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**FILED**

SEP 03 2013

CLERK, U.S. DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA  
 BY  DEPUTY CLERK

6 **LAW OFFICE OF JOSEPH C. GEORGE**  
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12 **UNITED STATES DISTRICT COURT**  
 13 **EASTERN DISTRICT OF CALIFORNIA**

14 Estate of BALJIT SINGH, deceased, by and  
 15 through PRABJIT SINGH DHANDA, JASJIT  
 16 KAUR DHANDA, SUKHJIT KAUR DHANDA  
 17 and DAVANJIT SINGH DHANDA (minors  
 18 through their mother and guardian ad litem  
 19 Amarjit Singh) and AMARJIT SINGH as  
 20 successors in interest; PRABJIT SINGH  
 21 DHANDA, Individually; JASJIT KAUR  
 22 DHANDA, Individually; SUKHJIT KAUR  
 23 DHANDA, Individually; DAVANJIT SINGH  
 24 DHANDA, Individually; and AMARJIT SINGH,  
 25 Individually,

CASE NO. 2:09-CV-01439-JAM-JFM

**STIPULATION OF PARTIES  
 REQUESTING COURT APPROVAL  
 OF SETTLEMENT OF MINORS'  
 CLAIMS AGAINST DEFENDANTS  
 DR. ROBERT HALES, PAUL  
 HENDRICKS, DR. GREGORY  
 SOKOLOV AND L. MICHAEL  
 TOMPKINS; [PROPOSED] ORDER**

Plaintiffs,

vs.

24 UC Davis Department of Psychiatry Chair DR.  
 25 ROBERT HALES; Clinical Director of Jail  
 26 Psychiatric Services PAUL HENDRICKS;  
 27 Medical Director of Jail Psychiatric Services DR.  
 28 GREGORY SOKOLOV; L. MICHAEL  
 TOMPKINS,

Defendants.

STIPULATION REQUESTING APPROVAL OF MINORS' CLAIMS AGAINST  
 UC DAVIS DEFENDANTS; [PROPOSED] ORDER

1 PURSUANT TO LOCAL RULE 202, the parties to the above-referenced action by  
2 and through their undersigned attorneys hereby stipulate and respectfully request the Court  
3 to approve the settlement of the minors' claims as to defendants Dr. Robert Hales, Paul  
4 Hendricks, Dr. Gregory Sokolov, and L. Michael Tompkins in this matter for the reasons set  
5 forth below.  
6

7 **BASIS FOR APPROVAL OF PROPOSED SETTLEMENT**  
8 **OR COMPROMISE OF MINORS' CLAIMS**

9 The above-referenced case involves plaintiffs Prabjit Singh Dhanda, Jasjit Kaur  
10 Dhanda, Sukhjit Kaur Dhanda and Davanjit Singh Dhanda, who are the minor children of  
11 the decedent Baljit Singh. The minors' mother, Amarjit Singh, is a plaintiff and was  
12 appointed their guardian ad litem for this action.

13 This is a civil rights action brought under 42 U.S.C. section 1983 regarding the  
14 suicide of Baljit Singh at the Sacramento County Main Jail. The action, which at one time  
15 included supplemental state law claims, was brought against various defendants who have  
16 been consistently described as Sacramento County Defendants and JPS Defendants.  
17 Extensive discovery was conducted in this case. Lengthy dispositive motions were filed,  
18 argued and considered by the Court.

19 The Sacramento County Defendants were all successful in their summary judgment  
20 motions which eliminated all of the claims against them, including those pertaining to the  
21 suicide prevention policies.

22 The JPS Defendants remaining in the case, on plaintiffs' theories that their direct  
23 interaction or supervisory shortcomings, including ratification, caused Baljit Singh's death,  
24 are UC Davis Department of Psychiatry Chair Dr. Robert Hales, Clinical Director of Jail  
25 Psychiatric Services Paul Hendricks, Medical Director of Jail Psychiatric Services Dr.  
26 Gregory Sokolov, and Dr. L. Michael Tompkins, a psychologist formerly employed by JPS  
27 at the jail.  
28

1           The JPS Defendants have adamantly denied any liability and dispute the damages.  
2 Notwithstanding those denials, a settlement was reached contingent upon this court's  
3 approval by which the JPS Defendants would pay (The settlement is being paid by the  
4 University of California Regents who were the employers of all of the individual JPS  
5 Defendants at the relevant time, as well as the employer of decedent Donna Champeau) a  
6 total of \$375,000, the allocation of which is discussed below.

