

# **EXHIBIT 4**

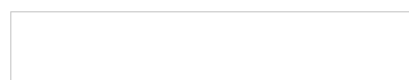
**Subject:** Re: 5:17-cv-02514, Novoa, et al. v The GEO Group  
**Date:** Saturday, August 22, 2020 at 3:43:00 PM Central Daylight Time  
**From:** Andrew Free  
**To:** Alicia Hou, Adrienne Scheffey  
**CC:** Novoa - External

Alicia:

We never got a response to these questions. Can you please provide one?

Thank you,

Andrew



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On Tue, Aug 18, 2020 at 2:45 PM Andrew Free <[andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com)> wrote:

Alicia:

Do you have a rough estimate of the data volume of the currently outstanding docs for production? We're looking for GB/TB numbers.

It appears TrustPoint may be using Relativity. Can you please confirm this, or if that's not correct, offer the system they're using?

Can you also advise whether GEO is using TAR for the outstanding productions, and if so, which tools (e.g., de-duping)?

We're asking because we're trying to figure out how we're going to be processing what GEO's about to be handing over, and to get a sense of the general burden right now.

Thanks very much,

Andrew



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On Mon, Aug 17, 2020 at 9:09 PM <[alicia.hou@akerman.com](mailto:alicia.hou@akerman.com)> wrote:

Magistrate Kewalramani,

As directed by the Court's August 14, 2020 minute order, please find attached GEO's letter to the Court outlining status of documents pending review.

Thank you,

**Alicia Hou**

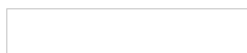
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