



KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE

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June 27, 2013

Via Hand Delivery

The Honorable Thelton E. Henderson
United States District Court
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

RE: Plata, et al. v. Brown, et al., U.S.D.C., N.D. Cal., Case No. C 01-01351 TEH

Dear Judge Henderson:

Enclosed please find the following invoices from the court-appointed experts, Madeleine LaMarre, MN, Joe Goldenson, M.D., and Michael Puisis, D.O.:

- (1) Ms. LaMarre, invoices dated 05/03/13, professional fees and expenses: \$20,052.43;
 - (2) Dr. Goldenson, invoice dated 05/01/13, professional fees and expenses: \$17, 580.84;
- and
- (3) Dr. Puisis, invoice dated 05/21/13, professional fees and expenses: \$32,953.24, invoice dated 3/11/13, professional fees and expenses \$24,667.94;

Dr. Puisis's invoice dated 3/11/13 was inadvertently omitted from a prior submission. I apologize to the Court and Dr. Puisis for any inconvenience. I have reviewed the invoices and believe they appear appropriate to pay. Please contact me with any questions.

APPROVED:

Thelton E. Henderson
United States District Judge

Respectfully submitted,

MANEESH SHARMA
Deputy Attorney General

For KAMALA D. HARRIS
Attorney General

Dated: 7/1/13

The Honorable Thelton E. Henderson

June 27, 2013

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Enclosures

cc:

Madeleine LaMarre MN (*via U.S. Mail, w/o encls.*)

Michael Puisis, D.O. (*via U.S. Mail, w/o encls.*)

Joe Goldenson, M.D. (*via U.S. Mail, w/o encls.*)

Paul Mello, Esq. (*via U.S. Mail, w/o encls.*)

Donald Specter, Esq. (*via U.S. Mail, w/o encls.*)

MS:

CA2001CS0001
20705421.doc

Madeleine LaMarre MN, FNP-BC
1143 Citadel Drive N.E.
Atlanta, Georgia 30324-3815
Phone: (404) 634-0117
Fax: (404) 634-2594
mlamarre@comcast.net

May 6, 2013

State of California
Department of Justice
Office of the Attorney General
ATTN: Patrick R. McKinney II, Deputy Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004

RE: Plata v. Brown

Dear Mr. McKinney,

Enclosed you will find my invoices for professional fees and expenses related to work as a Plata Medical Expert. Please let me know if you have any questions.

Thank you for your assistance in processing this invoice.

Sincerely,

A handwritten signature in black ink that reads "Madeleine LaMarre". The signature is written in a cursive style with a long horizontal flourish at the end.

Madeleine LaMarre MN, FNP-BC

Madeleine LaMarre
1143 Citadel Drive
Atlanta, Georgia, 30324
Tax ID #320079309

Professional Fees:

Date	Hours	Activity
4/8/13	2.75	CCI Report, Preparation for Kanan conference call
4/9/13	3.75	CCI Report, conference call with Renee Kanan
4/10/13	7.75	CCI Report, conference call with court experts and Dr. John Galgiani
4/15/13	7.0	Review of documents in preparation for cocci meeting, meet and confer meeting with the parties regarding CDCR response to cocci cases, travel to Corcoran
4/16/13	10.5	Corcoran Review
4/17/13	10.0	Corcoran Review
4/18/13	11.0	Corcoran Review
4/19/13	8.0	Corcoran Review
4/22/13	3.5	CCI Record Review and Report
4/23/13	5.0	CCI Record Review and Report
4/24/13	4.25	CCI Report
4/25/13	8.0	CCI Report, Review of cocci documents and draft expert report on CDCR response to cocci
4/26/13	1.0	Preparation and Conference call with John Galgiani
4/30/13	1.5	Review of Receiver emails, motion regarding exclusions to PVSP and Avenal, debrief regarding Corcoran
Total Professional Fees	84	@ \$200 = \$16,800

Travel Fees:

Date	Hours	Activity
4/11/13	8.0	Travel from Atlanta to San Francisco
4/19/13	10.0*	Travel from Corcoran to Atlanta
Total Travel Fees	18	@ \$100 = \$1800.00

