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MAUREEN P. ALGER (SBN 208522)  
MONIQUE R. SHERMAN (SBN 227494)  
COOLEY LLP  
Five Palo Alto Square  
3000 El Camino Real  
Palo Alto, CA 94306-2155  
Telephone: (650) 843-5000

MARY KATHRYN KELLEY (SBN 170259)  
SHANNON SORRELLS (SBN 278492)  
COOLEY LLP  
4401 Eastgate Mall  
San Diego, CA 92121-1909  
Telephone: (858) 490-6000

MELINDA BIRD (SBN 102236)  
DISABILITY RIGHTS CALIFORNIA  
350 South Bixel Street, Suite 209  
Los Angeles, CA 90017  
Telephone: (213) 213-8000  
Fax: (213) 213-8001

*Attorneys for Plaintiffs*

**[ADDITIONAL COUNSEL LISTED ON  
CAPTION PAGE]**

1 Pursuant to the Consent Decree (ECF 112-1) approved by this Court on November  
2 2, 2015 (ECF 170), the parties shall “jointly request the appointment of three Court  
3 experts pursuant to rule 706 of the Federal Rules of Evidence to advise the Court on the  
4 adequacy of implementation of the Remedial Plan.” (ECF 112-1 at ¶ 10.) It further  
5 provides, “The Court experts shall be entitled to reasonable compensation in an amount  
6 approved by the Court, which shall be paid by Defendant.” (*Id.* at ¶ 11.)

7 The parties have agreed on Dr. Roberta Stellman as one of the three Court experts.  
8 Her curriculum vitae is attached as Exhibit A. Dr. Stellman will complete evaluations  
9 and reports regarding mental health care in the Fresno County Jail. Defendant has agreed  
10 to compensate her at a rate of \$425 an hour for work performed and \$175 an hour for time  
11 spent traveling, and will reimburse her for reasonable travel expenses.

12 Defendant has provided Dr. Stellman with a copy of the Expert’s Duties (ECF  
13 112-1, Appendix B, at 42-43).

14 The parties hereby request appointment of Dr. Roberta Stellman as Court expert  
15 and approval of the compensation in the amount described above.

16  
17 Respectfully submitted,  
18 Dated: April 7, 2016 PRISON LAW OFFICE  
19  
20 :/s/ Kelly Knapp  
21 Kelly Knapp  
22 Attorney Plaintiffs Quentin Hall, Shawn  
23 Gonzales, Robert Merryman, Brian Murphy,  
24 Dawn Singh, and the Plaintiff Class

25 Dated: April 7, 2016 OFFICE OF FRESNO COUNTY COUNSEL  
26 :/s/ Daniel Cederborg  
27 Daniel Cederborg  
28 Attorney for Defendant

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1 The Court approves the appointment of Dr. Roberta Stellman as Court expert to be  
2 paid by Defendant in the amount of \$425 an hour for work performed and \$175 an hour  
3 for time spent traveling. Defendant will also reimburse her for reasonable travel expenses.

4 Rule 706(b) of the Federal Rules of Evidence requires the Court to “inform the  
5 expert of the expert’s duties.” The expert’s duties are as follows:

6 1. Pursuant to rule 706 of the Federal Rules of Evidence, the Courts’ experts  
7 shall advise the Court on the adequacy of the implementation of the Remedial Plan.

8 2. During the first year of the Consent Decree, the three Court experts shall  
9 each complete one comprehensive review and report to advise the Court on defendant’s  
10 progress in implementing the Remedial Plan. For the remaining duration of the Consent  
11 Decree, the Court experts shall complete comprehensive reviews and reports as they  
12 determine to be necessary, or as jointly requested by the parties, but not more than once a  
13 year, to advise the parties and the Court on the adequacy of defendant’s implementation of  
14 the Remedial Plan. To form the basis of their reports, the Court experts shall have access  
15 to all parts of any County jail facility, with adequate notice provided in advance of the  
16 same to ensure appropriate security is provided, all relevant budgetary, custody, and  
17 health care documents, persons (including confidential interviews with consenting staff  
18 and consenting prisoners) and institutional meetings, proceedings, and programs to the  
19 extent the experts reasonably determine such access is needed to fulfill their obligations.  
20 The Court experts shall not have access to personnel files, including records and  
21 information deemed confidential pursuant to California Penal Code § 832.7. Attorneys  
22 shall not have ex parte contact with experts regarding their preliminary and proposed  
23 opinions to be presented to the parties.

24 3. At the request of either party, the Court experts shall participate in the  
25 dispute resolution process, as described in Paragraph 18 of the Consent Decree, by  
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1 evaluating the issue in dispute and preparing a report, including but not limited to whether  
2 defendant is in substantial compliance with the terms of the Remedial Plan. The expert(s)  
3 shall devote his or her best efforts to provide his or her report regarding the area of  
4 disagreement within 45 days of the request.

5  
6 4. The Court experts shall be available to meet jointly with the parties in  
7 person or by telephone in a manner that is reasonable and convenient for the purpose of  
8 resolving disputes between the parties.

9 5. At the request of the Court, the Court experts shall attend any negotiations,  
10 mediation sessions, or court hearings.

11 6. The Court experts shall be entitled to reasonable compensation in an  
12 amount approved by the Court, which shall be paid by Defendant, for time incurred to  
13 prepare reports, resolve disputes, or attend hearings or meetings as requested by the Court.  
14 The Court experts shall provide defendant with a detailed written itemization of the  
15 claimed fees and costs, itemized by date, amount of time spent, and task, as well as  
16 records and bills evidencing the costs claimed, on a quarterly basis.

17  
18  
19 IT IS SO ORDERED.

20  
21 Dated: April 11, 2016

/s/ Lawrence J. O'Neill  
UNITED STATES DISTRICT JUDGE