

**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

**DEFENDANT ORACLE
AMERICA, INC.'S
SUPPLEMENTAL COUNTER-
DESIGNATIONS TO
PLAINTIFF'S DEPOSITION
DESIGNATIONS OF JOYCE
WESTERDAHL**

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Office of Administrative Law Judges
San Francisco, Ca

DEFENDANT'S SUPPLEMENTAL COUNTER-DESIGNATIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS

CASE NO. 2017-OFC-00006

Pursuant to 29 C.F.R. § 18.55, Oracle America, Inc. ("Oracle") hereby provides supplemental counter-designations of deposition testimony of Joyce Westerdahl. Oracle maintains its objections and counter-designations identified in its original counter-designations and objections filed by OFCCP on December 4, 2019. Oracle submits this supplement addressing testimony offered by OFCCP during the course of the hearing.

A. Joyce Westerdahl, Executive Vice President of Human Resources, May 30, 2019

Oracle objects that OFCCP has designated testimony that lacks foundation (Westerdahl Dep. Tr. 74:24-75:16), as established by Ms. Westerdahl's own testimony (*id.* 75:17-22). Oracle further objects that OFCCP has designated testimony regarding issues protected by the attorney-client privilege. (*Id.* 221:4-223:14.)

Oracle's Supplemental Counter-Designations

337:14-338:25

December 13, 2019

Respectfully submitted,

GARY R. SINISCALCO
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