying hiring information; employment history; previous employer; job category; job category; job category; job category			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42740		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; identifying job event; job category; employment history; job assignment; job assignment; employment tenure; supervisor name; job duties; job duties; job duties; supervisor name; supervisor name; supervisor name; identifying job assignment information; co-worker race; co-worker race; co-worker race; identifying salary information; identifying salary information; identifying salary information; specific salary; specific salary			
42741		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42742		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying job assignment information; race; employment history			
42743		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42744		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address	4/23/2019	Ana Hermosillo	
42745		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42746		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; identifying job assignment information; race; departure month; start date			
42747		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job duties; identifying co-worker location; job duties; job duties; job duties; job duties; previous employer; previous employers; salary information; prior specific salary; specific salary; specific salary; employment tenure			
42748		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying job assignment information; supervisor title; supervisor title; supervisor job title; co-worker job titles; supervisor work location; supervisor job title; departure reason; departure reason; supervisor title and location; supervisor name; supervisor title and location; specific compensation; specific compensation; co-worker identifying information; co-worker title; co-worker race; co-worker personal identifying information; co-worker job title; co-worker race; co-worker personal identifying information; co-worker title, race, citizenship/visa; co-worker race; co-worker race; identifying job assignment information; identifying job assignment information; supervisor title and work location; supervisor title and citizenship/visa			
42749		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42750		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42751		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42752		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42753		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42754		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	6/3/2019	Norm Garcia	
42755		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job title; employment tenure			
42756		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42757		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
42758		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42759		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information, employment history, employment tenure; personal identifying information, employment history; job title; hire date, employment tenure; supervisor name, co-worker information, job title; job duties; supervisor name; co-worker information; co-worker information; supervisor name; personal identifying information; co-worker information; co-worker information; co-worker information, race; co-worker information; co-worker information; job assignment; co-worker information; co-worker information; co-worker information; job title; job assignment; employment tenure; job duties			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42760		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name, co-worker information, job title; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information; co-worker information, race; co-worker information; supervisor name; job category; co-worker information; co-worker information, race; co-worker information; co-worker information; specific salary; unique identifying event; specific compensation; specific salary; job title; job assignment; employment tenure; supervisor name; job duties, job title; job duties; supervisor name; co-worker information; co-worker information, race;			
42761		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker information; co-worker information; co-worker information			
42762		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42763		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42764		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; race; name of acquired company; employment history; employment history; job title; job category; employment history; job category; employment history; current employer; current employer; employment history; employment history; co-worker information; citizenship/visa; personal identifying information	UNDATED	RSOL Attorney	
42765		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	6/3/2019	Norm Garcia	
42766		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; employment tenure; personal identifying information			
42767		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42768		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race			
42769		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title			
42770		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; job title; job category; hire date; employment tenure; job assignment; job title; job assignment; hire date; departure date; supervisor name, co-worker information, race, job title; job duties; supervisor name; co-worker information; co-worker information, race; co-worker information; specific compensation; specific salary; supervisor name; supervisor name, co-worker information, job category; job category; unique identifying event; specific salary; unique identifying event			
42771		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42772		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying event; unique identifying event; personal identifying information; email			
42773		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42774		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address; physical address; employment history	4/24/2019	Ana Hermosillo	
42775		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42776		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42777		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; employment tenure; employment history; job title; identifying job assignment information; employment history, specific work location; job title, salary; identifying work location; job title; job title; job assignment; job assignment; identifying job assignment information; co-workers race; supervisor name and title; supervisor name and title			
42778		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job assignment; job duties; supervisor name and title; supervisor name and title; supervisor name; supervisor departure date; co-worker number; co-worker number; co-worker number; co-worker number; specific salary; specific salary; citizenship/visa; specific salary information; specific salary; job title			
42779		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42780		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42781		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42782		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42783		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address	5/28/2019	Ana Hermosillo	
42784		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42785		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	departure month; job title; employment tenure; race; citizenship/visa			
42786		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	current employer; job title; job category; employment history; employment tenure; specific work location; job duties; job duties; job duties			
42787		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; compensation; identifying job event; employment history; employment history; identifying job assignment information; job assignment; identifying co-worker location; identifying co-worker locations; identifying co-worker locations; identifying co-worker locations; identifying co-worker location; identifying co-worker locations; supervisor name; supervisor unique identifying information; identifying co-worker location; identifying co-worker location			
42788		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job category; employment history; employment history; employment history; supervisor name; identifying work event; identifying co-worker information; identifying work event; identifying job assignment information; identifying job assignment information			
42789		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job title; citizenship/visa; citizenship/visa; employment history; employment history; job title; specific salary; specific salary			
42790		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category, job title			
42791		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42792		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42793		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42794		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address		Ana Hermosillo, Kiesha Cockett	
42795		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42796		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42797		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42798		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42799		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42800		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42801		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	5/2/2019	Ana Hermosillo	
42802		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying personal information; identifying personal information; identifying personal information; job history; job title; unique identifying information; unique identifying information;			
42803		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; date of hire; type of departure, end month; job title; job title; job duties; job category; job title; type of departure; job title;			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42804		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; job assignment; job assignment; identifying information about job assignment; job title; job assignment; identifying information about job assignment; supervisor name; supervisor name, job tenure; supervisor name; identifying information about supervisor; identifying information about supervisor; supervisor name; supervisor name; supervisor name; supervisor name			
42805		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job assignment; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; unique identifying action; identifying action; unique identifying information about team make up; unique identifying information about team make up; nique identifying information about team make up			
42806		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42807		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name			
42817		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; internet address;	5/29/2019	Ana Hermosillo	
42818		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42819		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa			
42820		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job tenure; job assignment; job title; coworker name; coworker name; job title, tenure; supervisor name; coworker name and identifying team information; coworker name; coworker name; identifying team information; coworker name; job title; coworker name; supervisor name; coworker name; name; coworker name; job title; coworker name			
42821		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; coworker name; job assignment; name; coworker name; coworker name; coworker name; coworker name; supervisor name; coworker name; name; coworker name; name; coworker name; name; specific compensation; specific compensation; identifying information; supervisor name; job title; job tenure; job title; job category; job tenure; job assignment; job duties; job duties; job history; job history; duties; job history; title; job assignment; job assignment; supervisor name; supervisor name;			
42822		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; job category; job tenure; job duties; specific salary; specific compensation; supervisor name; race; supervisor job title; job assignment; job tenure, supervisor name, duties; supervisor name; supervisor name; race; supervisor name and job tenure; supervisor name, name; supervisor name and team make up; race; unique identifying information about team, name; supervisor name and unique identifying information about team			
42823		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42824		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42825		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42826		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42827		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	coworker name; supervisor name; unique identifying information about team			
42828		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	5/31/2019	Ana Hermosillo	
42829		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42830		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job history; unique identifying information; job title, job tenure; job title; coworker name; identifying information; coworker name; supervisor name; job assignment; coworker name; job history; job title; job assignment; job title; race			
42831		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	citizenship/visa; job category; identifying information; identifying information; identifying information; job title;			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42832		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; job duties; specific salary; job history; specific salary; coworker job assignment, job title; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; citizenship/visa			
42833		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; supervisor name; identifying information about manager; job title; supervisor name; supervisor name and race; supervisor assignment; supervisor assignment; supervisor name; supervisor identifying history; identifying information; job title; identifying information; identifying information			
42834		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job history; citizenship/visa; identifying information; specific salary; identifying information; job category; supervisor name; job title			
42835		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42836		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42837		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42838		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42839		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	5/15/2019	Ana Hermosillo	
42840		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42841		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure; departure date; unique identifying action; job title; race; unique identifying information, citizenship/visa			
42842		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	category; unique identifying information; job duties; identifying information; supervisor name; supervisor title; supervisor name; supervisor name; identifying information; specific salary, specific compensation; supervisor name, race; unique identifying information, coworker name;			
42843		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; coworker name; identifying information; type of departure, unique identifying information; unique identifying information; coworker name; identifying information; supervisor name; supervisor name; identifying information about coworker; job assignment; job assignment; supervisor name; supervisor name; job assignment			
42844		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; job category; job history; specific salary; job title; job title; unique identifying information; job title			
42845		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42846		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42847		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42848		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; unique identifying event			
42849		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	identifying information			
42850		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; name; name; job title; job category; employment history; job assignments; employment history; job assignments, job duties; employment history; supervisor name; supervisor name; specific salary information; identifying work event; identifying work event	6/27/2019	Karina Wegman	
42851		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address	5/9/2019	Ana Hermosillo	
42852		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42853		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; job history; citizenship/visa; job history; job history; departure month and day; unique identifying information; unique identifying information			
42854		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job category; unique identifying information; job duties; job duties; job duties; information identifying job assignment; unique identifying information about team; unique identifying information about team; specific salary; job tenure			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
42855		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; identifying team information; specific compensation; job history; specific salary; supervisor name, race; specific salary; specific compensation; supervisor name; specific compensation; specific compensation; job history; supervisor name; supervisor name; supervisor name; job category; job category; job category; job title; job category; job title; job category; supervisor name; job category; job category; supervisor name; job category; job title; supervisor name; specific salary; job history; supervisor name; supervisor name			
42856		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job history; job history; supervisor name; supervisor name; supervisor name; job category; supervisor name; supervisor name; job history; job history; job history			
42857		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; supervisor name; supervisor name; supervisor name; specific compensation; supervisor name			
42858		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42859		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42860		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42861		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; supervisor name, job history; supervisor name; job history; supervisor name; coworker name; coworker name; supervisor name; job title; supervisor name; type of departure; supervisor name; identifying information; supervisor name; supervisor name; identifying information; job category; supervisor name; supervisor name; job category; coworker name; supervisor name; job title			
42862		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; unique identifying information about team make up; unique identifying information about team make up;			
42863		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42866		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address;	4/9/2019	Ana Hermosillo	
42866		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; internet address			
42867		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; job title; supervisor name;			
42867		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job history; job title; supervisor name			
42868		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; employment history; supervisor name; citizenship/visa;			
42868		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; citizenship/visa; citizenship/visa; job history; supervisor name; citizenship/visa			
42869		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment tenure; employment history; employment history; employment history, supervisor name, title and location; supervisor name; specific salary; job title; specific salary; job category; job category; specific salary; job duties; supervisor name; supervisor name; job title; employment history; employment history;			
42869		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job tenure; job history; job history; supervisor name, job history; supervisor name; specific pay; job title;			
42870		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; specific salary; employment history; employment history; employment history; previous employer;			
42871		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; job category; co-worker number; job category; co-worker location; job category; job category; co-worker name; co-worker name; job category; co-worker name; job category; co-worker information; supervisor name; employment history; specific salary; employment history; supervisor name; employment history; employment history; employment history			
42872		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name and title; co-worker number; co-worker information; co-worker number; co-worker information;			
42873		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	no GI			
42874		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42875		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	internet address			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42876		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI	7/3/2019	Cedrick Richardson	
42877		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name and race; citizenship/visa; hire date; citizenship/visa; citizenship/visa; employment tenure; hire date; job title; type of departure; job category; job category; employment history; job category; supervisor name; supervisor title; supervisor name and title; supervisor name; supervisor name and title; job category			
42878		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; job category; job category; type of departure; employment history; type of departure;			
42879		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42880		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; physical address	5/22/2019	Ana Hermosillo	
42881		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42882		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Date of acquired company; job category; employment history; employment history; specific salary; specific salary; job assignment; job title; job category; specific salary; specific salary; specific salary; specific salary; specific salary; employment history; job title; specific salary; specific salary; employment history; specific salary; departure month; employment history; job category and specific salary; job title			
42883		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa;			
42884		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name of acquired company; date of acquired company; job category; name of acquired company and job title; name of acquired company and job assignment; job category; job category; job title; employment history; job assignment; job assignment; job title; job category; employment history; job category and specific salary			
42885		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history; supervisor name and actions; supervisor name; supervisor location; employment history; supervisor location; supervisor name; supervisor names; supervisor name, race and title; supervisor location; supervisor location; supervisor name; supervisor name; supervisor employer; supervisor employer; supervisor employer; supervisor employment history; supervisor employer; supervisor employment history; supervisor name; employment history; personalized information; employment history; employment history; supervisor name			
42886		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure; type of departure; co-worker number; co-worker location; co-worker number; supervisor title; co-worker number; co-worker name; co-worker number; co-worker location; employment history; employment history; employment history; supervisor name and race; supervisor name; supervisor employment history; supervisor name; employment history; job assignment; employment history; employment history; personalized information; employment history and job assignment; employment history; personalized information; employment history; job assignment; employment history, work location			
42887		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42888		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42889		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42890		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42891		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42901		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number	6/3/2019	Norm Garcia	
42902		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific employment date; employment history; year of hire; current employer; job title; job category; specific employment date; unique work history			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42903		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42904		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa			
42905		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary information, job title, job category			
42906		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; employment history; job category; job assignment; employment history; supervisor name; job duties; supervisor name; unique team identifying information; employment history; unique team identifying information; job title; employment history; job category; job assignment; supervisor name; job duties; supervisor name; supervisor name; unique team identifying information			
42907		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique work location; citizenship/visa; specific salary; job title; job category; job assignment; unique work location; employment history			
42908		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; specific salary			
42909		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42919		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	5/13/2019	RSOL Attorney	
42920		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42921		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; race; citizenship/visa; citizenship/visa;			
42922		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job category; specific salary; specific salary information; employment history; specific salary information; supervisor name			
42923		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment; employment history; unique employment event; employment history; employment history; employment history; specific salary; supervisor name; employment history; job title; employment history; job category; job category			
42924		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; precise work location; precise work location; supervisor name and title; supervisor name			
42925		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor title; unique team identifying information; unique team identifying information; specific action done by her; supervisor name; unique action taken against her; unique action taken against her; employment history; employment history; job category; employment history; specific salary information; specific employment date; specific action done by her; specific salary; employment history; job category; specific salary; unique work location; specific salary; citizenship/visa; specific salary; supervisor name; specific action done by her			
42926		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique work location; unique team identifying information			
42927		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42928		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-work name and employment history			
42929		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title			
42930		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI	6/14/2019	Cedrick Richardson	
42931		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; race; hire date; personal identifying information; citizenship/race; identifying hiring information; job title; job title; hire date; departure date; identifying job event; job assignment; identifying personal information			
42932		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42933		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42934		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone; internet address	5/29/2019	Ana Hermosillo	

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.			NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.
42935		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	salary information; specific compensation; specific compensation; specific compensation; specific salary; job category; personal identifying information; educational history; co-worker name; co-worker salary; co-worker salary; co-worker compensation; co-worker name; co-worker compensation; name; co-worker compensation; co-worker salary, co-worker name, co-worker salary; co-worker name; co-worker name; co-worker name; co-worker salary; co-worker salary; co-worker compensation; supervisor name; co-worker names; supervisor name; co-worker name; supervisor name; supervisor name			
42936		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	compensation, job duties; supervisor name; supervisor name; name; supervisor name; employment history; job title; supervisor name; job assignment; job assignment; co-worker name; supervisor name; job title; supervisor name; job title; identifying job assignment information; co-worker name; co-worker personal identifying information; co-worker name, title; co-worker job titles			
42937		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; supervisor name; supervisor name and title; supervisor name; co-worker names; job duties; supervisor name			
42938		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race, personal identifying information			
42939		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title, job assignment, job duties, employment history; co-worker name; job category; identifying work location; identifying work location; employment tenure; precise work location, personal identifying information; job duties; job duties; job duties; job duties; job duties; job duties; specific salary; specific compensation; job title; hire date, unique educational information; unique educational information			
42940		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title			
42941		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; supervisor name; supervisor name; job title; supervisor name; supervisor job title; supervisors names; supervisor names; employment history; job assignment; job duties; job assignment; specific job assignment information; specific job assignment information; co-worker job title; co-worker race; name; co-worker name, supervisor name; co-worker name			
42942		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific salary; specific salary; specific salary; co-worker identifying employment history; co-worker salary; co-worker name; co-worker salary information; co-worker name; co-worker job title; co-worker name; name; co-worker name; supervisor name; supervisor name; job duties; co-worker salary; co-worker salary; supervisor name; supervisor name; supervisor name; job duties; job duties, job assignment; job duties; specific identifying job event; co-worker name; co-worker specific salary; supervisor name; supervisor name; supervisor name; supervisor name; name; supervisor name; supervisor name; supervisor name; job assignment; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor name; supervisor initials			
42943		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job assignment information; job assignment information; job assignment information; supervisor name; co-worker name; co-worker name; name; supervisor name; job assignment; job duties; co-worker race; employment tenure; job title			
42944		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42945		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42946		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; job assignment; job assignment; co-worker initials; job assignment; job assignment; job assignment; co-worker name; co-worker name, job duties; co-worker initials			
42947		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; telephone; e-mail address	6/10/2019	Ana Hermosillo	
42948		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42949		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	type of departure and departure date; job title; job category; employment tenure; race; citizenship/visa; citizenship/visa;			
42950		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job duties; specific salary; unique identifying event; unique identifying information; hire date; job title; job category; personal identifying information; personal identifying information			
42951		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; specific salary; specific salary;			
42952		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-worker name; specific salary; co-worker school; job category; job title; job category; job duties; unique identifying event; unique identifying event; employment history; supervisor name and title; unique identifying event; supervisor name; supervisor name and title; supervisors' names; job assignment; unique identifying event; unique identifying event			
42953		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	co-workers and supervisor name; co-worker name, race, and gender; co-worker name, race, and gender; co-worker name, race, and gender; co-workers and supervisor name; co-workers; co-worker name, race, and gender; co-worker name, race, and gender; supervisor name; co-worker race; co-worker race; co-worker's job duties; name; unique identifying information; unique identifying information; unique identifying information; co-workers title			
42954		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	coworkers' race, cities of work, type of departure, job category, and unique identifying information of co-worker;			
42955		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42956		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	unique identifying information; specific salary; specific salary			
42957		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal identifying information; supervisor name; supervisor name; supervisor identifying information; unique identifying event; job assignment; job assignment; supervisor name; co-worker name; job assignment; co-worker name, gender, office location, and race; job assignment; coworkers' race; co-worker name; job assignment; job assignment; job assignment; supervisor name;			
42958		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; supervisor name; coworkers' race; unique identifying event; coworker name; coworker title and unique identifying event; name; race; type of departure; unique identifying event; unique identifying event; job assignment; number of coworkers; coworker's race			
42959		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone	5/8/2019	Ana Hermsillo	
42960		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42961		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42962		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42963		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42964		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42965		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42966		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42967		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42978		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI	5/2/2019	Ana Hermsillo	
42979		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	Hire date; job title; job category; precise work location			
42980		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; citizenship/visa; citizenship/visa; unique identifying event and type of departure			
42981		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	hire date; employment history; job title;			
42982		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job title; job assignment; employment history; job duties; job duties; precise work location; supervisor name and title			

OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP: AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
42983		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor title; supervisor name; supervisor name; co-worker number; manager number; co-worker number and job title; job assignment; supervisor name; employment history; supervisor name; unique identifying event; unique identifying event; number of people for unique identifying event; unique identifying event; unique identifying event; unique identifying event; supervisor name;			
42984		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42985		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	race; race; race			
42986		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name, phone number; internet address	UNDATED	RSOL Attorney	
42987		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42988		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42989		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42990		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42991		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42992		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42993		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; race; citizenship/visa; job title and duties; former employer; specific employment date; employment history; personal history; specific salary; supervisor name and title	5/7/2019	Karina Wegman	
42994		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; employment history; employment history; employment history			
42995		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address; mailing address	04/25/no year	Cris Santos	
42996		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
42997		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; race; citizenship/visa; job title; job category; employment history and unique job location; unique employment event			
42998		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; specific salary; job duties and job assignments; employment tenure; employment history; supervisor name and title; unique team identifying information; unique team identifying information; job assignment; employment history; unique team identifying information; race; unique team identifying information; unique team identifying information; races; hire date; job title			
42999		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	personal history; employment history; specific salary; job category; job title; employment history; job duties; supervisor name and title; supervisor name and title			
43000		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisor name; unique team identifying information; unique team identifying information; unique team identifying information; race; job title			
43001		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job category; job assignment; employment history; job duties; supervisor name and title; supervisor name and title; unique team identifying information; race; race; job title; job category; job assignment; unique work location; employment history; job duties; supervisor name and date; supervisor name and date; supervisors names and title; unique team identifying information; employment history; unique team identifying information; race			
43002		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; race; job title; personal history			
43003		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	supervisors names; unique employment event; personal history			
43004		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	name; phone number; internet address	4/23/2019	Dan Chasek	
43005		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			
43006		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	employment history; race; citizenship/visa			

**OFCCP v. Oracle America, Inc., 2017-OFC-00006
OFCCP PRIVILEGE LOG, SUPPLEMENTAL PRODUCTION**

BATES START	BATES END	REDACTED or WITHHELD	DESCRIPTION	PRIVILEGE	BASES FOR ASSERTION OF GOV. INFORMANT PRIVILEGE	DATE	AUTHOR	RECIPIENTS
					NOTE: As designated on the face of certain documents, WP-AQ or WP:AQ designates redactions as work product in the form of attorney questions; WP is attorney opinion work product.		NOTE: For documents that have multiple pages, individually describing the privilege assertions, the authors and dates are noted for the first page of the multi-page document.	
43007		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job duties; job duties; specific salary; hire date; job title			
43008		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	former employer; job title; former employer information; specific salary; job category; job assignment; employment history; supervisor name			
43009		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job duties; supervisor name and title; supervisor name and title; supervisor name; specific salary information; unique work location			
43010		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	job title; job assignment; employment history; employment history; supervisor name; job duties; unique team identifying information			
43011		Produce - Redact	Attorney notes of contacts with confidential third parties	Government Informant; Attorney-Client/Work Product	specific employment date; employment history; job title; job title			
43012		Produce - Redact	Attorney notes of contacts with confidential third parties	Attorney Work Product	no GI			

EXHIBIT E



Orrick, Herrington & Sutcliffe LLP
777 South Figueroa Street
Suite 3200
Los Angeles, CA 90017-5855
+1 213 629 2020
orrick.com

David Fuad

E dfuad@orrick.com
D +1 213 612 2369

July 10, 2019

Abigail G. Daquiz
Office of the Solicitor
300 Fifth Avenue, Suite 1120
Seattle, Washington 98104

Re: *OFCCP v. Oracle America, Inc.*, OALJ Case No. 2017-OFC-00006

Dear Ms. Daquiz:

I write regarding OFCCP's July 5 and 8, 2019 productions, which were intended to comply with the Court's June 10, 2019 Order Granting In Part And Denying In Part Oracle's Second Motion To Compel.

