

The Honorable Robert J. Bryan  
Hearing Date: September 25, 2020

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

STATE OF WASHINGTON,  Plaintiff/Counter-Defendant,  v.  THE GEO GROUP, INC.,  Defendant/Counter Plaintiff.
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Case No.: 3:17-cv-05806-RJB

DECLARATION OF JOAN K. MELL IN SUPPORT OF THE GEO GROUP, INC.'S MOTION FOR IN CAMERA REVIEW AND TO ORDER THE STATE TO FILE GEO'S EXHIBIT 231 IN NATIVE FORMAT WITHOUT FULL PAGE REDACTIONS FOR USE AT TRIAL

**NOTE ON MOTION CALENDAR:**  
September 25, 2020

I, Joan K. Mell, make the following statement under oath subject to the penalty of perjury pursuant to the laws of the United States and the State of Washington:

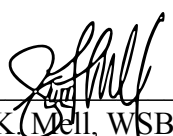
1. I am the attorney for The GEO Group, Inc. in the above-captioned matter. I am over the age of eighteen (18), and I am competent to testify in this matter.

2. On August 7, 2020 at 1:00 pm the parties conferred as to work product regarding Exhibit 231 and whether the information would be disclosed.

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Dated this 25th day of September, 2020 at Fircrest, WA.

III Branches Law, PLLC

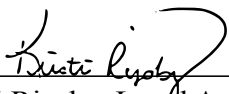


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Joan K. Mell, WSBA No. 21319  
Attorney for The GEO Group, Inc.,

**CERTIFICATE OF SERVICE**

I Kristi Rigsby, hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

DATED this 25th day of September, 2020 at Fircrest, Washington.

  
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Kristi Rigsby, Legal Assistant