* Billed less than actual travel time, took a night flight from SFO to ATL

Expenses:

Date	Description	Reimbursement Due
4/11/13	Taxi from home to Atlanta Airport	\$52.20
	Airfare from Atlanta to San Francisco	\$565.80
	Taxi from SFO to hotel	\$37.50*
4/14/13	Hotel	\$179.03
	Meals	\$N/C
4/15/13	Hotel	\$89.10
	Meals	\$56.00
4/16/13	Hotel	\$89.10
	Meals	\$46.00
4/17/13	Hotel	\$89.10
	Meals	\$30.00
4/18/13	Hotel	\$89.10
	Meals	\$43.00
4/19/13	Hotel**	\$0.00
	Tolls	\$5.00
	Meals	\$32.00
4/20/13	Taxi from Atlanta Airport to home	\$49.50
TOTAL		\$1,452.43

*Less than billed amount

**On 4/19/13 travel plans were changed to take 10:45 pm-6 am flight to Atlanta incurring no hotel expenses.

Total Due:

Professional Fees	\$16,800
Travel Fees	\$1,800
Travel Expenses	\$1,452.43
Total Due	\$20,052.43

Joe Goldenson, MD
 1406 Cypress Street, Berkeley, CA 94703
 510-524-3102
jgoldenson@gmail.com

Invoice: Plata

Date of Invoice: May 1, 2013

Billing Period: Apr-13

Hourly rate: \$275.00 (Travel @ \$137.50/hr)

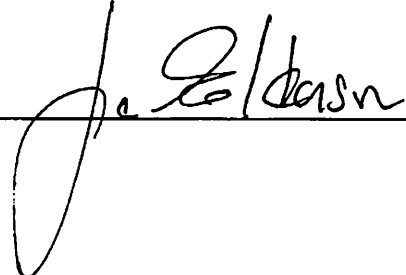
Amount to be paid this period: \$17,580.84

Date	Hours		Hourly Fee	Total	Task Performed
4/1/13	1.50	@	\$275.00 =	\$412.50	Review of records
4/4/13	2.00	@	\$275.00 =	\$550.00	Review of records
4/7/13	6.00	@	\$275.00 =	\$1,650.00	Review of records
4/8/13	3.50	@	\$275.00 =	\$962.50	Conference call with Dr. Kanan, review of records
4/9/13	2.00	@	\$275.00 =	\$550.00	Review of records
4/10/13	2.50	@	\$275.00 =	\$687.50	Conference calls with experts, review of records
4/11/13	2.00	@	\$275.00 =	\$550.00	Review of records
4/14/13	4.00	@	\$275.00 =	\$1,100.00	Review of records
4/15/13	3.00	@	\$275.00 =	\$825.00	Meetings
4/15/13	4.00	@	\$137.50 =	\$550.00	Travel
4/16/13	11.00	@	\$275.00 =	\$3,025.00	Site Visit - Corcoran
4/17/13	8.50	@	\$275.00 =	\$2,337.50	Site Visit - Corcoran
4/17/13	4.00	@	\$137.50 =	\$550.00	Travel
4/20/13	5.25	@	\$275.00 =	\$1,443.75	Report writing
4/24/13	4.00	@	\$275.00 =	\$1,100.00	Report writing
4/26/13	1.00	@	\$275.00 =	\$275.00	Conference call re cocci, Report writing
4/30/13	1.50	@	\$275.00 =	\$412.50	Conference call re cocci, Report writing
Total				\$16,981.25	

Professional Fees **\$16,981.25**

Travel Expenses **\$599.59**

TOTAL DUE **\$17,580.84**



Joseph L. Goldenson, MD
1406 Cypress Street, Berkeley, CA 94703
(510) 524-3102
jgoldenson@gmail.com

Travel Expense Claim

Date	Lodging	Meals	Car Rental	Air	Parking	Gas/Tolls	Miles	Other	Total/day
4/15/13	\$89.10	\$40.00			\$27.00		\$132.00		\$288.10
4/16/13	\$89.10	\$57.07					\$151.25		\$297.42
4/17/13		\$14.07							\$14.07
Total									\$599.59