As OFCCP is aware, the Order directed OFCCP to:

re-do *all* of its redactions and provide Oracle with copies of communications with current and former Oracle employees, or the records of such communications in which *only* identifying information is redacted. Factual content that will not specifically identify the informant may not be obscured in these redactions.

June 10, 2019 Order at 14. The Order further required that for each redaction made:

OFCCP must provide some indication of why the type of information redacted could identify the informant in question. ... [F]or instance a coding that informs a third party of the underlying nature of the redacted information (e.g. "name" or "address" or "email"). [I]n cases where OFCCP continues to redact significant portions of the factual content, it must provide some indication of why all of the information redacted would identify the informant. OFCCP's redactions and accompanying explanations must enable other parties, and me, to understand and assess the privilege, as required by the rules. It should be the rare or non-existent case that the content of an entire memo/note is redacted based on the government informant privilege—it protects only identifying information, not content.

Id.



Abigail G. Daquiz
July 10, 2019
Page 2

In its order denying OFCCP's Motion for Reconsideration, the Court also stated:

I expect OFCCP and its attorneys to engage in good faith redactions in compliance with the June 10, 2019, Order, and to make both timely production of redacted responsive documents and supplemental interrogatory responses.

July 2, 2019 Order at 9.

As explained below, OFCCP's July 5 and July 8 document productions, as well as its supplemental interrogatory responses, do not comply with the Court's Orders.

OFCCP's July 5 cover letter attempts to explain some of these deficiencies by opining that "factual summaries of interviews, included as responsive to Oracle's Interrogatory No. 49, is the best means of securing the facts" and that the interview notes "will be of limited utility because of the work product and informant information protected by the Court's orders." The Court's order is clear that OFCCP must produce both; one cannot substitute for the other.

That the summaries cannot serve as a substitute for the interview memos is evidenced by the fact that even the minimal information provided in the over-redacted memos reveal facts not contained within any of the summaries provided in response to Interrogatory 49. *See, e.g.*, DOL000041456 (noting belief that salary was low at least partially dependent on glassdoor.com and (presumably) that job duties included checking for errors and working with developers to fix them); DOL000041264 (including teaching product to teammates as (presumably) part of her job duties).

OFCCP's Document Production

OFCCP's document production is incomplete. OFCCP was ordered to **re**-produce the interview notes at issue in Oracle's Second Motion to Compel. But the only interview memos that OFCCP produced on July 5 were **new** memos, produced for the first time. Please confirm that OFCCP intends to supplement its production with the re-production of properly redacted interview memos this Friday, July 12.

Further, the interview notes that OFCCP did produce on July 5 do not comply with the Order. In most, if not all cases, the questions are entirely redacted. *See, e.g.*, DOL 41010. At the risk of placing too fine a point on it, statements made in response to unknown questions have little utility. This is even more true when the answers are "yes" or "no." *See, e.g.*, DOL 40805 (redacting entire sections as "WP-AQ"); 40856 (same); 41090 (same). Markings on the redactions indicate these questions were redacted pursuant to the "WP" (work product) privilege. The memos also include the notation "AQ" (and some cases, *e.g.*, DOL 41092, "QA"), without signifying what AQ and QA mean.

Abigail G. Daquiz
July 10, 2019
Page 3

OFCCP appears to be stating that “attorney questions” were redacted. But even where the likely question can be divined from the context of the unredacted responses, it is apparent OFCCP is not redacting “opinion work product” that reveals its impressions of the case. For instance, OFCCP redacted questions about the name and contact information of the witness. *See, e.g.*, DOL 40762 (redacting as “WP-AQ” a question that is followed by a chart listing the name, contact date and time, and contact information for the interviewee). Asking a witness for her or his contact information is not revealing OFCCP’s strategic impressions about the case. One document even redacts the “Initial Intake Interview” document title as “WP-AQ.” *See* DOL 42199. Please explain how these questions would disclose either (i) employee identifying information or (ii) attorney opinions or impressions, which are the only two bases on which OFCCP is permitted to redact any information contained in these interview notes. *See* Order at 27.

Indeed, most of the questions OFCCP is posing to potential witnesses are presumably strictly factual in nature. There is no basis for these redactions. There is no shortage of similar examples of OFCCP flouting the Court’s Order in its production. OFCCP has therefore not produced “the factual content of communications with third parties.” Order at 27.

Similarly, OFCCP has redacted information as “NR” or “non-responsive.” *See, e.g.*, DOL 41110 (non-responsive); 41120 (same); 41130 (“NR”); 41379 (same). Redactions for perceived “responsiveness” are prohibited by the Court’s Order. And even if they were permitted, is not clear what standard OFCCP is using to determine responsiveness in this context.

OFCCP’s privilege log further underscores Oracle’s concerns regarding these improper redactions. As the Court has stated, “the government informant privilege does not permit withholding information on the grounds that a creative attorney can postulate some way in which the information could narrow the potential sources.” 7/2/19 Order at 9 n.3. Contrary to the Court’s guidance, OFCCP has redacted facts, including “race/gender; date of hire; title at hire; date of current position; current title; line of business; organization; specialty; supervisor. . . info about when supervisor started supervising information” and “description of job duties.” *See, e.g.*, 7/9/19 Privilege Log at 1 (DOL000000750). Such redactions are overbroad and must be removed. OFCCP must provide, at a minimum, the race, gender, and job code of these employees.

Moreover, despite the representations in your July 5 cover letter describing the process OFCCP purportedly underwent to redact these notes, there are dozens of pages that have been redacted **in their entirety**. As the Court stated in its June 10, 2019 Order, OFCCP’s documents have “facially incredible levels with nearly everything deemed disclosure of an informant’s identity; there was no consistency and the redactions did not appear to follow any uniform directive.” Order at 13. The same remains true today.

Abigail G. Daquiz
July 10, 2019
Page 4

If OFCCP is unwilling to revise its redactions following our meet and confer efforts, given OFCCP's apparent unwillingness to comply with the June 10 Order, Oracle intends to file a motion to compel OFCCP's compliance with the Order, seeking both an expedited briefing schedule and an *in camera* review of these interview notes.

Interrogatory Responses

The supplemental interrogatory responses that OFCCP produced remain deficient. Like OFCCP's initial responses which the Court found insufficient, almost every response concerning the facts supporting specific allegations of OFCCP's Second Amended Complaint ("SAC") is substantively identical. OFCCP's responses to Interrogatories 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, and 33 are exactly the same. They were not even adjusted to reflect the appropriate paragraph in the SAC that the Interrogatory concerns. OFCCP's responses to Interrogatories 40, 41, 42, 43, 44, and 45 are also identical and include no new or separate facts from the first half of OFCCP's responses. At this point, it appears to be OFCCP's position that a single set of facts supports the allegations contained in paragraphs 11-16 and 18-24 of the SAC. If this is correct, please so confirm. If this is incorrect, please direct us to the specific differentiating facts in the 1846-page document OFCCP served.

Moreover, these cookie-cutter sets of facts are not even responsive. Many of OFCCP's assertions are not facts at all, but argument by OFCCP without reference to the underlying facts Oracle is seeking. See, e.g. Supp. Resp. at 9 ("Oracle gives less employment opportunities to females than males because of cultural and sexual stereotypes."); 10 ("Oracle grouped all jobs that it considered equal in value into the same local salary grade level having the same salary range."). OFCCP also quotes specific documents in its responses, but then fails to identify the source of those quotes, which prevents Oracle from understanding the alleged facts in context. See, e.g., *id.* at 10 ("Oracle claims that salary ranges take into account a person's tenure because 'in general, employees who have been in their current role longer tend to be paid higher in the salary range.'").

Interrogatory 27. Interrogatory 27 seeks the names of individuals with knowledge of facts, and the nature of the facts. OFCCP's supplemental response adds Oracle employees who may have knowledge, and the nature of that knowledge, but fails to supplement its previously identified list of individuals with the nature of the knowledge each person may have. OFCCP understands what this Interrogatory is seeking, as it answered fully with respect to Oracle's employees. OFCCP must supplement this response.

Interrogatory 49. In response to Interrogatory 49, OFCCP summarized what it contends it learned from 228 witness interviews, and incorporates the same general response OFCCP provided to each of its other Interrogatory responses. There are several problems with this response. First, OFCCP neglected to provide the race or ethnicity of any of the employees who provided the information included in response to Interrogatory 49. OFCCP redacted this information on the basis of the Government's Informant

Abigail G. Daquiz
July 10, 2019
Page 5

privilege. The Court has already foreclosed this argument. See 7/2/19 Order at 9 n.3. The race and ethnicity of these employees is needed to understand the relevance and import of their potential testimony (and to identify whether the employee is an impacted employee at all). Furthermore, the employee or former employee's job code is relevant, factual information that must be disclosed. OFCCP has continually asserted that job code is relevant to its case, and Oracle must understand the full set of facts OFCCP relies upon in developing its defense. See, e.g. Supp. Resp. 49 at 1679-80 (including "facts" concerning job codes).

OFCCP's response regarding Employee 59 is not clear, as the text of the summary relates to Employee 4. Please confirm whether this is an error.

OFCCP's response to Interrogatory 49 contains approximately **46 full pages** of Bates numbers.¹ The Court directed OFCCP to "specify only the responsive documents, not larger collections in which the documents containing the information may be found." 6/10/19 Order at 39. The listed Bates numbers appear to be the same Bates numbers referenced in each of the other Interrogatory responses. Please confirm that **each** document identified contains anecdotal evidence per the Court's order.

In addition, at least two Bates ranges that OFCCP identifies refer to more than 5,000 pages – ORACLE_HQCA_000000001-ORACLE_HQCA_000005683 and ORACLE_HQCA_0000089026-ORACLE_HQCA_0000128174. These enormous citations do not refer Oracle specifically to any fact that supports OFCCP's allegations, but rather require Oracle to engage in a needle-in-a-haystack search for relevant information across thousands of pages. Please identify with specificity which of these combined 44,831 pages contain relevant facts.

Finally, OFCCP's summaries reflect the importance of OFCCP's compliance with the Court's order regarding properly redacted interview notes. OFCCP's 228 witness summaries include approximately six summaries of interviews with employees who did not apparently feel discriminated against in their pay. See, e.g., Supp. Resp. at 1633 (employee 7); 1647 (employee 69). It is impossible for Oracle to know whether these employees provided additional information that may be useful to Oracle's defense.

Allegations of Bad Faith

Your July 5 letter also asserts that Oracle's "discovery demands were not made or pursued in good faith, but rather to delay the litigation and drain OFCCP's resources." The Court largely granted Oracle's motion to compel, rendering the first point null. In addition, as evidenced by Oracle's prompt requests to meet and confer regarding OFCCP's discovery deficiencies, Oracle is certainly not attempting to delay the

¹ This number is artificially low as it counts only entire pages that consist of only Bates numbers. There are many instances of pages that consist predominantly of Bates numbers that are not included here.

Abigail G. Daquiz
July 10, 2019
Page 6

litigation. And any drain on OFCCP's resources that resulted from opposing Oracle's motion to compel, preparing a groundless motion for reconsideration, and then engaging in a pantomime of compliance with the Court's order (thereby restarting the meet and confer and motion to compel process), is entirely OFCCP's fault.

Your July 9 email makes similar assertions. It refers to my colleague Warrington Parker's email to you upon receipt of OFCCP's production, questioning whether OFCCP's production was in full compliance with the Court's order. Seeking confirmation that OFCCP's Court-ordered production is complete does not require a review of the documents that had been produced. Indeed, as you know, this inquiry was prompted by an email exchange on July 4 wherein OFCCP indicated that OFCCP's production might not be complete by July 5.

And given that OFCCP's production was not completed on July 5, Oracle renews its request. Is the production ordered by the Court complete? If not, by what date will it be complete?

Oracle is in the process of preparing its expert reports. Oracle's experts need to be able to consider the facts of the case in their entirety. As a result we need to meet and confer as soon as practicable. Please let me know when you are available this **Friday, July 12 or Monday, July 15** to meet and confer regarding the foregoing.

Sincerely,

A handwritten signature in blue ink that reads "David P. Fuad". The signature is stylized and cursive.

David P. Fuad



July 12, 2019

Via Email Only

Mr. David Fuad
Orrick, Herrington & Sutcliffe LLP
777 South Figueroa Street
Suite 3200
Los Angeles, California, 90017-5855

Re: *OFCCP v. Oracle America, Inc.*
Case No. 2017-OFC-00006

Dear Mr. Fuad,

I write in response to your letter of July 10, 2019.

It is clear from your letter that the parties could be served by having some meaningful conversations about how OFCCP has supplemented its discovery responses following the Court's June 10 Order.

First, the Court's Order correctly protects the identities of government informants and attorney work product. It seems that Oracle's complaints with the supplemental document production are with how OFCCP has shielded from disclosure the identities of informants and protected attorney work product. We are perplexed about Oracle's opposition to our attempts to clarify these issues with the court, and its opposition to our request for in camera review of this material—only now to threaten to seek the same remedy. In any event, we can address how our production, including our privilege logs and our redactions, fully comply with the Court's order.

Second, you describe the supplemental interrogatory responses in a manner that reveals that you have not carefully read them. For example, Interr. 26, 28-37, and 33 [sic] are not exactly the same. Further, it is not correct that the same single set of facts supports the allegations contained in paragraphs 11-16 and 18-24 of the Second Amended Complaint. As you invite us to, we think it would be most fruitful to discuss our interrogatory responses on a conference call. We want to make plain the process that OFCCP undertook to state the facts that support the allegations in

the identified paragraphs in each of the responses as sought by Oracle's interrogatories. OFCCP has reviewed the more than 500,000 pages of documents and thousands of database files having over a hundred million data points Oracle has produced prior to May 1, 2019 and has compiled its understanding of those documents in the supplemental responses that both state facts (as the interrogatory requests) and identifies documents wherein those facts were contained. To meet the Court's Order and Oracle's insistence on full answers for each interrogatory without incorporating prior answers, OFCCP identified facts and it identified documents that contained those facts, with specific attention to what parts of those documents are responsive to the discovery requests.

During our conference we can walk through those responses and I am confident that we will be able to show you how each response, while referencing similar sets of documents, contain facts that are responsive to the interrogatory and either where in the documents, as OFCCP has described, those facts can be found or those documents that contain the identified facts. We will likely be supplementing our responses after reviewing Oracle's productions made in May, June and July that consist of over 200,000 pages of additional documents and over 6,000 additional database files. This is our understanding of what Oracle is seeking and what the Court has ordered and we will continue to fulfill our duty to supplement as required by the discovery rules. Regarding Interr. 27, I will supplement the response as requested by Friday July 19, 2019. We can address the other specific issues you raise when we meet next week.

OFCCP has devoted thousands of hours to reviewing Oracle's voluminous productions to identify the facts that Oracle's interrogatories call for and to preparing the supplemental production so we expect that your office will take the necessary time to read our responses and we will do our best to assist you where there is confusion.

We expect to supplement our privilege log to cover the documents produced to date by Monday, July 15, 2019. OFCCP has now produced all of the redacted attorney notes and appended to this letter is a correlation of the employee summaries and the produced notes. Again, we attempted to preemptively address the situation we find ourselves today by offering to provide the summaries included with our response to Interr. 49 to offer the facts we have learned from contacts with third parties. It is evident that the redactions of our attorney notes consistent with the Court's order and our responsibilities to protect the identity of government informants results in limited information being disclosed, but our summaries provide the relevant facts that respond to both the interrogatory and provide the factual content of those contacts with third parties. We will complete the production of responsive documents in our possession on July 5 by Friday, July 19.

Finally, OFCCP disagrees that an expedited briefing schedule is warranted and will oppose efforts to cut short the discovery process and agreed upon motions schedule. It stretches credulity that Oracle's experts would need information collected by OFCCP about Oracle's own employees whose employment conditions Oracle dictates and who have already been hailed into interviews by Oracle and its attorneys. Any statistical analysis Oracle's experts are preparing cannot be impacted by anecdotal evidence. Any expert analyzing Oracle's employees' job duties or functions has at its disposal Oracle's whole organization including the company's personnel managers, the company's personnel practices, and access to the workers themselves through interviews that it has conducted. OFCCP opposes any delay in the expert disclosure/discovery schedule and would oppose any request to continue the hearing in this matter.

I propose that we meet to discuss the issues raised in your letter that outlines the misapprehensions Oracle seems to have about OFCCP's supplemental answers and supplemental production in an attempt to come to a better understanding. Does Tuesday, July 16 at 2 PM work for you? If not, please propose a time later. We can also be available on Wednesday between 10-12.

Sincerely,



Abigail G. Daquiz
Senior Trial Attorney

cc via email: Ms. Connell, Ms. Kaddah, and Mr. Siniscalco, Ms. Grundy
Ms. Bremer, Mr. Garcia, Mr. Miller, Mr. Richardson, Mr. Song

Enc.

