

1 BLOOD HURST & O'REARDON, LLP  
TIMOTHY G. BLOOD (149343)  
2 LESLIE E. HURST (178432)  
PAULA R. BROWN (254142)  
3 JAMES M. DAVIS (301636)  
501 West Broadway, Suite 1490  
4 San Diego, CA 92101  
Tel: 619/338-1100  
5 619/338-1101 (fax)  
tblood@bholaw.com  
6 lhurst@bholaw.com  
pbrown@bholaw.com  
7 jdavis@bholaw.com

8 LAW OFFICES OF CHARLES S. ROSEMAN  
& ASSOCIATES  
9 CHARLES S. ROSEMAN (051453)  
RICHARD D. PRAGER (174788)  
10 1761 Hotel Circle South, Suite 250  
San Diego, CA 92108  
11 Tel: 619/544-1500  
619/239-6411 (fax)  
12 croseman@rosemanlaw.com  
rprager@rosemanlaw.com

13 Attorneys for Plaintiffs

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**08/15/2023** at 05:05:00 PM  
Clerk of the Superior Court  
By Malka Manneh, Deputy Clerk

LAW OFFICE OF  
THOMAS E. ROBERTSON  
THOMAS E. ROBERTSON (262659)  
501 West Broadway, Suite 1510  
San Diego, CA 92101  
Tel: 619/544-9911  
619/615-2264 (fax)  
thomas@robertsonsdlaw.com

14  
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **COUNTY OF SAN DIEGO – CENTRAL DIVISION**

17 SCOTT MILES STOUT AND DERRICK  
ALLEN FELTON, individually and on behalf  
18 of all others similarly situated,

19 Plaintiffs,

20 v.

21 THE GEO GROUP, INC., a Florida  
corporation, doing business in California as  
22 GEO CALIFORNIA, INC.; SDCC MIDDLE  
BLOCK, LLC, a Delaware limited liability  
23 company; and DOES 1-20, inclusive,

24 Defendants.

Case No. 37-2019-00000650-CU-CR-CTL

Assigned for All Purposes to:  
Judge Kenneth J. Medel  
Dept. C-66

**CLASS ACTION**

**DECLARATION OF THOMAS  
ROBERTSON IN SUPPORT OF MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND REQUEST  
FOR AWARD OF ATTORNEYS' FEES  
AND EXPENSES**

(UNLIMITED CIVIL MATTER)  
IMAGED FILE

(Mandatory eFILE Case)

**Date: September 29, 2023**  
**Time: 9:30 a.m.**  
**Dept: C-66**

Complaint Filed: January 4, 2019  
Trial Call: November 4, 2022

1 I, Thomas Robertson, declare:

2 1. I submit this declaration in support of Plaintiffs' Unopposed Motion for Final  
3 Approval of Class Action Settlement and Request for Award of Attorneys' Fees, Costs, Expenses,  
4 and Service Award. The following facts are within my personal knowledge, and if called as a  
5 witness, I could and would testify competently to them.

6 2. My law practice has two primary areas of focus. First, in the trial courts, I litigate  
7 civil rights cases with an emphasis on excessive force by police agencies and misconduct by  
8 correctional officers inside the jails and prisons. Second, I have an appellate law practice that  
9 encompasses civil and criminal appeals in both federal and state courts.

10 3. My law firm, along with our co-counsel, conducted significant work related to this  
11 Action. This work includes, but is not limited to, significant pre-suit investigation, legal research  
12 needed for drafting the initial complaint, and defending Plaintiffs' depositions.

13 4. My firm prosecuted this Action on a contingent-fee basis with no guarantee of  
14 recovery. The risk, from the outset of this litigation, is that I would provide legal representation  
15 (along with co-counsel) with the understanding that we would not receive any compensation unless  
16 we were successful, and the Court approved the corresponding compensation.

17 5. My work covered many aspects of the Action. For example, in the first year, I visited  
18 the Facility seventeen times to conduct over twenty interviews of disabled detainees regarding the  
19 conditions of their confinement. Many of these interviews also pertained to evaluating potential  
20 Class Representatives for the Action. In addition, during the same time period, I drafted  
21 approximately forty letters to detainees to obtain more information between my visits. My other  
22 work on the case include extensive legal research to support the legal theories set forth in the  
23 Action's original Complaint; obtaining and reviewing the Facility's medical records for several of  
24 the potential class members; helping draft multiple rounds of written discovery; maintaining contact  
25 with numerous class members after they left the Facility; conducting valuation research in advance  
26 of the mediations and helping draft the mediation briefs; helping prepare the Class Representatives  
27 for their depositions and defending their depositions; and assisting in drafting and reviewing the  
28 papers filed in support of preliminary and final approval of this class action Settlement. I believe



# **Exhibit A**

# LAW OFFICE OF THOMAS E. ROBERTSON

501 W. BROADWAY, SUITE 1510  
SAN DIEGO, CALIFORNIA 92101

TEL: (619) 544-9911  
*thomas@robertsonSDlaw.com*

---

## **Attorney Thomas E. Robertson**

Mr. Robertson founded the Law Office of Thomas E. Robertson with a focus on appellate law and civil rights litigation. He is admitted to practice in the state of California, as well as the U. S. Court of Appeals for the Ninth Circuit, and the U.S. District Court for the Central and Southern Districts of California. Mr. Robertson obtained his Juris Doctor degree from William & Mary Law School in Virginia, where he served on the Law Review, was awarded the school's highest award for oral advocacy, and graduated ranked 2nd in the Class of 2008.

