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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **EASTERN DIVISION**

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

16 *Plaintiffs,*

17 v.

18 **THE GEO GROUP, INC.,**

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

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION  
REGARDING DISCOVERY  
DISPUTE**

Date: October 2, 2020

Time: 2 p.m. PT

Courtroom: 3 or 4, 3<sup>rd</sup> Floor

Judge: Magistrate Judge Shashi H.  
Kewalramani

**NOTICE OF MOTION**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on October 2, 2020 at 2 p.m. PT, or on any such date and time as may be specified by the Court, in the courtroom of Magistrate Judge Shashi H. Kewalramani, Unites States District Court for the Central District of California, George E. Brown, Jr. Federal Building and United States Courthouse, 3470 Twelfth Street, Riverside, California, 92501-3801, Plaintiffs Raul Novoa, Jaime Campos Fuentes, Abdiaziz Karim and Ramon Mancia (“Plaintiffs”) will and hereby do move for an order related to the following discovery dispute.

Plaintiffs hereby submit their Opening Brief in support of a motion for an order requiring Defendant The GEO Group, Inc. to (1) produce information it has redacted under the law enforcement privilege, and (2) produce information it has redacted under the deliberative process privilege.

The Motion follows multiple conferences of counsel concerning these issues. This Motion is based on this Notice of Motion, the accompanying Memorandum in Support, the accompanying Declaration of Lydia Wright, and the arguments of counsel at the pre-motion conference and at any hearing the Court may hold on these matters.

1 Dated: September 30, 2020

Respectfully submitted,

2 */s/ Lydia A. Wright*

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***Class Counsel***

**CERTIFICATE OF SERVICE**

I, Lydia A. Wright, electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Central District of California, using the electronic case filing system. I hereby certify that I have provided copies to all counsel of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

Dated: September 30, 2020

/s/ Lydia Wright

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