APPENDIX

Employee Ref. in Interr. 49	BATES START	BATES END
1	40762	40769
2	40770	40785
3	40786	40795
4	40796	40804
5	40813	40822
6	40805	40812
7	40823	40827
8	40828	40836
9	40837	40839
10	40840	40851
11	40852	40855
12	40856	40866
13	40867	40876
14	40877	40881
15	41682	41695
16	40886	40896
17	40897	40905
17	41673	41681
18	40906	40916
19	40917	40927
20	40928	40937
21	40938	40946
22	40947	40957
23	40958	40961
24	40962	40971
25	40972	40982
26	40983	40992
27	40993	40996
28	40997	41008
29	41009	41013
30	41014	41020
31	41021	41029
32	41030	41039
33	41040	41048
34	41049	41061
35	41062	41065

Employee Ref. in Interr. 49	BATES START	BATES END
36	41066	41068
37	41069	41080
38	41081	41089
39	41090	41094
40	41095	41098
41	41099	41109
42	41809	41817
43	41114	41119
44	41120	41129
45	41462	41472
46	42533	42541
47	41489	41498
48	41696	41698
49	41956	41965
50	42589	42594
51	41242	41248
52	41604	41612
52	42765	42773
53	41256	41263
54	42086	42094
55	42774	42782
56	41590	41592
57	42551	42560
58	41329	41339
59	42658	42668
60	42801	42807
61	41151	41160
62	41646	41655
63	42469	42478
64	42571	42583
65	41399	41410
66	41854	41862
67	42337	42345
68	41438	41444
69	41479	41488
70	41946	41955
71	41737	41746

Employee Ref. in Interr. 49	BATES START	BATES END
72	42817	42827
73	42479	42487
74	42629	42638
75	41232	41241
76	41966	41977
77	42690	42697
78	41831	41839
79	42000	42003
80	42735	42743
81	42710	42717
82	42255	42264
83	42754	42763
84	41824	41830
85	42430	42439
86	41290	41292
87	41845	41853
88	42828	42838
89	41207	41216
90	41882	41889
91	41890	41900
92	42669	42678
93	42995	43003
94	42839	42849
95	42959	42967
96	42623	42628
97	42132	42141
98	42498	42507
99	41747	41755
99	41756	41764
100	41532	41541
101	42614	42622
102	41365	41366
103	42614	42622
104	42395	42397
105	41473	41473
106	41161	41171
107	42392	42394

Employee Ref. in Interr. 49	BATES START	BATES END
108	41805	41808
109	41456	41461
110	41182	41188
111	42783	42793
112	42645	42657
113	41141	41150
114	41513	41521
115	41988	41995
116	42162	42168
117	42080	42085
118	42408	42417
120	41593	41603
121	42375	42385
122	42595	42604
123	42421	42423
124	42099	42110
125	41499	41505
126	41542	41551
127	40882	40885
128	42111	42119
129	41583	41586
130	42142	42151
131	41175	41181
132	41318	41328
133	41110	41113
134	42132	42141
135	42508	42519
136	42450	42458
137	41197	41206
138	41699	41702
139	41923	41925
140	41552	41559
141	42179	42188
142	41570	41579
142	42233	42242
143	42346	42357
144	41628	41630

Employee Ref. in Interr. 49	BATES START	BATES END
145	41416	41427
146	42440	42449
147	41713	41722
148	42398	42407
149	42214	42222
150	42223	42232
150	42866	42875
151	41818	41820
152	41765	41768
153	42530	42532
154	42243	42250
155	41353	41364
156	42324	42326
157	42251	42254
158	41821	41823
159	42273	42280
160	42605	42613
161	42301	42310
162	41560	41569
163	41985	41987
164	41344	41352
165	41723	41725
166	41656	41666
167	42327	42336
168	42120	42131
169	42880	42891
170	42901	42909
171	42368	42374
172	42064	42079
173	41340	41343
174	42733	42733
175	41293	41304
176	42851	42863
177	42004	42008
178	41396	41398
179	42205	42213
180	41217	41225

Employee Ref. in Interr. 49	BATES START	BATES END
181	41904	41911
182	41387	41395
183	42520	42529
184	42152	42161
185	42315	42323
186	42919	42929
187	42930	42933
188	41926	41928
189	41703	41712
190	41798	41804
191	40983	40992
192	41631	41641
193	42934	42946
194	42947	42958
195	41785	41787
196	41587	41589
197	41788	41797
198	41788	41797
199	41863	41870
200	42978	42985
201	42564	42566
202	42488	42497
203	42583	42588
204	42639	42644
205	42744	42753
206	41428	41437
207	41667	41672
208	41996	41999
209	41580	41582
210	41305	41312
211	42561	42563
212	42358	42361
213	42542	42544
214	41642	41645
215	41782	41784
216	42362	42364
217	41313	41317

Employee Ref. in Interr. 49	BATES START	BATES END
218	42679	42689
219	41726	41736
220	41779	41781
221	42993	42994
222	41619	41627
223	42876	42879
224	43004	43012
225	41130	41140
226	41929	41936
227	42189	42198
228	42281	42290

From: Fuad, David

Sent: Friday, July 19, 2019 4:35 PM

To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Subject: RE: Response to Norm Garcia's communication yesterday regarding Tuesday's meet and confer

Dear Abigail,

Nobody is engaging in gamesmanship or sharp tactics. I think it is apparent the parties have a foundational disagreement over what is appropriately redacted. We fully intend to attach all meet and confer correspondence between the parties to show these efforts were meaningfully exhausted. And we in fact *have* engaged in a thorough review of the documents and interrogatory responses produced by OFCCP. That's how we know they are deficient.

With regard to the enormous resources OFCCP contends it summoned to comply with the Order, my point was simply that OFCCP failed to meet the Court's July 5 deadline. That is an objective fact, as evidenced by your reference to a rolling production that was "complete on July 12," save for some additional completeness that OFCCP expects "by July 20." So asserting Oracle's comment about the timing of OFCCP's production is "severely in bad faith" is a bit much. Put simply, that deadline was two weeks ago and yet we are somehow still meeting and conferring about the issues that were decided in the motions to compel.

As to the 2015 interviews, OFCCP is conflating the work product and government informant's privileges. Whether Oracle knows the identities of some of these employees is beside the point. When it first redacted these notes, OFCCP asserted the government informant's privilege. The Court found these redactions were "facially unacceptable." OFCCP was ordered to "re-do *all* of its redactions and provide Oracle with copies of communications with current and former Oracle employees, or the records of such communications in which *only* identifying information is redacted." 6/10 Order at 14. OFCCP instead chose to re-do *none* of its redactions. OFCCP's after-the-fact privilege log does not justify the "facially incredible" levels of redaction on these documents. OFCCP must produce the memos so they disclose the facts that were collected.

It also appears to be OFCCP's position that the fact OFCCP interviewed someone is equivalent to disclosing that that person has relevant information. Those individuals should have been identified in OFCCP's interrogatory responses.

We already explained below why the White/Non-White distinction does not work. Oracle must be able to understand the evidence that will be used against it. OFCCP has information on the employee's race that it intends to use against Oracle, but will not reveal that information to Oracle. This "secret evidence" undercuts fundamental fairness and due process for Oracle in this litigation.

With respect to the "non-responsive" redactions, OFCCP asks Oracle to accept its word that "most" of these redactions solely address the now-settled hiring claims. OFCCP is not entitled to pick and choose sections of documents that it considers responsive. The document is responsive and should be produced in its entirety, except for information specified by the Court's Order. Information that was relevant to a hiring claim may still also be relevant to one of

Oracle's defenses to the remaining claims. If the "non-responsive" sections truly have no relevance to OFCCP's claims or Oracle's defenses, this should be a non-issue for OFCCP.

As to the *in camera* review, should the Court grant in camera review, Oracle will submit the interview memos to the Court for its review. OFCCP can express its views on the *in camera* review process in its opposition (or non-opposition, as the case may be). We will make the request and the Court can dictate the process it wants. If OFCCP wants to meet and confer regarding the prior *in camera* reviews it has requested, that can be part of a separate meet and confer discussion.

You close by stating that "[t]hese discussions are obviously not complete." As Judge Clark recently explained, "The point of the meet and confer requirements is to have counsel actually talk and resolve their disputes without needing to adjudicate issues attorneys ought to be able to figure out on their own. It was *not* intended as another litigation tool designed to slow down or thwart the resolution of issues in the case." June 26 Order on Communications with Oracle Employees at 12-13. OFCCP has been consistent and firm that it will not provide appropriately-redacted interview notes or the race of the employees who it intends to call as witnesses. Oracle believes it is entitled to them. There is nothing else for the parties to say.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Sent: Thursday, July 18, 2019 7:12 PM

To: Fuad, David <dfuad@orrick.com>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Subject: RE: Response to Norm Garcia's communication yesterday regarding Tuesday's meet and confer

Dear David,

Once again, Oracle is refusing to pick up the phone and finish quite fruitful discussions regarding these issues. We were hopeful during our conversation on Tuesday that we would be able to work through these last discovery issues with you and get ready for trial. But I fear that this is gamesmanship, pure and simple—a path that Oracle began walking even before we submitted our responses. More than a week before our responses were due, you advised us—before you had reviewed even a single page of our thousands of pages of interrogatory responses and production—that you would be filing a motion to compel. Then, on Saturday, July 6, less than 24 hours after we had sent you our production, when Oracle had not even accessed the production, Warrington wrote to us to begin the meet and confer process, ignoring our efforts to discuss our production and proposal for a schedule for the orderly supplementation of our discovery responses, necessitated by the dictates of the June 10 Order. Since then, we have been asking you to *please* review our incredibly extensive and thoughtful production and have a fact-based discussion. In those discussions, we have repeatedly shown you how your concerns were misplaced or ill-founded, including in the communication yesterday in which we explained that—contrary to your assertion—we had identified and not-redacted each witness' gender, and in our conversation Tuesday, we explained to you that your demand for each witness' job code was in direct conflict with the declaration Oracle filed from Vicki Thrasher in Oracle's motion to seal. In Ms. Thrasher's declaration, she asserted that individual employees could be identified by *third parties* (who presumably have much less information about Oracle's own workforce than Oracle) from a simple listing of the number of people in various job codes.

By this letter, you appear to be determined to rush to Court, on the apparent belief that these sharp tactics will be rewarded by the Court. We disagree with your assessment of the Court's likely response, and ask that you accompany any filing with a copy of this letter memorializing our objection to your abandonment of the

meet and confer process. Better still, we ask that you return to the discussions as it appears from the rest of your letter that most of these matters can be resolved with further discussion since you still seem to misapprehend basic issues about the production and the Court's order. In fact, I received your letter just as I was getting ready to press send on an email providing a further response to your letter sent late yesterday. After I send this response, I am going to go ahead and send that response anyway, as I really think you should pick up the phone and finish these discussions since we are obviously making progress.

Many of your claims in your letter today are incorrect. Of particular importance are your false claims that the motion for reconsideration delayed our production or that we have not yet produced all the interview summaries. We fully complied with the Court's order and did not delay or defer by one minute devoting thousands of attorney hours to complying with the Court's order of June 10th. Our responses were timely, including interview summaries and other redacted documents produced, including intricately detailed privilege logs, produced with the interrogatory responses with rolling production occurring on a daily basis until they were complete on July 12. Responding to Oracle's interrogatory and RFP demands, along with the requirements of the Court's order regarding redaction of identifying information, was incredibly resource intensive and the Solicitor's Office is prepared to explain to Judge Clark that it marshalled the staff resources of the entire region to comply with the Court's Order of June 10. OFCCP fully and timely complied to the best of its ability and resources, producing more than 1,800 pages in detailed interrogatory responses and more than 2,300 pages in redacted documents and detailed privilege logs. The only remaining rolling production relates to communications with third parties, which, as we have explained, we are producing as fast as possible (producing more than 400 pages thus far of communications), but the technology and process involved cannot be sped up more than it has been. These documents are of the type produced and marked DOL000040023-40668. As we have advised you, we are actively working on this production and we now expect that the production of those third-party communication documents to be complete by July 20. Oracle is well aware of the time- and resource-consuming nature of the tasks required to produce these redacted documents and logs, which just underlines how severely in bad faith Oracle now makes these claims regarding this production. OFCCP and the Solicitor's Office will defend vigorously its good faith efforts and full compliance with the Court's order to the fullest extent possible with all available resources.

Second, and importantly, you are misrepresenting or misapprehending gravely the facts regarding the 2015 interview notes. As Oracle well knows, many of these interviews were conducted as part of the OFCCP's onsite visit and scheduled through and with Oracle management. Thus, *Oracle knows precisely the identities of each person interviewed by OFCCP during its onsite visit because Oracle assisted in arranging those interviews.* Oracle attorneys and managers also sat in on many of those interviews, making their own notes. Under the Court's order, the notes of those interviews do not need to be provided to Oracle at all because Oracle knows precisely who OFCCP talked to during the 2015 interviews and Oracle also knows it was not a large group of people. As the Court explained in its order, Oracle cannot claim it is not aware that the people OFCCP interviewed in 2015 during its onsite visit might have relevant information—since OFCCP requested specifically to interview those Oracle staff. Oracle absolutely knows that the people OFCCP interviewed during its onsite visits *by scheduling those interviews with Oracle's managers and attorneys* are likely to have relevant information. Again, as noted yesterday, in our telephone conversation with you on Tuesday, we realized that there might have been a very small number of people who OFCCP interviewed (after the onsite) telephonically in 2015. We checked our records and found that our suspicion was correct and that those telephonic interviews were not scheduled through Oracle management. For this reason, we agreed to look at that handful of interview notes directly and supplement our production.

Hoping that you abandon your sharp tactics, I will now respond to your new positions presented in this letter. We remain available to get on a call and finish these conversations. We do not understand why you would reject our proposal regarding amending the narrative to identify whether the witness is White or Non-White. We fully understand that this case turns on racial classifications more precise than those two categories, but we cannot reveal the race of the witness without identifying the witness. Please explain why you think you are entitled to the race information of each witness, given that it would identify so many witnesses, directly contrary to the Court's order.

As to any redactions marked as non-responsive, I suspect we are talking past one another, as we still do not understand your point here. You served on OFCCP specific requests for production. You then moved to compel further responses to those specific requests, and the Court ordered OFCCP to supplement its production to those specific requests. As we noted in our correspondence yesterday, the information redacted was not responsive to those specific requests for production. You did not request all interview notes, regardless of what they concerned. Specifically, we explained that most of those non-responsive redactions concerned the parties' now settled hiring claims. We continue to not understand why you seek this information since the parties agreed to set aside any discovery on the hiring claims at issue when they resolved the matter. We would really like to know why you seek this information since it is non-responsive to Oracle's requests for production—which is all that the Court order concerns.

Finally, as we have noted before, if you intend to seek in camera review, please note that we have twice sought such in camera review. Oracle has twice opposed our request for in camera review, and the Court has twice rejected it as well. If you are interested in this, we would like to discuss exactly what you are proposing and understand why you think that the Court will respond differently on this occasion. As we have twice asked for it, we obviously are interested in the idea and perhaps the parties can come together on a proposal that the Court might embrace, if the parties jointly request it.

These discussions are obviously not complete, so let us know if you are going to be available to get our heads together to talk about this further.

Thanks, Abby

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Fuad, David <dfuad@orrick.com>

Sent: Thursday, July 18, 2019 3:41 PM

To: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: RE: Response to Norm Garcia's communication yesterday regarding Tuesday's meet and confer

Norm,

Thank you for your email.

Let me say at the outset that this dispute regarding the interview memos has been pending since at least June 2017. They have been the subject of two motions to compel, both of which were granted. Fact discovery is now closed. So the noncommittal process proposed below whereby OFCCP may reduce "some" of the redactions and "attempt to" produce them in "less redacted" form is unworkable because we are out of time, and unnecessary because this issue has already been decided by the Court. We want to engage in a meaningful meet and confer process. But it is apparent the parties have very different views on what constitutes an appropriate level of redactions and it is not productive to continue this ceaseless cycle of incremental compliance with the Court's orders.

2015 Interviews

With respect to the 2015 interview notes, no Oracle managers were present at the interviews that were the subject of Oracle's motion. So we don't know what was said at those interviews. We are entitled to those facts. You note that the Court held that "work-product related to Oracle's current and former employees who have been identified to Oracle as possessing relevant evidence (if there are any such individuals) may also be withheld because Oracle could procure the substantial equivalent without undue hardship." 6/10 Order at 26. But *these employees have never been identified to Oracle by OFCCP as possessing relevant information*. So the Court's qualification does not apply to these memos. Moreover, your email does not address at all the government informant's privilege. Oracle's position has been, and two ALJs have agreed, that the memos have over-redacted what is necessary to protect the employees' identities. Thus, regardless of whatever work product OFCCP contends it may redact, the informant redactions are still overbroad.

2019 Interviews

We discussed extensively OFCCP's position that its questions reveal its impressions and strategic judgments and therefore warrant redaction. We also discussed Oracle's position that factual questions do not constitute opinion work product. These arguments were set forth in my July 10 initial and confer letter, responded to in Abigail's July 12 letter, discussed on Tuesday's call, reiterated in my follow-up correspondence yesterday, responded to again yesterday, and now continue to be addressed in this email. It is safe to say there is nothing new for either party to explain.

I understand there is case law holding that an attorney's questions can be work product in certain circumstances. But as I explained, we disagree in this case. Here is our authority:

The mere fact that an attorney might be able to make guesses about opinions from facts does not turn all records of fact into opinion work product. As it is, Oracle can already guess at the sorts of areas OFCCP is probing—OFCCP did file a complaint and Oracle possesses OFCCP's solicitation that explicitly stated the evidence it was looking for. The proposition that records of facts are opinions because an attorney recorded the facts is a curious one—and would tend to render "ordinary" work product an empty category.

In any event, OFCCP is essentially asking for an advisory opinion sanctioning an overly-broad redaction plan. I decline that invitation. The order is the same as before: redact the opinions and produce the facts.

7/2 Order Denying OFCCP Motion for Clarification/Reconsideration at 7-8. It is not reasonable to assert that questions such as "Have you ever received a raise?" or "Have you experienced discrimination?" are "opinion" work product in a case about compensation discrimination.

Summaries

Thank you for your clarification on how the summaries were prepared. We currently find ourselves in a situation where OFCCP provides summaries of its redacted conversations with employees, Oracle identifies inconsistencies or missing information in the summaries, OFCCP pledges to correct said misinformation, and then Oracle identifies other inconsistencies. This is not a productive use of either party's resources. I appreciate that OFCCP spent a great deal of time redacting the interview notes and preparing the summaries. But OFCCP was ordered to produce the interview notes with minimal redactions. So I am at a loss as to why we are meet and conferring about OFCCP's substitution of summaries for interview notes when that plan was rejected by the Court (twice).

Race Redactions

We have considered OFCCP's proposal to identify potential witnesses only as either White or Non-White. This case does not involve allegations that Whites make more than some unvariegated group identified as "Non-Whites." It involves allegations that Whites make more than Asians and a separate allegation that Whites make more than African-Americans. Each of those claims presumably will depend on different factual proof. And proving discrimination against Asians does not then prove claims as to African-Americans or all "Non-Whites." The obverse is true as well. Thus, identifying a witness as "Non-White" does not provide Oracle with materially more information about why these potential witnesses are relevant to OFCCP's specific claims or Oracle's defenses as to each specific claim alleged.

Non-Responsive Redactions

The Court's June 10 Order specifically provided that only two redactions could be made to the interview notes: (1) identifying information and (2) opinion work product. I am not sure what part of page 8 of the Court's July 2 Order you are referring to, but it does not say anything about redacting non-responsive portions of documents. We are not asking OFCCP to produce new documents that relate solely to settled hiring claims. In fact, it would have been *less* burdensome for OFCCP to produce the notes without the non-responsive redactions. So the fact that OFCCP created additional work for itself by redacting certain information, knowing it was contrary to the Court's order, and is now strongly opposing Oracle's efforts to uncover this purportedly irrelevant information, suggests it is not so irrelevant after all.

In closing, I agree we had a productive call. For example, my email below stated we do not intend to move to compel on OFCCP's interrogatory responses for now. I can represent that was not Oracle's plan when we began our call. But while we are trying to be reasonable, the still-redacted notes simply do not comply with the Court's Order and are too important to Oracle's defenses to let go. And it is too late in the game for Oracle to continue this process of slowly wringing facts out of OFCCP.

We have already been down this road twice before. When we were successful this last time, OFCCP further delayed production by filing a motion for reconsideration. When that did not work, OFCCP failed to meet the Court's July 5 deadline. Indeed, setting aside the issue of redactions, OFCCP has still not completed production of all the interview memos—whether or not there is agreement on the redactions. We met and conferred on these issues, both before the motions to compel and now after. OFCCP has three orders rejecting its position. We do not believe that the piecemeal process OFCCP proposes is appropriate. It will just further consume time. We will be filing a motion to compel seeking *in camera* review and evidentiary sanctions.

