OFFICE OF ADMINISTRATIVE LAW JUDGES
U.S. DEPARTMENT OF LABOR
WASHINGTON, D.C. 20001

In the Matter of

U.S. DEPARTMENT OF LABOR, OFFICE OF APPRENTICESHIP TRAINING, EMPLOYER AND LABOR SERVICES, Prosecuting Party, v. CALIFORNIA DEPARTMENT OF INDUSTRIAL RELATIONS, Respondent.	)	Case No. 2002-CCP-1

In the Matter of

U.S. DEPARTMENT OF LABOR, OFFICE OF APPRENTICESHIP TRAINING, EMPLOYER AND LABOR SERVICES, Prosecuting Party, v. CALIFORNIA APPRENTICESHIP COUNCIL, Respondent.	)	Case No. 2003-CCP-1

PROSECUTING PARTY'S MOTION TO COMPEL

Pursuant to 29 C.F.R. §§ 18.6(d) and 18.21 (2002), Prosecuting Party Office of Apprenticeship Training, Employer and Labor Services ("OATELS") hereby moves to compel Respondents California Department of Industrial Relations ("CDIR") and California

Apprenticeship Council ("CAC") to provide sufficient answers to certain of OATELS' January 17, 2002 discovery requests. OATELS has conferred with CDIR and provided CDIR and CAC with written clarification of the insufficiently answered requests. Although OATELS regards both respondents' answers to many other requests as insufficient, OATELS requests the ALJ's intervention only where undersigned counsel have reasonably concluded that further requests would be futile. OATELS will continue to seek sufficient responses to its other requests through further discovery and informal resolution, and will submit further motions to compel only as a last resort.

On March 17, 2003, OATELS served a separate copy of its requests on CAC's counsel, even though CAC was not admitted to this case until May 21, because he declared that the requests to CDIR did not apply to CAC and that his client would not respond unless the requests were addressed to CAC.[1] On March 18, CDIR responded to OATELS' requests. On March 27, OATELS' counsel conferred with CDIR's counsel in an effort to secure more complete responses informally. On April 7, OATELS gave CDIR a detailed written request for more sufficient responses and served a copy on CAC's counsel. On April 14, CAC responded to OATELS' discovery requests, and on April 17, CDIR replied to OATELS' informal request for sufficient responses.

On May 1, in lieu of production of documents and responses to certain interrogatories, CDIR simply permitted an agent of OATELS to copy 14,712 pages of documents, which were Bates-stamped for ease of reference. OATELS received this material the following week.

[1] On June 10, 2003, the ALJ's clerk informed undersigned counsel that CAC's April 25 request for a hearing had been docketed as Case No. 2003-CCP-1 and consolidated with CDIR's pending appeal, effective May 21.

Although OATELS had specifically asked CDIR to label each set of responsive documents by discovery request number, CDIR did not provide such identification, or label, organize, or index the documents in any way related to the discovery requests.[2] Because OATELS still considers certain of CDIR's and CAC's responses to be insufficient, OATELS now moves to compel.[3]

After discussing CDIR's and CAC's failure to provide the required specific justifications for their asserted privileges and/or objections, this motion sets out each discovery request in question, the insufficient CDIR and/or CAC response, OATELS' explanation of the insufficiency of CDIR's response, and CDIR's reply.[4] The motion then explains why the applicable response(s) is/are insufficient.

I. CDIR AND CAC HAVE WAIVED THEIR ASSERTED OBJECTIONS AND PRIVILEGES BY NOT SPECIFICALLY JUSTIFYING THEM.

The OALJ practice and procedure rules governing this proceeding, see 29 C.F.R. § 18.l, provide that reasons shall be stated for objections to interrogatories and requests for production, §§18.18(b), 18.19(e)(2). The Federal Rules of Civil Procedure, on which the OALJ rules are based, state that "[a]ll grounds for an objection to an interrogatory shall be stated with specificity. Any ground not stated in a timely objection is waived unless the party's failure to

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[2] For OATELS' request for labeling by discovery request number, see letter from Charles D. Raymond, Esq., Associate Solicitor for Employment and Training Legal Services, to John M. Rea, Esq., Chief Counsel, CDIR ("OATELS' Request for Clarification") at 1 (Apr. 7, 2003), attached as "Appendix ("App.") A."

