



Via E-Mail

The Honorable Richard M. Clark
OFFICE OF ADMINISTRATIVE LAW JUDGES
U.S. Department of Labor
90 7th Street, Room 4-815
San Francisco, CA 94103-1516

Re: July 7, 2020 Order Regarding Format of Exhibits

Dear Judge Clark:

Pursuant to the July 7, 2020 Order permitting the parties to resubmit exhibits in PDF or a Microsoft Suite Form, OFCCP submits plaintiff's trial exhibits with the original number, and an "A" added to indicate that the exhibits have been amended:

- PX434A (backup files for Madden report)
- PX435A (backup files for Madden rebuttal)
- PX469A (backup files for Saad Report)
- PX470A (backup files for Saad Rebuttal)

Consistent with the Court's instructions, all of the documents included in the zip files for the above exhibits are in either PDF or Excel formats. PX434A, PX435A, PX469A, and PX470A contain documents that were originally in Excel or PDF format, as well as the documents originally in other formats that have been converted.

OFCCP converted all of the documents in PX434 and PX435 that were not already in PDF or Excel formats into those formats. The converted PDF and Excel documents in PX434A and PX435A have the same names as the original documents in PX434 and PX435 with the following exceptions in PX435A:

1. The STATA .dta file "I_EarningsAll" was too large to convert into one Excel file, since it exceeded Excel's record limit. Consequently, OFCCP converted the STATA .dta file "I_EarningsAll" into four separate Excel documents with the file names: I_EarningsALL_PART1, I_EarningsALL_PART2, I_EarningsALL_PART3, and I_EarningsALL_PART4.
2. PX434 contained both a .dta dataset and an Excel file with the same name: "EducationLookups." When it converted EducationLookups.dta into Excel format, OFCCP named it "EducationLookups-dta" to distinguish it from the original Excel file named "EducationLookups."
3. Similarly, PX434 contained both a .dta dataset and an Excel file with the name "Jobdescriptors." When it converted "Jobdescriptors.dta" into Excel format, OFCCP renamed it "Jobdescriptors-dta."

OFCCP converted .sas files (including all SAS datasets) and .txt files in PX469 and PX470 into Excel. However, some of the documents within PX469 and PX470 already included multiple formats. For example, where the original exhibit included SAS program files and SAS .log files in PDF format, OFCCP included the original SAS .log files in PDF format in exhibits PX469A and PX470A, but did not convert (or include in PX469A and PX470A) the SAS files with the same name. PX469A and PX470A maintain the same folder structure as the original exhibits.

If you have any questions or would like additional information regarding these amended exhibits, please let us know.

Respectfully Submitted,

Laura C. Bremer

Laura C. Bremer
Counsel for Civil Rights
Office of the Solicitor
Department of Labor