

EXHIBIT G

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19 HEREIN ERRONEOUSLY AS “RCM
20 TECHNOLOGIES, INC.”)

21 UNITED STATES DISTRICT COURT
22 CENTRAL DISTRICT OF CALIFORNIA

23 BARBARA GRADY, individually and on
24 behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 RCM TECHNOLOGIES, INC.,

28 Defendant.

Case No. 5:22-CV-00842-JLS-SHK

**RCM TECHNOLOGIES (USA),
INC.’S RESPONSES TO
PLAINTIFF’S SECOND SET
INTERROGATORIES TO
DEFENDANT RCM
TECHNOLOGIES (USA), INC.**

PROPOUNDING PARTY: PLAINTIFF BARBARA GRADY

RESPONDING PARTY: DEFENDANT RCM TECHNOLOGIES (USA), INC.

SET NO.: TWO

1 TO PLAINTIFF BARBARA GRADY AND HER ATTORNEY OF RECORD:

2 Pursuant to Federal Rule of Civil Procedure 33, Defendant RCM
3 TECHNOLOGIES (USA), INC. (hereinafter “Defendant”) hereby provides responses
4 to the Interrogatories, Set Two, served upon it by Plaintiff BARBARA GRADY
5 (“Plaintiff”) as follows:

6 **PRELIMINARY STATEMENT**

7 The following answers are based upon information presently known and
8 available to Defendant. Discovery, both internal and external, is still ongoing, and
9 Defendant reserves the right to supplement these answers with subsequently discovered
10 information and/or to introduce such information at trial. Each answer is subject to all
11 objections as to competence, relevance, materiality, propriety, admissibility and any
12 and all other objections or grounds that would require exclusion of the answers
13 produced by Defendant, or any part thereof, if any of these answers were presented in
14 court. All appropriate objections and grounds are hereby reserved and may be
15 interposed at trial regarding the introduction into evidence of an answer produced by
16 Defendant herein.

17 The fact that Defendant has responded to or objected to any request or
18 interrogatory or part thereof may not be taken as an admission that they admit the
19 existence of any fact set forth in or assumed by such request or interrogatory or that
20 such answer constitutes relevant evidence other than as expressly admitted herein. No
21 implied admissions whatsoever are intended by these answers. The fact that Defendant
22 has answered part or all of any request or interrogatory shall not be construed to be a
23 waiver by Defendant of any objections to part or all of any interrogatory.

24 To the extent that part or all of any request or interrogatory calls for information
25 which constitutes material prepared in anticipation of litigation or for trial, information
26 or material covered by the work product doctrine or information protected from
27 disclosure by virtue of a privilege including, but not limited to, the attorney-client
28 communication privilege, Defendant objects to each and every such request and

1 interrogatory and will not supply or render any information or material protected from
2 discovery by virtue of the work product doctrine or any privilege including, but not
3 limited to, the attorney-client communication privilege. Also, Defendant objects to the
4 extent the requests and interrogatories seek information relating to Defendant's and her
5 counsel's legal conclusions and research and will not provide such information.

6 To the extent that any interrogatory seeks to discover the residence address and/or
7 telephone number of any individual, Defendant objects to each and every such
8 interrogatory on the grounds that such interrogatory seeks information privileged from
9 disclosure on the basis of said individual's right to privacy and confidentiality and
10 because such interrogatory seeks information which is not relevant to the subject matter
11 of this action nor reasonably calculated to lead to the discovery of admissible evidence.

12 The above-stated objections are hereby made applicable to each and all of the
13 interrogatories and are incorporated by reference as though fully set forth in each answer
14 to each interrogatory. Without waiving any of the foregoing objections, Defendant
15 responds as follows:

16 **RESPONSES TO INTERROGATORIES**

17 **INTERROGATORY NO. 1:**

18 For the time period October 8, 2017, to the present, please state the number of
19 NURSES YOU have employed AND/OR placed to work at a Covid testing AND/OR
20 vaccination site in California, other than a school site.

21 **RESPONSE TO INTERROGATORY NO. 1:**

22 Defendant objects to this Interrogatory on the grounds that it is overly broad,
23 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
24 regarding "NURSES," (which is defined as any "individual who has been employed by
25 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
26 California . . . and who [Defendant] placed in ANY medical center, medical system,
27 hospital, Covid testing or vaccination site, or other location in California that is owned
28 or operated by [Defendant] or ANY of [Defendant's] client or customers,"), insofar as

1 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
2 worked at just two types of assignments. Defendant objects to the term “YOU” as
3 overly broad and seeking irrelevant information to the extent that it requests information
4 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
5 AND/OR businesses.”