7           This motion seeks approval of settlement with the JPS Defendants as it applies to the  
8 minors in this matter.

9       1.   **Minors' names:**     Prabjit Singh Dhanda, Jasjit Kaur Dhanda, Sukhjit Kaur  
10 Dhanda, and Davanjit Singh Dhanda.

11   2.   **Age/Sex of Minors:** Prabjit Singh Dhanda is a 16 year old male, DOB     1997;  
12 Jasjit Kaur Dhanda is a 15 year old female, DOB     1998; Sukhjit Kaur Dhanda is an 8  
13 year old female, DOB     2005; Davanjit Singh Dhanda is a 7 year old male, DOB  
14     2006.

15   3.   **Causes of Action:**   The causes of action to be settled are all based on 42 U.S.C. §  
16 1983 survival action claims on behalf of the minors based on plaintiffs' allegations that the  
17 JPS Defendants were deliberately indifferent to decedent Singh's medical needs and that  
18 their constitutionally deficient supervision and ratification of the deliberately indifferent care  
19 of Singh resulted in his death by suicide.

20   4.   **Factual Basis:**   This case arises out of the suicide of Baljit Singh on March 14,  
21 2008, at the Sacramento County Main Jail.

22           At the time of his death Singh was a post-arraignment, pretrial detainee. He was  
23 arrested on March 5, 2008, and taken to the jail. At the booking medical screening he was  
24 determined by a Sacramento County Jail nurse to be medically unfit for incarceration and  
25 sent to the U.C. Davis Medical Center because he was showing the effects of withdrawing  
26 from alcohol/DTs and chronic pancreatitis. At that same screening, it was noted that Singh  
27 was to be seen by Jail Psychiatric Services (JPS) for mental issues and his need for  
28 psychotropic medications.

1 Singh was at the U.C. Davis Medical Center between March 5<sup>th</sup> and March 10<sup>th</sup>.  
2 During that time he was given the psychotropic medications that he had previously been  
3 prescribed. At that time, he did not have an active prescription because his medications had  
4 been discontinued as a result of his continued drinking, which is contraindicated when on his  
5 medications.

6 Singh was first seen for a mental health assessment by a JPS worker, LCSW Lori  
7 Severance, on the morning of March 13, 2008. Severance did an appropriate assessment.  
8 As part of doing her assessment, she printed out a copy of the Sacramento County Mental  
9 Health Systems CATS information for Singh. The CATS printout showed the dates of his  
10 involuntary psychiatric hospitalizations which coincided with previous suicide attempts. At  
11 the time of her assessment she did not believe Singh was suicidal. However, she did note  
12 his history of multiple prior suicide attempts and in-patient, involuntary psychiatric  
13 hospitalizations. She also was aware that Singh was desperate to continue taking the  
14 psychotropic medications which he had resumed taking at the U.C. Davis Medical Center,  
15 albeit without a new prescription.

16 On the afternoon of March 13, 2008, Singh wrapped an elasticized bandage around  
17 his neck in a possible attempt to kill himself. Singh was alone in his cell at that time. By  
18 happenstance, another jail inmate who had been called out of his cell to attend a court  
19 hearing glanced through the window in Singh's cell door and saw what was happening. He  
20 spontaneously yelled out that Singh was trying to kill himself. A deputy promptly rushed  
21 into the cell and was able to remove the noose before Singh had done any permanent  
22 damage. However, there was "a knot on the victim's left side."

23 Singh was taken to the hospital by ambulance to be medically cleared. While at the  
24 hospital, he remained in the custody of the Sacramento Sheriff's Department and under  
25 guard. At the hospital no significant physical injury was found. He was returned to the jail  
26 with the expectation that he would be psychiatrically evaluated and appropriately treated.

