

**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 LINDA  
ZHAO IN SUPPORT OF  
DEFENDANT ORACLE  
AMERICA, INC.'S OPPOSITION  
TO OFCCP'S MOTION TO  
COMPEL AND FOR ORDER  
SETTING PRODUCTION  
SCHEDULE**

I, LINDA ZHAO, hereby declare as follows:

1. I am the Senior Director for the Oracle Applications Labs (hereinafter "OAL"). I make this declaration in support of Oracle's Opposition to OFCCP's Motion to Compel and Order Setting Production Schedule. I have personal knowledge of the facts set forth herein, and if called as a witness could competently testify thereto.

2. The OAL team has been tasked with extracting various types of data from various Oracle databases and putting it in an exportable format for use and production in the above-titled matter.

3. The OAL team has been instructed that this data extract project is of the highest priority and is needed as soon as possible. Working on this project has caused major disruptions to the OAL team and caused them to shift their priority from working on other projects that are central to Oracle's operations and business. To meet the urgent demand, Oracle has dedicated

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**Exhibit P-277**

ten OAL team members, most of whom have worked on this project full time when needed and as a top priority because it is both complex and large in scope. We began the project on July 7, 2017, and it is still in progress. As of today we have spent approximately 360 person hours on this project.

4. The scope of the data request is very large and involves pulling over several hundred of fields of data for over 12,000 employees and many thousands of applicants over a four-year period.

5. The project is complex because OAL must pull the requested data from multiple databases and modules. The data requested resides in three databases, Taleo (Oracle Public Cloud Service), Human Capital Management (HCM) Fusion (Oracle Public Cloud Service), and Global Single Instance (GSI on-premise instance), and across eleven modules within the Taleo, GSI and HCM databases. The numerous modules within Taleo, GSI and HCM from which OAL must pull data include Taleo Recruiting, Core HR, iRecruitment, Payroll, Workflow, Compensation Workbench, Workforce Compensation, Talent Review, Performance Appraisal, Candidate Offers, and Manager Self Service.

6. There are no reporting functions in the relevant databases and modules that would provide the exact data requested. So to gather the data, the OAL team must draft various programming scripts to extract the varied data requested from the myriad locations in which it resides. The scripts are drafted by the most senior team members and reviewed by the managers. To date, OAL has drafted about 50 scripts and projects it will have to write at least a few more before the close of the project.

7. In general, the process of writing scripts to extract the requested data includes analyzing the request and identifying the different modules that must be used to gather the data (Taleo Recruiting, Core HR, iRecruitment, Payroll, Workflow, Compensation Workbench, Workforce Compensation, Talent Review, Performance Appraisal, Candidate Offers, and Manager Self Service), assigning tasks to various individuals handling the respective modules,

creating an employee list to tailor the extract to only the relevant individuals, and sharing that employee list with other module owners to begin the process of pulling the relevant information.

The types of scripts OAL has drafted include:

- a. Employee/Applicant List: To gather data for the relevant individuals OAL wrote scripts to create an employee list to limit the extract by geography and job function. This was a multi-step process. First, OAL wrote a script that limited the extract to employees and applicants at Redwood Shores or Redwood City, California. Next, OAL wrote a script to identify which employees or applicants were assigned or applied to the Product Development, Information Technology, or Support lines of business.
- b. Personnel Details: OAL has written and is continuing to refine/finalize a script to extract all the requested personnel data for the individuals on the employee list.
- c. Assignment Details: OAL has written and is continuing to refine/finalize numerous scripts to extract assignment details for the individuals on the employee list. To do this, OAL has written and is continuing to refine/finalize different scripts to gather various data associated with employment information, office details, basic applicant detail, background-check status, basic benefits information, and hire and termination details.
- d. iRecruitment Data: To extract the data requested from the iRecruitment module, OAL has written and is continuing to refine/finalize different scripts to extract the data from the various data fields within iRecruitment. This included writing scripts to extract the various data associated with vacancy detail, applicant employment history, applicant phone number, applicant profile, applicant qualifications, education, school, experience, jobs applied for, and applicant offer and compensation details in the offer (whenever an

offer for employment was extended), and file names of any attachments within iRecruitment such as resumes, cover letters, or letters of recommendation.

