



KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE

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August 16, 2013

RECEIVED

AUG 16 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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, invoice dated 05/31/13, professional fees and expenses: \$13,250.00, revised invoice dated 7/30/2013, originally dated 7/05/13, professional fees and expenses \$23,396.36;

(2) Dr. Goldenson, invoice dated 6/01/13, professional fees and expenses: \$ 7,975.00; revised invoice dated 6/28/13, professional fees and expenses: \$22,937.73; and

(3) Dr. Puisis, invoice dated 7/02/13, professional fees and expenses: \$38,747.82;

These invoices were previously submitted to the Court on July 26, 2013, but some of the invoices contained calculation errors. As instructed by Michael Chu, I am resubmitting the correct copies of all invoices submitted on July 26, 2013. I have reviewed the invoices and believe they appear appropriate to pay. Please contact me with any questions.

Respectfully submitted,

MANEESH SHARMA
Deputy Attorney General

APPROVED:

Thelton E. Henderson
United States District Judge

For

KAMALA D. HARRIS
Attorney General

Dated: 8/19/13

The Honorable Thelton E. Henderson
August 15, 2013
Page 2

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
Ltr transmitting revised invoices.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 31, 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
May 7, 2013	2.5	Review of the State's objections to the Receivers' Cocci proposal and related documents.
May 8, 2013	7.5	Review and edit of combined CCI report
May 9, 2013	7.0	Review and edit of combined CCI report
May 10, 2013	8.0	Document review and Cocci Report
May 13, 2013	3.25	Second Review and edit of Cocci Report
May 14, 2013	3.0	Second Review and edit of Cocci Report
May 16, 2013	1.75	Conference calls with Joe Goldenson, Cocci report, review of email correspondence, conference call with Jared Goldman regarding OIG audit process
May 17, 2013	4.5	Cocci report, conference call with Joe Goldenson regarding Cocci report and revision
May 18, 2013	3.75	Review of Lopez death review and eUHR, cocci report edits
May 19, 2013	3.5	Cocci Report review and edits
May 20, 2013	1.25	Cocci and CCI draft report edits, conference calls with Joe Goldenson and Mike Puisis
May 22, 2013	5.0	Review of Michael Chu comments. Conference call with Goldenson and Puisis. Cocci Report edits
May 23, 2013	4.5	Review of Michael Chu's comments regarding final draft, review of literature, conference calls with Puisis, Goldenson and Chu
May 24, 2013	1.25	Review of Michael Chu's comments regarding CCI report, editing of CCI report
May 28, 2013	1.75	Review and editing of CCI report, email correspondence
May 29, 2013	2.25	Review of SVSP CCHCS Death Summary Reports
May 30, 2013	2.0	Review of CCHCS comments regarding CCI report, editing of CCI report
May 31, 2013	3.5	Conference calls with Goldenson and Puisis, Michael Chu, Final Review and edit of CCI report, email correspondence and conference call with Jared Goldman
Total Professional Fees	66.25	@ \$200 = \$13,250

Total Due:

Professional Fees	\$13,250.00
Total Due	\$13,250.00

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

July 30, 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,

Thank you for processing my May and June 2013 invoices. Due to my inclusion of an asterisk to indicate that certain meals were invoiced at less than the actual amount, the excel spread sheet did not accurately calculate the expenses in June 2013. Enclosed you will find my revised invoice for professional fees and expenses related work as a Plata Medical Expert.

Michael Chu has requested that the May and June invoices be resubmitted together as soon as they are approved and he will process them when received.

I apologize for any inconvenience to you. Thank you for your assistance in processing this invoice.

Sincerely,



Madeleine LaMarre MN, FNP-BC

Madeleine LaMarre Tax ID #32-0079309
 1143 Citadel Drive
 Atlanta, Georgia, 30324