27 After Singh was returned to the jail, he was seen by JPS psychiatric nurse, Donna  
28 Champeau, for a suicide risk assessment. Champeau is now deceased and, therefore, is not a

1 party to this action. Plaintiffs argue that Champeau did a suicide risk assessment in name  
2 only. Ignoring the information in the file documenting Singh's troubled psychiatric history  
3 and Singh's inability or refusal to answer questions about his suicide attempt the previous  
4 day, she decided that Singh was a manipulative liar and cleared him for general population  
5 with no suicide precautions in place. Defendants and Defendants' experts asserted that  
6 Champeau's suicide assessment was both adequate and consistent with Severance's mental  
7 health assessment.

8         Shortly after Singh was placed in a general population cell, that housing unit's  
9 correctional officers received a phone call from the jail medical staff alerting them that  
10 Singh had attempted suicide the previous day and they believed he had not yet been cleared  
11 by JPS for general population. In response to that call, the deputies removed Singh from his  
12 cell and placed a phone call to JPS requesting an evaluation of a suicidal inmate. The  
13 deputies denied their independently being aware of any suicidal actions, words or tendencies  
14 by Baljit Singh at that time.

15         Defendant Tompkins was given the telephone referral regarding the requested  
16 evaluation of Singh. Tompkins reviewed the JPS file which included the CATS printout and  
17 both Severance's evaluation from the previous day and Champeau's suicide assessment  
18 from that morning, March 14, 2008. Plaintiffs contend that Tompkins formed the opinion  
19 that Champeau's assessment was wrong and incomplete and that while he was reviewing the  
20 file, Severance told him she thought Singh should be placed in the in-patient unit (suicide  
21 watch). Tompkins decided not to do a suicide risk assessment because Champeau had done  
22 one. Defendants deny that Tompkins formed any belief that Champeau's assessment was  
23 deficient and further contend that Tompkins was not, based on the information he had,  
24 obligated to do a formal suicide assessment, utilizing JPS' suicide assessment form, nor that  
25 he was required to see Singh, and further contend that his assessment of Mr. Singh was both  
26 correct and appropriate under the circumstances.

27         Tompkins went to see Singh and spoke with him for what may have been as little as  
28 two minutes, as the Plaintiffs believe, or closer to the five minutes that the defense

1 contends. Tompkins recognized that Singh suffered from a variety of mental illnesses.  
2 Singh again asked when he would be seen by a psychiatrist so his medications could be  
3 resumed to which Tompkins told him that wasn't going to happen before next week.  
4 Tompkins did not tell the correctional staff that Singh was at any heightened risk of suicide.

5 Plaintiffs believe that Tompkins mischaracterized his interaction with Singh when  
6 reporting that Singh "Did not meet 5150 criteria," thus suggesting that he had, in fact, done a  
7 suicide assessment of Singh. Defendants claim Tompkins appropriately reported his  
8 interaction with Singh.

9 Later that day, Singh jumped to his death from the upper tier.

10 Following the suicide, Sokolov and Hendricks took control of the file in anticipation  
11 of possible litigation. As a result of the death, by statute and policy there were several  
12 reviews of Singh's death, including a death review headed by the County Jail's Medical  
13 Director, Paul Dietrich, also deceased. Throughout the review process, Defendants Hales,  
14 Sokolov and Hendricks denied that either Champeau or Tompkins had done anything wrong.  
15 They ratified the actions of Champeau and Tompkins. Defendants deny the materiality of  
16 any discrepancies between Champeau and Severance's assessment. Plaintiffs assert that the  
17 discrepancy between Champeau's assessment and the CATS printout were significant.  
18 Plaintiffs also asserted that there were obvious gaps in information contained in the JPS file,  
19 which resulted from their de facto policy of doing assessments without accessing relevant,  
20 readily available medical information. Defendants denied that there was such a de facto  
21 policy/practice, and further deny that any relevant available medical information was  
22 ignored by the JPS clinicians who saw Mr. Singh.

23 Tompkins, one week before his deposition, threw out his notes regarding Singh that  
24 had expanded upon his Progress Note in the JPS file rather than produce them at his  
25 deposition.

26 Two court days before trial was scheduled to begin, defense counsel, plaintiffs and  
27 the court were notified that there were significant omissions from the JPS file that had been  
28 discovered and relied upon by the attorneys and experts throughout the course of the action.

