

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case File No. 9:20-cv-81063-RS

STEVE HARTEL, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

THE GEO GROUP, INC., *et al.*,

Defendants.

/

SUPPLEMENTAL DECLARATION OF MICHAEL JAMES DELOACH

I, Michael James DeLoach, declare as follows:

1. I respectfully submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement. I have personal knowledge of the statements herein and if called upon as a witness, could and would competently testify thereto.

2. I previously submitted a declaration in support of Plaintiffs' Motion for Preliminary Approval of Settlement which described my involvement in this case, beginning with its commencement and continuing through settlement. I adopt those statements and incorporate them herein as if they were set forth below.

3. I continue to support the approval of the settlement. As explained in my prior declaration, the settlement amount of \$3,000,000 represents a favorable outcome in the litigation given the obstacles we faced in terms of establishing liability and damages before a jury. Those issues included in pertinent part whether a jury would have been willing to agree that Defendants' statements about GEO's litigation exposure caused investors to sustain losses and/or whether Defendants' misrepresented GEO's ability to maintain its dividend.

4. I also still support my attorneys' request for an award of fees and reimbursement of expenses. The case was litigated extensively. My attorneys incurred substantial out-of-pocket expenses and invested heavily in time, effort and resources to achieve the result at hand. They should be compensated as requested, which is an award of fees in the amount of \$960,000 which is 32% of the settlement fund plus reimbursement of their out-of-pocket expenses not to exceed \$40,000.

5. I am also requesting an award for myself to reimburse me for the time and costs I incurred in serving as a lead plaintiff. My involvement in this lawsuit dates back to September 2020 when I first moved to be appointed as the lead plaintiff. I have since spent approximately 35 hours working with my attorneys on this matter. I participated in document discovery by obtaining records relating to my investments, which was difficult to do given that I had to physically locate many of the records being sought. I also reviewed documents and pleadings filed in this case, which were extensive, and discussed these materials with my attorneys. In exchange for my time and effort serving as the class representative, I am seeking an award of \$2,500 which I believe is fair and deserved.

6. During the course of this action, I was employed as a pharmacist. I hold a Doctor of Pharmacy from the University of Tennessee. The time I devoted to this action was time that I otherwise would have spent working in my normal course of employment. I believe that the requested amount of \$2,500 properly reimburses me for the time and effort I spent serving as the lead plaintiff in this action.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of September 2023.


James Michael DeLoach (Sep 28, 2023 11:18 MDT)
MICHAEL JAMES DELOACH