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10 Counsel for the Certified Classes
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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **EASTERN DIVISION**

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

19 *Plaintiffs,*

20 v.

21 **THE GEO GROUP, INC.,**

22 *Defendant.*

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

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO
EXCLUDE TESTIMONY OF DR.
JEFFREY KROPF**

Date: November 2, 2020
Time: 9 a.m. PT
Courtroom: 1
Judge: Hon. Jesus G. Bernal

23 TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

24 PLEASE TAKE NOTICE that, on Monday, November 2, 2020, or on such date
25 as may be specified by the Court, in the Courtroom of the Honorable Judge Jesus G.
26 Bernal, United States District Court for the Central District of California, George E.
27 Brown, Jr. Federal Building and United States Courthouse, 3470 Twelfth Street
28 Riverside, CA 92501-3801, Plaintiffs Raul Novoa, Jaime Campos Fuentes, Abdiaziz

1 Karim and Ramon Mancía will, and hereby do, move the Court for an Order excluding
2 the testimony of Dr. Jeffrey Kropf as to any use in this matter.

3 Submitted herewith in support of Plaintiffs’ Motion to Exclude Testimony of Dr.
4 Jeffrey Kropf are: (1) the Memorandum in Support of Plaintiffs’ Motion to Exclude
5 Testimony of Dr. Jeffrey Kropf; (2) the Proposed Order Granting Plaintiffs’ Motion to
6 Exclude Testimony of Dr. Jeffrey Kropf; and (3) the Declaration of Lydia Wright and
7 exhibits thereto.

8 This Motion is made following the conference of counsel pursuant to L.R. 7-3,
9 which took place on August 28, 2020.

10
11 Dated: October 1, 2020

Respectfully submitted,

12
13 /s/ Lydia A. Wright

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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: October 1, 2020

/s/ Lydia Wright
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