

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

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

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

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

**DECLARATION OF LYDIA
WRIGHT IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
GEO'S EX PARTE
APPLICATION TO EXTEND
CERTAIN DEADLINES**

I, Lydia Wright, declare that the following is true and correct based upon my personal knowledge:

1. I am an attorney for the Plaintiffs in the above-captioned action.

2. Attached hereto are the following exhibits in support of Plaintiffs' Opposition to GEO's *ex parte* Application, Dkt. 300.

3. During a conference call between the parties on August 14, 2020, GEO's counsel represented that to save money on data storage, GEO has adopted an e-discovery and document review protocol that only images the pages in a document when that document is actually reviewed.

4. Attached as **Exhibit 1** is a correct and true copy of email correspondence from myself to GEO's counsel dated August 14, 2020.

5. Attached as **Exhibit 2** is a correct and true copy of correspondence from GEO's counsel to Magistrate Kewalramani dated August 17, 2020.

1 6. Attached as **Exhibit 3** is a correct and true copy of email correspondence
2 from myself to Magistrate Kewalramani dated August 18, 2020.

3 7. Attached as **Exhibit 4** is a correct and true copy of email correspondence
4 from Plaintiffs' counsel to GEO's counsel dated August 18, 2020.

5
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7 Dated: August 23, 2020

/s/ Lydia A. Wright

Lydia A. Wright (admitted *pro hac vice*)

lwright@burnscharest.com

LA Bar # 37926

BURNS CHAREST LLP

365 Canal Street, Suite 1170

New Orleans, LA 70130

Telephone: (504) 799-2845

Facsimile: (504) 881-1765