

The Honorable Robert J. Bryan

**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.

Case No.: 3:17-cv-05769-RJB

**STATEMENT OF RELATED CASES**

The Geo Group Inc. ("GEO") gives notice to the Court of two cases related in that both involve the same named defendant, The GEO Group, Inc., and the same subject matter in that both seek to apply state minimum wage laws to federal detainees: *State of Washington v. The GEO Group, Inc.*, Pierce County Superior Court Case No.: 17-2-11422-2, removal notice filed 10/09/2017 and *Menocal v. The GEO Group, Inc.*, 113 F. Supp. 3d 1125 (D. Colo. 2015).

Dated this 9th day of October, 2017 at Fircrest, WA.

III Branches Law, PLLC

  
Joan K. Mell, WSBA #21319  
Attorney for The Geo Group, Inc.

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  
5 October 9, 2017, I electronically filed the above Statement of Related Cases, with the Clerk of the  
6 Court using the CM/ECF system and served via Email to the following:

ATTORNEY NAME & ADDRESS	METHOD OF DELIVERY
Schroeter, Goldmark & Bender Adam J. Berger, WSBA No. 20714 Lindsay L. Halm, wSBA No. 37141 Jamal N. Whitehead, WSBA No. 39818 810 Third Avenue, Suite 500 Seattle, WA 98104 berger@sgb-law.com halm@sgb-law.com whitehead@sgb-law.com	<input checked="" type="checkbox"/> CM/ECF E-Service  <input checked="" type="checkbox"/> E-mail
The Law Office of R. Andrew Free Andrew Free P.O. Box 90568 Nashville, TN 37209 andrew@immigrationcivilrights.com	
Sunbird Law, PLLC 1001 Fourth Avenue, Suite 3200 Seattle, WA 98154 devin@sunbird.law	

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

24 DATED this 9th day of October, 2017 at Fircrest, Washington.

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26 \_\_\_\_\_  
27 Joseph Fonseca, Paralegal