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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
SERENA MORONES**

Hearing Date: November 16, 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 16, 2020 at 9 a.m. PT,
25 or on such date as may be specified by the Court, in the Courtroom of the Honorable
26 Judge Jesus G. Bernal, United States District Court for the Central District of California,
27 George E. Brown, Jr. Federal Building and United States Courthouse, 3470 Twelfth
28 Street Riverside, CA 92501-3801, Plaintiffs Raul Novoa, Jaime Campos Fuentes,

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

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

8 This Motion is made following the multiple conferences of counsel pursuant to
9 L.R. 7-3, which took place on September 29, 2020 and October 15, 2020.

10 On October 7, 2020, Plaintiffs filed an Application for Leave to File the
11 Memorandum in Support of Plaintiffs' Motion to Exclude Testimony of Serena
12 Morones, the Rebuttal Expert Report of Serena Morones and the Deposition Transcript
13 of Serena Morones under Seal (Dkt. 342, Dkt. 343). In response to that Application and
14 following additional conference of counsel, GEO has stated that it does not object to
15 the public (i.e. unsealed and unredacted) filing of those materials. *See* Dkt. 350.

16
17 Dated: October 16, 2020

Respectfully submitted,

18
19 /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 16, 2020

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