



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

JIMMIE STEPHEN
Plaintiff(s)
vs.
FEDERAL RECEIVER J.C. KELSO, ET AL.,
Defendants.

No. 2:10-cv-01678-KJM KJN P
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, Tanya E. Moore, attorney for plaintiff(s), declare as follows:

I was appointed to represent plaintiff(s) in this action on August 10, 2012, by the Honorable KENDALL J. NEWMAN, United States District Judge/Magistrate. I believe that the following course of action is reasonably necessary to the prosecution of this action:

The services of a medical consultant/expert to review Plaintiff's medical records are required to evaluate the level of medical care provided to Plaintiff in the context of applicable industry standards and to evaluate the claims of deliberate indifference and medical malpractice, as well as the medical consequences to Plaintiff in the alleged delayed treatment and alleged improperly performed medical services. The amount below is a reasonable estimate of the costs that will be so incurred based on the retainer requested by the consultant/expert to review Plaintiff's medical records and properly advise Plaintiff's counsel. It is anticipated that the retainer requested will properly cover all such review and advice, although should the consultant/expert be required to prepare an expert report, testify at deposition and/or trial, the retainer is not anticipated to cover such amounts. Submitted herewith are the consultant/expert's Curriculum Vitae, Schedule of Fees, Retainer

(e.g., deposition of _____, defendant herein).

I have made reasonable inquiry and believe that the cost of this course of action will not exceed the amount of \$ 3,000.00.

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.

Stephen v. Kelso
2:10-cv-1678-KJM-KJN
Request to Incur Costs by Appointed Pro Bono Counsel

CONTINUATION OF REQUEST EXPLANATION

The services of a medical consultant/expert to review Plaintiff's medical records are required to evaluate the level of medical care provided to Plaintiff in the context of applicable industry standards and to evaluate the claims of deliberate indifference and medical malpractice, as well as the medical consequences to Plaintiff in the alleged delayed treatment and alleged improperly performed medical services. The amount below is a reasonable estimate of the costs that will be so incurred based on the retainer requested by the consultant/expert to review Plaintiff's medical records and properly advise Plaintiff's counsel. It is anticipated that the retainer requested will properly cover all such review and advice, although should the consultant/expert be required to prepare an expert report, testify at deposition and/or trial, the retainer is not anticipated to cover such amounts. Submitted herewith are the consultant/expert's Curriculum Vitae, Schedule of Fees, Retainer Agreement and Invoice for the Court's consideration.

REQUEST OF PRO BONO FOR PRE-APPROVAL OF EXPENDITURES - PAGE 2

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

Amount Approved	Purpose	Amount Paid
\$3,000.00	Medical consultant to review records and provide analysis	

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

Signed this 6th day of December, 2012, at San Jose, California.

/s/ Tanya E. Moore

Attorney for Plaintiff(s)

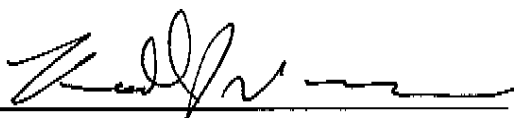
The above expenditure is Approved Denied

Or,

Good cause appearing therefore, this matter is set for discovery conference, pursuant

to rule _____, on _____, at _____, _____M. in Courtroom
Number _____.

Dated: 12/18/12


United States District Judge/Magistrate