1 The trial date was continued and considerable additional discovery was undertaken as a  
2 result, the cost of all of which was to be borne by the defendants.

3  
4 **5. Extent of Injuries:** The minor plaintiffs' injuries in this action are emotional  
5 injuries resulting from the loss of the love and support of their father.

6 Prior to his incarceration, the decedent was subject to a restraining order barring him  
7 from interacting with his children and wife. He was disabled and unable to provide financial  
8 support to his family.

9 Defendants would have presented expert testimony regarding Singh's shortened life  
10 expectancy, notwithstanding the suicide.

11 **6. Compromise determination:** Plaintiffs were motivated to settle this case because  
12 of the desire for closure and the realization that it might, in fact, be difficult for a jury to find  
13 liability. The case was neither straight forward nor simple. (At summary judgment, the  
14 Court rejected plaintiffs' relatively simple theory that liability could be premised by a policy  
15 failure of not requiring that Singh be placed on suicide watch for a minimum of twenty-four  
16 hours.) Plaintiffs were concerned whether a jury would find the necessary causal connection  
17 between the provable, deficient actions of Defendants and the seemingly determined and  
18 volitional act of suicide by Baljit Singh. Also, Plaintiffs were concerned with the possibility  
19 of a low damage award based upon a jury's possible perception that the plaintiffs should not  
20 receive a significant amount of monetary damages based on their relationships with Baljit  
21 Singh and his questionable prospects of providing economic support.

22 Defendants' primary incentive to resolve this case related to both the fees and costs  
23 they would face if Plaintiffs prevailed at trial and those they were obligated to incur  
24 regardless of the trial result because of their defending the action and their obligations  
25 arising from the continuance of the trial. An additional concern was that plaintiffs could  
26 prevail at trial and could potentially receive a verdict amount impacted if the jury found that  
27 the problems regarding the physical JPS file and documentation were material and due to the  
28 wrongful acts of the defendants.

1 The proposed settlement was arrived at through negotiations which separately  
2 addressed the plaintiffs' damages and the attorney's fees and costs. The total amount of the  
3 proposed settlement is \$375,000.00 allocated in the following manner:

- 4 • \$100,000.00 in total be placed in blocked accounts for the benefit of Baljit Singh's  
5 four children, Prabjit Singh Dhanda, Jasjit Kaur Dhanda, Sukhjit Kaur Dhanda, and  
6 Davanjit Singh Dhanda, who are named plaintiffs, in a federally insured bank for  
7 their benefit. That money shall be divided into four separate, blocked accounts for  
8 each of the four children in the amount of \$25,000.00 until he or she reaches  
9 eighteen years of age, unless the Court authorizes the withdrawal and expenditure of  
10 any portion of those funds.
- 11 • \$ 25,000.00 to be paid to Amarjit Singh, Baljit Singh's widow.
- 12 • \$250,000.00 collectively to be paid to the Law Office of Stewart Katz and the Law  
13 Office of Joseph C. George for statutory fees and costs. Further, this is to include  
14 the attorney fees attributable to the continuance of the April 8, 2013, trial date  
15 (defendants have agreed to pay the "hard costs" for deposition reporting,  
16 videotaping, plane fares, and Dr. Hayward's expert fees associated with that  
17 continuance and the reopened discovery up through and including the date of  
18 settlement, June 14, 2013.)

19 **7. Attorney's Fees and Costs.** Plaintiffs' attorney, Stewart Katz, was hired in 2008 and  
20 the Law Office of Joseph George associated into the case with Katz in August, 2009. The  
21 agreement provided for the attorneys to receive all statutory fees and costs either awarded  
22 by the court or as agreed upon by the parties, or, in the alternative, a percentage of the  
23 award—the percentage increasing over time, starting at 25% and eventually escalating up to  
24 50% which was the amount from late 2011 through the present time.

25 The amount of fees under this settlement is far less than plaintiffs' counsel would  
26 have been entitled to pursuant to a fee award and is significantly less than the amount due  
27 from a settlement without any provision for attorney fees.



