

The Honorable Robert J. Bryan

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

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

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 3:17-cv-05769-RJB

**[PROPOSED] ORDER
GRANTING PLAINTIFFS'
MOTION TO AMEND NOTICE
PLAN**

THIS MATTER came before the Court on Plaintiffs' Motion to Amend the Notice Plan. The Court has reviewed the motion and all evidence submitted in support of, and in opposition, if any, to the motion, as well as the pleadings on file, and is otherwise fully informed.

IT IS HEREBY ORDERED AS FOLLOWS:

1. Plaintiffs' Motion is GRANTED;
2. Plaintiffs' plan to limit notice in this case to publication notice, without a direct mail component, is the best notice practicable under the circumstances;
3. No later than 14 days after entry of this order, Plaintiffs shall distribute

1 notice to the class for a 45-day period as follows:

2 a. Radio Advertisements: The Administrator will air advertisements on
3 Spanish-speaking radio stations in those regions of Mexico and
4 Central America from which a significant portion of Class Members
5 originate. The Administrator will work with Class Counsel to
6 determine a reasonable and effective strategy for distributing these
7 advertisements.

8 b. Online/Social media advertisements: The Administrator will publish
9 advertisements in English and Spanish on Google and Facebook that
10 will be accessible both within and outside of the United States. The
11 Administrator will use its best efforts to target these advertisements
12 to increase the likelihood that they will be seen by Class Members,
13 and will actively monitor and manage these campaigns to prioritize
14 those advertisements that are performing best.
15

16 c. Press release: The administrator will distribute a press release about
17 the notice process to U.S., Latin American, and Asian media outlets.

18 4. Plaintiffs' Short Form Publication notice is approved and shall be posted in
19 conspicuous areas of the Northwest Detention Center and other GEO
20 facilities where class members congregate, and disseminated by other
21 publication means in the same or substantially similar form.
22

1 SO ORDERED, this _____ day of _____, 2019.

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The Honorable Robert J. Bryan
UNITED STATES DISTRICT JUDGE

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PRESENTED BY:

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SCHROETER GOLDMARK & BENDER

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s/ Jamal Whitehead

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[PROPOSED] ORDER GRANTING
AMENDED NOTICE PLAN (3:17-cv-
05769-RJB) – 3

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