

JANET M. HEROLD
Regional Solicitor
JEREMIAH E. MILLER
Counsel for Civil Rights
LAURA C. BREMER
Senior Trial Attorney
Office of the Solicitor
UNITED STATES DEPARTMENT OF LABOR
90 7th Street, Suite 3-700
San Francisco, California 94103
Tel: (415) 625-7757
Fax: (415) 625-7772
Email: bremer.laura@dol.gov

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AUG 29 2019

Office of Administrative Law Judges
San Francisco, Ca

**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.

Case No. 2017-OFC-00006

**DECLARATION OF LAURA C. BREMER IN SUPPORT OF OFCCP'S MOTION
REQUESTING BRIEFING REGARDING ORACLE'S NEWLY PRODUCED
PRIVILEGE LOG IDENTIFYING COMPENSATION ANALYSES AND
RELATED DOCUMENTS**

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 Motion Requesting Briefing Regarding Oracle's Newly Produced Privilege Log Identifying Compensation Analyses and Related Documents. 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 August 28, 2019, Oracle filed a privilege log. I reviewed the new privilege log and noted that it includes (1) documents that both pre-date and post-date the date ranges of the documents included in Oracle's Categorical Privilege Log, (2) lists names of individuals in the "from," "to," and "cc" columns that were not listed as "Sender(s)/Recipient(s)/Copyee(s)/Custodians" on Oracle's Categorical Privilege Log; and (3) provides descriptions of documents not included on Oracle's Categorical Privilege Log.

3. On August 29, 2019, I called Erin Connell and met and conferred with her regarding this motion. During our telephone call, Ms. Connell stated that Oracle would oppose a motion for further briefing and requesting *in camera* review. She noted that the Court has discretion to order *in camera* review.

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

Executed on August 29, 2019 in San Francisco, California.

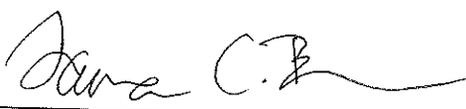

LAURA C. BREMER

CERTIFICATE OF SERVICE

I certify that on this 29th day of August 2019, (1) OFCCP's Motion Requesting Briefing Regarding Oracle's Newly Produced Privilege Log Identifying Compensation Analyses and Related Documents and (2) Declaration of Laura C. Bremer in Support of OFCCP's Motion Requesting Briefing Regarding Oracle's Newly Produced Privilege Log Identifying Compensation Analyses and Related Documents were served upon the following individuals by email at the following addresses:

Erin Connell (econnell@orrick.com)
Gary Siniscalco (grsiniscalco@orrick.com)
Warrington Parker (wparker@orrick.com)
John Giansello (jgiansello@orrick.com)
Kayla Grundy (kgrundy@orrick.com)
Jacqueline Kaddah (jkaddah@orrick.com)
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669

Attorneys for Defendant Oracle America, Inc.



LAURA C. BREMER
U.S. Department of Labor