



October 11, 2017

Via E-Mail and Hand Delivery

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

Dear Counsel:

As we have previously discussed, Oracle is producing today both the “database” that the parties have referenced in prior correspondence, as well as additional discovery responsive to the Court’s September 11, 2017 Order Granting in Part and Denying in Part Plaintiff’s Motion to Compel, including relevant employee personal contact information. The “database” is being hand delivered to you today on a hard drive in light of its volume. Oracle’s remaining document production is being produced through the usual FTP process. The files containing employee contact information are being produced both on the hard drive, as well as through a separate FTP electronic production. You will receive two separate emails today containing the FTP productions.

I. Data Export Files

In today’s “database” production, Oracle is producing over 75 data export files containing more than 1,000 data fields, and tens of thousands of accompanying documents. A detailed appendix is attached to this letter, and describes the sources from which these exports were drawn and the population parameters governing these extracts. All of data therein is confidential and produced subject to the Protective Order in this matter. We have endeavored to procure and produce data such that individuals can be identified across various data files through the use of name, employee ID, person ID, and/or party ID.

As I previously advised, and as we discussed this morning, during our QC process we have learned that a narrow range of exports related to the specific issues of pre-2015 offers to college applicants and data regarding employee H1B visa status will need to follow as supplements to this production. We will make our supplemental production related to the pre-2015 offers to college applicants no later than October 20, 2017. We are currently working to confirm a production date for the H1B visa information, and will confirm that date later today.



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II. Contact Information

Also in today's production, Oracle is producing data exports containing personal contact information consistent with the Court's September 11, 2017 order. The "Group I" files contain contact information for employees or former employees who fall within the compensation class. The "Group II" files contain contact information for employees or former employees who fall within the applicant class. Responsive contact information also is contained in the "database" files. This information is confidential and produced subject to both the Protective Order in this matter, as well as subject to the additional protections placed on it in the Court's September 11 order.

While we are providing this contact information as ordered, we believe the parties' agreement to stay discovery while the parties mediate includes OFCCP communicating with these individuals. If you believe differently, please let us know right away so that we can arrange a meet and confer call.

Moreover, even absent a discovery stay, with regards to any individuals who are or were employed in a managerial capacity (as indicated by a managerial job level, beginning with "M"), we expect you will abide by the limits on contact, and content of any contact, set forth in the applicable ethical rules and OFCCP's own guidance regarding notifications and rights to representation (*see* FCCM § 2M00).

We anticipate that you will have clarifying questions about this data once you begin your review, and would be happy to arrange meet and confer calls as appropriate to provide clarification. In the interest of ensuring a productive mediation, we ask that the parties use best efforts to complete any follow-up discussion or clarification regarding any of Oracle's data exports at least 30 days prior to the first mediation session.

Very truly yours,

A handwritten signature in blue ink that reads "Erin Connell".

Erin M. Connell

cc: Gary R. Siniscalco
Warrington Parker
Kathryn G. Mantoan
Jinnifer Pitcher



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APPENDIX

I. Data Pertaining to HQCA Employees in the PRODEV, INFTECH, and SUPP Job Functions

Oracle is producing the following data exports for individuals who were employed at HQCA in the PRODEV, INFTECH, and/or SUPP job function at any point from January 1, 2013 through January 17, 2017, inclusive.

From GSI ¹

- Emp_Personal_Experience_Qualification_Assign_Details.xlsx
- Merged Assignment History, Medicare and Sal Admin.xlsx
- Appraisal_Audit_All_Data.xlsx
- gsi_cwb_details.xlsx
- gsi_cwb_audit.xlsx
- gsi_focal_only_audit.xlsx
- gsi_comp_history.xlsx
- AllEarnings.xlsx
- AllEarnings2.xlsx
- us_audit_adhoc_comp_total.xlsx
- us_audit_adhoc_comp_wf.xlsx
- us_audit_adhoc_comp_wf_attach.xlsx
- Folders containing additional documentation relating to these individuals:
 - adhoc_comp_attach_ATG_GSIAP
 - adhoc_comp_attach_ATG_IMGAP

From Fusion

- Appraisal_Audit_All_Data.xlsx
- Talent_Review_Audit.xlsx
- Talent_Review_Audit_Notes.xlsx
- hcm_wfc_details.xlsx
- hcm_wfc_audit.xlsx

¹ We are also providing "CC Data dictionary.xlsx," a list of cost center/line of business (LOB) codes.