[3] CDIR's June 13, 2003 status report states that the agency will provide access to audio tapes and additional documents and has assembled additional documents for production. To date, CDIR has neither produced additional materials nor contacted us to arrange copying of them, even though these materials were due, with the rest of CDIR's responses, on March 18.

[4] As noted above, CAC received a copy of OATELS' request to CDIR for more sufficient responses a week before submitting its own responses to OATELS' discovery responses. Because CAC's responses were so uninformative, OATELS decided that informal resolution would be futile and would fruitlessly delay this proceeding.

object is excused by the court for good cause shown."[5] Fed. R. Civ. P. 33(b)(4); see also id. Advisory Committee Notes, 1993 Amendments, Subdivision (b), para. 2 ("objections must be specifically justified"); Burns v. Imagine Films Entertainment, Inc., 164 F.R.D. 589, 593 (W.D.N.Y. 1996) ("objections to interrogatories must be specific and supported by detailed explanation of why the interrogatories are objectionable"); McLeod, Alexander, Powell & Apffel v. Quarles, 894 F.2d 1482, 1485 (5th Cir. 1990) (applying same standard to objections to production requests).

A similar requirement applies to claims of privilege. Rule 26(b)(5) of the Federal Rules specifies that a party making such a claim "shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection." Ibid.; In re Air Crash at Taipei, Taiwan on October 31, 2000, 211 F.R.D. 374, 376 n.2 (C.D. Cal. 2002) (formally claiming a privilege involves specifying which information and documents are privileged and for what reasons); Pippenger v. Gruppe, 883 F. Supp. 1201, 1211 (S.D. Ind. 1994) (party invoking privilege must set forth specific facts supporting its application).

CDIR and CAC have only nominally invoked their asserted objections and privileges without stating the required specific justifications. Indeed, CDIR even failed to provide this information after OATELS specifically requested it. In its April 7, 2003 request for clarification of CDIR's responses, OATELS asked CDIR, in all cases where that agency was withholding information on the basis of an objection, to "explain why each objection, including objections to

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[5] The Federal Rules apply "in any situation not provided for or controlled by [the OALJ] rules, or by any statute, executive order or regulation." 29 C.F.R. 18.1(a).

requests not reproduced here, is applicable and warranted. Similarly, to the extent that you are withholding any of the requested information because you think that it is privileged or that disclosure may violate privacy rights, please explain why and how the privileges or privacy rights in question apply." OATELS' Request for Clarification at 2, App. A.

CDIR's reply did not address, let alone justify, any objections and, instead of providing specific justifications for privilege claims, said only that "[o]ther than confidential attorney-client communications and attorney work product, CDIR does not possess any requested information that it is withholding under privilege at this time." Responding Party CDIR's Supplemental Answers and Objections to Prosecuting Party's First Set of Interrogatories and Request for Production of Documents at 3 (Apr. 17, 2003), attached as "Appendix B."

Likewise, CAC's discovery responses did not say whether CAC was actually withholding any information on the basis of objections or privileges, and simply asserted, without any justification, that each of OATELS' requests sought information "protected by the attorney client, attorney work product and official information privileges." CAC's Responses to OATELS's First Set of Interrogatories at 1-2 (Apr. 14, 2003), attached as "Appendix C"; CAC's Responses to OATELS's First Set of Request for Production of Documents at 1-2 (Apr. 14, 2003), attached as "Appendix D." Such general or blanket assertions of privilege are unacceptable; a privilege claim must be made and sustained on a question-by-question or document-by-document basis. United States v. White, 950 F.2d 426, 430 (7th Cir. 1991); Taipei, 211 F.R.D. at 376 n.2; Land Ocean Logistics, Inc. v. Aqua Gulf Corp., 181 F.R.D. 229, 238 (W.D.N.Y. 1998); Starlight Int'l, Inc. v. Herlihy, 181 F.R.D. 494, 497 (D. Kan. 1998).