6 Subject to and without waiving the foregoing objections, Defendant responds as
7 follows: Approximately 395 individuals have been placed to work at a Covid testing
8 and/or vaccination site in California, other than a school site, during the time period
9 specified. Discovery is ongoing and Defendant reserves the right to supplement this
10 response as necessary.

11 **INTERROGATORY NO. 2:**

12 For the time period October 8, 2017, to the present, please state the number of
13 NURSES YOU have employed AND/OR placed to work at a Covid testing AND/OR
14 vaccination site in California, other than a school site, who have signed or executed
15 ANY ARBITRATION AGREEMENT with YOU.

16 **RESPONSE TO INTERROGATORY NO. 2:**

17 Defendant objects to this Interrogatory on the grounds that it is overly broad,
18 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
19 regarding “NURSES,” (which is defined as any “individual who has been employed by
20 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
21 California . . . and who [Defendant] placed in ANY medical center, medical system,
22 hospital, Covid testing or vaccination site, or other location in California that is owned
23 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
24 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
25 worked at just two types of assignments. Defendant objects to the term “YOU” as
26 overly broad and seeking irrelevant information to the extent that it requests information
27 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
28 AND/OR businesses.”

1 Subject to and without waiving the foregoing objections, Defendant responds as
2 follows: Approximately 15 individuals have signed arbitration agreements during the
3 time period specified. Discovery is ongoing and Defendant reserves the right to
4 supplement this response as necessary.

5 **INTERROGATORY NO. 3:**

6 For the time period October 8, 2017, to the present, please state the number of
7 NURSES YOU have employed AND/OR placed to work at a Covid testing AND/OR
8 vaccination site in California, other than a school site, who have signed ANY
9 acknowledgment of receipt of YOUR California Timekeeping, Meal Period and Rest
10 Break Policy(ies).

11 **RESPONSE TO INTERROGATORY NO. 3:**

12 Defendant objects to this Interrogatory on the grounds that it is overly broad,
13 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
14 regarding “NURSES,” (which is defined as any “individual who has been employed by
15 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
16 California . . . and who [Defendant] placed in ANY medical center, medical system,
17 hospital, Covid testing or vaccination site, or other location in California that is owned
18 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
19 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
20 worked at just two types of assignments. Defendant objects to the term “YOU” as
21 overly broad and seeking irrelevant information to the extent that it requests information
22 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
23 AND/OR businesses.”

24 Subject to and without waiving the foregoing objections, Defendant responds as
25 follows: Approximately 17 individuals have signed written acknowledgments of
26 receipt of the California Timekeeping, Meal Period and Rest Break Policy during the
27 time period specified. Discovery is ongoing and Defendant reserves the right to
28 supplement this response as necessary.

1 **INTERROGATORY NO. 4:**

2 For the time period October 8, 2017 to the present, please state the number of
3 NURSES YOU have employed AND/OR placed to work at a Covid testing AND/OR
4 vaccination site in California, other than a school site, who have signed an Employee
5 Meal Period Waiver Election Form or other document that waives their right to one or
6 more meal periods on a workday for which they are employed by YOU.

7 **RESPONSE TO INTERROGATORY NO. 4:**

8 Defendant objects to this Interrogatory on the grounds that it is overly broad,
9 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
10 regarding “NURSES,” (which is defined as any “individual who has been employed by
11 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
12 California . . . and who [Defendant] placed in ANY medical center, medical system,
13 hospital, Covid testing or vaccination site, or other location in California that is owned
14 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
15 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
16 worked at just two types of assignments. Defendant objects to the term “YOU” as
17 overly broad and seeking irrelevant information to the extent that it requests information
18 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
19 AND/OR businesses.”

20 Subject to and without waiving the foregoing objections, Defendant responds as
21 follows: Approximately 19 individuals have signed an Employee Meal Period Waiver
22 Election Form during the time period specified. Discovery is ongoing and Defendant
23 reserves the right to supplement this response as necessary.

24 **INTERROGATORY NO. 5:**

25 For ANY NURSES YOU have employed AND/OR placed to work at a Covid
26 testing AND/OR vaccination site in California, other than a school site, for the time
27 period October 8, 2017, to the present, please identify by date, employee, and amount,
28 each instance in which YOU have compensated the employee with a premium wage or

1 penalty for a missed or noncompliant meal or rest period.

