

The Honorable Robert J. Bryan

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 17-cv-05769-RJB

**DECLARATION OF R. ANDREW
FREE**

DECLARATION OF R. ANDREW FREE

Pursuant to 28 U.S.C. § 1746, I, R. Andrew Free, hereby declare under penalty of
perjury that the following is true and correct:

1. Plaintiffs attached four Exhibits to Plaintiffs’ Opposition to Defendant’s Motion to Dismiss the First Amended Complaint:
 - a. Exhibit A – GEO’s Second Supplemental Response to Plaintiffs’ Request for Admission Number 2 in *Menocal v. The GEO Group, Inc.*, No. 1:14-cv-02887-JLK (D. Colo.), provided July 21, 2017.
 - b. Exhibit B – Excerpts from agency records provided by U.S. Immigration and Customs Enforcement in response to a Freedom of Information Act assigned tracking number ICE 2013FOIA32547, which were disclosed

1 during litigation in *Stevens v. U.S. Dep't of Homeland Security*, No. 1:14-
2 cv-3305 (N.D. Ill. Filed May 6, 2014).

3 c. Exhibit C – An excerpt of the Detainee Handbook GEO provided detained
4 immigrants at is LaSalle Detention Facility in Jena, Louisiana in 2014 or
5 2015.

6 d. Exhibit D – Hearing Transcript from April 24, 2018 motion hearing before
7 this Court.

8 2. Each of these Exhibits is a true and accurate copy of the original record provided,
9 except with respect to the highlights to portions of Exhibit A, which were applied
10 by counsel.

11 3. Plaintiffs submit Exhibits A-C in support of their contention that the additional facts
12 averred by GEO's counsel—many of which are unsworn and unsupported by
13 documentary evidence—are disputed and will be challenged in the course of
14 discovery.

15 DATED this 18th day of July, 2018.

16 LAW OFFICE OF R. ANDREW FREE

17 /s/ R. Andrew Free
18 Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that I caused to be served in the manner noted below a copy of the foregoing pleading on the following individual(s):

Adam J Berger
SCHROETER GOLDMARK & BENDER
810 3RD AVE
STE 500
SEATTLE, WA 98104

Andrea D'Ambra
NORTON ROSE FULBRIGHT US LLP (NY)
1301 AVENUE OF THE AMERICAS
NEW YORK, NY 10019

Charles A Deacon
NORTON ROSE FULBRIGHT US LLP (SAN ANTONIO)
300 CONVENT ST
STE 2100
SAN ANTONIO, TX 78205

Mark Emery
NORTON ROSE FULBRIGHT US LLP (DC)
799 9TH STREET
STE 1000
WASHINGTON, DC 20001

R Andrew Free
LAW OFFICE OF R. ANDREW FREE
PO BOX 90568
NASHVILLE, TN 37209

Lindsay Halm
SCHROETER GOLDMARK & BENDER
810 3RD AVE
STE 500
SEATTLE, WA 98104

Joan K Mell
III BRANCHES LAW PLLC
1019 REGENTS BLVD STE 204
FIRCREST, WA 98466

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Meena Pallipamu Menter
MENTER IMMIGRATION LAW PLLC
8201 164TH AVENUE NE, STE 200
SEATTLE, WA 98052

Devin T Theriot-Orr
SUNBIRD LAW PLLC
1001 4TH AVENUE
STE 3200
SEATTLE, WA 98154

Jamal N Whitehead
SCHROETER GOLDMARK & BENDER
810 3RD AVE
STE 500
SEATTLE, WA 98104

DATED: July 16, 2018 at Nashville, Tennessee

/s/ R. Andrew Free

R. Andrew Free