Furthermore, both CDIR and CAC raised conclusory, boiler plate objections to OATELS' discovery requests. For example, CDIR objected, without any justification or explanation, that

18 of the 24 interrogatories were overbroad, and that 17 were vague and/or ambiguous. Responding Party CDIR's Answers and Objections to Prosecuting Party's First Set of Interrogatories and Request for Production of Documents (Mar. 18, 2003), attached as "Appendix E." CAC also made multiple unsupported objections alleging vagueness and ambiguity. See CAC's Responses to OATELS' Interrogatories, App. C. Such unsubstantiated objections are insufficient as a matter of law. McLeod, 894 F.2d at 1484-85; In re Aircrash Disaster Near Roselawn, Indiana October 31, 1994, 172 F.R.D. 295, 306-07 (N.D. Ill. 1997); Burns, 164 F.R.D. at 592-93.

CDIR's and CAC's failure to state specific justifications for their claimed objections and privileges has made it impossible for OATELS to assess the application and validity of these claims. Had CDIR and CAC provided these specific justifications, OATELS could either have dropped the allegedly objectionable request for the withheld documents or answered the objection/claim of privilege, thereby narrowing or sharpening the issues here. Since CDIR and CAC did not specifically justify their claimed objections and privileges, the two agencies have waived these claims, and should be ordered to identify and produce all information withheld thereof, properly labeled as the applicable agency's response to the interrogatory or production request in question.

II. CDIR AND CAC FAILED TO ANSWER CERTAIN OF OATELS' DISCOVERY REQUESTS SUFFICIENTLY AND MUST BE COMPELLED TO DO SO.

OATELS sets out below each discovery request in question, the insufficient CDIR and/or CAC response, OATELS' explanation of the insufficiency of CDIR's response, and CDIR's reply. The discussion of each discovery request concludes with an argument why each response is still insufficient, how the insufficiency can be remedied, and a request that CDIR and/or CAC be ordered to provide the requested information.

OATELS' INTERROGATORIES

Interrogatory No. 4

For each year since 1989, please identify all apprenticeship programs, both overall and in the building and construction trades that have applied for CDIR registration of a new or expanded program, the program's sponsor and the other participating employers. Please state what action CDIR and/or CAC has taken on each such application, the basis for that action and the status of each application/program, the dates of the application and all CDIR action on it; and specify whether the program was joint or unilateral, and the number of apprentices enrolled in each such program. Please include in your response the total number of approved joint programs and of approved unilateral programs, and the total number of rejected programs in each type of program, both overall and in the building and construction trades, and break these numbers down by year since 1989.

CDIR's Response to Interrogatory No. 4

CDIR objects on the grounds that the interrogatory is overbroad, vague and ambiguous, may violate the attorney-client privilege and work product protection, and is compound. Notwithstanding and subject to its objections, CDIR responds as follows.
CDIR does not routinely maintain reports with this information. CDIR has a log that shows programs by start date that it will make available to prosecuting party. Since 1998, CDIR has also maintained a log that shows programs given new program numbers, and will make this available to prosecuting party. The balance of the information requested is not reported, but can be determined by reviewing apprenticeship program files and may be derived by the requesting party with substantially the same burden as by the responding party. CDIR will make those files

available to prosecuting party for inspection and reproduction in the date, time, and manner agreed upon by the parties for production of documents.

OATELS' Explanation

While we are willing to review and copy the files in question, we think that your greater familiarity with your own files should enable you to guide us in the right direction by identifying all applications since 1995 that you have either formally rejected or that have been pending for at least two years. We further request that you state the reasons for each rejection and explain why each application still pending after two or more years has not yet been resolved.

Please also explain why the dates listed in the program file number log are sometimes different from the dates for the same programs in the initial approval date log you also provided in connection with your response.

CDIR's Response to OATELS' Explanation

We are willing to make available the appropriate personnel to provide you with guidance during your review of the files in question. We will look into the apparent date discrepancy if you can identify the ones of concern. It is not a question that can be answered in the abstract. Your request that we “explain why each application still pending after two or more years has not yet been resolved” does not establish a failure to answer the interrogatory, it’s a new question.

CAC's Response to Interrogatory No. 4

The Council objects to this interrogatory on the ground that it purports to require the Council to provide information about the California Department of Industrial Relations ("DIR"), a separate state agency.

