

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

Gress

Plaintiff(s)

vs.

Smith

Defendants.

No. 2:13-cv-00328-TLN-KJN

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, Ryan Daugherty, attorney for plaintiff(s), declare as follows:

I was appointed to represent plaintiff(s) in this action on September 23, 2013, by the Honorable Kendall Newman, United States District Judge/Magistrate Judge. I believe that the following course of action is reasonably necessary to the prosecution of this action:

a declaration by Dr. Howard Slyter in opposition to motions for summary judgment filed by twelve (12) defendants, as defendants' put forward declarations and statements of purported medical opinion in their motions. Plaintiff's counsel has spoken to Dr. Slyter about the pro bono nature of this case and he indicated that he will work with us to keep the hours and costs down. Dr. Slyter bills at \$550 and should spend approximately 4 hours to review the relevant documents and draft the declaration. Dr. Slyter's staff will help review documents and anticipates 6 hours of time at \$160 per hour. Plaintiff's counsel does not anticipate further costs until trial, which would be for an expert report, preparation for trial and testimony at trial. Any deposition costs of our expert would be paid for by Defendants. Plaintiff anticipates the cost of the expert report to be approximately the same as the cost of preparing the declaration, with more time drafting the report but less time reviewing documents as much of that work will be completed for the declaration. 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 \$ 3160.

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 27 day of September, 2016, at Sacramento, California.

RID
 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: October 4, 2016

Kendall J. Newman
 United States ~~District Judge~~ Magistrate Judge