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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO – CENTRAL DIVISION

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

19 Plaintiffs,

20 v.

21 THE GEO GROUP, INC., a Florida
22 corporation, doing business in California as
23 GEO CALIFORNIA, INC.; SDCC MIDDLE
BLOCK, LLC, a Delaware limited liability
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

**SUPPLEMENTAL JARJOURA
DECLARATION RE: NOTICE
ADMINISTRATION AND OPT-OUTS**

(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
2 SUPERIOR COURT OF THE STATE OF CALIFORNIA
3 COUNTY OF SAN DIEGO – CENTRAL DIVISION

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

SUPPLEMENTAL DECLARATION OF
LARA JARJOURA REGARDING NOTICE
ADMINISTRATION AND OPT-OUTS

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.

SUPPLEMENTAL DECLARATION OF LARA JARJOURA

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

3 **CLASS MEMBER DATA**

4
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

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

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, 37 were returned to JND as
8 undeliverable. Four Identified Notices were remailed to updated addresses after research, and
9 five Identified Notices were remailed upon request. Of the remailed Identified Notices, one
10 was again returned as undeliverable.
11

12 9. On May 26, 2023, JND mailed 13 Court-approved Notice and Claim Forms
13 (“Claims-Based Notice”) to 13 Claims-Based Class Members. Of these, eight were returned to
14 JND as undeliverable, and two were remailed to an updated address after research. JND also
15 mailed the Claims-Based Notice to two additional Class Members identified by Class Counsel,
16 one of which was returned as undeliverable.
17

18 10. As of the date of this Declaration, 67 Identified Class Members and seven
19 Claims-Based Class Members were mailed Notices that were not returned as undeliverable,
20 representing 60% of the total Class Member population.
21

22 **SETTLEMENT WEBSITE**

23 11. On May 26, 2023, JND established a dedicated settlement website
24 (www.GEOSettlementSanDiego.com) with the option for Claims-based Class Members to
25 electronically submit a claim. The website hosts copies of important case documents, including
26

27 _____
28 enters the mail stream. This product is an effective tool to update address changes when a person has completed a
change of address form with the USPS. The address information is maintained in the database for 48 months.

1 the Second Amended Civil Complaint, Settlement Agreement, and Preliminary Approval Order.
2 Additionally, the website includes English and Spanish copies of the Claim Form, Long Form
3 Notice, Short Form Notice and Publication Notice. The website also provides answers to
4 frequently asked questions, key dates and deadlines, and contact information for the Settlement
5 Administrator.
6

7 12. As of the date of this Declaration, the website has tracked 273 unique users with
8 869 page views. JND will continue to maintain the settlement website throughout the
9 administration process.
10

11 **SETTLEMENT EMAIL ADDRESS**

12 13. On May 26, 2023, JND established a case-specific, dedicated email address
13 (info@GEOSettlementSanDiego.com) to receive and respond to Class Member inquiries.
14

15 14. As of the date of this Declaration, the email address has received 17 emails.
16

17 **TOLL-FREE TELEPHONE NUMBER**

18 15. On May 26, 2023, JND established a case-specific, dedicated toll-free telephone
19 number (1-855-678-0651) for Class Members to obtain more information about the Settlement.
20

21 16. As of the date of this Declaration, the toll-free number has received 19 calls.
22 JND will continue to maintain the toll-free information line throughout the administration
23 process.
24

25 **CLAIMS RECEIVED**

26 17. The Claims-Based Notice informed the 15 Claims-Based Class Members with
27 mailing addresses that anyone who wanted to participate in the Settlement must submit a
28 completed and signed Claim Form, postmarked or submitted online on or before August 24,
2023.

1 18. In addition to the aforementioned research efforts to obtain valid mailing
2 addresses for Claims-Based Class Members, JND conducted outreach to their emergency
3 contacts to identify potential alternate mailing addresses. JND will continue its efforts to contact
4 Class Members throughout the administration process.
5

6 19. As of the date of this Declaration, JND has received three Claim Forms. JND
7 will process and report to Counsel any Claim Forms that are received.
8

9 20. On September 11, 2023, JND received a letter from an individual inquiring into
10 the status of his claim. A copy of that letter is attached hereto as Exhibit A. JND has no record
11 of receiving a claim from this individual. Class Counsel has informed JND that this individual
12 is not a member of the Class. JND will respond in writing to this individual explaining that he
13 is not a member of the class and that the deadline to file a claim has passed.
14

15 **REQUESTS FOR EXCLUSION**

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

19 22. As of the date of this Declaration, JND has not received any exclusion requests.
20

21 **OBJECTIONS**

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

25 24. As of the date of this Declaration, JND has not received any timely objections.
26
27
28

1 **ADMINISTRATION COSTS**

2 25. As of the date of this Declaration, JND has billed \$71,813.43 for costs and
3 expenses actually and reasonably incurred in connection with our administration of the
4 Settlement.
5

6 I declare under penalty of perjury pursuant to the laws of the United States of America
7 that the forgoing is true and correct.
8

9 Executed on September 19, 2023 at Seattle, Washington.
10

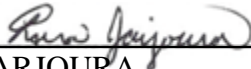
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12 _____
13 LARA JARJOURA
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Exhibit A

From



TO JND LEGAL
ADMINISTRATION
P.O. Box 91420
SEATTLE, WASHINGTON
98111

SEP 11 2023

9/5/23

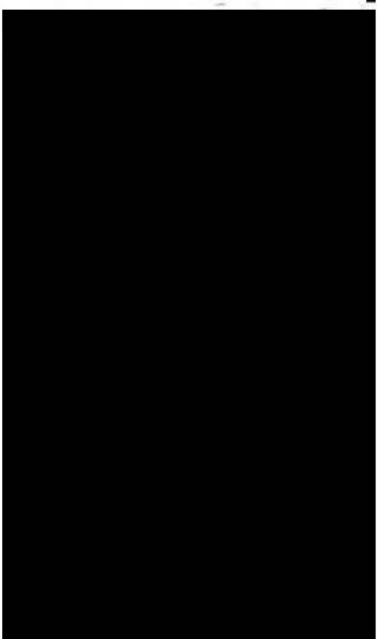
to whom it may concern:

My name is [REDACTED], number [REDACTED] and I am sending this in reference to the class action lawsuit against GEO San Diego that has to do with disabilities. I was housed in GEO San Diego in 2019 and I am disabled. I have been legally disabled since 2006 and require several accommodations that were not provided to me throughout my stay at GEO San Diego.

This is the second letter I have sent and have got no response. My first letter was sent August 3RD 2023. Please respond to this letter to let me know that my claim was submitted. If not please file this as an objection to the settlement. Today I also sent an email, as I just got the email address.

Thank You





Thinking

SN BERNARDINO CA 923

6 SEP 2023 23 7 L

Legal Mail

STOUT V. THE GEO GROUP

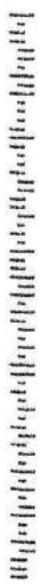
c/o JND LEGAL ADMINISTRATION

P.O. Box 91430

SEATTLE, WASHINGTON 98111

SEP 1 1 2023

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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 September 19, 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 that the foregoing is true and correct. Executed on September 19, 2023.

s/ Janet Kohnenberger

Janet Kohnenberger
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