2 **RESPONSE TO INTERROGATORY NO. 5:**

3 Defendant objects to this Interrogatory on the grounds that it is overly broad,
4 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
5 regarding “NURSES,” (which is defined as any “individual who has been employed by
6 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
7 California . . . and who [Defendant] placed in ANY medical center, medical system,
8 hospital, Covid testing or vaccination site, or other location in California that is owned
9 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
10 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
11 worked at just two types of assignments. Defendant objects to the term “YOU” as
12 overly broad and seeking irrelevant information to the extent that it requests information
13 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
14 AND/OR businesses.” Defendant additionally objects to the terms “premium wage” and
15 “penalty” as vague and ambiguous. Defendant further objects to this interrogatory to
16 the extent it calls for a legal conclusion.

17 Subject to and without waiving the foregoing objections, Defendant responds as
18 follows: The individuals set forth on Exhibit A received a meal and/or rest period
19 premium through May 17, 2024 under the pay code “PREM.” Additional sums may
20 have been paid outside of the “PREM” pay code. Discovery is ongoing and Defendant
21 reserves the right to supplement this response as necessary.

22 **INTERROGATORY NO. 6:**

23 For the time period October 8, 2017, to the present, please state the number of
24 NURSES YOU have employed AND/OR placed to work at a school site in California
25 to perform Covid testing AND/OR vaccinations.

26 **RESPONSE TO INTERROGATORY NO. 6:**

27 Defendant objects to this Interrogatory on the grounds that it is overly broad,
28 unduly burdensome, and seeks irrelevant information, to the extent it seeks information

1 regarding “NURSES,” (which is defined as any “individual who has been employed by
2 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
3 California . . . and who [Defendant] placed in ANY medical center, medical system,
4 hospital, Covid testing or vaccination site, or other location in California that is owned
5 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
6 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
7 worked at just two types of assignments. Defendant objects to the term “YOU” as
8 overly broad and seeking irrelevant information to the extent that it requests information
9 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
10 AND/OR businesses.”

11 Subject to and without waiving the foregoing objections, Defendant responds as
12 follows: Approximately 727 individuals have been placed to work at school sites to
13 perform Covid testing and/or vaccinations during the time period specified, though
14 additional or alternative duties may have been performed depending on client and/or
15 date. Discovery is ongoing and Defendant reserves the right to supplement this
16 response as necessary.

17 **INTERROGATORY NO. 7:**

18 For the time period October 8, 2017, to the present, please state the number of
19 NURSES YOU have employed AND/OR placed to work at a school site in California,
20 who have signed or executed ANY ARBITRATION AGREEMENT with YOU.

21 **RESPONSE TO INTERROGATORY NO. 7:**

22 Defendant objects to this Interrogatory on the grounds that it is overly broad,
23 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
24 regarding “NURSES,” (which is defined as any “individual who has been employed by
25 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
26 California . . . and who [Defendant] placed in ANY medical center, medical system,
27 hospital, Covid testing or vaccination site, or other location in California that is owned
28 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as

1 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
2 worked at just two types of assignments. Defendant objects to the term “YOU” as
3 overly broad and seeking irrelevant information to the extent that it requests information
4 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
5 AND/OR businesses.”

6 Subject to and without waiving the foregoing objections, Defendant responds as
7 follows: Approximately 483 individuals have signed arbitration agreements during the
8 time period specified. Discovery is ongoing and Defendant reserves the right to
9 supplement this response as necessary.

10 **INTERROGATORY NO. 8:**

11 For the time period October 8, 2017, to the present, please state the number of
12 NURSES YOU have employed AND/OR placed to work at a school site in California,
13 who have signed ANY acknowledgment of receipt of YOUR California Timekeeping,
14 Meal Period and Rest Break Policy(ies).

15 **RESPONSE TO INTERROGATORY NO. 8:**

16 Defendant objects to this Interrogatory on the grounds that it is overly broad,
17 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
18 regarding “NURSES,” (which is defined as any “individual who has been employed by
19 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
20 California . . . and who [Defendant] placed in ANY medical center, medical system,
21 hospital, Covid testing or vaccination site, or other location in California that is owned
22 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
23 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
24 worked at just two types of assignments. Defendant objects to the term “YOU” as
25 overly broad and seeking irrelevant information to the extent that it requests information
26 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
27 AND/OR businesses.”

28 Subject to and without waiving the foregoing objections, Defendant responds as

1 follows: Approximately 424 individuals have signed written acknowledgments of
2 receipt of the California Timekeeping, Meal Period and Rest Break Policy during the
3 time period specified. Discovery is ongoing and Defendant reserves the right to
4 supplement this response as necessary.

5 **INTERROGATORY NO. 9:**

6 For the time period October 8, 2017, to the present, please state the number of
7 NURSES YOU have employed AND/OR placed to work at a school site in California,
8 who have signed an Employee Meal Period Waiver Election Form or other document
9 that waives their right to one or more meal periods on a workday for which they are
10 employed by YOU.

