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14 THE GEO GROUP, INC.

14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION**

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

19 Plaintiff,

20 vs.

21 THE GEO GROUP, INC.,

22 Defendant.

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

Assigned to Hon. Jesus G. Bernal

**DECLARATION OF ELLEN  
ROBBINS IN RESPONSE TO  
PLAINTIFFS' APPLICATION TO  
FILE TWO EXHIBITS TO  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT UNDER  
SEAL**

1 THE GEO GROUP, INC.,  
 2 Counter-Claimant,  
 3 vs.  
 4 RAUL NOVOA, JAIME CAMPOS  
 5 FUENTES, ABDIAZIZ KARIM, and  
 6 RAMON MANCIA, individually and on  
 7 behalf of all others similarly situated,  
 8 Counter-Defendant.

TAC Filed: September 16, 2019  
 SAC Filed: December 24, 2018  
 FAC Filed: July 6, 2018  
 Complaint Filed: December 19, 2017  
 Trial Date: March 30, 2021

9 **DECLARATION OF ELLEN S. ROBBINS**

10 I, Ellen S. Robbins, hereby declare:

11 1. I am over the age of eighteen (18). The statements contained herein are  
 12 made based on my personal knowledge and/or made to the best of my knowledge upon  
 13 review of the record in this case, and if called upon to do so, I could and would  
 14 competently testify thereto.

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

18 3. On October 26, 2020, Plaintiffs filed their Application to File Two  
 19 Exhibits to Plaintiffs' Motion for Summary Judgment Under Seal ("Application") with  
 20 the Court seeking to file the following documents under seal:

- 21 a. Exhibit A to Plaintiffs' Motion for Summary Judgment: GEO-  
 22 Novoa\_00035044-GEONovoa\_00035249 (ECF 365-1, hereinafter  
 23 "Bridge Contract");
- 24 b. Exhibit B to Plaintiffs' Motion for Summary Judgment: GEO-  
 25 Novoa\_00040872-GEO\_Novoa\_00040885; GEO-  
 26 Novoa\_00041323-GEONovoa\_00041368 (ECF365-2, hereinafter  
 27 "Direct Contract").

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1           4.     On October 15, 2020, Plaintiffs' counsel contacted GEO's counsel to  
2 confer with GEO about the possibility of making redactions to the Bridge and Direct  
3 Contracts.

4           5.     On October 16, 2020, my office notified ICE counsel of Plaintiffs' request  
5 for redactions on the Bridge and Direct Contracts. We requested ICE advise whether  
6 they would be making any redactions to the Contracts as the documents were  
7 previously designated, "Highly Confidential" and "Attorneys' Eyes Only."

8           6.     We did not receive redactions back from ICE regarding these documents  
9 until October 29, 2020.

10          7.     The Bridge Contract and Direct Contract must be filed under seal.

11          8.     The Bridge Contract and Direct Contract both include numerous  
12 references to GEO's proprietary business information as well as personally identifiable  
13 information.

14          9.     GEO's competitive standing would likely be harmed if GEO's proprietary  
15 business information, such as sensitive financial information regarding wages, costs,  
16 staffing plans, and other information related to GEO's operations were made publicly  
17 available. *See Childs v. San Diego Family Housing, LLC* (S.D. Cal., May 14, 2020,  
18 No. 19CV2329 JM (MDD)) 2020 WL 2512188, at \*3 (granting motion to seal excerpts  
19 from confidential and proprietary business records); *see also Federal Trade*  
20 *Commission v. Qualcomm Incorporated* (N.D. Cal., Jan. 3, 2019, No. 17-CV-00220-  
21 LHK) 2019 WL 95922, at \*3 ("to the extent that the instant motion seeks to seal  
22 information that, if published, may harm Qualcomm's or third parties' competitive  
23 standing and divulges terms of confidential contracts, contract negotiations, or trade  
24 secrets, the Court agrees with the parties that compelling reasons exist to seal this  
25 information.")

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1 10. Additionally, third party privacy interests would likely be harmed if the  
2 personally identifiable information within the both contracts was disclosed. *See*  
3 *McMillan v. Chaker* (S.D. Cal., Oct. 2, 2017, No. 16CV2186-WQH-MDD) 2017 WL  
4 4417686, at \*2 (granting motion to seal where records contained "personal and  
5 confidential information... such as addresses, financial information, driver's license  
6 information, and a possible social security number"); *see also Benedict v. Hewlett-*  
7 *Packard Company* (N.D. Cal., July 1, 2016, No. 13-CV-00119-BLF) 2016 WL  
8 3568922, at \*2 (granting request to file documents under seal where records to be filed  
9 included personal identifiable information such as personal contact information, salary  
10 information, customer contacts, and employee data.)

11 11. Accordingly, there exists good cause to file the Bridge Contract and the  
12 Direct Contract under seal, or in the alternative, to file portions of the documents under  
13 seal in accordance with the redacted contracts attached hereto.

14 12. A redacted copy of the Bridge Contract is attached to this declaration as  
15 **Exhibit 1.**

16 13. A redacted copy of the Direct Contract is attached to this declaration as  
17 **Exhibit 2.**

18 I declare under penalty of perjury under the laws of the United States of America  
19 that the above is true and correct and that I executed this Declaration on the 30th day of  
20 October, 2020, in Hermosa Beach, California.

21 /s/ Ellen S. Robbins  
22 Ellen S. Robbins, Declarant  
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