Best,
David

From: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Sent: Wednesday, July 17, 2019 6:33 PM

To: Fuad, David <dfuad@orrick.com>; Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: Response to David Fuad's communication today regarding yesterday's meet and confer

Importance: High

David,

We do not believe that we are at an impasse for either the old 2015 interviews or for the 2019 interviews. The parties discussed our positions as to these two sets of documents yesterday, and agreed to provide further information to each other, including examples and authorities. I do not see where you have provided the authorities we asked you to provide to us for review and consideration and we thought you agreed to this request. Additionally, we have had no time to consider any of the specific examples you list in your correspondence today. We will look at those and provide you an answer as soon as we can.

As to notes regarding the 2015 interviews, we internally had further discussions yesterday after our meet and confer yesterday and agreed that we could reduce some of the redactions on some of the 2015 interview notes, but that as to others, we needed to bring to your attention an aspect of the Court's order you appear to have overlooked. In the Court's order on page 26, the Court expressly ordered that any interview notes which related to interviews with witnesses which are already known to Oracle did not have to be provided. Order of June 10, 2019 ("work-product related to Oracle's current and former employees who have been identified to Oracle as possessing relevant evidence (if there are any such individuals) may also be withheld because Oracle could procure the substantial equivalent without undue hardship"). Most of the 2015 notes related to interviews conducted onsite at Oracle which Oracle personnel and/or its attorneys attended and took notes. Oracle's participation in these witnesses interviews means that these notes do not need to be produced - - which is why the redactions did not change. There is, however, a small subset of these notes which concerned interviews conducted telephonically, which means that Oracle nor its attorneys were present. We will look at those again and attempt to produce them in a less redacted form, which should address your concerns.

In terms of the 2019 interview notes, yesterday we asked you for the authority for your claims that our attorney questions and script were not attorney opinions and impressions. I thought you agreed to provide those authorities. We explained that the questions we redacted were revealing of our impressions and strategic judgments. We explained to you that how we asked the questions--the way we asked them, etc. -- would communicate our mental impressions of the case and litigation strategy. We also explained that any factual content obscured by the redactions of these attorney questions and script were revealed in our interrogatory answers in which we summarized the factual information revealed to this litigation. As we explained, we researched the issue prior to responding and believe the case law clearly supports our redaction of our attorney questions and script. If you have authorities supporting your contrary position, can you please send us those authorities?

We also think that our conversation yesterday became confused about the scope of the interview summaries and your summary below reflects what may well have been our confusion on this question during the call. After the meet and confer, we went back to the litigation team to learn whether the summaries intended to summarize all non-identifying factual information in the interview or whether it was just providing a summary of the anecdotal information requested in the interrogatory. We learned that the summaries did, in fact, attempt to provide information beyond that requested in Interrogatory. In the summaries, we attempted to summarize all non-identifying factual information we secured in the interviews. Thus, if there is an interview question that was redacted and the answer was "yes" or "no," we provided the factual content of that information in the summary so that Oracle is not prejudiced by the redactions of attorney opinions and impressions, which the Court order expressly authorized OFCCP to redact. For example, in our discussion yesterday, you mentioned that there were a couple of summaries that appeared to reference information Oracle thinks is helpful, such as a witness reporting that she did not think she was treated differently due to her gender. You complained that when you went to the redacted notes, you did not see any non-redacted information that illuminated that response. That is simply because there was no more information provided

other than a yes or no answer to questions by the attorney trying to explore the witness' personal observations. The way that the attorney tried to ask that questions is properly redacted because those questions reveal the attorney's impressions, opinions, and litigation strategies on that issue.

Similarly, in the examples you provide in your email today, which we appreciate and will review further, we would like to discuss and reiterate a few points. First, as we explained yesterday, in the first example you cite, we expect the discrepancy is just an inadvertent error. We have not had time to look at it yet, but we will. We spent thousands of attorneys hours trying to get these redactions made and reviewed, but we are sure there are a few errors. If this is an error, we will correct it in the summary. As to the second two examples, the fact that these notes do not appear verbatim in the summary is simply because these notes, which were not redacted, are just specific details about the witness' account. The summaries are intended to provide Oracle with the factual information the Court ordered (including information that is obscured in the redacted notes due to being intermingled with identifying information or attorney work production opinions and impressions), along with any precise details that could be produced through the redacted documents. Again, we haven't had the time to look at those in depth yet, but we will and we will get back to you. There seems to be value in continuing to discuss this and see if there is truly a dispute here.

I also note that in your email below you claim that we are at an impasse on OFCCP's alleged redaction of gender and race information. I am confused by this statement. First, as you know, in both the interview summaries and in the redacted interview statements, OFCCP revealed the gender of the witness and did not redact the gender of the witness. It is true that we redacted the race from the witness statements because, as we explained to you yesterday, due to the truly tiny number of Blacks and Hispanics at Oracle, failing to redact the race of the witness would identify every Black and Hispanic witness. Similarly, if we only redacted the race of Black and Hispanic witnesses, we would be identifying them as Black and Hispanic -- clearly identifying them at Oracle. I am surprised by your statement that Oracle feels it is entitled to such race information, since Oracle well knows that OFCCP was instructed to redact identifying information. We have also discussed this matter internally after our call and our best solution to this conundrum is to offer to supplement the summaries to identify the witness as either White or Non-White. In that way, the few Blacks and Hispanics would not be identified. Trying to adjust the redactions on this issue will only end in identifying the witness. Please let us know what you think about this proposal.

Finally, we continue to be confused by your position on the redactions identified as non-responsive. The Court's order made clear that we only had to produce documents which were responsive to Oracle's RFP. Order of July 2nd at 8. The relevant RFP asked for documents related to allegations made in various paragraphs of the operative complaint. Oracle never requested all interview notes on any subject. Rather, it asked for interview notes relating to interviews conducted as to matters related to the Operative Complaint. As you or, at the very least, David Fortney is well aware, one of the advantages for both parties of resolving the hiring aspects of this litigation was that the parties did not have to spend any more discovery time or resources on those issues. Oracle has not produced any discovery related to the now-settled hiring claims and we are surprised that Oracle expects OFCCP to continue to produce information related to the settled hiring claims. The Court's order does not change the context here. The Court ordered OFCCP to produce documents responsive to the specific RFP Oracle served. The RFPs at issue relate to the operative complaint, which no longer has any hiring claims. Also, this feels like Oracle backtracking on the parties' basic understanding as to discovery in relation the settled hiring claims: both parties agreed that all discovery about hiring was going to end as soon as the hiring claims settled. We should discuss that issue more, and can bring both Janet Herold, the Regional Solicitor, and David Fortney, counsel for Oracle, into the discussions if that would be helpful. Given the breath of the dispute

remaining in this litigation, we should focus our time and energy on the issues which are still live in this litigation.

We demonstrated in our massive July 5, 2019, discovery responses that took thousands of attorney hours to put together that we went to great pains to fully comply with the Court's orders and Oracle's discovery demands. In our meet and confer yesterday, which we thought was productive, we thought both sides revealed a willingness to try to work through issues and concerns, and this process should be given the time necessary to finish at least those discussions. We committed yesterday to produce more information for ROGs 27 & 49 to address some of the issues Oracle raised yesterday. We likewise believe that we can make further progress in the interview notes through further meet and confer, as explained above.

Ms. Daquiz is out of the office this afternoon. She may have some additional thoughts when she returns. Please provide us the authorities related to the questions and get back to us on the issues and proposals identified above. We seem to be not far apart on many issues. Let us know when you are available to discuss these matters further.

Thanks

Norm

Norman E. Garcia
Senior Trial Attorney
United States Department of Labor
90 7th Street, Rm. 3-700; SF, CA 94103 Telephone number: (415) 625-7747 Facsimile number: (415) 625-7772

This message may contain information that is privileged or otherwise exempt from disclosure under applicable law. Do not disclose without consulting the Office of the Solicitor. If you think you received this e-mail in error, please notify the sender immediately.

From: Fuad, David <dfuad@orrick.com>
Sent: Wednesday, July 17, 2019 2:31 PM
To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, OFCCP's Supplemental Production, July 12, 2019 & Correspondence to Mr. Fuad

Abigail and Norm,

I write to follow up on our meet and confer discussion yesterday.

As we discussed, OFCCP will not be re-producing the “old” 2015 interview notes that were the subject of Oracle’s Second Motion to Compel because OFCCP contends that its July 9, 2019 privilege log adequately discloses the bases for the various redactions in those notes. Oracle disagrees with this and interprets the Court’s order to direct OFCCP to un-redact additional facts from these interviews.

In addition, we discussed OFCCP’s position that its redactions on the “new” 2019 interview notes are appropriate because (a) all redactions are necessary to protect employees’ identities and (b) all questions posed to Oracle employees constitute opinion attorney work product. Oracle disagrees. OFCCP should provide at least the race and gender for each employee so Oracle can determine whether and how the employee is relevant to OFCCP’s claims and Oracle’s defenses. In addition, because OFCCP’s questions to employees (as far as Oracle can tell) appear to be asking for strictly factual information that is directly relevant to OFCCP claims and Oracle’s defenses (e.g., whether an employee received a raise or a performance review), Oracle disagrees that OFCCP’s questions, under these circumstances, disclose OFCCP’s opinions, conclusions, or mental impressions about the case.

Further, OFCCP explained on our call that the summaries of its interviews provided in response to Interrogatory No. 49 were not intended to be complete summaries of the corresponding notes that were produced in response to the Court’s order, but rather only to be responsive to Interrogatory No. 49. I note this is contrary to the arguments in OFCCP’s Motion for Reconsideration, in which it averred that summaries would stand in for the notes and be “far more useful to *Oracle* than the ordered production of documents is likely to be.” In any event, these summaries are problematic because they omit or misstate facts contained in the notes, thereby demonstrating the importance of having the notes themselves.

I said I would send a few more examples – a non-exhaustive list of additional examples includes:

- Employee No. 2 (DOL 40770)
 - The summary says she received no raises while at Oracle, but the interview notes state that she received two raises.
- Employee No. 8 (DOL 40828)
 - The summary says the employee is familiar with a slang term referring to a certain group of Asian employees at Oracle, but interview notes make no mention of such term.
- Employee No. 15 (DOL 41682)
 - The summary states that a manager pointed to a box of Kleenex and made a comment about female employees like her needing it, but this comment does not appear in the interview notes.

These examples are only through the first fifteen of over two hundred summaries.

We also discussed the “non-responsive” redactions. OFCCP stated that the redacted information was not relevant to this case and reflected either since-dismissed allegations (such as the hiring claims), or innocuous small talk, like the weather. As you know, the Court’s order did not permit OFCCP to redact for perceived relevance. It is not up to OFCCP to pick and choose information within a document that it considers relevant to Oracle. These redactions should be removed.

As we discussed, OFCCP does not intend to change its positions on the redactions or summaries described above. It is therefore fair to say we are at an impasse on the interview notes.

Additionally, not all interview memoranda produced to date are reflected on the privilege logs OFCCP has produced. For example, the interview at Bates Nos. 42080-82 is missing from both the 7/9 and the 7/16 privilege logs. Please let us know if this is an oversight or if OFCCP intends to supplement.

With regard to OFCCP's interrogatory responses, Oracle continues to believe that OFCCP's supplemental interrogatory responses are not responsive or compliant with the Court's order. For example, as we discussed, they cite to thousands of pages of Oracle's policies and procedures without ever identifying the specific policy or procedure that OFCCP contends caused the alleged harm. While Oracle may make note of this to the Court, at this time, however, it does not intend to move to compel on these supplemental interrogatory responses.

Also, as I mentioned, OFCCP's interrogatory responses cite to 18 documents containing facts supporting OFCCP's allegations within the range DOL 1391-1432 that are on OFCCP's privilege log but have not been produced. On the log, these documents have been withheld under the Deliberative Process and Investigative Files privileges, and most are described only as "Other." Documents containing facts admittedly supportive of OFCCP's claims cannot be withheld entirely behind a privilege. OFCCP must produce these documents.

We look forward to the requested verification and the supplemental responses to Interrogatory No. 27 that are forthcoming.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Sent: Friday, July 12, 2019 6:36 PM

To: Fuad, David <dfuad@orrick.com>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: Oracle, OFCCP's Supplemental Production, July 12, 2019 & Correspondence to Mr. Fuad

David, please see the attached correspondence and further supplemental productions in OFCCP v. Oracle, 2017-OFC-00006. Please let me know if you have any trouble accessing these documents or if anyone else should be copied on these productions.

Abigail G. Daquiz
Attorney
U.S. Department of Labor
Office of the Solicitor
300 Fifth Avenue, Suite 1120
Seattle, WA 98104
d 206-757-6753
t 206-757-6762
f 206-757-6761
daquiz.abigail@dol.gov

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's 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.

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](https://www.orrick.com/Privacy-Policy) to learn about how we
use this information.

From: Fuad, David

Sent: Friday, July 19, 2019 4:38 PM

To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Subject: RE: Response to David Fuad's communication today regarding yesterday's meet and confer

Hi Abigail,

I understand OFCCP's position that its questions constitute attorney work product. I understand there is case law supporting that general proposition. As I explained, however, in this particular case the generic questions OFCCP appears to be asking are not "opinion" work product. I cited the Court's order, which appears to agree with Oracle on this point. ("As it is, Oracle can already guess at the sorts of areas OFCCP is probing—OFCCP did file a complaint and Oracle possesses OFCCP's solicitation that explicitly stated the evidence it was looking for.").

Here's an example from DOL 40808:

- ! [REDACTED]
- WP-AQ [REDACTED]
 - GI [REDACTED]
 - GI [REDACTED]
 - They asked him for his base salary and other comps when he was interviewed, before offer.
 - They made a low offer. GI [REDACTED]

The question appears to be something like, "How was your starting salary set?" That is plainly a factual question. The response is factual. OFCCP contends that this is appropriately redacted. Oracle disagrees. The parties have set forth their respective positions and legal authority but continue to disagree. We have therefore completed our meet and confer on this topic.

As to the summaries, I appreciate the explanations and clarifications. I understand preparing these summaries required a significant amount of work, and it would be unreasonable to expect there were no errors. But the Court ordered the notes to be produced. That is what this meet and confer is about. OFCCP's efforts to summarize hundreds of witness interviews harmoniously with their redacted counterparts, which still apparently require a separate narrative explanation of any discrepancies and omissions, simply proves Oracle's point that this is a Sisyphean task that will never replace the notes themselves.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Sent: Thursday, July 18, 2019 7:15 PM

To: Fuad, David <dfuad@orrick.com>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Subject: RE: Response to David Fuad's communication today regarding yesterday's meet and confer

Hi David,

Thanks for taking the time to walk through our supplementation. I was just getting ready to press send on this email when I got your email just before 4 p.m., but as I think we should continue our conversations, I am sending you this response anyway. I have sent a response to your email today in separate correspondence.

With respect to redaction of the attorney questions and script that OFCCP's attorneys created and used in interviewing witnesses, the case law clearly supports OFCCP's position that such information is opinion work product reflecting attorneys' mental impressions and may be redacted pursuant to the Court's order. Indeed, courts consistently find that "what questions counsel thought important to ask" reveals counsel's mental impressions and litigation strategy. *U.S. ex rel. Fago v. M & T Mortg. Corp.*, 242 F.R.D. 16, 18–19 (D.D.C. 2007); *See also United States v. McGraw-Hill Companies, Inc.*, No. CV 13-0779-DOC JCGX, 2014 WL 8662657, at *7 (C.D. Cal. Sept. 25, 2014) (refusing to compel attorney outline for a witness interview because the document was "plainly opinion work product"); *New York Times Co. v. U.S. Dep't of Justice*, 138 F. Supp. 3d 462, 475–76 (S.D.N.Y. 2015) (holding that documents reflecting attorney questions to witnesses were exempt from disclosure as work product because "the questions [the attorney] or his subordinates ask witnesses almost certainly reveal his thinking about the substance of the case"); *In re Student Fin. Corp.*, No. 02-11620 JBR, 2006 WL 3484387, at *15 (E.D. Pa. Nov. 29, 2006); *Frank v. L.L. Bean, Inc.*, No. CIV. 04-221-P-S, 2005 WL 2177062, at *1 (D. Me. Sept. 8, 2005); *Motley v. Columbia Broad. Sys., Inc.*, 94 F.R.D. 733, 735 (N.D. Ind. 1982); *Sanchez v. Matta*, 229 F.R.D. 649, 659 (D.N.M. 2004); *Barrett Indus. Trucks, Inc. v. Old Republic Ins. Co.*, 129 F.R.D. 515, 519 (N.D. Ill.1990). Accordingly, OFCCP properly redacted attorney questions and scripts here pursuant to the case law and Judge Clark's Order. You have not provided otherwise.

In response to the specific issues you raise about the summaries.

First, regarding Employee No. 2, you seem to be raising a conflict between a summary that states that the employee "never received a performance review or pay increase" with interview notes that describe a pay adjustment two months after being hired and then later describing a couple thousand dollars raise again before being laid off (at DOL000040773) – and in the same section of notes it is described that the employee reported that she received no raise – no performance evaluations. What happened here is that the witness did not see the two pay adjustments described in the notes as "pay increases." We would be happy to supplement the summary to make plain what the summary and the redacted notes say – which is that the witness feels she never received a pay increase but that her pay was adjustment to some extent right after she was hired and just before she left

Oracle. To be clear, with the summary and the redacted notes, the information you have been given accurately reflects the notes that the attorney made regarding what the witness said.

Second, regarding Employee No. 8, the issue you raise—where the summary provides more information than available in the interview notes—is a good example of how we ensured that Oracle was not prejudiced by our redaction of our attorney opinions and impressions, which the Court ordered us to redact. As explained in the case law cited above, the attorney’s list of questions very much reveal the attorneys’ impressions, opinions and strategies, which is why they were redacted consistent with this case authority. To ensure that OFCCP complied with the full spirit of the Court’s order (which specifically permitted OFCCP to redact its attorney opinions, impressions and strategy), OFFCP produced in the narrative a summary of the facts elicited in the interview but are not revealed in the redacted notes since some of relevant information being secured was contained in the attorney’s privileged questioning and opinions. In this specific example, the attorney’s questions elicited an answer regarding this slang term, but because the notes regarding the witness’ answers did not make that clear, we included that in the summary to ensure that OFCCP offered as full a production of any facts referenced in the attorney’s notes, viewed as a whole. It is worth mention as well, as we explained in our phone call on Tuesday, in addition to the summaries and redacted notes, we also provided very specific and detailed privilege logs, so that the basis and justification for every redaction is clear. We went to great lengths to ensure that OFCCP produced fully and completely all non-identifying facts elicited, either in the redacted notes or in the summaries which provided any factual information which might have been obscured due to the redactions of attorney impressions, strategies and opinions as ordered by the Court.

Finally, as we discussed, our dialogue has proven to move us along to catch errors and improve the parties’ understanding of the productions. For example, your question about Employee No. 15, below, revealed a few errors in our listing identifying the bates range for the notes matched against the employees as identified by number in the response to Interr. 49. The bates range for Employee No. 15 should be DOL 40882-40885. Please accept my apology for the error, but it did allow us to find where the snag was and we identified a handful of other bates ranges that needed to be adjusted. As you well know, OFCCP’s production was voluminous as we produced all employee interview notes and we used every available resource in the Solicitor’s office to get these notes produced, redacted and reviewed as quickly as possible. In that rush, inadvertent errors cannot be avoided, despite the best of efforts and maximum deployment of all available, albeit limited, government resources. By catching this error, we think your concerns are fully addressed. Please see the attached revised appendix. The employee numbers impacted by these corrections are 15, 33, 42, 81, 84, and 127.