The Council does not know how many programs have applied for DIR registration or the identity of the applicants. The Council only has knowledge about those applications that resulted

in an appeal to the Council form [sic] the DIR's decision on the application. This information is set forth in the minutes of the Councils meetings, which will be produced to OATELS on request.

Argument

A. CDIR's Response Is Insufficient Because It Does not Identify the Responsive Applications or Include the Requested Summary.

CDIR's response is insufficient because it does not identify the requested registration applications since 1995 that have been either formally rejected or pending for at least two years, or provide the requested summary thereof.[6] Instead of this summary, CDIR has produced almost 15,000 pages of documents, which, contrary to OATELS' request, have not been related to the discovery requests in any way. CDIR seeks to substitute these documents for an answer under the "business records" option of Federal Rule 33(d), claiming that OATELS can derive the requested information from them with substantially the same burden as CDIR, even though CDIR has not identified the relevant portions of the responsive documents or explained how they answer the interrogatory. Indeed, CDIR has not even indicated where in the nearly 15,000 pages produced the requested program files are located, how many there are, or where each one begins and ends. Moreover, CDIR has not identified the files, stated the dispositions of the applications, or provided any cross-reference to CAC appeal materials. Instead, CDIR has simply produced a mass of undifferentiated documents--unstapled, unseparated and unorganized--, from which it is not apparent how the requested information can be derived.

Although Federal Rule 33(d) permits a responding party to substitute such records for its answer where the burden of deriving the answer is the same for both parties, the rule also

[6] In its Request for Clarification, OATELS voluntarily limited its discovery requests, for the time being, to documents generated since 1995. Id. at 1; App. A at 1.

stipulates that "[a] specification shall be in sufficient detail to permit the interrogating party to locate and to identify, as readily as can the party served, the records from which the answer may be ascertained." Fed. R. Civ. P. 33(d). The Federal Rules Advisory Committee Notes admonish that "[a] respondent may not impose on an interrogating party a mass of records as to which research is feasible only for one familiar with the records." Fed. R.Civ. P. Advisory Committee Notes, 1970 Amendment, Subdivision (c) (relettered as the current Subdivision (d) by the 1993 Amendments); see also T.N. Taube Corp. v. Marine Midland Mortgage Corp., 136 F.R.D. 449, 455 (W.D.N.C. 1991) (not feasible to expect interrogating party to wade through a mass of documents in a vain attempt to locate relevant information).

The courts have interpreted the Rule 33(d) as requiring specification of the page or paragraphs that are responsive to the interrogatory. See Miller v. Fed. Express Corp., 186 F.R.D. 376, 385 (W.D. Tenn. 1999); Continental Illinois Nat'l Bank & Trust v. Caton, 136 F.R.D. 682, 687 (D. Kan. 1991); Sabel v. Mead Johnson & Co., 112 F.R.D. 211, 213 (D. Mass. 1986); Colorado v. Schmidt-Tiago Constr. Co., 108 F.R.D. 731, 735 (D. Col. 1985). Indeed, the court in Miller, 186 F.R.D. at 376, ordered the responding party to identify responsive documents by the Bates-stamped pages of the documents it had already produced under Rule 33(d). Miller, 186 F.R.D. at 385. Failure to meet the specificity requirement results in the loss of the "business records" option, i.e., in being forced to answer the interrogatory completely without substituting the documents for a written response. Pulsecard, Inc. v. Discover Card Servs., Inc., 168 F.R.D. 295, 305 (D. Kan. 1996). By not labeling, indexing, or citing the Bates-stamped page numbers of the responsive documents, CDIR has failed to meet this requirement. Since the pages that CDIR produced are undifferentiated by topic and are not stapled to indicate where a document begins and ends, it is extremely difficult to discern even which pages constitute which files.

Even if CDIR had specified the responsive documents, however, the burden of deriving the answer would not be the same for the answering and requesting parties. CDIR's greater familiarity with its own files, policies, internal operating procedures and application notations make it much easier for CDIR than OATELS to understand the disposition of each application and the reasons why the application was so handled. Indeed, without the requested summary of the disposition of rejected and long-pending applications, keyed to the applicable Bates-stamped pages, it is questionable whether CDIR's processed application forms would even be intelligible to an outsider unfamiliar with CDIR's internal notations, acronyms, short-hand expressions and underlying policies and procedures.

