

Print Form

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GREGORY BALDWIN

Plaintiff(s)

vs.

CDCR

Defendants.

No. 2:09-CV-00711 WBS-GGH

REQUEST FOR AUTHORITY TO INCUR
COSTS (APPOINTED COUNSEL) AND
REQUEST FOR PAYMENT

REQUEST OF PRO BONO FOR PRE-APPROVAL OF EXPENDITURES

Complete this form and return it to the court (with two copies) for approval prior to incurring the cost for which reimbursement is requested.

I, Rachael M. Smith, attorney for plaintiff(s), declare as follows:

I was appointed to represent plaintiff(s) in this action on February 12, 2013, by the Honorable Kimberly Mueller, United States District Judge/Magistrate Judge. I believe that the following course of action is reasonably necessary to the prosecution of this action:

We would like to depose two of Mr. Baldwin's treaters that saw and examined him before the incident to establish the nature and extent of his preexisting neck injury. This will be important at trial to demonstrate that he had a preexisting condition that made the force used by the defendants unreasonable. We have selected two treaters, Dr. Dhillon and Dr. Rahimifar, to depose. These treaters are located in Lancaster and Bakersfield. These treaters charge fees for deposition and trial testimony (as a fact witness), and we would like to record the depositions by video to play at trial. This will save costs associated with bringing this witnesses to trial. Each deposition should be relatively short, only 2-3 hours. I have attached their fee schedules, as well as an oral estimate we received for a videographer to attend the depositions.

Counsel seeking reimbursement must support all claimed expenses by submitting invoices, receipts or similar documentation. Without such documentation, counsel will not be reimbursed.

I have made reasonable inquiry and believe that the cost of this course of action will not exceed the amount of \$ 6,110.00.

I therefore request that this court authorize the expenditure in an amount not to exceed that stated above for the completion of this contemplated course of action.

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The following payments of costs have been heretofore approved in this matter:

Amount Approved	Purpose	Amount Paid

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30 day of January, 20 14, at San Francisco, California.

/s/ Rachael M. Smith

Attorney for Plaintiff(s)

The above expenditure is Approved Denied

Or,

Good cause appearing therefore, this matter is set for discovery conference, pursuant to rule _____, on _____, at _____, ____M. in Courtroom Number _____.

Dated: _____



United States District Judge/Magistrate Judge