

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

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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

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

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

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 LARA JARJOURA

(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

1
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Case No.: 37-2019-00000650-CU-CR-CTL

DECLARATION OF LARA JARJOURA

14 STATE OF WASHINGTON)
15) SS:
16 COUNTY OF KING)

16 **LARA JARJOURA**, being duly sworn, declares and states as follows:

17 1. I am a Vice President of Operations at JND Legal Administration
18 (JND”).¹ JND is a legal administration services provider with its headquarters located in Seattle,
19 Washington. JND has extensive experience in all aspects of legal administration and has
20 administered class actions in hundreds of cases.

21 2. JND is serving as the Settlement Administrator in the above-captioned litigation
22 (the “Action”), as ordered by the Court in its April 28, 2023 Order Granting Preliminary
23 Approval of Class Action Settlement (“Preliminary Approval Order”). The following
24 statements are based on my personal knowledge and information provided to me by other JND
25
26

27 _____
28 ¹ Capitalized terms used and otherwise not defined in this Declaration shall have the meanings
given to such terms in the Settlement Agreement or Preliminary Approval Order.

DECLARATION OF LARA JARJOURA

1 employees working under my supervision, and, if called on to do so, I could testify competently
2 thereto.

3
4 **CLASS MEMBER DATA**

5 3. On May 5, 2023, Class Counsel provided JND with 19 PDF files consisting of
6 19,805 pages. This documentation was related to 129 Class Members and included detainee,
7 medical, and incident reports in a non-standard format. In addition, JND was provided with a
8 list identifying that, of the 129 Class Members, a total of 110 Class Members were not required
9 to file a claim (“Identified Class Members”) and 19 Class Members were required to file a claim
10 (“Claims-Based Class Members”).
11

12 4. Given the transient nature of the population, JND reviewed the documentation
13 to obtain all potential mailing addresses, phone numbers, and emergency contacts for each Class
14 Member. JND also searched the California Department of Corrections and Rehabilitation
15 website (www.cdcr.ca.gov) using the Inmate Locator for updated addresses of Class Members.
16

17 5. Of the 110 Identified Class Members, JND was able to obtain address
18 information for 86. In total, for the Identified Class Members, JND was able to obtain 109
19 addresses, as some Class Members had multiple addresses. Of the 19 Claims-Based Class
20 Members, JND was able to obtain 13 mailing addresses.

21 6. Prior to mailing Notices, JND performed advanced address research using
22 TransUnion’s skip-trace database and then verified the mailing addresses through the National
23 Change of Address (“NCOA”) database.² The Class Member data was promptly loaded into a
24 database established for this Action.
25

26
27
28 ² The NCOA database is the official United States Postal Service (“USPS”) technology product
which makes change of address information available to mailers to help reduce undeliverable mail pieces before
mail enters the mail stream. This product is an effective tool to update address changes when a person has

1 **PUBLICATION NOTICE**

2 7. On May 26, 2023, JND caused a summarized version of the Notice (“Publication
3 Notice”) to appear in *The San Diego Union-Tribune* in English and in *El Latino* in Spanish.
4

5 **MAILED NOTICE**

6 8. On May 26, 2023, JND mailed 109 Court-approved Notices (“Identified
7 Notice”) to 86 unique Identified Class Members. Of these, 33 were returned to JND as
8 undeliverable, and eight were remailed to updated addresses after research.

9 9. On May 26, 2023, JND mailed 13 Court-approved Notice and Claim Forms
10 (“Claims-Based Notice”) to 13 Claims-Based Class Members. Of these, six were returned to
11 JND as undeliverable, and one was remailed to an updated address after research. On July 26,
12 2023, JND mailed the Claims-Based Notice to an additional Class Member identified by Class
13 Counsel.
14

15 10. As of the date of this Declaration, 71 Identified Class Members and nine Claims-
16 Based Class Members were mailed Notices that were not returned as undeliverable,
17 representing 66.7% of the total Class Member population.
18

19 **SETTLEMENT WEBSITE**

20 11. On May 26, 2023, JND established a dedicated settlement website
21 (www.GEOSettlementSanDiego.com) with the option for Claims-based Class Members to
22 electronically submit a claim. The website hosts copies of important case documents, including
23 the Second Amended Civil Complaint, Settlement Agreement, and Preliminary Approval Order.
24 Additionally, the website includes English and Spanish copies of the Claim Form, Long Form
25
26

27 _____
28 completed a change of address form with the USPS. The address information is maintained in the database for 48 months.

1 Notice, Short Form Notice and Publication Notice. The website also provides answers to
2 frequently asked questions, key dates and deadlines, and contact information for the Settlement
3 Administrator.

4
5 12. As of the date of this Declaration, the website has tracked 207 unique users with
6 335 page views. JND will continue to maintain the settlement website throughout the
7 administration process.

8 **SETTLEMENT EMAIL ADDRESS**

9
10 13. On May 26, 2023, JND established a case-specific, dedicated email address
11 (info@GEOSettlementSanDiego.com) to receive and respond to Class Member inquiries.

12 14. As of the date of this Declaration, the email address has received 11 emails.

13 **TOLL-FREE TELEPHONE NUMBER**

14
15 15. On May 26, 2023, JND established a case-specific, dedicated toll-free telephone
16 number (1-855-678-0651) for Class Members to obtain more information about the Settlement.

17 16. As of the date of this Declaration, the toll-free number has received 12 calls.
18 JND will continue to maintain the toll-free information line throughout the administration
19 process.

20 **CLAIMS RECEIVED**

21
22 17. The Claims-Based Notice informed the 14 Claims-Based Class Members with
23 mailing addresses that anyone who wanted to participate in the Settlement must submit a
24 completed and signed Claim Form, postmarked or submitted online on or before August 24,
25 2023.

26
27 18. In addition to the aforementioned research efforts to obtain valid mailing
28 addresses for Claims-Based Class Members, JND conducted outreach to their emergency

1 contacts to identify potential alternate mailing addresses. JND will continue its efforts to contact
2 Class Members throughout the administration process.

3 19. As of the date of this Declaration, JND has received 3 Claim Forms. JND will
4 process and report to Counsel any Claim Forms that are received.
5

6 **REQUESTS FOR EXCLUSION**

7 20. The Notices informed Class Members that anyone who wanted to be excluded
8 from the Settlement could do so by submitting a written request for exclusion (“opt-out”) to the
9 Settlement Administrator, postmarked on or before August 30, 2023.
10

11 21. As of the date of this Declaration, JND has not received any exclusion requests.

12 **OBJECTIONS**

13 22. The Notices informed Class Members that anyone who wanted to object to the
14 Settlement could do so by submitting a written objection to the Settlement Administrator,
15 postmarked on or before August 30, 2023.
16

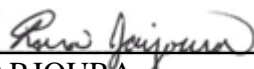
17 23. As of the date of this Declaration, JND has not received any objections.

18 **ADMINISTRATION COSTS**

19 24. As of the date of this Declaration, JND has billed \$60,529.77 for costs and
20 expenses actually and reasonably incurred in connection with our administration of the
21 Settlement.
22

23
24 I declare under penalty of perjury pursuant to the laws of the United States of America
25 that the forgoing is true and correct.

26 Executed on August 14, 2023 at Seattle, Washington.
27

28 

LARA JARJOURA

DECLARATION OF LARA JARJOURA