1 In total, plaintiffs' counsel's office spent at least 1313 hours prosecuting this civil  
2 rights action as to the JPS Defendants (This excludes the time spent opposing the County  
3 Defendants MSJ, as well as issues not related to the JPS defendants, such as, inadequate  
4 staffing.) Based on hourly rates of \$400.00 (785 hours) for Stewart Katz; \$175.00 (242  
5 hours) for Guy Danilowitz; \$400.00 (120.2 hours) for Joseph George, Sr.; and \$280.00  
6 (165.9 hours) for Joseph George Jr., the attorney's fees totaled \$450,882.00. Attached as  
7 Exhibit 1 is a summary and further breakdown of the attorney's fees.

8 It should be noted that \$58,564.00 of the fees are attributable to matters associated  
9 with the continuation of the April 8, 2013, trial date.

10 Attached as Exhibit 2 are the costs associated with the case. Those costs total  
11 \$95,497.67.

12 Finally, plaintiffs' counsel notes that the amount of the settlement for fees and costs  
13 is appropriate as it has been approved by the guardian ad litem for the minors, and given the  
14 risk taken by plaintiffs' counsel to prosecute this matter. Counsel took the matters on a  
15 contingency basis and advanced all fees and costs and thus went unpaid during the  
16 prosecution of this action.

17 This stipulation may be executed in any number of counterparts, each of which shall  
18 be an original, but all of which together shall constitute one instrument. Each of the parties  
19 below may execute this agreement through separate signature pages, with, as necessary  
20 appropriate verifications of their signatures, which will then be incorporated into one final  
21 document, which will then constitute the parties' final stipulation. When all signatures have  
22 been assembled into one final document, copies of same will be provided to the parties, by  
23 and through their respective counsel.

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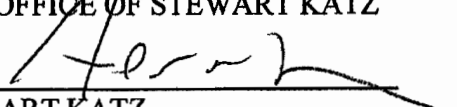
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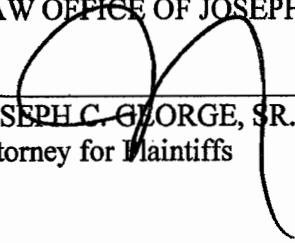
1 Dated: 8-29, 2013

LAW OFFICE OF STEWART KATZ

  
STEWART KATZ  
Attorney for Plaintiffs

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6 Dated: 08/29, 2013

LAW OFFICE OF JOSEPH C. GEORGE

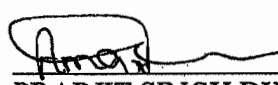
  
JOSEPH C. GEORGE, SR.  
Attorney for Plaintiffs

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11 Dated: \_\_\_\_\_, 2013

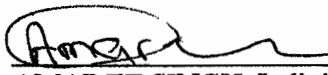
WILKE, FLEURY, HOFFELT, GOULD &  
BIRNEY, LLP

\_\_\_\_\_  
ROBERT F. TYLER, JR.  
Attorneys for Defendants,  
DR. ROBERT HALES, PAUL HENDRICKS;  
DR. GREGORY SOKOLOV; L. MICHAEL  
TOMPKINS

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PRABJIT SINGH DHANDA, JASJIT KAUR  
DHANDA, SUKHJIT KAUR DHANDA, and  
DAVANJIT SINGH DHANDA, minors  
through their Guardian Ad Litem, AMARJIT  
SINGH, and as successors in interest of the  
Estate of Baljit Singh

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24 Dated: 8/30/13, 2013

  
AMARJIT SINGH, Individually and as  
successor in interest of the Estate of Baljit  
Singh

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Dated: \_\_\_\_\_, 2013

LAW OFFICE OF STEWART KATZ

\_\_\_\_\_  
STEWART KATZ  
Attorney for Plaintiffs

Dated: \_\_\_\_\_, 2013

LAW OFFICE OF JOSEPH C. GEORGE

\_\_\_\_\_  
JOSEPH C. GEORGE, SR.  
Attorney for Plaintiffs

Dated: August 29, 2013

~~WILKE, FLEURY, HOFFELT, GOULD &  
BIRNEY, LLP~~

\_\_\_\_\_  
ROBERT F. TYLER, JR.  
Attorneys for Defendants,  
DR. ROBERT HALES, PAUL HENDRICKS;  
DR. GREGORY SOKOLOV; L. MICHAEL  
TOMPKINS

