

# **EXHIBIT 5**

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**From:** Lydia Wright <lwright@burnscharest.com>  
**Sent:** Friday, August 21, 2020 3:01 PM  
**To:** Hou, Alicia (Lax)  
**Cc:** Scheffey, Adrienne (Assoc-Den); Van Pelt, David (Ptrn-Lax); Gallion, Michael (Ptrn-Lax); Cizmorris, Melissa (Assoc-Den); Turner, Jonathan (Assoc-Lax); Novoa - External  
**Subject:** Re: Novoa et al. v. GEO - conferral re upcoming deadlines

Thanks, Alicia. You may represent that Plaintiffs oppose GEO's *ex parte* application to modify the scheduling order as set forth below.

**Lydia A. Wright**  
Burns Charest LLP  
365 Canal Street, Suite 1170  
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504.799.2845 main  
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**From:** "alicia.hou@akerman.com" <alicia.hou@akerman.com>  
**Date:** Friday, August 21, 2020 at 4:38 PM  
**To:** Lydia Wright <lwright@burnscharest.com>  
**Cc:** Adrienne Scheffey <Adrienne.scheffey@akerman.com>, David Van Pelt <david.vanpelt@akerman.com>, Michael Gallion <michael.gallion@akerman.com>, "melissa.cizmorris@akerman.com" <melissa.cizmorris@akerman.com>, Jonathan Turner <jonathan.turner@akerman.com>, Novoa - External <Novoa-External@burnscharest.com>  
**Subject:** RE: Novoa et al. v. GEO - conferral re upcoming deadlines

Lydia,

As we discussed on our call, given the outstanding discovery, we think that the outstanding discovery in this case warrants an extension of the discovery deadline. Considerations include, the additional discovery propounded this month by Plaintiffs, that Plaintiffs continue to notice additional depositions which further compress the time available for written discovery, and outstanding expert discovery—including depositions of Plaintiffs experts. In short, we do not think there are enough days between now and the discovery cutoff to reasonably accomplish the remaining discovery. Additionally, as we discussed on our call today and our call last Friday, Plaintiffs' delay in filing their motion to approve class notice has resulted in a notice completion deadline that falls after our dispositive motion cutoff. We look forward to receiving your response regarding whether you will join or oppose our request this afternoon.

Best,

**Alicia Hou**  
Special Counsel  
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**From:** Lydia Wright <lwright@burnscharest.com>  
**Sent:** Friday, August 21, 2020 2:13 PM  
**To:** Hou, Alicia (Lax) <alicia.hou@akerman.com>  
**Cc:** Scheffey, Adrienne (Assoc-Den) <adrienne.scheffey@akerman.com>; Van Pelt, David (Ptrn-Lax) <david.vanpelt@akerman.com>; Gallion, Michael (Ptrn-Lax) <michael.gallion@akerman.com>; Cizmorris, Melissa (Assoc-Den) <melissa.cizmorris@akerman.com>; Turner, Jonathan (Assoc-Lax) <jonathan.turner@akerman.com>; Novoa - External <Novoa-External@burnscharest.com>  
**Subject:** Re: Novoa et al. v. GEO - conferral re upcoming deadlines

Hi Alicia,

Why does GEO believe these extensions are necessary? A better understanding of your rationale will help us determine whether to oppose or join in GEO's motion.

Also, please note that the best way to get ahold of me is by email. Particularly during this work-from-home period, a message left on the general office line may not reach me in a timely manner.

Thanks,

**Lydia A. Wright**  
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**From:** "[alicia.hou@akerman.com](mailto:alicia.hou@akerman.com)" <[alicia.hou@akerman.com](mailto:alicia.hou@akerman.com)>  
**Date:** Friday, August 21, 2020 at 4:00 PM  
**To:** Lydia Wright <[lwright@burnscharest.com](mailto:lwright@burnscharest.com)>  
**Cc:** Adrienne Scheffey <[Adrienne.scheffey@akerman.com](mailto:Adrienne.scheffey@akerman.com)>, David Van Pelt <[david.vanpelt@akerman.com](mailto:david.vanpelt@akerman.com)>, Michael Gallion <[michael.gallion@akerman.com](mailto:michael.gallion@akerman.com)>, "[melissa.cizmorris@akerman.com](mailto:melissa.cizmorris@akerman.com)" <[melissa.cizmorris@akerman.com](mailto:melissa.cizmorris@akerman.com)>, Jonathan Turner <[jonathan.turner@akerman.com](mailto:jonathan.turner@akerman.com)>  
**Subject:** Novoa et al. v. GEO - conferral re upcoming deadlines

Lydia,

Thanks for returning my call earlier. My understanding based on our call is that Plaintiffs are not currently interested in extending any of the deadlines in this case. As I mentioned on our call, we believe the below extensions are needed.

Please let us know by COB today whether Plaintiffs will continue to oppose these deadlines.

Event	Current Date	Proposed Date
Expert Disclosure (Initial)	Monday, August 17, 2020	No Change
Expert Disclosure (Rebuttal)	Monday, August 31, 2020	Wednesday, September 30, 2020

All Discovery Cutoff (including hearing discovery motions)	Monday, September 14, 2020	Friday, October 30, 2020
Last Date to Conduct Settlement Conference	Monday, October 12, 2020	Friday, November 6, 2020
Last Date to File Summary Judgment Motions	Wednesday October 4, 2020	Friday, November 6, 2020
Last Date to Hear Non-Discovery Motions	Monday, November 30, 2020	Friday, December 4, 2020
Final Pretrial Conference and Hearings on Motions in Limine	Monday, January 4, 2021 at 11:00 AM	No Change
Trial Date	Tuesday, February 2, 2021 at 9:00 AM	No Change

**Alicia Hou**

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