Client: Plata v. Brown

Professional Fees:		
Date	Hours	Activity
6/4/2013	10.00	Salinas Valley State Prison Review
6/5/2013	10.00	Salinas Valley State Prison Review
6/6/2013	10.50	Salinas Valley State Prison Review
6/7/2013	7.50	Salinas Valley State Prison Review
6/10/2013	1.00	Preparation and conference call regarding refinement of OIG inspection tool
6/11/2013	2.25	Conference call with Kelso et al, regarding SVSP
6/12/2013	2.00	Preparation/conference call with Christine Berthold et al. re refinement of OIG inspection tool
6/13/2013	7.00	Corcoran Record Review and Report
6/14/2013	4.00	Corcoran Record Review and Report
6/16/2013	3.00	Corcoran Record Review and Report
6/17/2013	7.00	Corcoran Record Review and Report
6/18/2013	9.50	Corcoran Record Review and Report
6/19/2013	4.25	Corcoran Report
6/20/2013	4.50	Corcoran Report
6/21/2013	7.50	Conference call with court experts, Corcoran Report, Plata email correspondence.
6/23/2013	8.50	Corcoran Report
Total Professional Hours	98.50	
Total at Hourly Rate of \$200.00	\$19,700.00	

Travel Fees:		
Date	Hours	Activity
6/3/2013	9.5	Travel from Albuquerque to Salinas, CA
6/7/2013	3.0	Travel from SVSP to San Francisco
6/8/2013	7.5	Travel from San Francisco to Atlanta
Total Travel Hours	20.0	
Total at Hourly Rate of \$100	\$2,000.00	

Expenses:		
Date	Expense	Description
6/3/2013	\$690.20	Airfare

	\$150.07	Hotel
	\$32.29	Meals
6/4/2013	\$150.07	Hotel
	\$45.00	Meals
6/5/2013	\$150.07	Hotel
	\$45.00	Meals
6/6/2013	\$150.07	Hotel
	\$45.00	Meals
6/7/2013	\$125.09	Hotel
	\$45.00	Meals
6/8/2013	\$20.00	Meals
	\$48.50	Cab Fare from Atlanta Airport to 1143 Citadel Drive
Total Expenses	\$1,696.36	

Professional Fees	\$19,700.00	
Travel Fees	\$2,000.00	
Expenses	\$1,696.36	
Total Due	\$23,396.36	

*Billed less than amount charged

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

Invoice: Plata

Date of Invoice: June 1, 2013

Billing Period: May-13

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

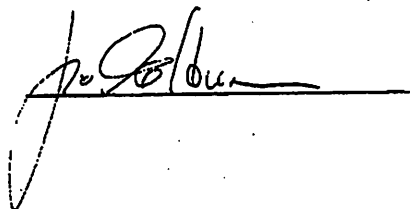
Amount to be paid this period: \$7,975.00

Date	Hours	Hourly Fee	Total	Task Performed
5/6/13	3.00 @	\$275.00 =	\$825.00	Report writing, review of documents
5/7/13	2.50 @	\$275.00 =	\$687.50	Report writing, review of documents
5/12/13	5.50 @	\$275.00 =	\$1,512.50	Report writing
5/14/13	1.50 @	\$275.00 =	\$412.50	Report writing
5/17/13	3.00 @	\$275.00 =	\$825.00	Report writing
5/18/13	5.00 @	\$275.00 =	\$1,375.00	Report writing
5/21/13	3.00 @	\$275.00 =	\$825.00	Report writing
5/22/13	4.00 @	\$275.00 =	\$1,100.00	Conference with experts, report writing
5/25/13	0.50 @	\$275.00 =	\$137.50	Report writing
5/31/13	1.00 @	\$275.00 =	\$275.00	Conference calls, report writing
Total			\$7,975.00	

Professional Fees
\$7,975.00

Travel Expenses
\$0.00

TOTAL DUE \$7,975.00



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

Invoice: Plata

Date of Invoice: June 28, 2013

Billing Period: Jun-13

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

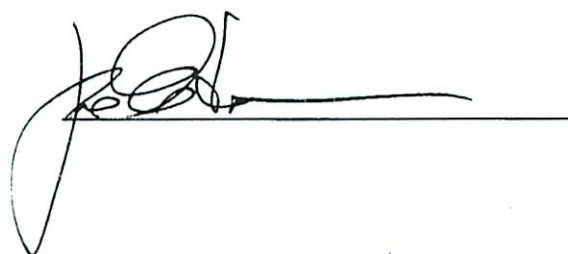
Amount to be paid this period: \$22,937.73

