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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **EASTERN DIVISION**

16 **RAUL NOVOA, JAIME CAMPOS**
17 **FUENTES, ABDIAZIZ KARIM, and**
18 **RAMON MANCIA** individually and on
behalf of all others similarly situated,
Plaintiffs,

19 v.

20 **THE GEO GROUP, INC.,**
21 *Defendant.*

Civil Action No. 5:17-cv-02514-JGB-SHKx

PLAINTIFFS' EX PARTE
APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER REQUIRING COVID-19
PREVENTION MEASURES FOR
NATIONWIDE HUSP CLASS

Hearing: None Set
The Honorable Jesus G. Bernal

1 Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Rule
2 65-1, Plaintiffs hereby move this Court for emergency relief in the form of a temporary
3 restraining order directing that GEO to either (a) halt the use of Class Members¹ in the
4 provision of work or services under the HUSP program or (b) protect those Class
5 Members who provide HUSP services by (i) providing protective clothing and antiseptic
6 supplies and (ii) conducting testing of all Class Members to detect COVID-19, in light
7 of the serious risks to their health and safety posed by the current COVID-19 pandemic.
8 This Application is supported by the accompanying Memorandum in Support of
9 Plaintiffs' *Ex Parte* Application for a Temporary Restraining Order Requiring COVID-
10 19 Prevention Measures for Nationwide HUSP Class, Declarations, and Exhibits filed
11 contemporaneously.

12 Plaintiffs respectfully request that the Court shorten time on, and hear their,
13 concurrently filed motion for expedited discovery, so that it can be heard at the same
14 time as this motion for a temporary restraining order.

21 ¹ Class Members include any person who is (a) civilly detained at any GEO immigration detention
22 center in the United States and (b) subject to a GEO Housing Unit Sanitation Policy (HUSP) at any
23 point during their detention excluding (1) individuals detained in GEO's family residential detention
24 facility in Karnes City, Texas; (2) individuals detained in the Alexandria Staging Facility in Alexandria,
25 Louisiana; (3) any individual detained in the custody of the U.S. Marshall or any other law
26 enforcement agency at a GEO facility where the company also detains civil immigration detainees
pursuant to contracts with ICE; and (4) civilly detained immigrants detainees held at the Aurora ICE
Processing Center in Aurora, Colorado at any time before October 22, 2014. Dkt. No. 229 at 2.

1 Counsel of record for Defendants is:

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24 Pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Rule 7-
25 19.1, counsel for Plaintiffs informed counsel for Defendants of the substance and the
26 date of this *ex parte* application by email on March 18, 2020 and by phone on April 6,
2020. Counsel for Defendants did not state whether they oppose the filing of this *ex*
parte application.

1 Dated: April 6, 2020

Respectfully submitted,

2
3 /s/ Daniel H. Charest

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CERTIFICATE OF SERVICE

1
2 On April 6, 2020, I electronically submitted the foregoing document with the
3 clerk of the court for the U.S. District Court, Central District of California, using the
4 electronic case filing system. I hereby certify that I have provided copies to all counsel
5 of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).
6

7 */s/ Daniel H. Charest*

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