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18 THE GEO GROUP, INC.

19 **UNITED STATES DISTRICT COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION**

21 RAUL NOVOA, JAIME CAMPOS
22 FUENTES, ABDIAZIZ KARIM, and
23 RAMON MANCIA, individually and on
24 behalf of all others similarly situated,

25 Plaintiffs,

26 vs.

27 THE GEO GROUP, INC.,

28 Defendant.

THE GEO GROUP, INC.,

Counter-Claimant,

vs.

RAUL NOVOA, JAIME CAMPOS
FUENTES, ABDIAZIZ KARIM, and
RAMON MANCIA, individually and on
behalf of all others similarly situated,

Counter-Defendant.

Case No. 5:17-cv-02514-JGB-SHK

Assigned to Hon. Jesus G. Bernal
and the Honorable Shashi H.
Kewalramani

DISCOVERY MATTER

**DECLARATION OF COLIN
BARNACLE IN SUPPORT OF
DEFENDANT THE GEO
GROUP, INC.'S MOTION FOR
PROTECTIVE ORDER**

TAC Filed: September 16, 2019
SAC Filed: December 24, 2018
FAC Filed: July 6, 2018
Complaint Filed: December 19, 2017
Trial Date: June 23, 2020

DECLARATION OF COLIN BARNACLE

I, Colin L. Barnacle, hereby declare:

1. I am an attorney licensed to practice law, I am admitted *pro hac vice* in this Court, and am a Partner with Akerman LLP and counsel of record for The GEO Group, Inc. ("GEO") in this action. I have personal knowledge of the matters set forth herein.

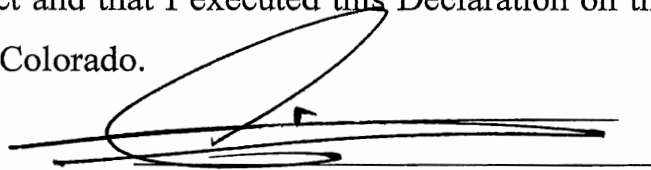
2. Attached as Exhibit A is a an excerpt of one of the 30(b)(6) depositions of GEO, taken by Plaintiffs in this matter on December 11, 2019. In this particular deposition, the Warden of Adelanto, James Janecka, served as GEO's designee.

3. Mr. Janecka was designated for Adelanto-specific questions to Topics 5, 6,7,8,10,11,12 (subpart a only), 17 (subparts c,d,e,g,h,j, and k), and 18.

4. The parties are conferring about dates for a subsequent 30(b)(6) deposition.

5. I have reviewed (1) Plaintiff's First Set of Discovery Requests To Defendant the GEO Group, Inc.; (2) Plaintiffs' Second Set of Requests For Admission And Request For Inspection to Defendant the GEO Group, Inc. dated August 23, 2019; and (3) Plaintiffs' Second Set of Requests For Production To Defendant the GEO Group, Inc. dated October 8, 2019 (all discovery requests propounded by Plaintiffs in this case) and none of the requests seek information about Mr. Zoley's meetings with Adelanto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this Declaration on the 20th day of December, 2019, in Denver, Colorado.



Colin L. Barnacle, Declarant

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