UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Oracle America, Inc. v. Procore Technologies, Inc.

Oracle v. Procore · No. 24-cv-07457-JST (LB) · Decided July 28, 2025

SUMMARY

The United States District Court for the Northern District of California denied Procore Technologies, Inc.'s motion to quash subpoenas served on seven nonparty former Oracle customers. The court held that Procore lacked standing to challenge the subpoenas based on alleged burdens to its customers, business relationships, or proprietary information, and found that the requested discovery was relevant to Oracle's trade-secret misappropriation claims. The court directed the parties to confer regarding protection under the existing protective order.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Laurel Beeler
JURISDICTION	United States District Court for the Northern District of California
DECIDED	July 28, 2025
DOCKET	24-cv-07457-JST (LB)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Procore Technologies, Inc. moved under Federal Rule of Civil Procedure 45 to quash subpoenas issued by Oracle to seven nonparty former Oracle customers. The district court denied the motion.
STANDARD OF REVIEW	The court applied Federal Rules of Civil Procedure 26 and 45 to determine whether Procore had standing to challenge the nonparty subpoenas and whether the requested information was relevant and proportional to the needs of the case.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

discovery dispute · civil procedure · misappropriation of trade secrets · trade secrets · commercial litigation

PRACTICE AREAS

civil procedure | discovery | trade secrets | commercial litigation

QUESTIONS PRESENTED

1. Whether Procore had standing to move to quash subpoenas issued to nonparty former customers.
2. Whether the subpoenas sought relevant and discoverable information under Federal Rules of Civil Procedure 26 and 45.
3. Whether party discovery had to precede the nonparty discovery.

HOLDINGS

1. Procore lacked standing to challenge the subpoenas because it asserted only the potential burden on its customers, disruption to its business relationships, and an interest in confidential or proprietary information, none of which established a privilege or personal right sufficient to confer standing on this record.
2. The court did not require Oracle to wait for or repeat party discovery before proceeding with the nonparty subpoenas.
3. The subpoenas sought relevant, discoverable information concerning Oracle's trade-secret-misappropriation claim, and the court permitted the discovery absent objections based on burden or overbreadth.

KEY QUOTATIONS

> *"The general rule is that a party lacks standing to move to quash a third-party subpoena except for claims of privilege or personal rights."* (Analysis § 1)

> *"The court denies Procore's motion to quash."* (Conclusion)

FACTUAL BACKGROUND

Oracle alleged that its former employee Mark Mariano misappropriated Oracle trade secrets and disclosed them to Procore, which used the information in Procore Pay. Oracle subpoenaed seven former Oracle customers, all construction companies, for documents and communications concerning Procore Pay, Oracle and Textura Payment Management, Mariano, Procore contracts and payments, and product integrations. Nearly half of the subpoenaed entities had already produced documents, and the remaining responses were due by July 31, 2025.

PROCEDURAL HISTORY

Oracle brought claims against Procore and former Oracle employee Mark Mariano for trade-secret misappropriation under the Defend Trade Secrets Act and breach of contract. During discovery, Oracle subpoenaed seven nonparty former customers for documents concerning Procore Pay, Oracle's information, and the alleged misappropriation. Procore moved to quash, but no subpoenaed nonparty moved to quash or sought a protective order; the court denied Procore's motion.

DISPOSITION

other

CASES CITED

- GreenCycle Paint, Inc. v. PaintCare, Inc., No. 15-cv-04059-MEJ, 2018 WL 1399865, at *2 (N.D. Cal. Mar. 19, 2018)
- Updateme Inc. v. Axel Springer SE, No. 17-cv-05054-SI (LB), 2018 WL 5734670, at *3 (N.D. Cal. Oct. 31, 2018)
- Crispin v. Christian Audigier, Inc., No. CV 09-09509 MMM (JEMx), 2010 WL 2293238, at *5 (C.D. Cal. May 26, 2010)
- Hatamian v. Advanced Micro Devices, Inc., No. 14-cv-00226-YGR (JSC), 2015 WL 7180662, at *4 (N.D. Cal. Nov. 16, 2015)
- Nidec Corp. v. Victor Co. of Japan, 249 F.R.D. 575, 577 (N.D. Cal. 2007)
- FemtoMetrix Inc. v. Huang, No. 23-MC-80332-TSH, 2024 WL 396186, at 3, 5–6 (N.D. Cal. Feb. 1, 2024)
- Rawcar Group, LLC v. Grace Medical Group, Inc., No. 13cv1105-H (BLM), 2014 WL 12199977, at *3–*5 (S.D. Cal. June 26, 2014)
- Kovalenko v. Kirkland & Ellis LLP, No. 22-CV-05990-HSG (TSH), 2024 WL 664691, at *3 (N.D. Cal. Feb. 16, 2024)
- Glass Egg Digital Media v. Gameloft, Inc., No. 17CV04165-MMC (RMI), 2019 WL 2499710, at *5 (N.D. Cal. June 17, 2019)
- Peng v. Nw. Mut. Life Ins. Co., No. 17-cv-01760-SI, 2017 WL 3007030, at *1 (N.D. Cal. July 14, 2017)
- Shoen v. Shoen, 5 F.3d 1289, 1292 (9th Cir. 1993)