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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 ANJE
DODSON IN SUPPORT OF
DEFENDANT ORACLE
AMERICA, INC.'S MOTION TO
SEAL PORTIONS OF THE
EVIDENCE SUBMITTED IN
OFCCP'S OPPOSITION TO
ORACLE'S MOTION FOR
PROTECTIVE ORDER**

I, Anje Dodson, declare as follows:

1. I make this declaration in support of Oracle America, Inc.'s ("Oracle") Motion to Seal Portions of the Evidence Submitted in Support of OFCCP's Opposition to Oracle's Motion for Protective Order, or, in the Alternative, Motion to Strike OFCCP's Expert Analyses. I have personal knowledge of the matters discussed in this declaration or, where stated, base my statements on my review of records kept in the regular course of business by Oracle. If called to testify to the information in this declaration, I could do so competently. Before signing this declaration, I read it carefully to make sure it was accurate, and it is. I was not pressured or required to sign this declaration, and I am providing this declaration voluntarily.

2. I am currently a Senior Vice President of Human Resources at Oracle. I have worked for Oracle for over 20 years. I came up through the ranks at Oracle, having previously

DECLARATION OF ANJE DODSON IN SUPPORT OF ORACLE'S MOTION TO SEAL

held the titles: HR Representative, Senior HR Representative, HR Business Partner, Manager of Human Resources, Senior Manager of Human Resources, Director of Human Resources, Senior Director of Human Resources, and Vice President of Human Resources.

3. Given my current and former roles and long history with Oracle, I am familiar with Oracle’s policies and business practices regarding treatment of current and/or former employees’ confidential information related to their personnel files and similar files housing their private information. I have reviewed the following materials that Oracle seeks to seal and the redacted versions of the same, which are attached as exhibits to the Declaration of Jonathan Riddell in Support of Defendant Oracle America, Inc.’s Motion to Seal Portions of the Evidence Submitted in Support of OFCCP’s Opposition to Oracle’s Motion for Protective Order, or, in the Alternative, Motion to Strike OFCCP’s Expert Analyses.

Riddell Decl. Exhibit	Document Name	Confidential Material
D	Bremer Decl., Ex. G: Expert Rebuttal Report of Ali Saad, Ph.D., August 2019	Personnel information of non-party employees: ¶¶ 28-30 (including Examples 1-3) (fn. 23-24), 48, and p. B3 Identifying information of non-party employees: ¶ 28-30 (fn. 23, 24), and p. B3
E	Bremer Decl., Ex. H: Expert Report of Ali Saad, Ph.D., July 19, 2019	Identifying information of non-party employees: ¶¶ 87, 103 (fn. 70), 106-107, 110 (fn. 79), 111, 115 (fn. 89), and pp. B6-B7

4. The redacted materials in the chart above contain confidential information that was derived from or is stored in the employee personnel and similar files of various current and/or former Oracle employees who are not parties to this litigation—information which Oracle

goes to great lengths to protect—or contain confidential information derived from databases containing personnel information.

5. These materials include information from confidential personnel records related to various current and former employees, and Oracle restricts access to this information. Oracle limits access to these materials because they include personal, private, and highly sensitive employee information, such as compensation information. Oracle respects the privacy interests of its employees and maintains strict confidentiality policies to limit dissemination of information found within employee personnel files. This includes limiting access to personnel information to those who have a legitimate business need to know. One of the ways Oracle achieves this is by restricting access through the use of login credentials that grant viewing and access rights to only those with a legitimate business need to review the information. As an added safeguard, Oracle requires employees to sign agreements that prohibit employees from sharing other Oracle employees' personnel information.

6. The personal privacy interests of the Oracle employees identified in these documents would be directly compromised if the material became public. Not only would the disclosure of these materials amount to an intrusion on their privacy interests, it could also lead to embarrassment, or even harassment by others, including coworkers, or members of the media given the media attention in this case. Equally important, public disclosure of such information would serve to erode employees' confidence in Oracle's commitment to safeguarding their privacy interests.

7. In addition, the materials above are expert materials that identify by name current and/or former Oracle employees. And even in cases where individuals are not mentioned by name, the materials divulge various pieces of information, which on their own and/or in the aggregate, would suffice to expose their identities. The testimony and other evidence, which concerns these employees, is based on data and information Oracle does not share with the public. This information upon which the expert relied and opined on, regarding these individuals

comes from or is housed in Oracle's personnel data that it only shares internally among those with a business need-to-know.

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

Executed in Boise, Idaho on October 25, 2019



Anje Dodson