

Clerk of the

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

8

9

10

11

12

13

14

15 16

17

18

19

20 21

22 23

24 25

26

27 28 CALIFORNIA CIVIL RIGHTS DEPARTMENT,

Plaintiff,

VS.

CISCO SYSTEMS, INC,

Defendant.

Case No.: 20CV372366

ORDER RELATED TO INFORMAL DISCOVERY CONFERENCE

Date:

November 15, 2024

Dept:

Judge: Hon. Amber S. Rosen

On November 15, 2024, Rumduol Vuong and Brett Watson, counsel for Plaintiff California Civil Rights Department (CRD) and Nicholas Horton, counsel for Defendant Cisco. had an informal discovery conference with the Honorable Amber Rosen and agreed that the Court would issue an order after full discussion of the parties' positions regarding Requests 24, 25, 31, 32, 35, 37, 39-44, and 70 of CRD's Request for Production of Documents, Set One. After considering the papers and arguments of the parties, the Court issues the following order:

## 1. RFPs 24 and 25

With respect to the requests for communications, from January 1, 2012 to the present (or any other time period agreed to by the parties), about discrimination or harassment on the basis of caste, Cisco will use the following search terms to locate such communications among the Candid Team: (1) color or dark w/15 skin; (2) skin w/15 discrimination or retaliation or harassment; (3) caste!; (4) untouchab! or outcast; (5) India or Indian w/15 discrimination or

retaliation or harassment; (6) Dalit; (7) Hindi or Hindu! w/15 class; (8) ancestry w/15 discrimination or retaliation or harassment; and (9) Brahmin or Kshatriya or Vaishya or Shudras. Cisco will use the following search terms to locate such communications among the HR/ER staff: (1) caste! w/15 FEHA or Title VII or policy or policies or train! or complain! or disclos!; and (2) Dalit or Brahmin or Kshatriya or Vaishya or Shudras or untouchab! or outcast.

Once the searches are done, Cisco will turn over those documents responsive to the request for "COMMUNICATIONS . . . about discrimination or harassment on the basis of caste, including but not limited to, internal COMMUNICATIONS and COMMUNICATIONS with PERSONS outside of CISCO."

#### 2. RFPs 31, 32, 35, 37, 39-44

Cisco shall turn over, for each request, disciplinary and counseling records for each of the named employees for the time period indicated.

### 3. RFP 70

CRD's request is denied, except that Cisco will provide to CRD additional information regarding the complaints, charges, arbitrations, and lawsuits (hereinafter referred to as "complaints") against CISCO alleging discrimination, or harassment, or retaliation, based on Indian origin or Indian ancestry or Hinduism that were found but did not sound in caste. Such additional information will include a general description of why the complaints were not responsive to the request and may, but won't necessarily, include the number of such complaints made. CRD is not prevented by this ruling from bringing a further motion to compel regarding the complaints based on Indian origin or Indian ancestry or Hinduism.

IT IS SO ORDERED.

4 Dated: Nov. 15, 2024

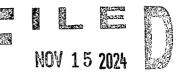
Amber Rosen

Hon. Amber Rosen
Judge of the Superior Court



# SUPERIOR COURT OF CALIFORNIA COUNTY OF SANTA CLARA

DOWNTOWN COURTHOUSE 191 NORTH FIRST STREET SAN JOSÉ, CALIFORNIA 95113 CIVIL DIVISION



RE:

California Department Of Fair Employment And Housing et al vs Cisco Systems,

Inc. et al

Case Number:

20CV372366

#### **PROOF OF SERVICE**

**ORDER RELATED TO INFORMAL DISCOVERY CONFERENCE** was delivered to the parties listed below the above entitled case as set forth in the sworn declaration below.

If you, a party represented by you, or a witness to be called on behalf of that party need an accommodation under the American with Disabilities Act, please contact the Court Administrator's office at (408) 882-2700, or use the Court's TDD line (408) 882-2690 or the Voice/TDD California Relay Service (800) 735-2922.

DECLARATION OF SERVICE BY MAIL: I declare that I served this notice by enclosing a true copy in a sealed envelope, addressed to each person whose name is shown below, and by depositing the envelope with postage fully prepaid, in the United States Mail at San Jose, CA on 11/15/2024. CLERK OF THE COURT, by Felicia Samoy, Deputy.

cc: Lynne C. Hermle Orrick Herrington & Sutcliffe LLP 1000 Marsh Road Menlo Park, CA 94025-1015 Alex Hernaez 345 California St. Suite 2200 San Francisco, CA 94104

Timothy Carl Travelstead Narayan Travelstead P.C. 7901 Stoneridge Drive, Ste 230 PLEASANTON, CA 94588

Ryan McCarl 2219 Main Street #144 San Monica, CA 90405

Jamie Lorraine Crook California Civil Rights Department 651 Bannon Street, Suite 200 Sacramento, CA 95811