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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

RECEIVED

OCT 17 2019

Office of Administrative Law Judges
San Francisco, Ca

**DECLARATION OF LAURA C. BREMER IN SUPPORT OF OFCCP'S OPPOSITION
TO ORACLE'S MOTION FOR A PROTECTIVE ORDER**

I, Laura C. Bremer, state and declare as follows.

1. I am a Senior Trial Attorney for the U.S. Department of Labor, Office of the Solicitor, and counsel of record for Plaintiff in this action. I submit this declaration in support of OFCCP's Opposition to Oracle's Motion for Protective Order, filed October 11, 2019. I have personal knowledge of the matters set forth in this declaration, and I could and would competently testify thereto if called upon to do so.

2. On October 3, 2019, Dr. Madden sent tables to OFCCP and that same day OFCCP sent Dr. Madden's tables to Oracle, providing advanced warning that OFCCP intended to use said tables during the depositions of Dr. Madden and Dr. Saad.

3. Attached hereto as Exhibit A is a true and correct copy of excerpts from the July 19, 2019 "Analysis of Gender and Racial Differences in Compensation At Oracle, 2013-2018," authored by Dr. Janice F. Madden, PhD.

4. Attached hereto as Exhibit B is a true and correct copy of excerpts from the October 10, 2019 deposition of Dr. Janice F. Madden.

5. Attached hereto as Exhibit C is a true and correct copy of excerpts from the October 11, 2019 deposition of Dr. Ali G. Saad.

6. Attached hereto as Exhibit D is a true and correct copy of excerpts from the August 16, 2019 "Response to Dr. Ali Saad's Expert Report on Gender and Racial Differences in Compensation at Oracle USA," authored by Dr. Janice F. Madden, PhD.

7. Attached hereto as Exhibit E is a true and correct copy of Dr. Madden's October 11, 2019 Declaration and exhibits, introduced as Exhibit 9 to the October 11, 2019 deposition of Dr. Saad.

8. Attached hereto as Exhibit F is a true and correct copy of Wal-Mart Stores Inc.'s Motion to Strike Intervenor TPSA's "Supplemental" Expert Report and Exclude Any Testimony

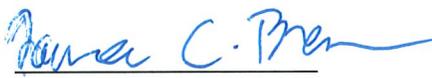
Based On It, *Wal-Mart Stores, Inc. v. Texas Alcoholic Beverage Comm'n*, No. 15-cv-00134 (W.D. Tx., filed Jan. 27, 2017) (ECF No. 185).

9. Attached hereto as Exhibit G is a true and correct copy of Dr. Saad's Rebuttal Expert Report.

10. Attached hereto as Exhibit H is a true and correct copy of Dr. Saad's Initial Report.

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

Executed on October 17, 2019 in San Francisco, California.


LAURA C. BREMER