

EXHIBIT 3

From: Hou, Alicia (Lax)
Sent: Thursday, August 6, 2020 4:02 PM
To: Lydia Wright
Cc: Novoa - External; Turner, Jonathan (Assoc-Lax); Scheffey, Adrienne (Assoc-Den); Cizmorris, Melissa (Assoc-Den); Van Pelt, David (Ptrn-Lax)
Subject: RE: Novoa - Correspondence Re. Discovery Dispute & Meet and Confer

Hi Lydia,

We should be able to begin production of anything that does not need ICE review on a rolling basis by August 24.

Thanks,

Alicia Hou

Special Counsel
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alicia.hou@akerman.com

From: Lydia Wright <lwright@burnscharest.com>
Sent: Thursday, August 6, 2020 7:57 AM
To: Hatch, Lorna (LAA-Lax) <lorna.hatch@akerman.com>
Cc: Novoa - External <Novoa-External@burnscharest.com>; Turner, Jonathan (Assoc-Lax) <jonathan.turner@akerman.com>; Hou, Alicia (Lax) <alicia.hou@akerman.com>; Scheffey, Adrienne (Assoc-Den) <adrienne.scheffey@akerman.com>; Cizmorris, Melissa (Assoc-Den) <melissa.cizmorris@akerman.com>; Van Pelt, David (Ptrn-Lax) <david.vanpelt@akerman.com>
Subject: Re: Novoa - Correspondence Re. Discovery Dispute & Meet and Confer

Counsel,

With respect to Issue 3 in Jonathan's letter, and as stated in my email of July 31, 2020, the parties have already agreed to exclude the terms "covid" and "coronavirus" from the search terms. In that same email, I asked GEO to provide a date certain when GEO will conduct the searches and make the corresponding document productions, so we can inform Magistrate Kewalramani of the same. GEO has not responded to that request. So, again, when will GEO begin producing responsive documents?

Thanks,

Lydia A. Wright

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From: "lorna.hatch@akerman.com" <lorna.hatch@akerman.com>
Date: Tuesday, August 4, 2020 at 3:12 PM

To: Lydia Wright <lwright@burnscharest.com>

Cc: Novoa - External <Novoa-External@burnscharest.com>, Jonathan Turner

<jonathan.turner@akerman.com>, Alicia Hou <alicia.hou@akerman.com>, Adrienne Scheffey

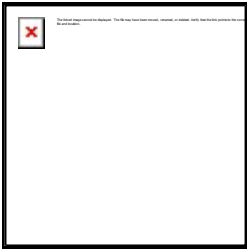
<Adrienne.scheffey@akerman.com>, "melissa.cizmorris@akerman.com" <melissa.cizmorris@akerman.com>,

David Van Pelt <david.vanpelt@akerman.com>

Subject: Novoa - Correspondence Re. Discovery Dispute & Meet and Confer

Good afternoon Counsel,

Per Mr. Turner's request, please see the attached correspondence.



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