After law school, beginning in September 2008, Mr. Robertson clerked one year for the Honorable Tommy E. Miller, a Magistrate Judge in the U.S. District Court for the Eastern District of Virginia. The following year, he moved to San Diego and clerked one year for Magistrate Judge Louisa S. Porter in the U.S. District Court for the Southern District of California.

After concluding his federal judicial clerkships, Mr. Robertson opened the Law Office of Thomas E. Robertson and began representing plaintiffs in civil rights litigation. Specifically, Mr. Robertson focuses on cases of excessive force by law enforcement and unlawful practices inside jails and prisons. He has tried seven jury trials to verdict, including *Wilkerson v. City of San Diego*, 12-cv-2994-WQH (S.D. Cal.) (unanimous verdict in favor of plaintiff on claims of excessive force, including award of punitive damages); *Johnson v. County of San Diego*, 14-cv-616-LAB (S.D. Cal.) (unanimous verdict in favor of plaintiff on claims of false arrest and excessive force); and *Sialoi v. City of San Diego*, 11cv2280-JLS (S.D. Cal.) (unanimous verdict in favor of plaintiff on claims of negligence and officers' unconstitutional entry of the home). He has also prevailed on an *affirmative* motion for summary adjudication, where the district court found liability on plaintiffs' civil rights claims as a matter of law. *Bush v. County of San Diego*, 15-cv-686-L-JMA (S.D. Cal.). In addition, Mr. Robertson has recently obtained favorable settlements in "jail death" cases where liability was heavily disputed. *See, e.g., Estrada v. Imperial County*, 17cv326-BAS (S.D. Cal.) (\$675,000 settlement where young woman without any documented history of suicidal intent committed suicide in her cell); *Woodward v. County of San Diego*, 17cv2369-TWR (S.D. Cal.) (\$400,000 settlement for man unexpectedly assaulted and strangled by his cellmate).

Mr. Robertson's appellate practice began when he joined the panel of Appellate Defenders, Inc., representing indigent defendants on direct appeal of their criminal convictions. He was promoted up the tiers of panel to the highest level, now representing clients who received sentences of "life" or "life without the possibility of parole." Mr. Robertson has obtained full reversals in numerous cases, including recent decisions in *People v. Dominguez* (2021) 66 Cal.App.5th 163, and

*People v. Cauble* (Cal. App. Dec. 23, 2020) (Case No. D076215). He also won a unanimous decision in the California Supreme Court that resolved a split in authority on an issue of criminal restitution. (*People v. Martinez* (2017) 2 Cal.5th 1093.)

Mr. Robertson serves on the Southern District of California's pro bono panel (for civil lawsuits brought by indigent prisoners), and he received the "Outstanding Service Award" from the Legal Aid Society of San Diego for helping develop and implement the "Self-Help Workshop" for pro se litigants in the Fourth District California Court of Appeal. Mr. Robertson also gives CLE presentations, such as his recent program, "Building a Reply Brief from the Ground Up," presented to Appellate Defenders, Inc. (May 18, 2022), and to the Marin Chapter of the California Appellate Defense Counsel (Oct. 14, 2022). Mr. Robertson was selected as a "San Diego Super Lawyers Rising Star" in 2019, and then as a "San Diego Super Lawyer" from 2020 to present.

Before law school, Mr. Robertson graduated from Claremont McKenna College with a degree in Mathematics and Economics, worked two years for the Mergers & Acquisitions Department of Goldman Sachs, then moved to Chile to teach high school mathematics.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

*Scott Miles Stout; Derrick Allen Felton v. The GEO Group, Inc.; SDCC Middle Block, LLC*

San Diego Superior Court – Central  
Case No. 37-2019-00000650-CU-CR-CTL

I hereby certify that on August 15, 2023, I electronically filed the foregoing with the Clerk of the Court using One Legal Online Court Services, and electronically served the foregoing upon the attorney of record for each party in this case at the e-mail address(es) registered for such service through One Legal Online Court Services. Parties may access this filing through the Court’s website.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 15, 2023.

*s/ Janet Kohnenberger*

Janet Kohnenberger  
BLOOD HURST & O’REARDON, LLP  
501 West Broadway, Suite 1490  
San Diego, CA 92101  
Tel: 619/338-1100  
619/338-1101 (fax)  
jkohnenberger@bholaw.com