I look forward to talking with you and your team in the coming days. Thanks, Abby

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Sent: Wednesday, July 17, 2019 6:33 PM

To: Fuad, David <dfuad@orrick.com>; Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah,

Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: Response to David Fuad's communication today regarding yesterday's meet and confer

Importance: High

David,

We do not believe that we are at an impasse for either the old 2015 interviews or for the 2019 interviews. The parties discussed our positions as to these two sets of documents yesterday, and agreed to provide further information to each other, including examples and authorities. I do not see where you have provided the authorities we asked you to provide to us for review and consideration and we thought you agreed to this request. Additionally, we have had no time to consider any of the specific examples you list in your correspondence today. We will look at those and provide you an answer as soon as we can.

As to notes regarding the 2015 interviews, we internally had further discussions yesterday after our meet and confer yesterday and agreed that we could reduce some of the redactions on some of the 2015 interview notes, but that as to others, we needed to bring to your attention an aspect of the Court's order you appear to have overlooked. In the Court's order on page 26, the Court expressly ordered that any interview notes which related to interviews with witnesses which are already known to Oracle did not have to be provided. Order of June 10, 2019 ("work-product related to Oracle's current and former employees who have been identified to Oracle as possessing relevant evidence (if there are any such individuals) may also be withheld because Oracle could procure the substantial equivalent without undue hardship"). Most of the 2015 notes related to interviews conducted onsite at Oracle which Oracle personnel and/or its attorneys attended and took notes. Oracle's participation in these witnesses interviews means that these notes do not need to be produced -- which is why the redactions did not change. There is, however, a small subset of these notes which concerned interviews conducted telephonically, which means that Oracle nor its attorneys were present. We will look at those again and attempt to produce them in a less redacted form, which should address your concerns.

In terms of the 2019 interview notes, yesterday we asked you for the authority for your claims that our attorney questions and script were not attorney opinions and impressions. I thought you agreed to provide those authorities. We explained that the questions we redacted were revealing of our impressions and strategic judgments. We explained to you that how we asked the questions--the way we asked them, etc. -- would communicate our mental impressions of the case and litigation strategy. We also explained that any factual content obscured by the redactions of these attorney questions and script were revealed in our interrogatory answers in which we summarized the factual information revealed to this litigation. As we explained, we researched the issue prior to responding and believe the case law clearly supports our redaction of our attorney questions and script. If you have authorities supporting your contrary position, can you please send us those authorities?

We also think that our conversation yesterday became confused about the scope of the interview summaries and your summary below reflects what may well have been our confusion on this question during the call. After the meet and confer, we went back to the litigation team to learn whether the summaries intended to summarize all non-identifying factual information in the interview or whether it was just providing a summary of the anecdotal information requested in the interrogatory. We learned that the summaries did, in fact, attempt to provide information beyond that requested in Interrogatory. In the summaries, we attempted to summarize all non-identifying factual information we secured in the interviews. Thus, if there is an interview question that was redacted and the answer was "yes" or "no," we provided the factual content of that information in the summary so that Oracle is not prejudiced by the redactions of attorney opinions and impressions, which the Court order expressly authorized OFCCP to redact. For example, in our discussion yesterday, you mentioned that there were a couple of summaries that appeared to reference information Oracle thinks is helpful, such as a witness reporting that she did not think she was treated differently due to her gender. You complained that when you went to the redacted notes, you did not see any non-redacted information that illuminated that response. That is simply because there was no more information provided other than a yes or no answer to questions by the attorney trying to explore the witness' personal observations. The way that the attorney tried to ask that questions is properly redacted because those questions reveal the attorney's impressions, opinions, and litigation strategies on that issue.

Similarly, in the examples you provide in your email today, which we appreciate and will review further, we would like to discuss and reiterate a few points. First, as we explained yesterday, in the first example you cite, we expect the discrepancy is just an inadvertent error. We have not had time to look at it yet, but we will. We spent thousands of attorneys hours trying to get these redactions made and reviewed, but we are sure there are a few errors. If this is an error, we will correct it in the summary. As to the second two examples, the fact that these notes do not appear verbatim in the summary is simply because these notes, which were not redacted, are just specific details about the witness' account. The summaries are intended to provide Oracle with the factual information the Court ordered (including information that is obscured in the redacted notes due to being intermingled with identifying information or attorney work production opinions and impressions), along with any precise details that could be produced through the redacted documents. Again, we haven't had the time to look at those in depth yet, but we will and we will get back to you. There seems to be value in continuing to discuss this and see if there is truly a dispute here.

I also note that in your email below you claim that we are at an impasse on OFCCP's alleged redaction of gender and race information. I am confused by this statement. First, as you know, in both the interview summaries and in the redacted interview statements, OFCCP revealed the gender of the witness and did not redact the gender of the witness. It is true that we redacted the race from the witness statements because, as we explained to you yesterday, due to the truly tiny number of Blacks and Hispanics at Oracle, failing to redact the race of the witness would identify every Black and Hispanic witness. Similarly, if we only redacted the race of Black and Hispanic witnesses, we would be identifying them as Black and Hispanic -- clearly identifying them at Oracle. I am surprised by your statement that Oracle feels it is entitled to such race information, since Oracle well knows that OFCCP was instructed to redact identifying information. We have also discussed this matter internally after our call and our best solution to this conundrum is to offer to supplement the summaries to identify the witness as either White or Non-White. In that way, the few Blacks and Hispanics would not be identified. Trying to adjust the redactions on this issue will only end in identifying the witness. Please let us know what you think about this proposal.

Finally, we continue to be confused by your position on the redactions identified as non-responsive. The Court's order made clear that we only had to produce documents which were responsive to Oracle's RFP. Order of July 2nd at 8. The relevant RFP asked for documents related to allegations made in various paragraphs of the operative complaint. Oracle never requested all interview notes on any subject. Rather, it asked for interview notes relating to interviews conducted as to matters related to the Operative Complaint. As you or, at the very least, David Fortney is well aware, one of the advantages for both parties of resolving the hiring aspects of this litigation was that the parties did not have to spend any more discovery time or resources on those issues. Oracle has not produced any discovery related to the now-settled hiring claims and we are surprised that Oracle expects OFCCP to continue to produce information related to the settled hiring claims. The Court's order does not change the context here. The Court ordered OFCCP to produce documents responsive to the specific RFP Oracle served. The RFPs at issue relate to the operative complaint, which no longer has any hiring claims. Also, this feels like Oracle backtracking on the parties' basic understanding as to discovery in relation the settled hiring claims: both parties agreed that all discovery about hiring was going to end as soon as the hiring claims settled. We should discuss that issue more, and can bring both Janet Herold, the Regional Solicitor, and David Fortney, counsel for Oracle, into the discussions if that would be helpful. Given the breath of the dispute remaining in this litigation, we should focus our time and energy on the issues which are still live in this litigation.

We demonstrated in our massive July 5, 2019, discovery responses that took thousands of attorney hours to put together that we went to great pains to fully comply with the Court's orders and Oracle's discovery demands. In our meet and confer yesterday, which we thought was productive, we thought both sides revealed a willingness to try to work through issues and concerns, and this process should be given the time necessary to finish at least those discussions. We committed yesterday to produce more information for ROGs 27 & 49 to address some of the issues Oracle raised yesterday. We likewise believe that we can make further progress in the interview notes through further meet and confer, as explained above.

Ms. Daquiz is out of the office this afternoon. She may have some additional thoughts when she returns. Please provide us the authorities related to the questions and get back to us on the issues and proposals identified above. We seem to be not far apart on many issues. Let us know when you are available to discuss these matters further.

Thanks

Norm

Norman E. Garcia
Senior Trial Attorney
United States Department of Labor

This message may contain information that is privileged or otherwise exempt from disclosure under applicable law. Do not disclose without consulting the Office of the Solicitor. If you think you received this e-mail in error, please notify the sender immediately.

From: Fuad, David <dfuad@orrick.com>
Sent: Wednesday, July 17, 2019 2:31 PM
To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, OFCCP's Supplemental Production, July 12, 2019 & Correspondence to Mr. Fuad

Abigail and Norm,

I write to follow up on our meet and confer discussion yesterday.

As we discussed, OFCCP will not be re-producing the "old" 2015 interview notes that were the subject of Oracle's Second Motion to Compel because OFCCP contends that its July 9, 2019 privilege log adequately discloses the bases for the various redactions in those notes. Oracle disagrees with this and interprets the Court's order to direct OFCCP to un-redact additional facts from these interviews.

In addition, we discussed OFCCP's position that its redactions on the "new" 2019 interview notes are appropriate because (a) all redactions are necessary to protect employees' identities and (b) all questions posed to Oracle employees constitute opinion attorney work product. Oracle disagrees. OFCCP should provide at least the race and gender for each employee so Oracle can determine whether and how the employee is relevant to OFCCP's claims and Oracle's defenses. In addition, because OFCCP's questions to employees (as far as Oracle can tell) appear to be asking for strictly factual information that is directly relevant to OFCCP claims and Oracle's defenses (e.g., whether an employee received a raise or a performance review), Oracle disagrees that OFCCP's questions, under these circumstances, disclose OFCCP's opinions, conclusions, or mental impressions about the case.

Further, OFCCP explained on our call that the summaries of its interviews provided in response to Interrogatory No. 49 were not intended to be complete summaries of the corresponding notes that were produced in response to the Court's order, but rather only to be responsive to Interrogatory No. 49. I note this is contrary to the arguments in OFCCP's Motion for Reconsideration, in which it averred that summaries would stand in for the notes and be "far more useful to *Oracle* than the ordered production of documents is likely to be." In any event, these summaries are problematic because they omit or misstate facts contained in the notes, thereby demonstrating the importance of having the notes themselves.

I said I would send a few more examples – a non-exhaustive list of additional examples includes:

- Employee No. 2 (DOL 40770)
 - The summary says she received no raises while at Oracle, but the interview notes state that she received two raises.
- Employee No. 8 (DOL 40828)
 - The summary says the employee is familiar with a slang term referring to a certain group of Asian employees at Oracle, but interview notes make no mention of such term.

- Employee No. 15 (DOL 41682)
 - The summary states that a manager pointed to a box of Kleenex and made a comment about female employees like her needing it, but this comment does not appear in the interview notes.

These examples are only through the first fifteen of over two hundred summaries.

We also discussed the “non-responsive” redactions. OFCCP stated that the redacted information was not relevant to this case and reflected either since-dismissed allegations (such as the hiring claims), or innocuous small talk, like the weather. As you know, the Court’s order did not permit OFCCP to redact for perceived relevance. It is not up to OFCCP to pick and choose information within a document that it considers relevant to Oracle. These redactions should be removed.

As we discussed, OFCCP does not intend to change its positions on the redactions or summaries described above. It is therefore fair to say we are at an impasse on the interview notes.

Additionally, not all interview memoranda produced to date are reflected on the privilege logs OFCCP has produced. For example, the interview at Bates Nos. 42080-82 is missing from both the 7/9 and the 7/16 privilege logs. Please let us know if this is an oversight or if OFCCP intends to supplement.

With regard to OFCCP’s interrogatory responses, Oracle continues to believe that OFCCP’s supplemental interrogatory responses are not responsive or compliant with the Court’s order. For example, as we discussed, they cite to thousands of pages of Oracle’s policies and procedures without ever identifying the specific policy or procedure that OFCCP contends caused the alleged harm. While Oracle may make note of this to the Court, at this time, however, it does not intend to move to compel on these supplemental interrogatory responses.

Also, as I mentioned, OFCCP’s interrogatory responses cite to 18 documents containing facts supporting OFCCP’s allegations within the range DOL 1391-1432 that are on OFCCP’s privilege log but have not been produced. On the log, these documents have been withheld under the Deliberative Process and Investigative Files privileges, and most are described only as “Other.” Documents containing facts admittedly supportive of OFCCP’s claims cannot be withheld entirely behind a privilege. OFCCP must produce these documents.

We look forward to the requested verification and the supplemental responses to Interrogatory No. 27 that are forthcoming.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Sent: Friday, July 12, 2019 6:36 PM

To: Fuad, David <dfuad@orrick.com>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: Oracle, OFCCP's Supplemental Production, July 12, 2019 & Correspondence to Mr. Fuad

David, please see the attached correspondence and further supplemental productions in OFCCP v. Oracle, 2017-OFC-00006. Please let me know if you have any trouble accessing these documents or if anyone else should be copied on these productions.

Abigail G. Daquiz

Attorney

U.S. Department of Labor

Office of the Solicitor

300 Fifth Avenue, Suite 1120

Seattle, WA 98104

d 206-757-6753

t 206-757-6762

f 206-757-6761

daquiz.abigail@dol.gov

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's 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.

Attachments:

DOL000041673-41681 (Revised Redactions) 2019-07-22.pdf; OFCCP v. Oracle HQ, Initial Interview Outline (Redacted).pdf

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Sent: Monday, July 22, 2019 6:50 PM

To: Fuad, David <dfuad@orrick.com>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

David,

We continue to not understand why Oracle refuses to pick up the phone and talk to us about this, in light of the Court's repeated instruction to do so. It is not accurate that we have discussed everything we raised in our email earlier today.

As offered this afternoon, in an effort to resolve this dispute, we have attached a template that removes a majority, but not all, of the questions that attorneys followed loosely when interviewing witnesses in 2019. As we have explained, this template was not designed to be a questionnaire, nor was it designed with any understanding that it would be revealed to the witness, or anyone outside of litigation counsel. This template was given to attorneys to give them an idea as to what topics to explore, but the attorneys were given freedom to modify, omit, or alter the questions in any way they saw fit. In this attached template, we have redacted all of the questions in which we are providing advice, opinions, or instructions to the attorneys conducting the interviews (*e.g.*, the first two pages), or which are not seeking direct and specific factual responses. We are willing to go back through all of the interview notes and unredact all of the identified questions (as shown in yellow highlighting). We expect you will find the template itself to be sufficient to understand the meaning of the "yes" and "no" answers in the produced interview notes, for which you have indicated your unwillingness simply to review the narrative for that witness to learn any non-identifying facts obscured by the redactions. Nevertheless, we have attached a set of attorney notes for Employee No. 47, in which we have removed the redactions for most of the questions as an example of what we are offering to produce.

We make this proposal in the spirit of compromise and do not waive any assertion of attorney client privilege/work product as to these attorney questions generally nor do we waive as to any other questions not included in this proposal. As you will see, this proposal attempts to meet Oracle more than halfway, and this should save both parties and the Court tremendous time and resources trying to resolve this dispute regarding anecdotal evidence.

In one part of the attached template, you will see a section entitled Recruiting. In this section, we have unredacted *all* of the questions which concern the now-settled hiring case (and highlighted them in blue) so that you can verify that our redactions of these hiring claim inquiries as non-responsive were proper. None of these hiring claim attorney questions relate in any way to any issue that is still live in this case. It was the

parties' express agreement when the hiring case was settled that all discovery regarding hiring would end. We have been advised by the Regional Solicitor that she is very concerned about Oracle's violation of this essential understanding she and David Fortney had, and she will pursue this with David if you do not withdraw your contest on these redactions. We are not going to change the redactions to the interview notes for this recruitment section.

We continue to think that we should get our heads together to discuss this proposal, so please let us know when you are available to talk. If you continue to refuse to speak to us, we will immediately alert the Court to your refusal to meet and confer with us as *repeatedly* instructed by the Court and ask that any motion about our supplemental production be stayed until these discussions occur.

Thanks,
Abby

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Fuad, David <dfuad@orrick.com>

Sent: Monday, July 22, 2019 3:11 PM

To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail,

I appreciate OFCCP's attempt to reach agreement but this email simply confirms that is not possible. We have already discussed telephonically everything that OFCCP raises below. For example, it has been OFCCP's position since we began these discussions that its opinion and fact work product are inextricably intertwined. The Court rejected that exact argument mostly recently in the Motion for Reconsideration. On July 18 in response to your request for authority we pointed OFCCP to the Court's July 2 Order, which specifically stated in reference to these notes that not all records of fact are opinion work product. If OFCCP considers that "no contrary authority whatsoever" then we are clearly at an impasse.

If OFCCP has a materially new proposal that we have not already discussed, please put it in writing by tomorrow and Oracle will consider it.

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



From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Monday, July 22, 2019 12:58 PM
To: Fuad, David <dfuad@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

David,

I am in receipt of your emails sent to me Friday evening. In consideration of the Court's numerous orders instructing the parties to pick up the phone and talk in good faith, I would like to request a call to talk through the remaining issues.

- You are not correct that there is no further opportunity to reach an agreement regarding the 2019 redactions. As an initial matter, this dispute is a distraction from the work of preparing this matter for trial as it is focused on discovery related to anecdotal evidence and not about the systemic discrimination alleged and discussed in our expert's report. OFCCP is eager to engage on this issue so that both parties and the Court can focus our efforts, and because we believe it is our duty to meet and confer in good faith as the court directed. What your position continues to fail to account for is that the attorney *opinion* work product and the *factual* work product you reference, as a matter of practical reality, are intermingled. When we made the redactions, we researched the applicable caselaw and learned, as you must have since you have been able to provide no contrary authority whatsoever, that attorney questions and script are presumptively attorney *opinion* work product. Nevertheless, in an effort to resolve our disagreement this dispute and avoid spending our time and the Court's time on matters that could be resolved here and now by simple compromises by both parties, we are willing to continue to try to work with you to see if we can distinguish opinion and fact questions more finely here and we have a specific proposal to discuss. As proof of our good faith efforts to reach an agreement with you, we are preparing to send the interview template with a list of questions unredacted as to which we are willing to compromise and samples of interview notes with questions unredacted for your review. We are working to get these to you this afternoon for discussion. In order to move quickly, we request to have a conversation on the phone today or tomorrow as the court has repeatedly

encouraged us to do to try to talk through this. Please send us times you are available by phone today and tomorrow.

- We may have reached impasse regarding the race redactions. Race information in the notes would be identifying for all Blacks and Hispanics, and thus contrary to the express terms of the Court's order. Our central concern is that the information we turn over would identify the government informant. We remain willing to hear out any ideas you may have to preserve identity, but at this juncture, we do not see a way to do that.
- As to the 2015 interview notes, we similarly think you are ignoring the express terms of the Court's order: Oracle knows the people OFCCP interviewed during the onsite and has long been on notice that these individuals may have relevant information. Again, the 2015 interviews notes were largely of workers interviewed through appointments with Oracle personnel in 2015. As Norm informed you last week on Wednesday, while we believe that our detailed privilege log meets the Court's order on the issue of OFCCP's assertion of the government's informant privilege we continued to review and, as promised, we will be reproducing notes of interviews of workers that Oracle was not involved in arranging.

It is our sincere hope that Oracle will take a more cooperative posture in this case, so that we may move our focus to the merits of this case. We look forward to hearing from you soon.

Thanks,
Abby

Abigail G. Daquiz
Attorney
U.S. Department of Labor
Office of the Solicitor
300 Fifth Avenue, Suite 1120
Seattle, WA 98104
d 206-757-6753
t 206-757-6762
f 206-757-6761
daquiz.abigail@dol.gov

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's 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](https://www.orrick.com/Privacy-Policy) to learn about how we
use this information.

Date: April 24, 2019

RSOL Conducting Interview: Dan Chasek

WITNESS CONTACT INFO WP: AQ [REDACTED]

Name:	GI [REDACTED] WP [REDACTED]
Contact Date and Time:	
Non-Work Phone Number:	
Non-Work Email Address:	GI [REDACTED]
Non-Work Mailing Address	
Call Summary/Highlights	

INTRODUCTION

WP: AQ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- | [REDACTED]
- | [REDACTED]

[REDACTED]

WP-AQ

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SHE'S NOT AWARE OF WHAT ANYONE ELSE WAS MAKING WHILE SHE WAS ^{GI} [REDACTED] -
2017. WHEN HIRED IN ^{GI} [REDACTED], A ^{GI} [REDACTED] MANAGER, WORKING FOR ^{GI} [REDACTED].
^{GI} [REDACTED] HAD ^{GI} [REDACTED] PEOPLE WORKING FOR HER (MALE AND FEMALE). TRANSFERRED TO ^{GI} [REDACTED].
WHERE PROMOTED TO ^{GI} [REDACTED]. THAT HER LAST PROMOTION. IN REDWOOD SHORES UNTIL ^{GI} [REDACTED].
^{GI} [REDACTED]. ^{GI} [REDACTED] ^{WP} [REDACTED].
SHE MENTIONED THAT WHEN SHE SUPERVISED A TEAM THAT WAS
WORKING IN ^{GI} [REDACTED], THEY POSTED THEIR SALARIES IN THEIR LUNCH ROOM SO THEY ALL KNEW
WHAT THEY WERE MAKING.