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- Z_PromApproverMtxRpt.xlsx
- Z_PromApproverAttachmentKey.xlsx
- A folder entitled containing additional documentation relating to these individuals:
 - Comp_Attachments

From iRecruitment

- HQCA_IREC_DATA.xlsx
- Folders containing additional documentation relating to these individuals:
 - HQCA_OFR_WF_ATTCH_GSIAP
 - HQCA_OFR_WF_ATTCH_IMGAP
 - Resumes
 - other

From Taleo

- Application Data.xlsx
- Application - Candidate-Skills.xlsx
- Application - CSW History.xlsx
- Application - Education.xlsx
- Application - Experience.xlsx
- Application - History.xlsx
- Application - Source.xlsx
- Candidate - Demographics.xlsx
- Candidate - Languages.xlsx
- Candidate - Referrals.xlsx
- Candidate - Preferences - Job Field.xlsx
- Candidate - Preferences - Location.xlsx
- Candidate - Preferences - Organization.xlsx
- Requisition - Collaborators Data.xlsx
- Requisition - Description and Qualification Data.xlsx
- Requisition - Other Locations.xlsx
- Requisition Data.xlsx
- File Attachments - By Requisition.xlsx
- File Attachments - By Candidate.xlsx
- Folders containing additional documentation relating to these individuals:

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- FILES1

II. Data for HQCA PT1 Applicants and Hires

Oracle is producing the following data exports related to (1) vacancies and requisitions for which an individual was hired between January 1, 2013 and January 17, 2017, inclusive, and was whose hire location was HQCA and (2) college recruits during that same time period (subject to the pre-2015 offers to college applicants issue identified above).

From iRecruitment

- PT1_HQCA_IREC_MAIN.xlsx
- Folders containing additional documentation relating to these requisitions:
 - PT1_HQCA_IREC_WF_ATTACHMENTS
 - Resumes
 - Otherdocs

From Taleo

- Application Data.xlsx
- Application - Candidate-Skills.xlsx
- Application - CSW History.xlsx
- Application - Education.xlsx
- Application - Experience.xlsx
- Application - History.xlsx
- Application - Source.xlsx
- Candidate - Demographics.xlsx
- Candidate - GovtClearance.xlsx
- Candidate - Languages.xlsx
- Candidate - Referrals.xlsx
- Candidate - Preferences - Job Field.xlsx
- Candidate - Preferences - Location.xlsx
- Candidate - Preferences - Organization.xlsx
- Requisition - Collaborators Data.xlsx
- Requisition - Description and Qualification Data.xlsx
- Requisition - Other Locations.xlsx
- Requisition Data.xlsx

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- File Attachments – By Candidate.xlsx
- File Attachments – By Requisition.xlsx
- Folders containing additional documentation relating to these requisitions:
 - Taleo Data - Files - Part1
 - Taleo Data - Files – Part2
 - Taleo Data - Files – Part3
 - Taleo Data - Files – Part4
 - Taleo Data - Files – Part5
 - Taleo Data - Files – Part6
 - Taleo Data - Files – Part7
 - Taleo Data - Files – Part8
 - Taleo Data - Files – Part9
 - Taleo Data - Files - Part10

From RESUMate

- FY13 Last Name A-L Memos.pdf
- FY13 Last Name A-L Text Fields.xlsx
- FY13 Last Name M-Z Memos.pdf
- FY13 Last Name M-Z Text Fields.xlsx
- FY14 Last Name A-L Memos.pdf
- FY14 Last Name A-L Text Fields.xlsx
- FY14 Last Name M-Z Memos.pdf
- FY14 Last Name M-Z Text Fields.xlsx
- FY15 Last Name A-I Memos.pdf
- FY15 Last Name A-I Text Fields.xlsx
- FY15 Last Name J-R Memos.pdf
- FY15 Last Name J-R Text Fields.xlsx
- FY15 Last Name S-Z Memos.pdf
- FY15 Last Name S-Z Text Fields.xlsx
- FY16 Last Name A-I Memos.pdf
- FY16 Last Name A-I Text Fields.xlsx
- FY16 Last Name J-R Memos.pdf
- FY16 Last Name J-R Text Fields.xlsx
- FY16 Last Name S-Z Memos.pdf
- FY16 Last Name S-Z Text Fields.xlsx



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- FY17 Last Name A-I Memos.pdf
- FY17 Last Name A-I Text Fields.xlsx
- FY17 Last Name J-R Memos.pdf
- FY17 Last Name J-R Text Fields.xlsx
- FY17 Last Name S-Z Memos.pdf
- FY17 Last Name S-Z Text Fields.xlsx
- FY18 Last Name A-L Memos.pdf
- FY18 Last Name M-Z Memos.pdf
- FY18 Text Fields.xlsx