Dated: \_\_\_\_\_, 2013

\_\_\_\_\_  
PRABJIT SINGH DHANDA, JASJIT KAUR  
DHANDA, SUKHJIT KAUR DHANDA, and  
DAVANJIT SINGH DHANDA, minors  
through their Guardian Ad Litem, AMARJIT  
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Estate of Baljit Singh

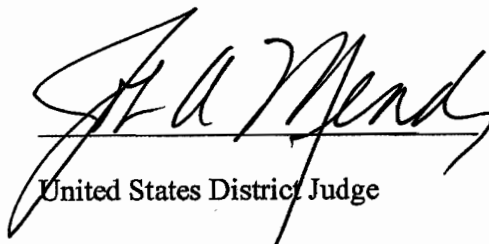
Dated: \_\_\_\_\_, 2013

\_\_\_\_\_  
AMARJIT SINGH, Individually and as  
successor in interest of the Estate of Baljit  
Singh

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**IT IS SO ORDERED:**

Dated: August 30, 2013

  
United States District Judge

# **EXHIBIT 1**

**Estate of Baljit Singh, et al. v. County of Sacramento, et al.**  
Case No. 2:09-CV-01439-JAM-JFM  
Hours Summary and Breakdown

Attorney	Total Hours for JPS Defs (*1)	JPS Only (*2)	JPS Substantial (*3)	County Defs Hours (*4)	Total # Hours Spent on Case
Stewart Katz	785.0 \$400.00 \$314,000.00	388.2 @ \$400/hr = \$155,280.00 (Continuance Related: 102.9 @ \$400/hr = \$41,160.00)	396.8	185	970
Guy Danilowitz	242.0 \$175.00 \$42,350.00	45.3 @ \$175/hr = \$7,927.50 (Continuance Related: 0 @ \$175/hr = \$0.00)	196.7	35.6	277.6
Joseph C. George, Ph.D.	120.2 \$400.00 \$48,080.00	41.6 @ \$400/hr = \$16,640.00 (Continuance Related: 20.9 @ \$400/hr = \$8,360.00)	78.6	0	120.2
Joseph C. George, Jr.	165.9 \$280.00 \$46,452.00	143.9 @ 280/hr = \$40,292.00 (Continuance Related: 32.3 @ 280/hr = \$9,044.00)	22.0	1	166.9
	(JPS Total: \$450,882.00)	(Continuance Related Total: \$58,564.00)			

\* 1: This is the total of the hours which are JPS only and those substantially related to JPS defendants. This figure includes the totals for the next two columns. The contemporaneously kept time records did not allocate the activities between these categories and this represents a best effort in that regard.

\* 2: This category represents a good faith estimate of activities which exclusively or overwhelmingly related to the prosecution of the action against the JPS defendants. This figure encompasses all of the post summary judgment activities and trial preparation activities. It also includes the time spent on the JPS MSJ, the litigated discovery dispute(s) regarding peer-review discovery and discovery concerning the mental health evaluations. The post-continuance time and dollars are listed underneath and included within each attorney's hours for this category. The contemporaneously kept time records did not allocate the activities between these categories and this represents a best effort in that regard.

\* 3: This category represents a good faith estimate of activities which while pertaining to the JPS defendants also were undertaken in connection with the case against the County defendants. This included but is not limited to the suicide prevention policy related discovery and research, damages, Plaintiffs' separate statement of facts, Singh's March 2008 incarceration, and Baljit Singh's extensive medical and psychiatric history, and the post-suicide reviews. The contemporaneously kept time records did not allocate the activities between these categories and this represents a best effort in that regard.

\* 4: This category represents a good faith estimate of activities which exclusively or overwhelmingly related to the prosecution of the claims against the County defendants. This includes the response to the County's MSJ motion and their SUMF, and discovery and research regarding the issues relating to the question of understaffing. The contemporaneously kept time records did not allocate the activities between these categories and this represents a best effort in that regard.

Estate of Baljit Singh, et al. v. County of Sacramento, et al.

