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15 THE GEO GROUP, INC.

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION**

18 RAUL NOVOA, JAIME CAMPOS
19 FUENTES, ABDIAZIZ KARIM, and
20 RAMON MANCIA, individually and on
21 behalf of all others similarly situated

22 Plaintiff,

23 vs.

24 THE GEO GROUP, INC.,

25 Defendant.

26 THE GEO GROUP, INC.,

27 Counter-Claimant,

28 vs.

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

Counter-Defendant.

Case No. 5:17-cv-02514-JGB-SHKx

Assigned to Hon. Jesus G. Bernal

**DECLARATION OF ALICIA Y.
HOU IN SUPPORT OF
DEFENDANT THE GEO GROUP,
INC.'S OPPOSITION TO
PLAINTIFF'S MOTION TO
APPROVE CLASS NOTICE PLAN
AND FORM OF NOTICE**

TAC Filed: September 16, 2019
SAC Filed: December 24, 2018
FAC Filed: July 6, 2018
Complaint Filed: December 19, 2017
Trial Date: February 2, 2021

DECLARATION OF ALICIA Y. HOU

I, ALICIA Y. HOU, declare as follows:

1. I am over 18 years of age and have personal knowledge of the facts and circumstances set forth in this declaration, and if called upon to do so, I could and would competently testify thereto.

2. I am an attorney licensed to practice law in the State of California. I am an attorney with the law firm Akerman, LLP, attorneys of record for Defendant The GEO Group, Inc. (**GEO**) in this action.

3. This declaration is made in support of GEO's Opposition to Plaintiffs' Motion to Approve Class Notice Plan and Form of Notice.

4. Plaintiffs did not begin the conferral process with GEO until early July and pressured GEO to return comments, confer, and resolve material issues contained in seven notices within a mere fourteen days. A true and correct copy of Plaintiffs' counsel's conferral e-mail to me is attached as **Exhibit A**.

5. In good faith, GEO provided comments by Plaintiffs' arbitrary deadline of July 27, 2020. That same day, on July 27, Plaintiffs' counsel Mallory Biblo and I had a telephone call to confer about the contents of their Motion. Ms. Biblo and I had a further conferral call on July 31, 2020.

6. On August 4, 2020, following the parties' July 31 conferral call, I e-mailed Ms. Biblo and asked, among other inquiries, whether Plaintiffs intended on issuing mail notice. A true and correct copy of my August 4 e-mail to Plaintiffs' counsel highlighting the mail issue is attached as **Exhibit B**.

7. During the conferral process, Plaintiffs' counsel provided me a list of outreach organizations through which they intend on sending e-mail notice. A true and correct copy of the excel spreadsheet I received from Plaintiffs' counsel outlining the list of outreach organizations is attached as **Exhibit C**.

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8. Plaintiffs' counsel stated on one of the two conferral calls that they did not have website mockups ready and would not be able to present one to me prior to their filing of the motion.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on August 24, 2020 at Los Angeles, California.

/s/ Alicia Y. Hou
Alicia Y. Hou

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