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OCT 31 2019

UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES

Office of Administrative Law Judges  
San Francisco, Ca

OFFICE OF FEDERAL CONTRACT  
COMPLIANCE PROGRAMS, UNITED  
STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

ORACLE AMERICA, INC.,

Defendant.

OALJ Case No. 2017-OFC-00006

OFCCP No. R00192699

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

I, Jonathan Riddell, declare as follows:

1. I am an attorney with Orrick, Herrington & Sutcliffe LLP, attorneys of record for defendant Oracle America, Inc. ("Oracle"). I make this declaration in support of Oracle'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 ("Motion to Seal"). I have personal knowledge of the facts set forth herein and if called as a witness could competently testify thereto.

2. I have reviewed the materials that Oracle seeks to seal in its Motion to Seal. I have also reviewed the attached versions of the aforementioned documents. The attached versions include redactions covering the information that Oracle both deems confidential and seeks to seal through its motion; more specifically:

DECLARATION OF J. RIDDELL IN SUPPORT OF ORACLE'S MOTION TO SEAL

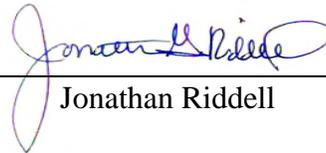
<b>Exhibit</b>	<b>Document Name</b>	<b>Confidential Material</b>
<b>A</b>	Declaration of Laura C. Bremer in Support of OFCCP's Opposition to Oracle's Motion for a Protective Order ("Bremer Decl."), Ex. A: Expert Report of Janice Madden, Ph.D., July 19, 2019	Information about bonus awards: pp. 11, 26 (fn. 15) Information about stock awards: pp. 11, 23-24, 36, 44
<b>B</b>	Bremer Decl., Ex. D: Expert Rebuttal Report of Janice Madden, Ph.D., August 16, 2019	Pay growth data: p. 52 (Table R10)
<b>C</b>	Bremer Decl., Ex. E: Declaration of Janice F. Madden, October 11, 2019	Oracle compensation information: Ex. C
<b>D</b>	Bremer Decl., Ex. G: Expert Rebuttal Report of Ali Saad, Ph.D., August 2019	Oracle compensation information: ¶¶ 38 (fn. 40), 39, 41 Personnel information of non-party employees: ¶¶ 28-30 (including Examples 1-3) (fn. 23-24), 48, and p. B3 Compensation information for specific non-party employees: ¶¶ 28-30 (including Examples 1-3), 37-38, 41, 48, 86 Identifying information of non-party employees: ¶ 28-30 (fn. 23, 24), B3
<b>E</b>	Bremer Decl., Ex. H: Expert Report of Ali Saad, Ph.D., July 19, 2019	Oracle salary, bonus, and equity information: ¶¶ 14, 38-40, 43-44, 46, 51, 53-54, 57-58, 68-69, 71-72, 82, 85-89 (fn. 61), 118, 126, 136-137, 139-41, 162-163, 166 (fn. 129), 186, 190, and pp. C2-C3, C8, E6-E9 Compensation and promotion strategies that relate to specific teams of employees: ¶ 115 (fn. 89, 91) Compensation information for specific non-party employees: ¶¶ 51, 53-54, 68, 71-72, 85-89 (fn. 61), 106-107, 139, 141 Identifying information of non-party employees: ¶¶ 87, 103 (fn. 70), 106-107, 110 (fn. 79), 111, 115 (fn. 89), and pp. B6-B7

3. The materials Oracle seeks to seal include excerpts from the Expert Report of Ali Saad, Ph.D. (July 19, 2019) and the Expert Rebuttal Report of Ali Saad, Ph.D. (August 16, 2019), both of which were produced by Oracle to OFCCP and expressly designated as “Confidential.”

4. On or about April 12, 2019, May 24, 2019, and May 30, 2019, Oracle produced data files containing data related to individuals who worked in HQCA in the Product Development, Support, or Information Technology job functions at some point between January 1, 2013 and January 18, 2019, all of which were expressly designated as “Confidential.”

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

Executed on October 24, 2019, in Sacramento, California.



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Jonathan Riddell