11 **RESPONSE TO INTERROGATORY NO. 9:**

12 Defendant objects to this Interrogatory on the grounds that it is overly broad,
13 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
14 regarding “NURSES,” (which is defined as any “individual who has been employed by
15 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
16 California . . . and who [Defendant] placed in ANY medical center, medical system,
17 hospital, Covid testing or vaccination site, or other location in California that is owned
18 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
19 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
20 worked at just two types of assignments. Defendant objects to the term “YOU” as
21 overly broad and seeking irrelevant information to the extent that it requests information
22 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
23 AND/OR businesses.”

24 Subject to and without waiving the foregoing objections, Defendant responds as
25 follows: Approximately 446 individuals have signed an Employee Meal Period Waiver
26 Election Form during the time period specified. Discovery is ongoing and Defendant
27 reserves the right to supplement this response as necessary.

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1 **INTERROGATORY NO. 10:**

2 For ANY NURSES YOU have employed AND/OR placed to work at a school
3 site in California, for the time period October 8, 2017, to the present, please identify by
4 date, employee, and amount, each instance in which YOU have compensated the
5 employee with a premium wage or penalty for a missed or noncompliant meal or rest
6 period.

7 **RESPONSE TO INTERROGATORY NO. 10:**

8 Defendant objects to this Interrogatory on the grounds that it is overly broad,
9 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
10 regarding “NURSES,” (which is defined as any “individual who has been employed by
11 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
12 California . . . and who [Defendant] placed in ANY medical center, medical system,
13 hospital, Covid testing or vaccination site, or other location in California that is owned
14 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
15 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
16 worked at just two types of assignments. Defendant objects to the term “YOU” as
17 overly broad and seeking irrelevant information to the extent that it requests information
18 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
19 AND/OR businesses.” Defendant additionally objects to the terms “premium wage”
20 and “penalty” as vague and ambiguous. Defendant further objects to this interrogatory
21 to the extent it calls for a legal conclusion.

22 Subject to and without waiving the foregoing objections, Defendant responds as
23 follows: The individuals set forth on Exhibit B received a meal and/or rest period
24 premium through May 17, 2024 under the pay code “PREM.” Additional sums may
25 have been paid outside of the “PREM” pay code. Discovery is ongoing and Defendant
26 reserves the right to supplement this response as necessary.

27 **INTERROGATORY NO. 11:**

28 For the time period October 8, 2017, to the present, please state the number of

1 NURSES YOU have employed AND/OR placed to work at a school site in California
2 to perform services other than (or in addition to) Covid testing AND/OR vaccinations.

3 **RESPONSE TO INTERROGATORY NO. 11:**

4 Defendant objects to this Interrogatory on the grounds that it is overly broad,
5 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
6 regarding “NURSES,” (which is defined as any “individual who has been employed by
7 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
8 California . . . and who [Defendant] placed in ANY medical center, medical system,
9 hospital, Covid testing or vaccination site, or other location in California that is owned
10 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
11 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
12 worked at just two types of assignments. Defendant objects to the term “YOU” as
13 overly broad and seeking irrelevant information to the extent that it requests information
14 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
15 AND/OR businesses.”

16 Subject to and without waiving the foregoing objections, Defendant responds as
17 follows: Approximately 715 individuals have been placed to work at a school site to
18 perform services other than (or in addition to) Covid testing AND/OR vaccinations
19 during the time period specified, though additional or alternative duties may have been
20 performed depending on client and/or date. Discovery is ongoing and Defendant
21 reserves the right to supplement this response as necessary.

22 **INTERROGATORY NO. 12:**

23 For the time period October 8, 2017, to the present, please state the number of
24 NURSES YOU have employed AND/OR placed to work at a hospital in California to
25 perform services other than (or in addition to) Covid testing AND/OR vaccinations.

26 **RESPONSE TO INTERROGATORY NO. 12:**

27 Defendant objects to this Interrogatory on the grounds that it is overly broad,
28 unduly burdensome, and seeks irrelevant information, to the extent it seeks information

1 regarding “NURSES,” (which is defined as any “individual who has been employed by
2 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
3 California . . . and who [Defendant] placed in ANY medical center, medical system,
4 hospital, Covid testing or vaccination site, or other location in California that is owned
5 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
6 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
7 worked at just two types of assignments. Defendant objects to the term “YOU” as
8 overly broad and seeking irrelevant information to the extent that it requests information
9 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
10 AND/OR businesses.”

