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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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

Plaintiff,

v.

THE GEO GROUP, INC., a Florida  
corporation,

Defendant.

No. 3:17-cv-05769-RJB

PLAINTIFFS' NOTICE OF  
SUPPLEMENTAL AUTHORITY RE:  
DEFENDANT'S MOTION TO  
DISMISS AND SUPPORTING  
DECLARATION OF TRACEY  
VALERIO

Plaintiffs respectfully submit the attached supplemental authority with respect to the arguments made at pages 4, 6, 7, 9 of the Reply in Support of GEO's Motion to Dismiss Plaintiff's First Amended Complaint (Dkt. #104) in reliance on the Declaration of Tracey Valerio (Dkt. #105). The attached letter from Anne M. Rose, Associate Legal Advisor in the Office of the Principal Legal Advisor for U.S. Immigration and Customs Enforcement, dated August 1, 2018, and received by undersigned counsel via email at 4:45 p.m. on this date, directly relates to the admissibility, reliability, and lack of legal authority of the Valerio Declaration and therefore to all arguments reliant on that Declaration. As the August 1 date of

PLAINTIFFS' NOTICE OF  
SUPPLEMENTAL AUTHORITY  
RE: DEFENDANT'S MOTION TO  
DISMISS AND SUPPORTING  
DECLARATION OF TRACEY VALERIO -1  
Case No. 3:17-cv-05769-RJB

Law Office of R. Andrew Free  
P.O. Box 90568  
Nashville, TN 37209  
O: (844) 321-3221x1  
F: (615) 829-8959



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 1, 2018, I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the  
4 following:

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25 **PLAINTIFFS' NOTICE OF  
SUPPLEMENTAL AUTHORITY  
RE: DEFENDANT'S MOTION TO  
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DECLARATION OF TRACEY VALERIO -3  
Case No. 3:17-cv-05769-RJB**

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DATED: August 1, 2018, at Tacoma, Washington.

s/R. Andrew Free  
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PLAINTIFFS’ NOTICE OF  
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DECLARATION OF TRACEY VALERIO -4  
Case No. 3:17-cv-05769-RJB

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