

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 MALLORY
BIBLO IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF THEIR MOTION
TO APPROVE CLASS NOTICE
PLAN AND FORM OF NOTICE**

I, Mallory Biblo, 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. During the meet and conferral process, counsel for The GEO Group, Inc. ("GEO") did not mention the one-way intervention doctrine or any issues related to such doctrine.
3. Further, GEO raised the issue of mail notice—for the first time—on August 4, 2020, the day that Plaintiffs filed their Notice Plan, and after four weeks of conferral.
4. Attached hereto are the following exhibits in support of Plaintiffs' Reply in Support of their Motion to Approve Class Notice Plan and Form of Notice, Dkt. 310.
5. Attached as **Exhibit E** is a correct and true copy of email correspondence from Plaintiffs' counsel to GEO's counsel dated July 2, 2020.
6. Attached as **Exhibit F** is a correct and true copy of email correspondence from Plaintiffs' counsel to GEO's counsel dated July 8, 2020.

7. Attached as **Exhibit G** is a correct and true copy of email correspondence from Alicia Hou to Plaintiffs' counsel dated July 8, 2020.

8. Attached as **Exhibit H** is a correct and true copy of email correspondence from Alicia Hou to myself dated July 27, 2020.

9. Attached as **Exhibit I** is a correct and true copy of email correspondence from Alicia Hou to myself dated July 27, 2020.

10. Attached as **Exhibit J** is a correct and true copy of email correspondence from myself to Alicia Hou dated July 31, 2020.

11. Attached as **Exhibit K** is a correct and true copy of email correspondence from Alicia Hou to myself dated August 4, 2020.

Dated: August 31, 2020

/s/ Mallory Biblo

Mallory Biblo (admitted *pro hac vice*)

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