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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON AT TACOMA**

9
10 CHAO CHEN, individually and on
11 behalf of all those similarly situated,

12 Plaintiff,

13 v.

14 THE GEO GROUP, INC., a Florida
15 corporation,

16 Defendant.
17
18

Case No.: 3:17-cv-05769

NOTICE OF APPEARANCE

(Clerk's Action Requested)

19 **TO:** THE CLERK OF THE COURT

20 **AND TO:** ALL PARTIES

21 PLEASE TAKE NOTICE that JOAN K. MELL and the law firm III BRANCHES LAW,
22 PLLC, appears for THE GEO GROUP, INC. in the above-entitled action. Said appearance is
23 without waiver of any defenses including, without limitation, the defenses of:
24

- 25 1. Lack of Jurisdiction of Subject Matter;
26 2. Lack of Jurisdiction over the Person;
27 3. Improper Venue;
28 4. Insufficiency of Process;
29

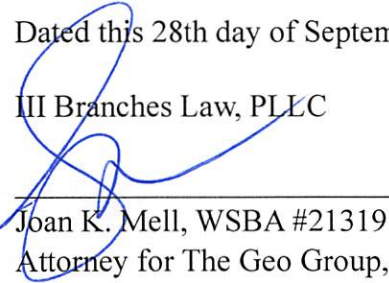
- 1 5. Insufficiency of Service of Process;
2 6. Failure to State a Claim upon which Relief may be Granted; and,
3 7. Failure to Join a Party.
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5 **YOU ARE HEREBY FURTHER NOTIFIED** that all further papers and pleadings,
6 except original process, shall be served upon the undersigned attorney at the address stated below.

7 Joan K. Mell
8 III Branches Law, PLLC
9 1019 Regents Boulevard, Suite 204
10 Fircrest, Washington 98466
11 Telephone: (253)-566-2510
12 Facsimile: (281)-664-4643
13 Email: joan@3brancheslaw.com

14 Dated this 28th day of September, 2017 at Fircrest, WA.

15 III Branches Law, PLLC

16 
17 _____
18 Joan K. Mell, WSBA #21319
19 Attorney for The Geo Group, Inc.
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1 **CERTIFICATE OF SERVICE**

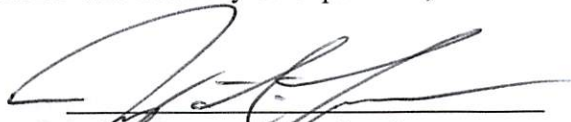
2 I, Joseph Fonseca, hereby certify as follows:

3 I am over the age of 18, a resident of Pierce County, and not a party to the above action. On
4 September 28, 2017, I electronically filed the above Notice of Appearance, with the Clerk of the
5 Court using the CM/ECF system and served via Email to the following:
6

ATTORNEY NAME & ADDRESS	METHOD OF DELIVERY
7 Schroeter, Goldmark & Bender 8 Adam J. Berger, WSBA No. 20714 9 Lindsay L. Halm, wSBA No. 37141 10 Jamal N. Whitehead, WSBA No. 39818 11 810 Third Avenue, Suite 500 12 Seattle, WA 98104 13 berger@sgb-law.com 14 halm@sgb-law.com 15 whitehead@sgb-law.com	■ CM/ECF E-Service ■ E-mail
16 The Law Office of R. Andrew Free 17 Andrew Free 18 P.O. Box 90568 19 Nashville, TN 37209 20 andrew@immigrationcivilrights.com	
21 Sunbird Law, PLLC 22 1001 Fourth Avenue, Suite 3200 23 Seattle, WA 98154 24 devin@sunbird.law	

25 I certify under penalty of perjury under the laws of the State of Washington that the above
26 information is true and correct.

27 DATED this 28th day of September, 2017 at Fircrest, Washington.

28 
29 Joseph Fonseca, Paralegal