*\$0.55/ mile

Michael Puisis D.O., S.C.
 932 Wesley
 Evanston, Illinois 60202
 Home 847-425-1270
 Cell 847-921-1270
 Email mpuisis@gmail.com
 EIN# 36-4386352

Invoice #6

Plata v. Davis C-01-1351

May 21, 2013

Date	Service	Hours	Rate	Total
4/14/2013	Airfare for Corcoran trip			\$590.80
4/14/2013	Hotel SF for cocci meeting			\$165.66
4/15/2013	Parking SF Cocci meeting			\$24.00
4/15/2013	Hotel Visalia			\$389.34
4/19/2013	Hotel SF airport return trip			\$180.61
4/20/2013	rental car			\$501.95
4/17/2013	gas			\$46.18
4/19/2013	gas			\$42.45
4/15/2013	Dinner			\$15.19
4/16/2013	Dinner			\$16.87
4/17/2013	Dinner			\$18.97
4/18/2013	Dinner			\$23.72
4/4/13 to 4/12/13	Chart reviews corcoran	37	275	\$10,175.00
4/14/2013	Travel	5	137.5	\$687.50
4/15/2013	Document review and cocci meeting	7	275	\$1,925.00
4/16/2013	Corcoran Site visit	10.5	275	\$2,887.50
4/17/2013	Corcoran Site visit	10	275	\$2,750.00
4/18/2013	Corcoran Site visit	11	275	\$3,025.00
4/19/2013	Corcoran Site visit	8	275	\$2,200.00
4/19/2013	Travel	4	137.5	\$550.00

4/20/2013	Travel	5	137.5	\$687.50
5/11/2013	Cocci report	7	275	\$1,925.00
5/17/2013	Corcoran report	8	275	\$2,200.00
5/18/2013	Corcoran report	7	275	\$1,925.00
TOTAL				\$32,953.24

Michael Puisis D.O., S.C.
 932 Wesley
 Evanston, Illinois 60202
 Home 847-425-1270
 Cell 847-921-1270
 Email mpuisis@gmail.com
 EIN# 36-4386352

Invoice #4

Plata v. Davis C-01-1351

March 11, 2013

Date	Service	Hours	Rate	Amount	Total
2/18/2013	Airfare to San Francisco to SCC			\$247.80	\$247.80
2/18/2013	Hotel SCC			\$377.60	\$377.60
2/22/2013	Hotel at SF airport			\$179.75	\$179.75
2/18/2013	Rental Car			\$297.64	\$297.64
2/18/2013	Meal			\$11.94	\$11.94
2/20/2013	Meal			\$56.23	\$56.23
2/21/2013	Meal			\$48.13	\$48.13
2/22/2013	Gas			\$25.66	\$25.66
2/22/2013	Gas			\$13.81	\$13.81
2/18/2013	Travel	7.75	137.5	\$1,065.63	\$1,065.63
2/19/2013	SCC site visit	8	275	\$2,200.00	\$2,200.00
2/20/2013	SCC site visit	8.5	275	\$2,337.50	\$2,337.50
2/21/2013	SCC site visit	10	275	\$2,750.00	\$2,750.00
2/22/2013	SCC site visit	5.5	275	\$1,512.50	\$1,512.50
2/22/2013	Travel	3	137.5	\$412.50	\$412.50
2/23/2013	Travel	4.5	137.5	\$618.75	\$618.75
2/25/2013	Reports	8	275	\$2,200.00	\$2,200.00
2/26/2013	Reports	9	275	\$2,475.00	\$2,475.00
2/27/2013	Reports	9	275	\$2,475.00	\$2,475.00
2/28/2013	Reports	7.5	275	\$2,062.50	\$2,062.50
3/1/2013	Reports	7	275	\$1,925.00	\$1,925.00
3/2/2013	Reports	2	275	\$550.00	\$550.00
3/10/2013	Reports	3	275	\$825.00	\$825.00
TOTAL					\$24,667.94