

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

The Honorable Benjamin H. Settle

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

Case Nos. 3:24-cv-05095-BHS

DEPARTMENT OF LABOR AND
INDUSTRIES OF THE STATE OF
WASHINGTON,

Plaintiff,

v.

GEO SECURE SERVICES, LLC;
THE GEO GROUP, INC.,

Defendants.

STIPULATED MOTION AND
ORDER ENTERING
PERMANENT INJUNCTION

NOTE ON MOTION CALENDAR:
SAME DAY

I. STIPULATION

The Department of Labor and Industries, GEO Secure Services, LLC, and The GEO Group, Inc. stipulate and move as follows:

1. Consistent with the July 1, 2024, Order that granted a preliminary injunction, the Court should enter a permanent injunction, permanently enjoining GEO from denying L&I access to inspect the Northwest ICE Processing Center pursuant to its authority under, and for the limited purposes set forth in RCW 49.17.070. The court should dismiss Plaintiff’s claim under

1 HB 1470 Sec. 3, codified at RCW 70.395.050, without prejudice and dismiss Plaintiff's other
2 claims with prejudice.

3 2. That this agreement resolves all claims arising from this matter, and any other
4 claim is dismissed. Each side will bear its own costs and fees.

5 3. That this Court should retain jurisdiction to enforce or modify this injunction.
6 Dismissal of Plaintiff's claim for contempt from the January 30, 2024 complaint shall not mean
7 that Plaintiff cannot pursue contempt if there is a violation of this permanent injunction.

8 Stipulated to this 25th day of September, 2024.

9
10 *Attorneys for Department of Labor and Industries*

11 ROBERT W. FERGUSON
12 Attorney General

13 */s/Anastasia Sandstrom*
ANASTASIA SANDSTROM, WSBA No. 24163
14 *Senior Counsel*
800 Fifth Ave., Ste. 2000
15 Seattle, WA 98104
(206) 464-7740
16 Anastasia.Sandstrom@atg.wa.gov

17 ELLEN RANGE, WSBA No. 51334
Assistant Attorney General
18 7141 Cleanwater Drive SW
Olympia, WA 98501-0111
(360) 586-6314
19 Ellen.Range@atg.wa.gov

20
21 *Attorneys for GEO Secure Services, LLC, and The GEO Group, Inc.*

22 */s/Harry J. F. Korrell*
Harry J. F. Korrell, WSBA No. 23173
23 John G. Hodges-Howell, WSBA No. 42151
920 Fifth Avenue, Suite 3300
24 Seattle, WA 98104-1610
Phone: 206.622.3150
25 harrykorrell@dwt.com
26 jhodgeshowell@dwt.com

1 **II. ORDER**

2 For the reasons stated in the Court’s order granting in part L&I’s motion for
3 preliminary injunction, the stipulated motion is granted, and GEO is permanently enjoined
4 from denying L&I access to inspect the Northwest ICE Processing Center pursuant to its
5 authority under, and for the limited purposes set forth in, RCW 49.17.070. L&I’s claim for
6 access under HB 1470 Sec. 3, codified at RCW 70.395.070, is dismissed without prejudice,
7 and its other claims are dismissed with prejudice. Dismissal of Plaintiff’s claim for
8 contempt from the January 30, 2024 complaint shall not mean that Plaintiff cannot pursue
9 contempt if there is a violation of this permanent injunction. Each side will bear its own
10 costs and fees.

11 This Court shall retain jurisdiction to enforce or modify the injunction.

12 Dated this 25th day of September, 2024.

13 
14 _____
15 BENJAMIN H. SETTLE
16 United States District Judge

17 Presented by:

18 *Attorneys for Department of Labor and Industries*

19 ROBERT W. FERGUSON
20 Attorney General

21 */s/Anastasia Sandstrom*
22 ANASTASIA SANDSTROM, WSBA No. 24163
23 *Senior Counsel*
24 800 Fifth Ave., Ste. 2000
25 Seattle, WA 98104
26 (206) 464-7740
Anastasia.Sandstrom@atg.wa.gov

ELLEN RANGE, WSBA No. 51334
Assistant Attorney General
7141 Cleanwater Drive SW
Olympia, WA 98501-0111
(360) 586-6314
Ellen.Range@atg.wa.gov

1 *Attorneys for GEO Secure Services, LLC, and The GEO Group, Inc.*

2 */s/Harry J. F. Korrell*

3 Harry J. F. Korrell, WSBA No. 23173

4 John G. Hodges-Howell, WSBA No. 42151

5 920 Fifth Avenue, Suite 3300

6 Seattle, WA 98104-1610

7 Phone: 206.622.3150

8 harrykorrell@dwt.com

9 jhodgeshowell@dwt.com