

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiff,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 3:17-cv-05769-RJB

PLAINTIFFS' NOTICE OF
SUPPLEMENTAL AUTHORITY RE:
DEFENDANT'S MOTION TO
DISMISS AND SUPPORTING
DECLARATION OF TRACEY
VALERIO

Plaintiffs respectfully submit the attached supplemental authority with respect to the arguments made at pages 4, 6, 7, 9 of the Reply in Support of GEO's Motion to Dismiss Plaintiff's First Amended Complaint (Dkt. #104) in reliance on the Declaration of Tracey Valerio (Dkt. #105). The attached letter from Anne M. Rose, Associate Legal Advisor in the Office of the Principal Legal Advisor for U.S. Immigration and Customs Enforcement, dated August 1, 2018, and received by undersigned counsel via email at 4:45 p.m. on this date, directly relates to the admissibility, reliability, and lack of legal authority of the Valerio Declaration and therefore to all arguments reliant on that Declaration. As the August 1 date of

PLAINTIFFS' NOTICE OF
SUPPLEMENTAL AUTHORITY
RE: DEFENDANT'S MOTION TO
DISMISS AND SUPPORTING
DECLARATION OF TRACEY VALERIO -1
Case No. 3:17-cv-05769-RJB

Law Office of R. Andrew Free
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Neither Anne Rose, ICE Counsel, nor Kristin Gibson, the Assistant United States Attorney contact for this matter, could be reached via email or telephone to determine whether ICE intends to appear in open court to lodge its objection, or whether the Department of Justice intends to do so on its behalf.

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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: August 1, 2018, at Tacoma, Washington.

s/R. Andrew Free

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