Date	Hours	Hourly Fee	Total	Task Performed
6/1/13	2.50 @	\$275.00 =	\$687.50	Review of records
6/3/13	2.50 @	\$137.50 =	\$343.75	Travel
6/4/13	10.00 @	\$275.00 =	\$2,750.00	Site visit
6/5/13	10.00 @	\$275.00 =	\$2,750.00	Site visit
6/6/13	9.00 @	\$275.00 =	\$2,475.00	Site visit
6/6/13	2.50 @	\$137.50 =	\$343.75	Travel
6/7/13	3.00 @	\$275.00 =	\$825.00	Review of records, report writing
6/8/13	5.00 @	\$275.00 =	\$1,375.00	Review of records, report writing
6/9/13	6.00 @	\$275.00 =	\$1,650.00	Review of records, report writing
6/11/13	2.50 @	\$275.00 =	\$687.50	Conference call with Receiver, report writing
6/12/13	4.00 @	\$275.00 =	\$1,100.00	Conference call with OIG, report writing
6/15/13	6.00 @	\$275.00 =	\$1,650.00	Review of records, report writing
6/18/13	2.50 @	\$275.00 =	\$687.50	Review of documents report writing
6/21/13	2.00 @	\$275.00 =	\$550.00	Conference call with experts, document and records review
6/23/13	5.75 @	\$275.00 =	\$1,581.25	Review of records
6/24/13	5.00 @	\$275.00 =	\$1,375.00	Review of documents and report writing
6/25/13	4.00 @	\$275.00 =	\$1,100.00	Report writing
6/28/13	1.00 @	\$275.00 =	\$275.00	Report writing
Total			\$22,206.25	

Professional Fees \$22,206.25

Travel Expenses \$731.48

TOTAL DUE \$22,937.73



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
6/3/13	\$150.07	\$25.27					\$60.50		\$235.84
6/4/13	\$150.07	\$40.00							\$190.07
6/5/13	\$150.07	\$40.00					\$27.50		\$217.57
6/6/13							\$88.00		\$88.00
Total									\$731.48

*\$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

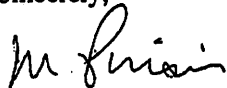
July 2, 2013

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

Dear Mr. Patrick McKinney,

Find enclosed my invoice for the SVSP site visit and report and items various conference calls.

Sincerely,



Michael Puisis, D. O.

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 #7

Plata v. Davis C-01-1351

July 2, 2013

Date	Service	Hours	Rate	Total
6/3/2013	Airfare for SVSP trip			\$650.80
6/3/2013	Hotel for SVSP tour			\$600.28
6/3/2013	Taxi to airport			\$38.00
6/3/2013	Meal			\$15.16
6/5/2013	Meal			\$36.87
6/6/2013	Meal			\$43.89
6/6/2013	Gas			\$25.18
6/7/2013	Meal			\$37.07
6/7/2013	gas			\$33.57
6/7/2013	Hotel SF airport			\$167.88
6/8/2013	Rental car			\$554.87
6/8/2013	Taxi to home			\$38.00
6/3/2013	Travel	8.5	137.5	\$1,168.75
6/4/2013	SVSP site visit	10	275	\$2,750.00
6/5/2013	SVSP site visit	10	275	\$2,750.00
6/6/2013	SVSP site visit	10.5	275	\$2,887.50
6/7/2013	SVSP site visit	7.5	275	\$2,062.50
6/7/2013	Travel to SF	3	137.5	\$412.50
6/8/2013	Travel to Chicago	6	137.5	\$825.00
6/18/2013	Cocci conference call and document review	1.5	275	\$412.50
6/10/2013	OIG call/ SVSP report	9	275	\$2,475.00

6/11/2013	Debrief with Receiver and SVSP report	7	275	\$1,925.00
6/12/2013	OIG call/ SVSP report	9	275	\$2,475.00
6/13/2013	SVSP report	7.5	275	\$2,062.50
6/14/2013	SVSP report	9	275	\$2,475.00
6/17/2013	SVSP report	9	275	\$2,475.00
6/24/2013	SVSP report	8	275	\$2,200.00
6/25/2013	SVSP report	9	275	\$2,475.00
6/26/2013	SVSP report; call with Ritter; call with Adams, Young, Camara, and Ellis	8	275	\$2,200.00
6/27/2012	SVSP report	9	275	\$2,475.00
TOTAL				\$38,747.82