Processed agency application forms typically do not speak for themselves. Instead, they generally make sense only to agency personnel and others who are familiar with the forms and the agency's way of doing things. OATELS has not been able to decipher some of the acronyms and codes on the few internal, computer-generated reports CDIR has produced so far. CDIR's informal, hand-written comments on registration applications and its unfamiliar procedures for processing them will compound this problem. Rule 33(d) requires the responding party to derive the answer itself when that party can do so more efficiently than the interrogating party. Oppenheimer Fund, Inc. v. Sanders, 437 U.S. 340, 357 (1978); Taube, 136 F.R.D. at 455. A fortiori, the responding party must determine the answer itself when that party is the only one that understands its own documents, policies and procedures. To answer this interrogatory sufficiently, CDIR must provide enough information about the handling of each application so that OATELS can understand the program files, which CDIR must identify and produce in their entirety. OATELS should not be forced to guess the meaning of CDIR's documents and

speculate about what actions the agency took and why, when CDIR can answer the same questions authoritatively.

Furthermore, CDIR's assertion that OATELS' request for an explanation of why each application still pending after two or more years is still unresolved is a new interrogatory is without merit. OATELS' request falls within the scope of the original interrogatory which requested a statement of "what action" CDIR and/or CAC have/has taken on each application, the basis therefore, and the status of each application. "No action" and "still pending after two or more years," and the explanations therefor, are, where applicable, just as responsive to the "what action?" and status questions as "approved," "denied," "referred back" and their supporting explanations are for other applications.

B. CAC's Response Is Insufficient Because It Does not Identify or Provide the Responsive CAC Decisions or Include the Requested Summary.

Similarly, CAC's claim that its meeting minutes are an acceptable "business records" alternative to an answer to the interrogatory is not convincing. CDIR has already produced several thousand pages of CAC meeting minutes, which report many matters other than registration appeals. Neither CDIR nor CAC has provided page or paragraph references to the passages that discuss the appeals of DAS registration decisions. Thus, the production of these minutes is not an adequate substitute for the requested summary of the disposition or status of appeals of denied applications. Moreover, since CAC admits that it has knowledge of these appeals, and presumably also has copies of its own decisions, the agency's much greater familiarity with its own minutes, cases and procedures, enables it to identify the appeals in question and ascertain their disposition or status much more easily and reliably than OATELS. In addition, because OATELS' Request for Production No. 4 asks for all materials supporting the

response to this interrogatory, CAC's response is also insufficient because it does not include the responsive CAC decisions.

Accordingly, OATELS asks that the ALJ order CDIR to

(1) identify all registration applications since 1995 that have been either formally rejected or pending for at least two years, either by citing the Bates-stamped page numbers in the documents already produced, if applicable, or by producing these documents, properly labeled as the agency's response to this interrogatory, at CDIR's own expense; and

(2) include the requested summary of the status or disposition of all applications mentioned in (1) in the agency's response to this interrogatory. The summary must include the reasons for each rejection and must also explain why each application still pending after two or more years has not yet been resolved. The summary must also include references to the Bates-stamped pages of each application summarized.

OATELS requests further that the ALJ order CAC to

(1) include the requested summary of the status or disposition of all appeals of DAS decisions to CAC since 1995 rejecting registration applications, including an explanation of why each application still pending after two or more years has not yet been resolved, in the agency's response to this interrogatory; and

(2) produce all of the CAC decisions listed in CAC's response to (1), properly labeled as the agency's response to Request for Production No. 4.

Interrogatory No. 18

Please identify all apprenticeship registration applications in the building and construction trades since 1989, either for a new program or expansion of an approved program, on which existing programs notified under section 212.2(g), or any predecessor regulation,

submitted comments. For each such application, please identify the applicant, the disposition of the application, the basis for that disposition, the dates of the application and all CDIR action on it; and specify whether the applicant was a joint or unilateral program, and the number of apprentices enrolled in the program. Please include in your response the total number of joint programs and of unilateral programs whose applications were denied, or whose registration was revoked wholly or partially in an ensuing appeal, based on the submitted comments. Please also include the total number of each type of program whose applications were approved despite such comments.

