



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

Henry Jones

Plaintiff(s)

vs.

P. Kuppinger, et al

Defendants.

No. 2:13-cv-00451-AC

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, Chijioke O. Ikonte, attorney for plaintiff(s), declare as follows:

I was appointed to represent plaintiff(s) in this action on 5/25/2018, by the Honorable Allison Claire, United States District Judge/Magistrate Judge. I believe that the following course of action is reasonably necessary to the prosecution of this action:

See Attachment A

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 \$3500.00.

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 7th day of November, 2018, at Los Angeles, California.

[Handwritten Signature]

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: 11/7/18

[Handwritten Signature]  
United States District Judge/Magistrate Judge

## ATTACHMENT A

The plaintiff, HENRY A. JONES ("Jones") would like to retain Joseph A. Gunn as an expert witness in the within action. Defendants have concluded deposition of Jones.

Following review of the deposition of Jones, review of the incidents report, CDCR Operations Manual RE: Use of force, Title 15 of the California Code of Regulations, Section 3268: Use of Force, POST Manual: Use of Force, Jones medical records, and this Court's Order on Defendant's Motion for Summary Judgment, the issue in this case is whether the force used was excessive and unnecessary under the circumstance. This issue falls within the purview of an expert witness such as Joseph Gunn.

Joseph A. Gunn will perform the following tasks:

1. Review of all the incident reports prepared in connection with the use of force.
2. Prepare reports and declarations based upon review
3. Prepare and testify at depositions
4. Prepare and testify at trial
5. Consultations with counsel, including assisting in preparation for and deposition of defense experts (if any)

An estimate for Joseph A. Gunn's initial service is as follows:

- I. Review of all incident reports, declarations, Rule 26 disclosure, Declaration: \$2500.00
- II. Telephone consultations with counsel: \$1000.00

Joseph A. Gunn's rate is reasonable and I selected Mr. Gunn after comparing the rate of other experts.