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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

**RAUL NOVOA, JAIME CAMPOS
FUENTES, ABDIAZIZ KARIM, and
RAMON MANCIA**, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

Civil Action No. 5:17-cv-02514-JGB-SHKx

**DECLARATION OF LYDIA
WRIGHT IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF CLASS
CERTIFICATION**

I, Lydia Wright, declare that the following is true and correct based upon my personal knowledge:

1. I am an attorney for the Plaintiffs in the above-captioned action.

2. Attached hereto are the following exhibits in support of Plaintiffs' Reply in Support of Class Certification, ECF 209:

3. Attached as **Exhibit 1** is a true and correct copy of the transcript of the deposition of Amber Martin, GEO's Executive Vice President of Contract Compliance, taken in *Menocal, et al. v. The GEO Group, Inc.*, Case No. 1:14-cv-02887 (D. Colo.) on October 9, 2019 in Boca Raton, Florida.

4. Attached as **Exhibit 2** is a true and correct copy of the Written Testimony of Selene Saavedra-Roman, which was delivered on September 26, 2019 to the House Judiciary Committee Subcommittee on Immigration and Citizenship during a hearing entitled "The Expansion and Troubling Use of ICE Detention."

1 5. Attached as **Exhibit 3** is a true and correct copy of the Declaration of
2 Shannon Ely, Contracting Officer at U.S. Immigration and Customs Enforcement,
3 Office of Acquisition Management, dated October 11, 2019.

4 6. Attached as **Exhibit 4** is a true and correct copy of the transcript of the
5 Rule 30(b)(6) deposition of Dawn Ceja, GEO’s Assistant Warden of Operations at the
6 Aurora ICE Processing Center in Aurora, Colorado, taken in *Menocal, et al. v. The GEO*
7 *Group, Inc.*, Case No. 1:14-cv-02887 (D. Colo.) on March 29, 2016 in Denver, Colorado.

8 7. Attached as **Exhibit 5** is a true and correct copy of the report issued on
9 March 6, 2017 by the Office of Inspector General, Dept. of Homeland Security entitled:
10 “Management Alert on Issues Requiring Immediate Action at the Theo Lacy Facility in
11 Orange, California” (“OIG-17-43-MA”).

12 8. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the
13 foregoing is true and correct to the best of my knowledge.

14
15 Dated: November 4, 2019

/s/ Lydia A. Wright

Lydia A. Wright (admitted *pro hac vice*)

lwright@burnscharest.com

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CERTIFICATE OF SERVICE

On November 4, 2019, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Central District of California, using the electronic case filing system. I hereby certify that I have provided copies to all counsel of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Lydia Wright
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