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FILED
NOV 15 2024

Clerk of the Court
Superior Court of CA County of Santa Clara
F. SAMOY DEPUTY

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA

CALIFORNIA CIVIL RIGHTS DEPARTMENT,

Plaintiff,

vs.

CISCO SYSTEMS, INC,

Defendant.

Case No.: 20CV372366

**ORDER RELATED TO INFORMAL
DISCOVERY CONFERENCE**

Date: November 15, 2024
Dept: 16
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

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

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

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

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

13 3. RFP 70

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

22 **IT IS SO ORDERED.**

23
24 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 JOSE, CALIFORNIA 95113
CIVIL DIVISION

FILED
NOV 15 2024
Clerk of the Court
Superior Court of CA County of Santa Clara
BY F. SAMOY DEPUTY

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
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