

# **EXHIBIT 2**



Alicia Y. Hou

Akerman LLP  
601 West Fifth Street  
Suite 300  
Los Angeles, CA 90071

T: 213 688 9500  
F: 213 627 6342

August 17, 2020

**VIA ELECTRONIC-MAIL**

The Honorable Shashi H. Kewalramani  
United States Magistrate Judge  
George E. Brown, Jr. Federal Building  
3470 12th St., Riverside, CA 92501

***Re: Novoa, et al. v The GEO Group, Inc., Civil Action No. 5:17-cv-02514 (C.D. Cal.)***

The Honorable Judge Kewalramani,

This letter serves to address the issues raised within the Court's August 14, 2020 Minute Order requesting (1) that GEO provide an estimate of the number of pages of documents and other materials that remain to be produced by Defendants, and (2) information regarding the number of documents awaiting ICE review and when they were provided to ICE.

1. Estimated Number of Pages to be Produced:

After thorough inquiry, GEO is unable to estimate the number of pages of documents and other materials that remain to be produced by Defendants. In this case, Plaintiffs' discovery search terms have fielded over 32,000 potentially responsive documents, however, an estimate as to how many pages this electronically stored data constitutes is difficult if not impossible to answer at this time. Until the files have been reviewed and exported for production, it remains exceedingly difficult to approximate the number of pages to be produced.

In seeking an answer to the Court's question, GEO consulted with its e-discovery vendor, TrustPoint One, who was able to provide the following insight:

"The answer to the question 'how many pages will this electronically stored data end up being' is hard to answer. Some files are easily estimated (i.e., generic PDFs, unexotic MS Word files), but there are so many different ways you can format other file types (i.e., Adobe Portfolio, PowerPoint, Excel, MSWord with embedded files or tracked changes) that's difficult, if not impossible to accurately estimate the page count. And we've only discussed MS Office and Adobe files. We've not mentioned design files (CAD, DWG, etc.) or other more exotic file types.

Folks within the eDiscovery industry can't agree on a good estimate (in my opinion because there isn't one), but some common numbers you might see are:

The Honorable Shashi H. Kewalramani

August 17, 2020

Page 2

---

<b>Document Type</b>	<b>Average Pages/DOC</b>	<b>Average Pages/GIG</b>
Microsoft Word Files	9	64,782
Email Files	1.5	100,099
Microsoft Excel Files	50	165,791
Lotus 1-2-3 Files	55	297,317
Microsoft PowerPoint	14	17,552
Text Files	20	677,963
Image Files	1.4	15,477

In my personal experience, I've seen numbers well above and well below these estimates. It's why I am so reluctant to give clients an estimate. If I tell them that their PowerPoints will be about 14 pages per file, but the ESI protocol requires Speaker Notes blown up or if the files are formatted in landscape, they could double that page count, easily. The client thinks I've blown the scope and they think I don't know what I'm doing."

In light of the consideration outlined above, GEO remains unable to provide an estimate of the number of pages of documents and other materials that remain to be produced by GEO in this action, but GEO will endeavor to update the Court and counsel if more information comes to light.

2. Documents Awaiting ICE Review:

Regarding the Court's request for information as to the number of outstanding pages of documents and materials GEO has provided to ICE for review and when these materials were so provided, GEO has transferred documents to ICE for its review continually since the inception of discovery. Currently, 4,966 documents await review by ICE – these pending documents were transferred beginning on August 6, 2020 and GEO continues to transfer documents to ICE as they are reviewed on a rolling basis. For the reasons outlined above, an accurate estimate as to the number of pages that this electronically stored data constitutes is difficult if not impossible to answer until the files have been reviewed and exported for production.

We are happy to answer any further inquiry the Court may have in connection with the above.

Sincerely,

*/s/ Alicia Hou*

Alicia Hou

cc: Counsel of Record