- e. Workflow: To extract the data requested from the Workflow module OAL has written and is continuing to refine/finalize a script to extract the various data associated with offer and ad hoc compensation approval history with any related comments within the module.
- f. Payroll: To extract the requested payroll data, OAL has written and is continuing to refine/finalize different scripts to gather various data associated with salary history, assignment history, Medicare wages, and other compensation details including bonus and equity information.
- g. Compensation Workbench: To extract the data requested from the Compensation Workbench module, OAL has written and is continuing to refine/finalize different scripts to gather various data associated with all annual focal and equity history data, all rankings, ratings, and notes, related approval, and audit history including persons and the dates associated with the change/approval.
- h. Workforce Compensation: To extract the data requested from the Workforce compensation module in Fusion, OAL has written and is continuing to refine/finalize different scripts to gather various data associated with all annual focal and equity history data, all rankings, ratings, and notes, related approval, and audit history including persons and the dates associated with the change/approval.
- i. Performance Appraisal: To extract the data requested from the Performance Appraisal module, OAL has written and is continuing to refine/finalize scripts to extract various data associated with the appraisal data for the individuals on

the employee list, all ratings, final talent ratings, questionnaires that employee and managers and 3rd party participants enter, and comments regarding an employee within the module.

- j. Talent Profile: To extract the data requested from the Talent Profile module, OAL has written and is continuing to refine/finalize different scripts to extract various data associated with any notes within the module, along with any given tasks listed in the module, and all assigned Talent Profile ratings.
  - k. Taleo Recruiting: To extract the data requested from the Taleo database OAL has written and is continuing to refine/finalize various scripts to extract various data associated with the vacancy detail, applicant employment history, applicant phone number, applicant profile, applicant qualifications, education, school, and applicant experience. OAL is still developing a means to extract the associated documents from Taleo, such as resume, cover letter, and letters of recommendation with help from Taleo Product Development team due to limitation of the current version of the Taleo product. This has been a learning experience for Taleo Product Development, as it has never had to do this before for any customers.
  - l. Manager Self Service: To extract the data requested from Manager Self Service module in GSI, OAL has written and is continuing to refine/finalize different scripts to extract various data associated with Ad hoc compensation changes and approvals through Manager Self Service
  - m. Manager Action in Fusion: To extract the data requested from Manager Action module in Fusion, OAL has written and is continuing to refine/finalize different scripts to extract various data associated with Ad hoc compensation changes and approvals through Manager Action in Fusion.
8. All the scripts have common fields such as employee name or employee

identification number or applicant number that can be used to link the data across multiple Excel spreadsheets so the data can be presented in a readable format.

9. After extracting the data into spreadsheets, OAL must then perform a quality control review by running the scripts to determine if the correct data is returned and if the mapping function properly links each piece of data extracted to each other piece, across the common fields, by employee name and/or employee identification number.

10. After the test scripts are run, my team must coordinate with Oracle's counsel to ensure that the data is presented in a logical, readable format and that it includes the information requested by OFCCP. This has and will likely continue to result in changes to the scripts and has made it necessary to revise and rerun various exportable spreadsheets.

11. To date, my team has spent over 360 person hours working on this project to pull data from January 1, 2013 through January 17, 2017, not to mention time spent by the Taleo Product Development team. I anticipate it will take many more hours to complete this phase alone. In light of the scope of this project, the fact that there are a number of scripts that are still yet to be written, and the amount of quality control review that still needs to be conducted, this project cannot be completed by September 1, 2017. I do not believe it is feasible to complete this project prior to October 1, 2017.

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

Executed in Redwood City, California, on August 25, 2017.

  
LINDA ZHAO

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