Case No. 2:09-CV-01439-JAM-JFM

Hours Summary and Breakdown

The agreed upon fees are 30.32% of the settlement after both the settlement amount and the amount of the attorneys' fees are adjusted for the sum attributable to the continuance:

Settlement Amount: \$375,000.00  
(less total continuance) -\$58,564.00  
**Total: \$316,436.00**

Attorneys' Fees &  
Costs Awarded: \$250,000.00  
(less costs): -\$95,497.67  
(less total continuance) -\$58,564.00  
**Total: \$95,938.33**

# **EXHIBIT 2**



**Estate of Baljit Singh, et al. v. County of Sacramento, et al.**

Case No. 2:09-CV-01439-JAM-JFM

Plaintiffs' Costs

	<b><u>Amount</u></b>
<b>Filing Fees:</b>	<b>\$350.00</b>
<b>Service of Subpoenas &amp; Non-Expert Witness Fees:</b>	<b>\$1,677.60</b>
<b>Investigative Fees:</b>	<b>\$117.50</b>
<b>Records &amp; Copy Services:</b>	<b>\$6,378.08</b>
<b>Depositions and Court Transcripts:</b>	
Transcript: Amarjit Singh	447.95
Transcripts: Prabjit & Jasjit Dhanda	550.00
Transcript: Nirmal Singh	342.50
Transcript: Sukhmindar Dhesi	291.30
Transcripts: Patrick Walker & Donald Vagt	822.80
Transcript: Gregory Sokolov, MD, Volume I	1,056.70
Transcripts: Brian Moore & Kathryn Newbold Thomas	616.30
Transcript: Jessica McNary	263.50
Transcripts: Shane Waterstradt & Melissa Telliano	341.90
Transcript: Gregory Sokolov, MD, Volume II	482.40
Transcript: Pouria Kashkouli, MD	137.05
Transcript: Donna J. Kinser, MD	203.46
Transcript: L. Michael Tompkins, Ed.D.	412.00
Videographer: L. Michael Tompkins, Ed.D.	225.00
Transcript: Robert Hales	859.80
Videographer: Robert Hales	538.75
Transcript: Lori Severance	557.00
Videographer: Lori Severance	362.50
Transcript: Paul Hendricks, RN	740.20
Videographer: Paul Hendricks, RN	467.00
Transcript: Cynthia Lopez	390.75
Transcripts: David Nofsinger & Scott Jones	850.30
Transcript: Sandy Unarie	309.05

**Estate of Baljit Singh, et al. v. County of Sacramento, et al.**

Case No. 2:09-CV-01439-JAM-JFM

Plaintiffs' Costs

	<u>Amount</u>
<b>Depositions &amp; Court Transcripts (Cont'd):</b>	
Transcripts: Peter Dietrich, MD; Wanda Battles, Uma Zykofsky	1,011.65
Transcript: Autar Singh	97.50
Transcript: Warren Cook	432.20
Transcript: Jeffery Metzner, MD	723.95
Expert Deposition Testimony Fees: Jeffrey Metzner, MD	1,750.00
Transcript: Lindsay Hayes-Volume 1	1,041.00
Expert Deposition Testimony Fees: Lindsay Hayes	2,100.00
Expert Deposition Testimony Fees: Lindsay Hayes	350.00
Transcript: Richard Hayward, Ph.D.	853.95
Transcript: Emily Keram, MD	539.20
Transcript: Lindsay Hayes-Volume 2	665.69
Transcript from Court Hearing on 10/3/12	38.70
Transcript from Court Hearing on 04/8/13	748.00
<b>SUBTOTAL:</b>	<b>\$21,620.05</b>
<b>Expert Witness Fees:</b>	
Richard Hayward	32,994.00
Warren Cook	3,000.00
Emily Keram, MD	23,154.42
David Freeto	2,250.00
<b>SUBTOTAL:</b>	<b>\$61,398.42</b>
<b>Travel:</b>	<b>\$3,001.94</b>
<b>Federal Express:</b>	<b>\$487.11</b>
<b>Miscellaneous:</b>	<b>\$466.97</b>
<b><u>GRAND TOTAL:</u></b>	<b><u>\$95,497.67</u></b>