

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

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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**

**NOTICE OF MOTION AND 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

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**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

**PLEASE TAKE NOTICE** that on September 29, 2023, at 9:30 a.m., or as soon as the matter can be heard in the courtroom of the Honorable Kenneth J. Medel, located in Department C-66 of the San Diego Superior Court, at 330 West Broadway, San Diego, California 92101, Plaintiffs Scott Miles Stout and Derrick Allen Felton hereby move for an order and judgment: granting final approval of the Settlement; and awarding Plaintiffs' Counsel's requested attorneys' fees in the amount of \$2,640,000, costs and expenses in an amount up to \$240,237.12, and Plaintiffs' Service Awards of \$10,000 each.

This motion is made pursuant to California Code of Civil Procedure section 382 and California Rules of Court, rule 3.760, *et seq.* on the grounds that the proposed settlement is fair, reasonable, and adequate.

This motion is based on this notice, Plaintiffs' memorandum in support of the motion for preliminary approval, Plaintiffs' memorandum in support of motion for final approval of class action settlement and request for award of attorneys' fees and expenses, the declarations of Timothy G. Blood, Thomas Robertson, Lara Jarjoura, and the exhibits thereto, the complete file and record in this action and such oral argument as the Court may consider in deciding this motion.

Respectfully submitted,

Dated: August 15, 2023

BLOOD HURST & O'REARDON, LLP  
TIMOTHY G. BLOOD (149343)  
LESLIE E. HURST (178432)  
PAULA R. BROWN (254142)  
JAMES M. DAVIS (301636)

By: s/ Timothy G. Blood

TIMOTHY G. BLOOD

501 West Broadway, Suite 1490  
San Diego, CA 92101  
Tel: 619/338-1100  
619/338-1101 (fax)  
tblood@bholaw.com  
lhurst@bholaw.com  
pbrown@bholaw.com  
jdavis@bholaw.com

LAW OFFICES OF CHARLES S. ROSEMAN  
& ASSOCIATES  
CHARLES S. ROSEMAN (051453)

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1761 Hotel Circle South, Suite 250  
San Diego, CA 92108  
Tel: 619/544-1500  
619/239-6411 (fax)  
csroseman@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*

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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 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