11 Subject to and without waiving the foregoing objections, Defendant responds as
12 follows: Approximately 207 individuals have been placed to work at a hospital in
13 California to perform services other than (or in addition to) Covid testing and/or
14 vaccinations during the time period specified. Discovery is ongoing and Defendant
15 reserves the right to supplement this response as necessary.

16 **INTERROGATORY NO. 13:**

17 For ANY NURSES YOU have employed AND/OR placed to work at a hospital
18 in California to perform services other than (or in addition to) Covid testing AND/OR
19 vaccinations, for the time period October 8, 2017 to the present, please identify by date,
20 employee, and amount, each instance in which YOU have compensated the employee
21 with a premium wage or penalty for a missed or noncompliant meal or rest period.

22 **RESPONSE TO INTERROGATORY NO. 13:**

23 Defendant objects to this Interrogatory on the grounds that it is overly broad,
24 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
25 regarding “NURSES,” (which is defined as any “individual who has been employed by
26 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
27 California . . . and who [Defendant] placed in ANY medical center, medical system,
28 hospital, Covid testing or vaccination site, or other location in California that is owned

1 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
2 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
3 worked at just two types of assignments. Defendant objects to the term “YOU” as
4 overly broad and seeking irrelevant information to the extent that it requests information
5 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
6 AND/OR businesses.” Defendant additionally objects to the terms “premium wage”
7 and “penalty” as vague and ambiguous. Defendant further objects to this interrogatory
8 to the extent it calls for a legal conclusion.

9 Subject to and without waiving the foregoing objections, Defendant responds as
10 follows: The individuals set forth on Exhibit C received a meal and/or rest period
11 premium through May 17, 2024 under the pay code “PREM.” Additional sums may
12 have been paid outside of the “PREM” pay code. Discovery is ongoing and Defendant
13 reserves the right to supplement this response as necessary.

14 **INTERROGATORY NO. 14:**

15 For the time period October 8, 2017, to the present, please state the number of
16 YOUR clients with which YOU have had staffing agreements AND/OR arrangements,
17 which have owned or operated a Covid testing AND/OR vaccination site in California
18 where YOU have employed or placed one or more NURSES.

19 **RESPONSE TO INTERROGATORY NO. 14:**

20 Defendant objects to this Interrogatory on the grounds that it is overly broad,
21 unduly burdensome, and seeks irrelevant information, to the extent it seeks information
22 regarding “NURSES,” (which is defined as any “individual who has been employed by
23 [Defendant] as a nurse, traveling nurse, testing provider, or like hourly position in
24 California . . . and who [Defendant] placed in ANY medical center, medical system,
25 hospital, Covid testing or vaccination site, or other location in California that is owned
26 or operated by [Defendant] or ANY of [Defendant’s] client or customers,”), insofar as
27 Plaintiff was employed solely as a Licensed Vocational Nurse on a per diem basis and
28 worked at just two types of assignments. Defendant objects to the term “YOU” as

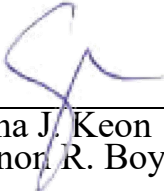
1 overly broad and seeking irrelevant information to the extent that it requests information
2 concerning, “ANY subsidiary, agent AND/OR affiliate of ANY of the foregoing entities
3 AND/OR businesses.” Defendant additionally objects to this Interrogatory on the
4 grounds that the phrase “staffing agreements AND/OR arrangements” is vague and
5 ambiguous.

6 Subject to and without waiving the foregoing objections, Defendant responds as
7 follows: During the specified time period, Defendant has had a contract with Ginkgo
8 for K-12 Covid testing, Los Angeles Unified School District for Covid testing (and
9 other duties), and a separate contract with San Bernardino County.

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Dated: June 17, 2023

LITTLER MENDELSON, P.C.



Martha J. Keon
Shannon R. Boyce

Attorneys for Defendant
RCM TECHNOLOGIES, INC.

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California, over the age of eighteen years, and not a party of the within action. My business address is: 2049 Century Park East, Suite 500, Los Angeles, CA 90067. On **May 15, 2024**, I served the foregoing document(s) described as

RCM TECHNOLOGIES (USA), INC.’S RESPONSES TO PLAINTIFF’S SECOND SET INTERROGATORIES TO DEFENDANT RCM TECHNOLOGIES (USA), INC.

on the interested parties in this as follows:

Joshua Konecky
Nathan Piller
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
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Attorneys for Plaintiff
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VIA ELECTRONIC SERVICE: Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed herein. My email address is mgerard@littler.com.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. Executed on **May 15, 2024** at Los Angeles, California.

Mary Ann Gerard


[Signature]

4881-5565-1009.3 / 090137-1042