

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 their Notice Plan. The Court has reviewed the motion and all evidence submitted in support of, and in opposition, to the motion, as well as the pleadings on file and argument of counsel, and is otherwise fully informed.

IT IS HEREBY ORDERED AS FOLLOWS:

1. Plaintiff's Motion is GRANTED in part;
2. No later than January 24, 2020, Plaintiffs shall distribute notice to the Class as follows:

- a. Administrator: JND Legal Administration will serve as the notice administrator (Administrator).

- 1 b. Direct Mail to Class Members Still in Custody: Plaintiffs shall serve
2 the long form notice (Dkt. No. 142) upon those Class Members GEO
3 has identified as still in custody at NWDC or other GEO/ICE
4 facilities.
- 5 c. Internet/Social Media Banner Ads: The Administrator will publish
6 advertisements in English and Spanish on Google Display Networks
7 and Facebook that will be accessible both within and outside of the
8 United States. The Administrator will use its best efforts to target
9 these advertisements to increase the likelihood that Class Members
10 will see them.
- 11 d. Press Release: The Administrator will distribute a press release
12 about the notice process to U.S., Latin American, and Indian media
13 outlets.
- 14 e. Radio Advertisements: The Administrator will air advertisements on
15 Spanish-speaking radio stations in those regions of Mexico and
16 Central America from which a significant portion of Class Members
17 originate or are believed to live.
- 18 f. Website: The Administrator will create a website containing the
19 class notice information in English and Spanish. Class members may
20 download the Exclusion form and email, mail, or fax the form to the
21 Administrator.
22 Administrator.

1 g. Toll-Free Number: The Administrator will establish a toll-free
2 number with Interactive Voice Responses (IVR) and live operators
3 fluent in multiple dialects to provide class notice information.

4 h. Opt-Outs: The opt-out deadline will be February 24, 2020. The
5 Administrator shall notify the parties of any opt-outs within seven
6 (7) days of the deadline. Within 14 days of the opt-out deadline,
7 Class Counsel Shall file a report with the Court regarding opt-outs.
8

9 3. Plaintiffs will distribute notice to the class as described for a period ending
10 on February 24, 2020.

11 4. GEO will post class notice information in conspicuous areas of the
12 Northwest Detention Center accessible by civil immigration detainees.
13

14 SO ORDERED, this _____ day of _____, 2020.
15

16 _____
The Honorable Robert J. Bryan
UNITED STATES DISTRICT JUDGE

17 PRESENTED BY:

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