I. MANAGER STATUS

- Are you/were you an Oracle manager?
 - SHE WAS
- Do/did you have the authority to hire, fire, discipline, or determine pay of other employees while at Oracle?
 - WP-AQ [REDACTED]
 - WP-AQ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
 - WP-AQ [REDACTED]
[REDACTED]
 - W [REDACTED]
P- [REDACTED]
AQ [REDACTED]

II. BACKGROUND & VISA STATUS

- Can you please tell me what gender you identify as?
 - FEMALE
- Can you please tell me what race you identify as?
 - GI [REDACTED]
- Were you a U.S. citizen, greencard holder, or have a work visa while working for Oracle? WP: AQ [REDACTED]
[REDACTED]
 - GI [REDACTED]

III. RECRUITMENT AND EMPLOYMENT STATUS

- Are you currently employed at Oracle?
 - WP: AQ [REDACTED]
 - Who is your current employer?
 - GI [REDACTED]
 - What is your current job title?
 - [REDACTED]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.

Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

- What are your current job duties
 -
 - WP-AQ [REDACTED]
 - ?
 - WP-AQ [REDACTED]
 - ?
 - WP-AQ [REDACTED]
[REDACTED]
- WP: AQ [REDACTED]
 - What is your current job title?
 -
 - Do you know what your current individual contributor (IC) number (or manager/M number) is?
 -
 - Do you currently work at the Redwood Shores facility?
 -
 - What are your current job duties?
 -
 - WP-AQ [REDACTED]
 -
- WP: AQ [REDACTED]
 - When did you first get hired at Oracle?
 - GI [REDACTED]
 - What was the job title you got hired for?
 - SEE ABOVE
- **Recruitment**

NR



- When you received a promotion did you also receive an increase in pay?
- When you received a promotion, did you have additional job duties?
- When you received a promotion, did your global career level (e.g. IC level) change?
- WP: AQ [REDACTED]
[REDACTED]:

ADDITIONAL JOB QUESTIONS:

- Job Title (INCLUDING IC or M #)
- Organization/ Project
- Location
- Employment dates
- Supervisor
- Describe primary job duties
- Chain of Command
 - Supervisor name and title
 - Supervisor's supervisor name and title
 - Who was the senior VP who supervised your supervisors?
- WP: AQ [REDACTED]
[REDACTED]
- Did you anyone from your team ever talk about your pay? NO
 - (If yes) What was said?
- Did you ever ask for a raise?
 - (If yes) Did you get it?
 - (If yes) Was it justified in some way, if so, how?
- WP: AQ [REDACTED]

ADDITIONAL JOB QUESTIONS

- Job Title
- Organization/ Project
- Location
- Employment dates
- Supervisor
- Describe primary job duties
- Chain of Command
 - Supervisor name and title
 - Supervisor's supervisor name and title
 - Who was the senior VP who supervised your supervisors?
- WP: AQ [REDACTED]
[REDACTED]

- Did you anyone from your team ever talk about your pay?
 - (If yes) What was said? NO
- Did you ever ask for a raise? NO
 - (If yes) Did you get it? YES, BUT NOT EVERY YEAR.
 - (If yes) Was it justified in some way, if so, how?
- WP: AQ [REDACTED]

V. PERFORMANCE APPRAISALS

- Did your supervisor give you an annual performance review?
 - NEVER
- How often did you receive performance reviews?
 - WP-AQ [REDACTED]
 - WP-AQ [REDACTED]
 - YES
 - WP-AQ [REDACTED]
 - NO
 - WP-AQ [REDACTED]
 - I DON'T KNOW
 - WP-AQ [REDACTED]
 - WP-AQ [REDACTED]
 - WP [REDACTED]

HYPO: 8 PEOPLE ON TEAM. BOSS SAYS RAISES AND BONUSES. IF BOAT SINKING, HOW WOULD YOU RANK PEOPLE YOU WOULD SAVE FIRST. THIS MEANT THESE PEOPLE WERE MOST IMPORTANT AND BOSSES WOULD ALLOCATE RAISES ACCORDINGLY. SHE DOESN'T KNOW IF THIS PROCESS EXTENDED GI [REDACTED] [REDACTED] IT WAS IN THE GI [REDACTED], TOO. SHE DOESN'T KNOW IF THE PROCESS CHANGED THROUGHOUT. THIS WAS SOMETHING THAT WAS NOT RELATED TO OVERALL APPRAISALS, JUST BONUSES AND RAISES.

VI. DIRECT EVIDENCE OF DISCRIMINATION

- WP: AQ [REDACTED] NO
 - WP-AQ [REDACTED]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.

Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

- WP-AQ [REDACTED]
- WP-AQ [REDACTED]
- NO
- WP-AQ [REDACTED] NO
-
- WP-AQ [REDACTED]
- WP-AQ [REDACTED]
- WP-AQ [REDACTED] NO
- WP-AQ [REDACTED] NO

VII. OTHER

- WP-AQ [REDACTED] Non-responsive [REDACTED]
[REDACTED] HER SALARY WAS GI [REDACTED]
WHEN SHE GI [REDACTED] (GI [REDACTED] WHEN SHE STARTED 17 YEARS PREVIOUSLY). SHE WAS
THREE PEOPLE AWAY FROM GI [REDACTED] IN THE HIERARCHY. Non-responsive [REDACTED]
[REDACTED]
-
- WP-AQ [REDACTED]

VIII. OTHER POTENTIAL CLASS MEMBER WP: AQ

[REDACTED]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.

Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

Date:

RSOL Conducting Interview:

WITNESS CONTACT INFO WP-AQ [Redacted]

Name:	
Contact Date and Time:	
Non-Work Phone Number:	
Non-Work Email Address:	
Non-Work Mailing Address	
Call Summary/Highlights	

INTRODUCTION

WP-AQ [Redacted]

- [Redacted]
- [Redacted]

[Redacted]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.
Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

WP-AQ

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.

Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

▪ **What are your current job duties**

•

WP-AQ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

▪ **What is your current job title?**

•

▪ **Do you know what your current individual contributor (IC) number (or manager/M number) is?**

•

▪ **Do you currently work at the Redwood Shores facility?**

•

▪ **What are your current job duties?**

•

WP-AQ [REDACTED]

•

• WP-AQ [REDACTED]

○ **When did you first get hired at Oracle?**

▪

○ **What was the job title you got hired for?**

▪

• **Recruitment**

○ **Did Oracle give you a job offer for the same job you interviewed for?**

▪

○ WP-AQ [REDACTED]

[REDACTED]

[REDACTED]

○ **How did you find out about the job at Oracle?**

▪

○ **Were you a student at the time?**

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.

Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

o Chain of Command

- Supervisor name and title
- Supervisor's supervisor name and title
- Who was the senior VP who supervised your supervisors?

o WP-AQ [Redacted]

[Redacted]

o Did you anyone from your team ever talk about your pay?

- (If yes) What was said?

o Did you ever ask for a raise?

- (If yes) Did you get it?
- (If yes) Was it justified in some way, if so, how?

o WP-AQ [Redacted]

[Redacted]

[Redacted]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.
Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

- When you received a promotion did you also receive an increase in pay?
- When you received a promotion, did you have additional job duties?
- When you received a promotion, did your global career level (e.g. IC level) change?
- WP-AQ [REDACTED]

ADDITIONAL JOB QUESTIONS:

- Job Title (INCLUDING IC or M #)
- Organization/ Project
- Location
- Employment dates
- Supervisor
- Describe primary job duties
- Chain of Command
 - Supervisor name and title
 - Supervisor's supervisor name and title
 - Who was the senior VP who supervised your supervisors?
- WP-AQ [REDACTED]
- Did you anyone from your team ever talk about your pay?
 - (If yes) What was said?
- Did you ever ask for a raise?
 - (If yes) Did you get it?
 - (If yes) Was it justified in some way, if so, how?
- WP-AQ [REDACTED]

ADDITIONAL JOB QUESTIONS

- Job Title
- Organization/ Project
- Location
- Employment dates
- Supervisor
- Describe primary job duties
- Chain of Command
 - Supervisor name and title
 - Supervisor's supervisor name and title
 - Who was the senior VP who supervised your supervisors?
- WP-AQ [REDACTED]

ATTORNEY WORK PRODUCT / SUBJECT TO INFORMER'S PRIVILEGE

This document contains information that is privileged or otherwise exempt from disclosure under applicable law.

Do not disclose without consulting the Office of the Solicitor.

INITIAL INTAKE INTERVIEW

-
- WP-AQ [REDACTED]
- [REDACTED]
- [REDACTED]

VII. OTHER

- WP-AQ [REDACTED]
- [REDACTED]

VIII. OTHER POTENTIAL CLASS MEMBERS WP-AQ [REDACTED]



July 22, 2019

Via Email Only

Mr. David Fuad
Orrick, Herrington & Sutcliffe LLP
777 South Figueroa Street, Suite 3200
Los Angeles, California, 90017-5855

Re: *OFCCP v. Oracle America, Inc.*
Case No. 2017-OFC-00006

Dear Mr. Fuad,

Enclosed please find a supplemental production. Specifically, these are interview notes with revised redactions from telephonic interviews taken by OFCCP during the compliance review in 2015 that have been described in detail in OFCCP's privilege log. The other interviewees during the compliance review are all known to Oracle either because Oracle had representatives attended the interviews or arranged for those interviews at Oracle HQ.

Please advise if you have any questions about this production.

Sincerely,

A handwritten signature in blue ink, appearing to read "Abigail G. Daquiz".

Abigail G. Daquiz,
Senior Trial Attorney

cc via email: Ms. Connell, Ms. Kaddah, and Mr. Siniscalco, Ms. Grundy
Ms. Bremer, Mr. Garcia, Mr. Miller, Mr. Richardson, Mr. Song
Enc.

Attachments:

2019.03.19 [Oracle] Parker Ltr to [OFCCP] Daquiz re Resp to Ltr of March 15.pdf

From: Fuad, David**Sent:** Wednesday, July 24, 2019 2:12 PM**To:** Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>**Cc:** Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>**Subject:** RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail and Norm,

Following up on one topic of yesterday's call and the last bullet of your July 22 email below, I am attaching Warrington's March 19, 2019 letter to you. The second page identifies each of the 2015 interview memos for which Oracle does not know the employee being interviewed. Oracle expects OFCCP will re-produce these memos with appropriate GI redactions pursuant to the Court's June 10, 2019 Order. Please let us know when that production will be complete.

Best,
David

From: Fuad, David**Sent:** Tuesday, July 23, 2019 10:15 AM**To:** 'Daquiz, Abigail - SOL' <Daquiz.Abigail@dol.gov>**Cc:** Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>**Subject:** RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail,

Are you available at 4 p.m. today for a call?

As I have explained, Oracle is willing to continue meeting and conferring as long as there appears to be a chance to resolve this dispute. OFCCP's offer to unredact the questions and answers in the example you sent is a step in the right direction.

I want to address, however, OFCCP's belief that this proposal is "in the spirit of compromise" and "meet[s] Oracle more than halfway." OFCCP is not meeting Oracle anywhere. It is meeting a Court Order. Oracle expended a great deal of effort over the last few months and years meeting and conferring and moving to compel (twice) just to get this one, still

heavily-redacted set of notes. And the fact OFCCP was previously redacting as “opinion work product” a subject as obviously central to this case as “Direct of Evidence of Discrimination” does not leave Oracle with tremendous confidence that even now OFCCP grasps the intent of the Court’s Order. Indeed, OFCCP continues to redact the specific questions under that section.

Further, OFCCP’s expectation that Oracle will find the template sufficient to understand the previously produced over-redacted notes is misplaced. As an initial matter, the template is still blanketed with unexplained redactions. Moreover, the Court did not order OFCCP to produce, nearly twenty days late and only after Oracle stated its intent to move to compel a third time, a begrudging Rosetta Stone that Oracle must go back and match up with OFCCP’s earlier production. The notes should be produced unredacted, as the Court ordered. We also take issue with OFCCP’s statement that Oracle was “unwilling[] simply to review the narrative” summaries that were provided. As explained previously, we reviewed them and found them unreliable. They also do not comply with the Court’s Order.

Another issue is OFCCP’s continued insistence on redacting information that it contends relates solely to the hiring claims. OFCCP is taking the affirmative step of scrubbing information from relevant and responsive documents because it believes the information is not relevant to Oracle. OFCCP has unequivocally stated it will not change these non-responsive redactions. Oracle intends to challenge them.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Tuesday, July 23, 2019 9:21 AM
To: Fuad, David <dfuad@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Hi David, quick correction—the notes attached at DOL000041673 correspond to Employee No. 17 (not 47) as described in the Interr. 49 summaries. I’m around all day. Thanks, Abby

Abigail G. Daquiz
U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Daquiz, Abigail - SOL
Sent: Monday, July 22, 2019 6:50 PM
To: Fuad, David <dfuad@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

David,

We continue to not understand why Oracle refuses to pick up the phone and talk to us about this, in light of the Court's repeated instruction to do so. It is not accurate that we have discussed everything we raised in our email earlier today.

As offered this afternoon, in an effort to resolve this dispute, we have attached a template that removes a majority, but not all, of the questions that attorneys followed loosely when interviewing witnesses in 2019. As we have explained, this template was not designed to be a questionnaire, nor was it designed with any understanding that it would be revealed to the witness, or anyone outside of litigation counsel. This template was given to attorneys to give them an idea as to what topics to explore, but the attorneys were given freedom to modify, omit, or alter the questions in any way they saw fit. In this attached template, we have redacted all of the questions in which we are providing advice, opinions, or instructions to the attorneys conducting the interviews (*e.g.*, the first two pages), or which are not seeking direct and specific factual responses. We are willing to go back through all of the interview notes and unredact all of the identified questions (as shown in yellow highlighting). We expect you will find the template itself to be sufficient to understand the meaning of the "yes" and "no" answers in the produced interview notes, for which you have indicated your unwillingness simply to review the narrative for that witness to learn any non-identifying facts obscured by the redactions. Nevertheless, we have attached a set of attorney notes for Employee No. 47, in which we have removed the redactions for most of the questions as an example of what we are offering to produce.

We make this proposal in the spirit of compromise and do not waive any assertion of attorney client privilege/work product as to these attorney questions generally nor do we waive as to any other questions not included in this proposal. As you will see, this proposal attempts to meet Oracle more than halfway, and this should save both parties and the Court tremendous time and resources trying to resolve this dispute regarding anecdotal evidence.

In one part of the attached template, you will see a section entitled Recruiting. In this section, we have unredacted *all* of the questions which concern the now-settled hiring case (and highlighted them in blue) so that you can verify that our redactions of these hiring claim inquiries as non-responsive were proper. None of these hiring claim attorney questions relate in any way to any issue that is still live in this case. It was the parties' express agreement when the hiring case was settled that all discovery regarding hiring would end. We have been advised by the Regional Solicitor that she is very concerned about Oracle's violation of this essential understanding she and David Fortney had, and she will pursue this with David if you do not withdraw your contest on these redactions. We are not going to change the redactions to the interview notes for this recruitment section.

We continue to think that we should get our heads together to discuss this proposal, so please let us know when you are available to talk. If you continue to refuse to speak to us, we will immediately alert the Court to your refusal to meet and confer with us as *repeatedly* instructed by the Court and ask that any motion about our supplemental production be stayed until these discussions occur.

Thanks,
Abby

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Fuad, David <dfuad@orrick.com>
Sent: Monday, July 22, 2019 3:11 PM
To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail,

I appreciate OFCCP's attempt to reach agreement but this email simply confirms that is not possible. We have already discussed telephonically everything that OFCCP raises below. For example, it has been OFCCP's position since we began these discussions that its opinion and fact work product are inextricably intertwined. The Court rejected that exact argument mostly recently in the Motion for Reconsideration. On July 18 in response to your request for authority we pointed OFCCP to the Court's July 2 Order, which specifically stated in reference to these notes that not all records of fact are opinion work product. If OFCCP considers that "no contrary authority whatsoever" then we are clearly at an impasse.

If OFCCP has a materially new proposal that we have not already discussed, please put it in writing by tomorrow and Oracle will consider it.

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



From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Monday, July 22, 2019 12:58 PM
To: Fuad, David <dfuad@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

David,

I am in receipt of your emails sent to me Friday evening. In consideration of the Court's numerous orders instructing the parties to pick up the phone and talk in good faith, I would like to request a call to talk through the remaining issues.

- You are not correct that there is no further opportunity to reach an agreement regarding the 2019 redactions. As an initial matter, this dispute is a distraction from the work of preparing this matter for trial as it is focused on discovery related to anecdotal evidence and not about the systemic discrimination alleged and discussed in our expert's report. OFCCP is eager to engage on this issue so that both parties and the Court can focus our efforts, and because we believe it is our duty to meet and confer in good faith as the court directed. What your position continues to fail to account for is that the attorney *opinion* work product and the *factual* work product you reference, as a matter of practical reality, are intermingled. When we made the redactions, we researched the applicable caselaw and learned, as you must have since you have been able to provide no contrary authority whatsoever, that attorney questions and script are presumptively attorney *opinion* work product. Nevertheless, in an effort to resolve our disagreement this dispute and avoid spending our time and the Court's time on matters that could be resolved here and now by simple compromises by both parties, we are willing to continue to try to work with you to see if we can distinguish opinion and fact questions more finely here and we have a specific proposal to discuss. As proof of our good faith efforts to reach an agreement with you, we are preparing to send the interview template with a list of questions unredacted as to which we are willing to compromise and samples of interview notes with questions unredacted for your review. We are working to get these to you this afternoon for discussion. In order to move quickly, we request to have a conversation on the phone today or tomorrow as the court has repeatedly encouraged us to do to try to talk through this. Please send us times you are available by phone today and tomorrow.
- We may have reached impasse regarding the race redactions. Race information in the notes would be identifying for all Blacks and Hispanics, and thus contrary to the express terms of the Court's order. Our central concern is that the information we turn over would identify the government informant. We remain willing to hear out any ideas you may have to preserve identity, but at this juncture, we do not see a way to do that.
- As to the 2015 interview notes, we similarly think you are ignoring the express terms of the Court's order: Oracle knows the people OFCCP interviewed during the onsite and has long been on notice that these individuals may have relevant information. Again, the 2015 interviews notes were largely of workers interviewed through appointments with Oracle personnel in 2015. As Norm informed you last week on Wednesday, while we believe that our detailed privilege log meets the Court's order on the issue of OFCCP's assertion of the government's informant privilege we continued to review and, as promised, we will be reproducing notes of interviews of workers that Oracle was not involved in arranging.

It is our sincere hope that Oracle will take a more cooperative posture in this case, so that we may move our focus to the merits of this case. We look forward to hearing from you soon.

Thanks,
Abby

Abigail G. Daquiz
Attorney
U.S. Department of Labor
Office of the Solicitor
300 Fifth Avenue, Suite 1120
Seattle, WA 98104
d 206-757-6753
t 206-757-6762
f 206-757-6761
daquiz.abigail@dol.gov

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's 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.



March 19, 2019

Abigail G. Daquiz
Office of the Solicitor
U.S. Department of Labor
300 Fifth Avenue, Suite 1120
Seattle, WA 98104-2397

Re: OFCCP v. Oracle:

Dear Ms. Daquiz

I write in response to your letter of March 15, 2019. I have attached a list of the documents by bate-stamp number referenced in your letter and my original meet and confer letter dated February 26, 2019.

I note that your letter only responds to one aspect of my meet and confer letter dated February 26, 2019. I did receive a letter from Norm Garcia dated March 12, 2019. I am assuming it represents OFCCP's position as to the other matters raised in my letter of February 26.

I would like to schedule a telephonic meet and confer. I propose March 25, 2019.

