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Via E-Mail

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**Re: OFCCP v. Oracle America, Inc., OALJ Case No. 2017-OFC-00006
Additional Information re Previously Produced Data**

Dear Laura:

I write with a point of clarification regarding the “PEOPLE_HIERARCHY_DATA” (column BR¹) and “Supervisor_Name” (column W) fields in the Emp Assignment information tabs of ORACLE_HQCA_0000070738, 581395, 581396, and 597172 (file names “Emp_Personal_Experience_Qualification_Assign_Details.xlsx,” “Emp_Personal_Experience_Qualification_Assign_Details_Supplemental_Production,” “Emp_Personal_Experience_Qualification_Assign_Details_Supplemental_Updated_Population,” and “Emp_Personal_Experience_Qualification_Assign_Details_Historical_Population”).

It is our understanding that the entries in “Supervisor_Name” are generally historically accurate and reflect a given employee’s first-level manager between the corresponding “EFFECTIVE_START_DATE” (column D) and “EFFECTIVE_END_DATE” (column E). Consider a hypothetical Employee X and her first-level manager, Manager Y. A new record/row is generally generated for Employee X any time Employee X’s first-level manager (“Supervisor_Name”) changes (*e.g.*, from Manager Y to Manager Z), with the values in other fields captured that were in place as of the “EFFECTIVE_END_DATE”. However, if Employee X keeps reporting to Manager Y and yet Manager Y’s manager changes, that change in and of itself will generally not generate a new record/row for Employee X (though it generally will for

¹ In ORACLE_HQCA_0000597172, the “PEOPLE_HIERARCHY_DATA” field is in column BQ.



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Manager Y, since her first-level manager changed). Thus, the entries in the “PEOPLE_HIERARCHY_DATA” field may not be fully historically accurate for those time periods where Employee X is reporting to Manager Y. This is because there can be instances where Manager Y’s reporting structure has changed, and yet nothing else may have changed with regard to any of the other values in tab Emp Assignment information for Employee X that would generate a new record/row for Employee X.

For example, the data for [REDACTED] (PERSON_ID [REDACTED]) in ORACLE_HQCA_0000070738 indicates that his “Supervisor_Name” was [REDACTED] (PERSON_ID [REDACTED]) from [REDACTED] through [REDACTED]. For rows 4963-4965 for [REDACTED], the three left-most values in the “PEOPLE_HIERARCHY_DATA” field during this time period are:

EFFECTIVE START DATE	EFFECTIVE END DATE	PEOPLE_HIERARCHY_DATA
[REDACTED]	[REDACTED]	[REDACTED]

Starting on the next row chronologically (row 4962), the three left-most values in the “PEOPLE_HIERARCHY_DATA” field are:

EFFECTIVE START DATE	EFFECTIVE END DATE	PEOPLE_HIERARCHY_DATA
[REDACTED]	[REDACTED]	[REDACTED]

Meanwhile, if one looks to the data for [REDACTED], rows 3746-3752, one sees the following “Supervisor_Name” entries for [REDACTED] and associated “EFFECTIVE_START_DATE” and “EFFECTIVE_END_DATE” values:



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EFFECTIVE START DATE	EFFECTIVE END DATE	Supervisor_Name
[REDACTED]		

Thus, the data for [REDACTED] reflects that he reported during this time period to [REDACTED] between [REDACTED] and [REDACTED]; to [REDACTED] between [REDACTED] and [REDACTED]; to [REDACTED] between [REDACTED] and [REDACTED]; and to [REDACTED] from [REDACTED] forward. [REDACTED] data, and the "PEOPLE_HIERARCHY_DATA" fields therein, do not reflect [REDACTED] five-month period of reporting to (in turn) [REDACTED], [REDACTED], and [REDACTED]. That information can, however, be seen in [REDACTED] data. You may already have identified this issue on your own review of the data, but we note it here in the interest of clarity.

Sincerely,

Kathryn G. Mantoan