

The Honorable Robert J. Bryan

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

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

Plaintiff,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 17-cv-05769-RJB

PLAINTIFF’S MOTION FOR
LEAVE TO AMEND CLASS
ACTION COMPLAINT

Note on Motion Calendar:
June 8, 2018

Pursuant to the Court’s order dated May 15, 2018 (Dkt. No. 77), Plaintiff Chao Chen seeks leave to amend his class action complaint (Dkt. No. 1) to substitute three individuals as named plaintiffs in this action and to voluntarily withdraw as a named plaintiff. Pursuant to Local Rules W.D. Wash. Civil Rule 15, a copy of Plaintiff’s proposed amended complaint is attached to this motion as Exhibit 1 and a redlined version comparing the proposed amended complaint with the original is attached as Exhibit 2.

DATED this 24th day of May, 2018.

SCHROETER GOLDMARK & BENDER

s/ Jamal N. Whitehead

Adam J. Berger, WSBA #20714
Lindsay L. Halm, WSBA #37141
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED at Seattle, Washington this 24th day of May, 2018.

s/ Sheila Cronan

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