Very truly yours,

A handwritten signature in blue ink, appearing to read "W Parker", enclosed within a blue circular scribble.

Warrington Parker

cc: Laura Bremer
Jeremiah Miller
Norm Garcia

Orrick, Herrington & Sutcliffe LLP

The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669

+1 415 773 5700
orrick.com

Warrington Parker
E wparker@orrick.com
D +1 415 773 5740



March 19, 2019

Page 2

Bate Stamp Numbers of Witness Interviews

DOL000000804-843
DOL000000844-849
DOL000000850-851
DOL000000856-861
DOL000000862-864
DOL000000865-867
DOL000000873-875
DOL000000876-879
DOL000000880-883
DOL000000884-889
DOL000000890-894
DOL000000895-897
DOL000000898-904
DOL000036573-575
DOL000036576-579
DOL000036580-582
DOL000036583-585
DOL000036586-588
DOL000036591-594
DOL00003659-597
DOL000036598-599
DOL000036606-608
DOL000036609-614
DOL000036606-608
DOL000036615-618
DOL000036647-651
DOL000036683-684
DOL000036685-688
DOL000036689-692
DOL000036693-695
DOL000036696-698
DOL000036699-701
DOL000036702-705
DOL000036755-759
DOL000036784-785
DOL000036786-789
DOL000036790-794
DOL000036795-797
DOL000036798-803
DOL000036804-806
DOL000039030
DOL000039031
DOL000039032-033
DOL000039034-035



July 25, 2019

Via Email Only

Mr. David Fuad
Orrick, Herrington & Sutcliffe LLP
777 South Figueroa Street, Suite 3200
Los Angeles, California, 90017-5855

Re: *OFCCP v. Oracle America, Inc.*
Case No. 2017-OFC-00006

Dear David,

In response to Oracle's request for reproduction of interview notes taken in 2015, and with reference to Mr. Parker's letter of March 15, 2019, below is an explanation.

- The following documents are produced herewith: DOL000000804, DOL000000813, DOL000000815, DOL000000832, DOL000000844, DOL000000856, DOL000000865, DOL000000884 (this document is a duplicate of DOL000036798 and, as such, 36798 will not be separately produced), DOL000000890, DOL000000898, DOL000039030 (DOL000039031 is identical to 39030 and, as such, 39031 will not be separately produced), and DOL000039032 (DOL000039034 is identical to 39032 and, as such, 39034 will not be separately produced).
- DOL000000817 was already produced with revised redactions on July 22, 2019. This document is a duplicated at DOL000036683 and, as such, OFCCP is only reproducing DOL000000817.
- DOL000000821 was already produced with revised redactions on July 22, 2019. This document is a duplicated at DOL000036583, as such, OFCCP will not reproduce DOL000036583 and OFCCP directs Oracle to its previous production.
- DOL000000829 was already produced with revised redactions on July 22, 2019. This document is a duplicated at DOL000036606 and 36693 and, as such, OFCCP is only reproducing DOL000000829.
- DOL000000862 was already produced with revised redactions on July 22,

2019. This document is a duplicated at DOL000036696 and, as such, OFCCP is only reproducing DOL000000862.

- DOL000000876 was already produced with revised redactions on July 22, 2019. This document is a duplicated at DOL000036689 and, as such, OFCCP is only reproducing DOL000000876.
- DOL000000880 was already produced with revised redactions on July 22, 2019. This document is a duplicated at DOL000036615 and 36786 and, as such, OFCCP is only reproducing DOL000000880.
- DOL000000895 was already produced with revised redactions on July 22, 2019. This document is a duplicated at DOL000036580, as such, OFCCP will not reproduce DOL000036580 and OFCCP directs Oracle to its previous production.
- DOL000036586 is duplicated at DOL000000782 and that document was reproduced with revised redactions on July 22, 2019. As they are duplicates, OFCCP will not reproduce DOL000036586 and OFCCP directs Oracle to its previous production.
- DOL000036647 is duplicated at DOL000000777 and that document was reproduced with revised redactions on July 22, 2019. As they are duplicates, OFCCP will not reproduce DOL000036647 and OFCCP directs Oracle to its previous production.
- DOL000036685 is duplicated at DOL000000852 and that document was reproduced with revised redactions on July 22, 2019. As they are duplicates, OFCCP will not reproduce DOL000036685 and OFCCP directs Oracle to its previous production.
- DOL000036755 was reproduced to Oracle with no redactions on April 5, 2019.
- DOL000036790 is duplicated at DOL000000790 and that document was reproduced with revised redactions on July 22, 2019. As they are duplicates, OFCCP will not reproduce DOL000036790 and OFCCP directs Oracle to its previous production.
- DOL000036609 is a duplicate of DOL000000701. These are notes of an interview with a manager during which Oracle representatives were present and will not be reproduced.

Mr. David Fuad
July 25, 2019
Page 3

The remaining documents sought in will not be produced as they are interviews of employees known to Oracle through either Oracle's receipt of those employees' requests to meet with OFCCP during the onsite, Oracle's provision of resumes to OFCCP of those individual employees, and OFCCP's specific request to Oracle to meet with those employees during the compliance review.

Please advise if you have any questions about this production.

Sincerely,



Abigail G. Daquiz,
Senior Trial Attorney

cc via email: Ms. Connell, Ms. Kaddah, and Mr. Siniscalco, Ms. Grundy
Ms. Bremer, Mr. Garcia, Mr. Miller, Mr. Richardson, Mr. Song
Enc.

From: [Fuad, David](#)
To: [Daquiz, Abigail - SOL](#); [Garcia, Norman - SOL](#)
Cc: [Parker, Warrington](#); [Grundy, Kayla Delgado](#); [Kaddah, Jacqueline D.](#); [Siniscalco, Gary R.](#); [Connell, Erin M.](#); [Miller, Jeremiah - SOL](#); [Mantoan, Kathryn G.](#); [Colonna, Daniel P.](#); [Song, Charles C - SOL](#); [Bremer, Laura - SOL](#); [Song, Charles C - SOL](#)
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call
Date: Tuesday, July 30, 2019 10:04:26 AM
Attachments: [image001.png](#)
[image002.png](#)

Abigail,

Thank you for your email. It does not raise any new issues that were not already addressed in prior emails and our telephonic meet and confers. Instead it further confirms that the parties have an irreconcilable disagreement regarding OFCCP's redactions, including the non-responsive redactions, what constitutes opinion work product, and the redactions to employees' races.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Monday, July 29, 2019 4:53 PM
To: Fuad, David <dfuad@orrick.com>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>
Cc: Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Hi David,

I'm in the office for another hour if you have time to chat. We have worked hard to address Oracle's concerns and it appears that your client is intent on filing a motion regardless of what we do—short of turning over attorney work product and information about government informants which we are entitled to withhold.

First, we think a joint request for in camera review of the interview template would accomplish what I understand Oracle to be seeking—a ruling about whether some or all of the questions should be unredacted as not opinion work product. Regardless of other disagreements we have, we continue to believe that if we sought this review jointly, that Oracle can get what it seeks and is entitled to at this stage of the litigation from these attorney notes. Then, OFCCP can continue to move forward with supplementation and the parties can move on to preparing this case for hearing.

Regarding the form of filing, we could certainly jointly move; and/or contact his clerk, Ms. Ballard, for guidance about how to quickly get a simple request to the Judge Clark (joint letter, joint motion, etc.)

Second, I want to clarify what seems to be a misconception in your email about what is in the first section of the template and ultimately, what Oracle's discovery requests were of OFCCP. The description and instruction section in the first part of the template was not a "communication" to third parties (as sought in Oracle's RFPs) but instead, as we have described, attorneys' summaries to each other and instructions regarding the conduct of the interview. There is nothing in the redacted materials indicates what was communicated to third parties—only instructions and a summary available for use by an attorney as they saw fit.

Third, your email does not reflect what I understood the parties agreed about during our telephone conferences—that the direction or line of questioning inherently implicates attorney opinion work product, even though the individual questions elicit individual facts. When we asked you during our call if Oracle could ever agree to any question being protected by the work product doctrine—we were genuinely trying to understand Oracle's position. Instead of trying to provide an example of the *types* of question Oracle would recognize as protected, Oracle instead takes the position that none of the questions can ever be protected because an attorney uttered something out loud that according to Oracle waives the attorney client work product protections. This is counter to the caselaw we previously provided to you in which courts found questions used in interviewing witnesses to be attorney work product. See e.g. *In re Student Finance Corp.*, 2006 WL 3483387. In any event, It seems that Oracle is confusing OFCCP's attorney notes to verbatim transcripts of what was actually said during conversations between lawyers and third parties.

Fourth, what about OFCCP's position regarding the non-responsive redactions does not make sense. It appears from your comments that you are far removed from the actual production end of this work because all of these changes takes time. Unredacting hundreds of pages of documents—that are unrelated to the claims at issue—is burdensome, especially when weighed against any relevance to the claims or defenses. And—again, you seem to ignore or forget—when a fact was elicited prompted by questions in this area of the interview, those facts were disclosed and/or summarized in response to Interrogatory No. 49.

Finally, what outside of the attorney notes described above, does Oracle believe is outstanding or not in compliance? You indicated that Oracle's demand for information about third parties' race was necessary. Is there anything else from our production and/or supplementation that you have further questions about? Again, we have continuously offered information and provided an open line for conversation while we have worked to diligently produce and reproduce responsive documents to Oracle. We remain available—please advise if you have more concerns.

Thank you,

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Fuad, David <dfuad@orrick.com>

Sent: Monday, July 29, 2019 2:26 PM

To: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Cc: Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL

<Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Norm,

We have considered your proposal for a joint letter but must decline. There are several discovery disputes outstanding and a joint letter would not capture them all. Further, by the time the parties agreed on the format and substance of a letter, including responding to each other's arguments, the letter would resemble a fully-briefed motion anyway. Also, I am not aware of the Court giving the parties the authority to submit joint letter briefs in lieu of formal motions.

Regarding the first section of the template, I understand that while some of the redacted content is attorney-to-attorney instructions, I further understood that some content was how OFCCP is describing this action to employees. A case description disclosed to nonparty current or former employees would not be opinion work product.

As to what type of questions could be opinion work product, it is OFCCP's burden to establish that opinion work product protection applies, not Oracle's burden to hypothesize questions OFCCP may redact. All of the questions and answers we have seen thus far are factual in nature. Moreover, if OFCCP is disclosing its questions to employees, that is a waiver of any work product protection.

OFCCP's position on the non-responsive redactions does not make sense. OFCCP took the affirmative step of redacting those sections. All it has to do is un-redact them. There is no burden. The information is relevant for all the reasons I explained on July 25.

While we have resolved some issues through this extended meet and confer process, unfortunately the parties simply have remaining disagreements that are not capable of mutual resolution.

Best,
David

From: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>

Sent: Thursday, July 25, 2019 5:51 PM

To: Fuad, David <dfuad@orrick.com>

Cc: Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL

<Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Importance: High

Good evening David:

We received your email and we are surprised by your response, as we thought we were close – in a moment rarely experienced in this case – to getting something resolved on our own! Alas, it appears that today is not the day that we will score a victory for our meet and confer efforts. Despite our continued differences, we share your professed interest in a speedy resolution of these issues, so why don't we just file a joint letter asking the Court for an in camera review of the template? If this proceeds by motion, we are at least three weeks away from the Court even beginning to look at this, and then if the Court orders further changes, we would have to commence those as of the time of the Court's order. If we work together, we could file a joint letter with each party getting a page to present their arguments by Tuesday of next week and we can walk the unredacted template up to Court for review in chambers. As the party that has twice sought and twice been denied an in camera review and as we have always thought it would have sped this process along considerably if the Court could identify the line between opinion-attorney work product and factual-attorney work product, we still think this is a great idea and we expect the Court would appreciate a brief joint presentation with just a few pages to review in camera. Once we have the Court's order, we can move as quickly as possible to implement the Court's orders.

So you are aware, we have not delayed in withdrawing the redactions on all of the questions we identified in our proposal we gave you earlier this week. We are prepared to start production of those tomorrow, with more than 50 statements (and likely more), and we should have the complete set of more than 250 redacted statements by mid-week of next week.

Moving to the substance of your letter, we want to correct a couple of things. First, the first section of the template was *not* a communication to the witnesses, it was instructions from the attorneys in charge of the case to the attorneys conducting the interviews about how to do the interview. We thought you agreed on our call on Tuesday that instructions that we gave in the template to the interviewer about how to conduct the interview were opinion attorney work product.

Second, I asked you for what *type* of questions you thought were opinion attorney work product, in light of the case law that finds all attorney questions to be opinion attorney work product. We were looking for some examples of what sorts of questions you thought were in your fact-work product and opinion-work product categories, so we could identify if there

was a way to resolve the dispute without the Court's assistance. During our call, you could not identify at that moment any question, thought this may be a good way to flesh out if we had any further dispute and told us that you had to consult with your team and would get back to us. Apparently, you have reconsidered such that Oracle is taking the position that it wants to see all of the questions in the notes because it cannot think of a single type of question that could be protected by opinion attorney work product.

Third, on the section redacted as non-responsive since it concerned only the settled hiring claims, we don't see any question in this section that was previously disclosed to you in our proposal on Monday that would elicit information relating to assignment. As you know, our expert's report on channeling and assignment is a statistical argument that will not be defended by presenting testimony from witnesses about their particular assignment at hire. Nevertheless, given that you raised this argument on Tuesday in our discussion, we looked at the questions again and the only one that could even conceivably be connected to assignment would be the question which asks whether the applicant was offered the same job for which they interviewed. Although this information has no bearing on OFCCP's channeling arguments, we can unredact this question and answer if that would put an end to this dispute (which your letter appears it would not). What frustrates us greatly about your position on this, as we have explained repeatedly, is that a chief advantage for both parties in settling the hiring claim was to save us both the time, resources and expense involved in further discovery and litigating the hiring claim. You claimed originally that you didn't trust us that our redactions of these sections concerned hiring, and now that we have disclosed the questions to confirm the veracity of our representation regarding this section, you still are not willing to let this go. These sections obviously concern the hiring case and both parties deserve to enjoy the cost savings and peace we bargained for when we settled those claims.

Finally, David, we do not appreciate that you continue to accuse us of delaying this process. As you well know, our conversations would have gone faster if you would have gotten on the phone sooner as we repeatedly requested, instead of slowing everything down by these letter writing campaigns. Also, it is clear that in our conversations, we have managed to resolve a wide range of issues. We are disappointed that Oracle is tied into this all-or-nothing approach, but it is a step too far to say that this process has not been worthwhile or was too time consuming.

We would like to put this matter behind us, as we all still have plenty to do right now in other aspects of this case. *Please* let us know right away about filing a joint request. It will be a far speedier process, and we are confident that the Court will appreciate a concise letter setting forth the dispute and submission of the template for an en camera review.

Thanks,

Norm

Norman E. Garcia
Senior Trial Attorney
United States Department of Labor
90 7th Street, Rm. 3-700; SF, CA 94103 Telephone number: (415) 625-7747 Facsimile
number: (415) 625-7772

This message may contain information that is privileged or otherwise exempt from disclosure under applicable law. Do not disclose without consulting the Office of the Solicitor. If you think you received this e-mail in error, please notify the sender immediately.

From: Fuad, David <dfuad@orrick.com>
Sent: Thursday, July 25, 2019 4:03 PM
To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>
Cc: Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail and Norm,

I write to follow up on Tuesday's meet and confer regarding the redactions OFCCP continues to apply to the interview notes.

I appreciate Norm walking us through the redactions and their purpose. Oracle continues to disagree, however, that OFCCP has complied with the Court's order. Even the most recent less-redacted exemplar notes still remove: (1) background on the case that OFCCP is providing to Oracle's employees; (2) certain questions that OFCCP is posing to Oracle's employees; and (3) purportedly "non-responsive" information relating to hiring and recruitment.

As we have discussed, the Court's Order only permits OFCCP to redact information that discloses the identity of the employees and opinion work product. With respect to categories (1) and (2) above, statements or questions that OFCCP is making to Oracle employees would not disclose their identities. Similarly, statements or questions that OFCCP is making to Oracle employees are not entitled to opinion work product protection because they are being disclosed to the employees, i.e., third parties with whom OFCCP has no privileged relationship.

I understand there is case law stating that attorney questions can be opinion work product. I understand you would like Oracle to provide an example of a question it *would* consider to be opinion work product. Because Oracle has no idea what OFCCP is redacting, we cannot respond to those requests. At bottom, OFCCP is redacting factual questions and answers

that are relevant to OFCCP's claims and Oracle's defenses. The Court has ordered OFCCP to produce those questions and answers.

Regarding the "non-responsive" redactions, we already have explained they are not permitted by the Court's order. In addition to that straightforward and dispositive reason as to why they are improper, the assertion that they are "non-responsive" is inaccurate. OFCCP continues to allege that pay discrimination occurs as part of the hiring process, in that Oracle allegedly "assigns" women and persons of color to lower-paying jobs. OFCCP also alleges Oracle discriminates with respect to starting pay. Because of these allegations, which also are contained in OFCCP's recently produced expert report, statements by employees about whether they were hired into a different job than they applied for, or about purported discrimination based on their starting pay, are highly relevant and discoverable. The assertion that these portions of the interviews relate solely to the now-resolved hiring claim is also wrong. As pled in the SAC, OFCCP's hiring claim related solely to college recruiting in the PT1 job group. By definition, the members of that college recruiting "class" were never hired by Oracle. Yet the notes at issue are from interviews with current or former Oracle employees who, again by definition, were not victims of alleged hiring discrimination. Thus, the statements from employees in these notes cannot relate to the dismissed college recruiting claim *at all* because *those* persons were never hired and therefore never interviewed.

We anticipate OFCCP will seek to further extend this meet and confer. But we initiated this discussion regarding OFCCP's compliance with the Court's order back on July 10. Over the last two weeks, we have met and conferred telephonically for hours and traded thousands of words. As I mentioned on our call, given OFCCP's various positions including those described above, Oracle has no confidence that the parties will reach agreement. And Oracle sees no need to continue meeting and conferring regarding compliance with a Court order. Too much time has passed already. Oracle intends to move to compel and seek an *in camera* review of the notes at issue so that the Court can decide whether OFCCP's redactions are appropriate.

Best,
David

From: Fuad, David

Sent: Wednesday, July 24, 2019 2:12 PM

To: 'Daquiz, Abigail - SOL' <Daquiz.Abigail@dol.gov>

Cc: 'Garcia, Norman - SOL' <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; 'Miller, Jeremiah - SOL' <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; 'Song, Charles C - SOL' <Song.Charles.C@dol.gov>; 'Bremer, Laura - SOL' <Bremer.Laura@dol.gov>; 'Song, Charles C - SOL' <Song.Charles.C@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail and Norm,

Following up on one topic of yesterday's call and the last bullet of your July 22 email below, I am attaching Warrington's March 19, 2019 letter to you. The second page identifies each of the 2015 interview memos for which Oracle does not know the employee being interviewed. Oracle expects OFCCP will re-produce these memos with appropriate GI redactions pursuant to the Court's June 10, 2019 Order. Please let us know when that production will be complete.

Best,
David

From: Fuad, David

Sent: Tuesday, July 23, 2019 10:15 AM

To: 'Daquiz, Abigail - SOL' <Daquiz.Abigail@dol.gov>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Abigail,

Are you available at 4 p.m. today for a call?

As I have explained, Oracle is willing to continue meeting and conferring as long as there appears to be a chance to resolve this dispute. OFCCP's offer to unredact the questions and answers in the example you sent is a step in the right direction.

I want to address, however, OFCCP's belief that this proposal is "in the spirit of compromise" and "meet[s] Oracle more than halfway." OFCCP is not meeting Oracle anywhere. It is meeting a Court Order. Oracle expended a great deal of effort over the last few months and years meeting and conferring and moving to compel (twice) just to get this one, still heavily-redacted set of notes. And the fact OFCCP was previously redacting as "opinion work product" a subject as obviously central to this case as "Direct of Evidence of Discrimination" does not leave Oracle with tremendous confidence that even now OFCCP grasps the intent of the Court's Order. Indeed, OFCCP continues to redact the specific questions under that section.

