

## EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 14-CV-02887-JLK

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ALEJANDRO MENOCA,  
MARCOS BRAMBILA,  
GRISEL XAHUENTITLA,  
HUGO HERNANDEZ,  
LOURDES ARGUETA,  
JESUS GAYTAN,  
OLGA ALEXAKLINA,  
DAGOBERTO VIZGUERRA, and  
DEMETRIO VALERGA,  
on their own behalf and on behalf of all others similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

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**DEFENDANT THE GEO GROUP, INC.'S SECOND SUPPLEMENTAL RESPONSES  
TO PLAINTIFFS' WRITTEN DISCOVERY**

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Defendant, The GEO Group, Inc. ("GEO"), through its undersigned attorneys, hereby provides its Second Supplemental Responses to Plaintiffs' Written Discovery. These responses are made pursuant to the Court's Orders dated June 6, 2016 (ECF Nos. 84 and 85), striking GEO's previous discovery responses and staying discovery with respect to class action issues. In providing information responsive to Plaintiffs' written discovery, GEO does not intend to waive any applicable privilege or work product protection.

Response: These documents are typically maintained in a detainee's file. GEO previously provided redacted detainee files for the named Plaintiffs, Bates numbered GEO\_MEN 160-1394. GEO is producing unredacted copies of the detainee files.

**16. Please provide any and all documents which purport to be signed by any Plaintiff.**

Response: These documents are typically maintained in a detainee's file. GEO previously provided redacted detainee files for the named Plaintiffs, Bates numbered GEO\_MEN 160-1394. GEO is producing unredacted copies of the detainee files.

### **REQUESTS FOR ADMISSION**

**1. Admit that at least one detainee in the Aurora Detention Center faced disciplinary or other corrective action for refusing to participate in work pursuant to the Housing Unit Sanitation Policy.**

Response: GEO denies with respect to the named Plaintiffs. Any further response to this request for admission relates only to class action issues that are currently stayed.

**2. Admit that immigration detainees in other detention facilities owned and or operated by GEO are paid more than \$1 per day for their participation in the VWP.**

Response: There are some ICE detainees at some GEO facilities in some jobs that are paid more than \$1 per day. There are also some detainees at a GEO facility that are permitted to work more than one job, are paid \$1 per day for each job and, therefore, could earn more than \$1 per day for their participation in the VWP. However, at facilities that receive reimbursement from ICE for the VWP, detainees are only reimbursed \$1 per day.

**of the Housing Unit Sanitation Policy; and**

**3. Any area that was the subject of detainee work as a result of the VWP.**

Response: The requested date has passed, but GEO will work with Plaintiffs' attorneys to find a time for some of Plaintiffs' attorneys to inspect the Aurora facility.

Respectfully submitted this 21st day of July, 2017.

As to objections, requests for production, requests for admission, and request for inspection:

S/ Dana L. Eismeier

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