

Print Form

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

Larry Giraldes

Plaintiff(s)

vs.

Jeffrey Beard

Defendants.

No. 2:14-cv-01780-CKD  
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, Alan J. Reinach, attorney for plaintiff(s), declare as follows:

I was appointed to represent plaintiff(s) in this action on March 10, 2015, by the Honorable Carolyn K. Delaney, United States District Judge/Magistrate Judge. I believe that the following course of action is reasonably necessary to the prosecution of this action:

- 1. Obtain an expert witness report with respect to Christian religious teachings and laws concerning marriage, and the importance of consummation, as well as physical, emotional and spiritual intimacy nurtured during private time;
- 2. One or two visits to Plaintiff to secure his declaration in support of his MSJ.

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 \$ 3,000.

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.

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

Case Number: 2:14-cv-01780-CKD

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

Amount Approved	Purpose	Amount Paid
\$2,000	Expert Witness Fee / report	
\$1000	Travel budget for two (2) trips to Sacramento from southern California	

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

Signed this 8th day of July, 2015, at Thousand Oaks, California.

Alan J. Remer

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: 7/13/2015

Carolyn K. Delaney  
United States District Judge/Magistrate/Judge

**Carolyn K. Delaney**  
**U.S. Magistrate Judge**