CDIR's Response to Interrogatory No. 18

CDIR objects on the grounds that the interrogatory is compound and not calculated to lead to the discovery of Relevant Evidence. Notwithstanding and subject to its objections, CDIR responds as follows:

Requested information is contained in business records and may be derived by the requesting party with substantially the same burden as by the responding party. The business records include the apprenticeship program files, including appeal files, and will be made available by CDIR for inspection and reproduction in the date, time, and manner agreed upon by the parties for production of documents.

OATELS' Explanation

For the reasons stated in our explanation following your Response to Interrogatory No. 4 supra, we ask that you identify all applications since 1995 that fall within the scope of this interrogatory, and state the disposition of each application and the basis therefor.

CDIR's Response to OATELS' Explanation

See our Response Re: Interrogatory No. 4, above.

CAC's Response to Interrogatory No. 18

The Council objects to this interrogatory on the ground that it purports to require the Council to provide information about the California Department of Industrial Relations ("DIR"), a separate state agency.

The Council does not have any knowledge of the applications for registration that have been submitted to DIR since 1989.

The Council's knowledge of applications that resulted in appeal to the Council from DIR's decisions of approval or denial is set forth in the minutes of the Council's meetings since the 1989. The minutes will be produced to OATELS upon request.

Argument

For the reasons explained above, see supra, pp. 9-12, CDIR's response is insufficient because it does not identify the requested registration applications in the building and construction trades since 1995, on which existing programs submitted comments, or include the requested summary thereof. For similar reasons, see supra, pp. 12-13, CAC's response is insufficient because it does not identify or provide the responsive CAC decisions on appeals of DAS decisions on such applications, or provide the requested summary of the status or disposition of these appeals. The responsive CAC decisions must be produced because they are within the scope of Request for Production No. 18, which asked for all materials supporting the response to this interrogatory.

Accordingly, OATELS asks that the ALJ order CDIR to

(1) identify all registration applications in the building and construction trades since 1995, on which existing programs submitted comments, either by citing the Bates-stamped page

numbers in the documents already produced, if applicable, or by producing these documents, properly labeled as the agency's response to this interrogatory, at CDIR's own expense; and

(2) produce a summary of all applications mentioned in (1). The summary must include the status or disposition of each such application and the basis therefor. The summary must also include references to the Bates-stamped pages of each application summarized.

OATELS requests further that the ALJ order CAC to

(1) produce a summary of the status or disposition of all appeals to CAC of DAS decisions issued since 1995 on applications in the building and construction trades, on which existing programs submitted comments.

(2) produce all of the CAC decisions listed in CAC's response to (1).

OATELS' REQUESTS FOR PRODUCTION OF DOCUMENTS

As discussed earlier, see supra, p. 3 & n.2, despite OATELS' request, CDIR did not label, by discovery request number, any of the nearly 15,000 pages of documents it made available to OATELS for copying on May 1, 2003. Accordingly, OATELS asks the ALJ to order CDIR to identify the documents responsive to each request, either by citing the Bates-stamped page numbers of the documents already produced, if applicable, or by producing these documents, properly labeled by discovery request number, at CDIR's own expense.

CONCLUSION

For these reasons, OATELS respectfully requests that the ALJ order CDIR and CAC, as applicable, within ten days of the date of his order, to

(1) identify and produce, properly labeled by discovery request number, all information, whether responses to interrogatories or to requests for production, withheld on the basis of claimed objections or privileges;

(2) identify, by citing Bates-stamped page numbers of documents already produced, if applicable, or produce, properly labeled by discovery request number, all information responsive to the interrogatories or production requests discussed above; and

(3) produce, properly labeled by discovery request number, all materials not released before that support interrogatory or production request responses compelled by the ALJ's order, including, but not limited to, such materials identified above.

Furthermore, OATELS also respectfully requests that the ALJ

(4) instruct CDIR and CAC that failure to comply fully with his order may result in

(a) a ruling barring the non-complying party(ies) from introducing evidence for or against any claim or defense related to an insufficiently answered discovery request, see 29

C.F.R. § 18.6(d)(2)(iii); or

(b) a default judgment against the non-complying party(ies), see § 18.6(d)(2)(v).

Respectfully submitted,

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