

1 GARY R. SINISCALCO (STATE BAR NO. 64770)
grsiniscalco@orrick.com
2 ERIN M. CONNELL (STATE BAR NO. 223355)
econnell@orrick.com
3 KATHRYN G. MANTOAN (STATE BAR NO. 239649)
kmantoan@orrick.com
4 ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard Street
5 San Francisco, CA 94105-2669
Telephone: 415-773-5700
6 Facsimile: 415-773-5759

7 JESSICA R. PERRY (STATE BAR NO. 209321)
jperry@orrick.com
8 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
9 Menlo Park, California 94025
Telephone: 650-614-7400
10 Facsimile: 650-614-7401

11 Attorneys for Defendant
ORACLE AMERICA, INC.

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SAN MATEO

16 RONG JEWETT, SOPHY WANG, XIAN
MURRAY, ELIZABETH SUE PETERSEN
17 MARILYN CLARK, AND MANJARI KANT,
individually and on behalf of all others
18 similarly situated,

19 Plaintiffs,

20 v.

21 ORACLE AMERICA, INC.,

22 Defendant.

Case No. 17CIV02669

**DEFENDANT ORACLE AMERICA,
INC.'S RESPONSES AND
OBJECTIONS TO PLAINTIFFS' FIRST
SET OF FORM INTERROGATORIES -
EMPLOYMENT LAW**

Trial Date: Not Set

Date Action Filed: June 16, 2017

24 PROPOUNDING PARTY: Plaintiffs RONG JEWETT, SOPHY WANG, XIAN MURRAY,
25 ELIZABETH SUE PETERSEN, MARILYN CLARK, AND
MANJARI KANT

26 RESPONDING PARTY: Defendant ORACLE AMERICA, INC.

27 SET NUMBER: One (No. 217.1)
28

ORACLE'S RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF FORM INTERROGATORIES - EMPLOYMENT LAW

4131-7942-0694

Exhibit P-304

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Pursuant to Code of Civil Procedure Sections 2030.210, *et seq.* Defendant Oracle
3 America, Inc. (“Defendant” or “Oracle”) hereby submits the following responses and objections
4 to Plaintiffs’ Form Interrogatories—Employment Law to Defendant Oracle America, Inc. (Set
5 One), served on counsel for Oracle on August 6, 2018. These responses and objections are timely
6 served pursuant to the extension from Plaintiffs’ counsel memorialized in writing on August 28,
7 2018.

8 **PRELIMINARY STATEMENT**

9 Oracle has not completed its investigation of the facts related to this case and the
10 following response is, therefore, preliminary. Further discovery, investigation and research may
11 produce additional relevant facts that may change the response set forth below. Although this
12 response is complete to the best of Oracle’s knowledge, this response is given without prejudice
13 to Oracle’s right to produce at the time of trial or beforehand additional relevant evidence that
14 may come to light regarding the issues raised in this lawsuit. Oracle reserves the right to amend
15 its objections and response.

16 **RESPONSE TO FORM INTERROGATORIES**

17 **FORM INTERROGATORY NO. 217.1:**

18 Is your response to each request for admission served with these interrogatories an
19 unqualified admission? If not, for each response that is not an unqualified admission:

20 (a) state the number of the request;

21 (b) state all facts upon which you base your response;

22 (c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have
23 knowledge of those facts; and

24 (d) identify all DOCUMENTS and other tangible things that support your response and
25 state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT
26 or thing.

27 **RESPONSE TO FORM INTERROGATORY NO. 217.1:**

28 Subject to and without waiving the foregoing objections, Oracle responds:

- 1 -

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(d) None.

Dated: September 19, 2018

GARY R. SINISCALCO
JESSICA R. PERRY
ERIN M. CONNELL
KATHRYN G. MANTOAN
Orrick, Herrington & Sutcliffe LLP

By: 
ERIN M. CONNELL
Attorneys for Defendant
ORACLE AMERICA, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION

I, Rich Allison, declare I am the Senior Vice President, Global Practices and Risk Management, for Oracle America, Inc., and am authorized to make this verification on its behalf.

I have read the following:

**DEFENDANT ORACLE AMERICA, INC.'S RESPONSES AND OBJECTIONS
TO PLAINTIFFS' FIRST SET OF FORM INTERROGATORIES -
EMPLOYMENT LAW**

and know its contents. I am informed and believe that the matters stated therein are true and on that ground declare under penalty of perjury under the laws of the State of California that the same are true and correct and that this verification was executed on September 18, 2018 in

Redwood City, California.



Rich Allison

VERIFICATION

4131-7942-0694