Further, OFCCP's expectation that Oracle will find the template sufficient to understand the previously produced over-redacted notes is misplaced. As an initial matter, the template is still blanketed with unexplained redactions. Moreover, the Court did not order OFCCP to produce, nearly twenty days late and only after Oracle stated its intent to move to compel a third time, a begrudging Rosetta Stone that Oracle must go back and match up with OFCCP's earlier production. The notes should be produced unredacted, as the Court ordered. We also take issue with OFCCP's statement that Oracle was "unwilling[]" simply to review the narrative" summaries that were provided. As explained previously, we reviewed them and found them unreliable. They also do not comply with the Court's Order.

Another issue is OFCCP's continued insistence on redacting information that it contends relates solely to the hiring claims. OFCCP is taking the affirmative step of scrubbing information from relevant and responsive documents because it believes the information is not relevant to Oracle. OFCCP has unequivocally stated it will not change these non-responsive redactions. Oracle intends to challenge them.

Best,
David

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Tuesday, July 23, 2019 9:21 AM
To: Fuad, David <dfuad@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

Hi David, quick correction—the notes attached at DOL000041673 correspond to Employee No. 17 (not 47) as described in the Interr. 49 summaries. I'm around all day. Thanks, Abby

Abigail G. Daquiz
U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Daquiz, Abigail - SOL
Sent: Monday, July 22, 2019 6:50 PM

To: Fuad, David <dfuad@orrick.com>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

David,

We continue to not understand why Oracle refuses to pick up the phone and talk to us about this, in light of the Court's repeated instruction to do so. It is not accurate that we have discussed everything we raised in our email earlier today.

As offered this afternoon, in an effort to resolve this dispute, we have attached a template that removes a majority, but not all, of the questions that attorneys followed loosely when interviewing witnesses in 2019. As we have explained, this template was not designed to be a questionnaire, nor was it designed with any understanding that it would be revealed to the witness, or anyone outside of litigation counsel. This template was given to attorneys to give them an idea as to what topics to explore, but the attorneys were given freedom to modify, omit, or alter the questions in any way they saw fit. In this attached template, we have redacted all of the questions in which we are providing advice, opinions, or instructions to the attorneys conducting the interviews (e.g., the first two pages), or which are not seeking direct and specific factual responses. We are willing to go back through all of the interview notes and unredact all of the identified questions (as shown in yellow highlighting). We expect you will find the template itself to be sufficient to understand the meaning of the "yes" and "no" answers in the produced interview notes, for which you have indicated your unwillingness simply to review the narrative for that witness to learn any non-identifying facts obscured by the redactions. Nevertheless, we have attached a set of attorney notes for Employee No. 47, in which we have removed the redactions for most of the questions as an example of what we are offering to produce.

We make this proposal in the spirit of compromise and do not waive any assertion of attorney client privilege/work product as to these attorney questions generally nor do we waive as to any other questions not included in this proposal. As you will see, this proposal attempts to meet Oracle more than halfway, and this should save both parties and the Court tremendous time and resources trying to resolve this dispute regarding anecdotal evidence.

In one part of the attached template, you will see a section entitled Recruiting. In this section, we have unredacted *all* of the questions which concern the now-settled hiring case (and highlighted them in blue) so that you can verify that our redactions of these hiring claim inquiries as non-responsive were proper. None of these hiring claim attorney questions relate

in any way to any issue that is still live in this case. It was the parties' express agreement when the hiring case was settled that all discovery regarding hiring would end. We have been advised by the Regional Solicitor that she is very concerned about Oracle's violation of this essential understanding she and David Fortney had, and she will pursue this with David if you do not withdraw your contest on these redactions. We are not going to change the redactions to the interview notes for this recruitment section.

We continue to think that we should get our heads together to discuss this proposal, so please let us know when you are available to talk. If you continue to refuse to speak to us, we will immediately alert the Court to your refusal to meet and confer with us as *repeatedly* instructed by the Court and ask that any motion about our supplemental production be stayed until these discussions occur.

Thanks,
Abby

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Fuad, David <dfuad@orrick.com>

Sent: Monday, July 22, 2019 3:11 PM

To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: RE: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

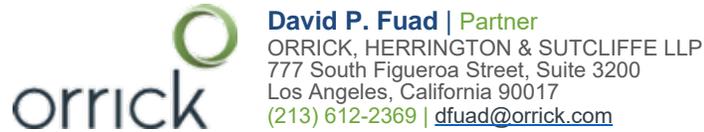
Abigail,

I appreciate OFCCP's attempt to reach agreement but this email simply confirms that is not possible. We have already discussed telephonically everything that OFCCP raises below. For example, it has been OFCCP's position since we began these discussions that its opinion and fact work product are inextricably intertwined. The Court rejected that exact argument mostly recently in the Motion for Reconsideration. On July 18 in response to your request for authority we pointed OFCCP to the Court's July 2 Order, which specifically stated in reference to these notes that not all records of fact are opinion work product. If OFCCP considers that "no contrary

authority whatsoever” then we are clearly at an impasse.

If OFCCP has a materially new proposal that we have not already discussed, please put it in writing by tomorrow and Oracle will consider it.

Best,



From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Monday, July 22, 2019 12:58 PM
To: Fuad, David <dfuad@orrick.com>
Cc: Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Parker, Warrington <wparker@orrick.com>; Grundy, Kayla Delgado <kgrundy@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Song, Charles C - SOL <Song.Charles.C@dol.gov>
Subject: Oracle, Meet and Confer re OFCCP Supplemental Discovery Production, scheduling a call

David,

I am in receipt of your emails sent to me Friday evening. In consideration of the Court's numerous orders instructing the parties to pick up the phone and talk in good faith, I would like to request a call to talk through the remaining issues.

- You are not correct that there is no further opportunity to reach an agreement regarding the 2019 redactions. As an initial matter, this dispute is a distraction from the work of preparing this matter for trial as it is focused on discovery related to anecdotal evidence and not about the systemic discrimination alleged and discussed in our expert's report. OFCCP is eager to engage on this issue so that both parties and the Court can focus our efforts, and because we believe it is our duty to meet and confer in good faith as the court directed. What your position continues to fail to account for is that the attorney *opinion* work product and the *factual* work product you reference, as a matter of practical reality, are intermingled. When we made the redactions, we researched the applicable caselaw and learned, as you must have since you have been able to provide no contrary authority whatsoever,

that attorney questions and script are presumptively attorney *opinion* work product. Nevertheless, in an effort to resolve our disagreement this dispute and avoid spending our time and the Court's time on matters that could be resolved here and now by simple compromises by both parties, we are willing to continue to try to work with you to see if we can distinguish opinion and fact questions more finely here and we have a specific proposal to discuss. As proof of our good faith efforts to reach an agreement with you, we are preparing to send the interview template with a list of questions unredacted as to which we are willing to compromise and samples of interview notes with questions unredacted for your review. We are working to get these to you this afternoon for discussion. In order to move quickly, we request to have a conversation on the phone today or tomorrow as the court has repeatedly encouraged us to do to try to talk through this. Please send us times you are available by phone today and tomorrow.

- We may have reached impasse regarding the race redactions. Race information in the notes would be identifying for all Blacks and Hispanics, and thus contrary to the express terms of the Court's order. Our central concern is that the information we turn over would identify the government informant. We remain willing to hear out any ideas you may have to preserve identity, but at this juncture, we do not see a way to do that.
- As to the 2015 interview notes, we similarly think you are ignoring the express terms of the Court's order: Oracle knows the people OFCCP interviewed during the onsite and has long been on notice that these individuals may have relevant information. Again, the 2015 interviews notes were largely of workers interviewed through appointments with Oracle personnel in 2015. As Norm informed you last week on Wednesday, while we believe that our detailed privilege log meets the Court's order on the issue of OFCCP's assertion of the government's informant privilege we continued to review and, as promised, we will be reproducing notes of interviews of workers that Oracle was not involved in arranging.

It is our sincere hope that Oracle will take a more cooperative posture in this case, so that we may move our focus to the merits of this case. We look forward to hearing from you soon.

Thanks,
Abby

Abigail G. Daquiz
Attorney
U.S. Department of Labor



July 5, 2019

Via Email Only

Mr. Warrington Parker, III
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard St.
San Francisco, CA 94105-2669

Re: *OFCCP v. Oracle America, Inc.*
Case No. 2017-OFC-00006

Dear Warrington,

Enclosed please find OFCCP's Supplemental Responses to Oracle's Second Set of Interrogatories and documents responsive to Oracle's Requests for Production, Set Two, as ordered by Judge Clark. This production includes a supplemental production with documents responsive to Requests for Production Nos. 104, 106, 111, 116, 121, 123, 131, 134, 137, 140, 151, 154, 157, 170, 175, 180, 185, 197, and 202. Without waiving any asserted objections, and in accordance with Judge Clark's Order, OFCCP produces DOL000040023-000041746. OFCCP has no documents to produce in response to Request for Production No. 232 as limited by Judge Clark Order.

As I advised you previously, by necessity, this production will have to be supplemented after OFCCP has the opportunity to review Oracle's recent voluminous document production of just this week and recent weeks. Further, the resource intensive nature, and technological challenges inherent in, redacting such a large volume of attorney work product, along with ensuring appropriate review to ensure that no identifying information is inadvertently disclosed, requires OFCCP to supplement its production of redacted interview notes and accompanying privilege log as that redaction process is finalized. I know you are well aware of these challenges and delays, as Oracle's productions have been rolling with supplements over many months. We prioritized the production of all factual information from responsive interview notes to ensure full production today. The production of the underlying redacted responsive interview notes from conversations with workers will be produced as soon as possible and we expect it will be no later than Friday, July 12, 2019.

As I attempted to discuss with you and your colleagues earlier this week, the production of the redacted attorney notes is a time-intensive process as those documents, once collected from the many authors within the Solicitor's office, must be processed by our litigation support vendor, then reviewed and redacted for privilege, and then processed again for reproduction. In your email of July 4, 2019, without discussing the production with me, you indicated that you will not agree to any additional time for production. You stated that it was unacceptable that there was no date certain for a complete production and that Oracle intends to bring this delay to the court's attention. I am perplexed and disappointed by your office's response to my attempt to discuss a reasonable time-frame for further supplementation. Candidly, I am shocked by the impropriety of your threat to file further motions with the Court without even seeing our production, reviewing it for sufficiency, and meeting and conferring with OFCCP about any concerns you might have with our supplementation. We have long been concerned that these discovery demands were not made or pursued in good faith, but rather to delay the litigation and drain OFCCP's resources. We have worked with you over many months and accepted long delays from Oracle between productions it promised. We expect you to do the same, and abandon the gamesmanship.

As you will see when you review the production today, OFCCP has provided Oracle with the facts it seeks, as the Court ordered. As will now be clear to you, that the factual summaries of interviews, included as responsive to Oracle's Interrogatory No. 49, is the best means of securing the facts elicited from OFCCP's attorneys' contacts with workers. The attorney notes that have and will be produced will be of limited utility because of the work product and informant information protected by the Court's orders.

Sincerely,



Abigail G. Daquiz
Senior Trial Attorney

cc via email: Ms. Connell, Ms. Kaddah, and Mr. Siniscalco
Ms. Bremer, Mr. Garcia, Mr. Miller, Mr. Richardson, Mr. Song

ENC.

From: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>
Sent: Monday, July 8, 2019 11:08 PM
To: Parker, Warrington
Cc: Mantoan, Kathryn G.; Colonna, Daniel P.; Connell, Erin M.; Siniscalco, Gary R.; Fuad, David; Kaddah, Jacqueline D.; Miller, Jeremiah - SOL; Bremer, Laura - SOL; Garcia, Norman - SOL; Song, Charles C - SOL; Grundy, Kayla Delgado
Subject: RE: Oracle, OFCCP's Responses to Second Set RFPs & Supp. Production
Attachments: OFCCP Privilege Log 2019-07-09.pdf; 2019-07-08 COMBINED START DOL000041604.pdf

Counsel,

Attached, please find a revised privilege log and further production responsive to Oracle's Requests for Production. We hope you will take the time to review OFCCP's supplemental responses sent last week on July 5. As we argued to the Court that it would be, it was a burdensome task to respond to the broad interrogatories propounded by Oracle – and the breadth of the requests necessitated the voluminous response (that will need to be supplemented again as OFCCP continues to review Oracle's rolling production). To assist counsel, the Interrogatory responses sent on Friday contain a table of contents that are bookmarked for each interrogatory.

As we attempted to discuss with you last week, we will continue to supplement our responses. We will continue to produce responsive documents, and as the Court's order contemplates, they will be redacted to protect attorney work product and information that would identify government informants. We anticipate producing responsive documents regularly throughout the rest of the litigation as the Court's order has made clear that many documents not normally discoverable must be produced, and those documents are being created all the time. As we told you earlier, in the coming days we expect to have produced all of the attorney notes of the contacts with third parties, summarized in OFCCP's responses to Oracle's Interr. 49, as supplemented. Other documents responsive to Oracle's requests will continue to be processed and produced. In your email of July 6, 2019 you ask if our productions represent full compliance with the Court's order and what remains to be produced, and when such production will be complete. I note that your email was sent before anyone from your firm had even accessed the production. I am concerned that Oracle seems less interested in our production and supplemental discovery responses than it is in having disputes and raising them with the Court at its first opportunity. As I have tried to discuss with your office, compliance with the Court's order will require that OFCCP produce documents throughout the litigation as any communications from third parties are received and as OFCCP takes notes of communications with third parties in preparation for the hearing in this matter. We believe our extensive supplemental responses and production are in compliance with the Court's Order and our discovery obligations. We expect that you will review our productions and responses before attempting to allege any deficiencies with the Court.

Abigail G. Daquiz

U.S. Department of Labor | Office of the Solicitor | 206.757.6753 (direct)

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.

From: Parker, Warrington <wparker@orrick.com>

Sent: Saturday, July 6, 2019 7:42 AM

To: Daquiz, Abigail - SOL <Daquiz.Abigail@dol.gov>

Cc: Mantoan, Kathryn G. <kmantoan@orrick.com>; Colonna, Daniel P. <dcolonna@orrick.com>; Connell, Erin M. <econnell@orrick.com>; Siniscalco, Gary R. <grsiniscalco@orrick.com>; Fuad, David <dfuad@orrick.com>; Kaddah, Jacqueline D. <jkaddah@orrick.com>; Miller, Jeremiah - SOL <Miller.Jeremiah@dol.gov>; Bremer, Laura - SOL <Bremer.Laura@dol.gov>; Garcia, Norman - SOL <Garcia.Norman@DOL.GOV>; Song, Charles C - SOL <Song.Charles.C@dol.gov>

Subject: Re: Oracle, OFCCP's Responses to Second Set RFPs & Supp. Production -- DOCUMENTS (2 of 2)

Given the correspondence of July 3 and 4, we would like to know the following:

1. Do these productions represent full compliance with the Court's orders?
2. If not, what remains to be produced?
3. What is the date by which production will be produced, if the answer to Number 1 is not yes?

Please consider these questions as necessary to a meet and confer.

Sent from my iPad

On Jul 5, 2019, at 22:06, "daquiz.abigail@dol.gov" <daquiz.abigail@dol.gov> wrote:

**You have received 20 secure files
from daquiz.abigail@dol.gov.**

Use the secure links below to download.

Counsel,

This is the second of two emails containing 19 documents (DOL 000041587-000041746). The first set included a cover letter, the privilege log attached with the produced documents, and documents DOL 000040023-41586.

I've included the cover letter for the production in both emails. Please let me know if you have any issues accessing the documents.

Thank you,

Abigail Daquiz
206-757-6753

Secure File Downloads:

Available until: **19 July 2019**

Click links to download:

[2019-07-05 Letter to W. Parker,
Cover to OFCCP Supp
Responses.pdf](#)

262.81 KB, Fingerprint:
b56aa539a8acff128d421e07df39ff1f
([What is this?](#))

[DOL000041587.pdf](#)

248.43 KB, Fingerprint:
4155f9e6e6c49b4932c42a0f7e0987b6
([What is this?](#))

[DOL000041590.pdf](#)

153.16 KB, Fingerprint:
e120e8fa8085a5142f6bf68a5bcd3922
([What is this?](#))

[DOL000041593.pdf](#)

1.06 MB, Fingerprint:
02d64dce598dd2e73ebb892a208c4f4b
([What is this?](#))

[DOL000041613.pdf](#)

407.56 KB, Fingerprint:
8ca977488d0e577b301e2244e3aac70
7 ([What is this?](#))

[DOL000041619.pdf](#)

1005.49 KB, Fingerprint:
689e7520bc4e251c1a83496cfc54f538
([What is this?](#))

[DOL000041628.pdf](#)

872.96 KB, Fingerprint:
c4f82d3245f83cfa4535ee4cb7a6b46
([What is this?](#))

[DOL000041631.pdf](#)

1.09 MB, Fingerprint:
83e4eaf3bfdd6bd4de624387c00117a2
([What is this?](#))

[DOL000041642.pdf](#)

877.03 KB, Fingerprint:
655dcc0f598552f222ccb0c5d8ddc218
([What is this?](#))

[DOL000041646.pdf](#)

1.08 MB, Fingerprint:
6751ce83ce7d7cd41459fd242c60b233
([What is this?](#))

[DOL000041656.pdf](#)

1.20 MB, Fingerprint:
1b7d76d08e4e22685464376a3c40279
4 ([What is this?](#))

[DOL000041667.pdf](#)

462.31 KB, Fingerprint:
cc76fd57bc133c025aabfafa682fc0cb
([What is this?](#))

[DOL000041673.pdf](#)

976.47 KB, Fingerprint:
564c56095729d121f1ed8a253c72cf42
([What is this?](#))

[DOL000041682.pdf](#)

1.62 MB, Fingerprint:
ca284422dcc2c3f54f51cf90e3e4b039
([What is this?](#))

[DOL000041696.pdf](#)

294.52 KB, Fingerprint:
da0e2303db181aadf311dff54dc115d
([What is this?](#))

[DOL000041699.pdf](#)

346.48 KB, Fingerprint:
6e565c9769afaf7bd67bfb2899bbcfe1
([What is this?](#))

[DOL000041713.pdf](#)

1.03 MB, Fingerprint:
e929351110a9e36488665c6728469f22
([What is this?](#))

[DOL000041723.pdf](#)

210.98 KB, Fingerprint:
b7a885a837a814f4dd2280169446f1a3
([What is this?](#))

[DOL000041726.pdf](#)

1.26 MB, Fingerprint:
db042fe005957b5f492a7c00ced31743
([What is this?](#))

[DOL000041737.pdf](#)

1.16 MB, Fingerprint:
4e41a4f994482392d1f5a5d8b2812d89
([What is this?](#))

You have received secure links within this email sent via [Employee Benefits Security Administration Secure File Sharing](#). To retrieve the files, please click on the links above. To learn how your company can benefit from Accellion Secure File Sharing, please visit <http://www.accellion.com>

Secured
by
[Accellion](#)

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



July 22, 2019

Via Email Only

Mr. David Fuad
Orrick, Herrington & Sutcliffe LLP
777 South Figueroa Street, Suite 3200
Los Angeles, California, 90017-5855

Re: *OFCCP v. Oracle America, Inc.*
Case No. 2017-OFC-00006

Dear Mr. Fuad,

Enclosed please find a supplemental production. Specifically, these are interview notes with revised redactions from telephonic interviews taken by OFCCP during the compliance review in 2015 that have been described in detail in OFCCP's privilege log. The other interviewees during the compliance review are all known to Oracle either because Oracle had representatives attended the interviews or arranged for those interviews at Oracle HQ.

Please advise if you have any questions about this production.

Sincerely,

A handwritten signature in blue ink, appearing to read "Abigail G. Daquiz".

Abigail G. Daquiz,
Senior Trial Attorney

cc via email: Ms. Connell, Ms. Kaddah, and Mr. Siniscalco, Ms. Grundy
Ms. Bremer, Mr. Garcia, Mr. Miller, Mr. Richardson, Mr. Song
Enc.