

**KAMALA D. HARRIS**  
Attorney General

State of California  
**DEPARTMENT OF JUSTICE**



455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102-7004

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E-Mail: Maneesh.Sharma@doj.ca.gov

November 6, 2013

*Via E-Mail Only*

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 and Michael Puisis, D.O.:

- (1) Ms. LaMarre, invoice dated 10/14/13, professional fees and expenses: \$5,250.00; and
- (2) Dr. Puisis, invoice dated 10/30/13, professional fees and expenses: \$29,801.34.

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

11/07/13

Respectfully submitted,

MANEESH SHARMA  
Deputy Attorney General

For KAMALA D. HARRIS  
Attorney General

Enclosures

cc:

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

The Honorable Thelton E. Henderson  
November 6, 2013  
Page 2

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

MS:

CA2001CS0001  
40812837.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](mailto:mlamarre@comcast.net)

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October 14, 2013

State of California  
Department of Justice  
Office of the Attorney General  
ATTN: Maneesh Sharma, Deputy Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004

RE: Plata v. Brown

Dear Maneesh,

Enclosed you will find my invoices for professional fees related 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,



Madeleine LaMarre MN, FNP-BC

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

Client: Plata v. Brown

<b>Professional Fees:</b>		
<b>Date</b>	<b>Hours</b>	<b>Activity</b>
9/3/2013	2.75	Preparation for and conference calls with Mike Puisis, and Judge Henderson et al., CCWF Report
9/4/2013	9.50	CCWF Final Draft Report
9/5/2013	7.50	CCWF Final Draft Report
9/27/2013	2.00	CIM report
9/30/2013	4.50	CIM report
<b>Total Professional Hours</b>	<b>26.25</b>	
<b>Total at Hourly Rate of \$200.00</b>	<b>\$5,250.00</b>	

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<b>Professional Fees</b>	<b>\$5,250.00</b>	
<b>Total Due</b>	<b>\$5,250.00</b>	

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

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October 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

Dear Mr. Patrick McKinney,

Find enclosed my invoice for the visit to CSP-SAC on October 7, 2013 to October 11, 2013. This is a re-submission as I failed to include a \$35 taxi fee on the prior invoice.

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 #10**

Plata v. Davis C-01-1351  
 October 30, 2013

Date	Service	Hours	Rate	Total
10/6/2013	Taxi to airport			\$35.00
10/6/2013	Airfare for SAC trip			\$496.80
10/6/2013	Rental car SAC trip			\$384.91
10/6/2013	Hotel in SF airport			\$125.32
10/7/2013	Hotel in Folsom for SAC trip including breakfast M-Th			\$486.56
10/6/2013	meal			\$40.00
10/7/2013	breakfast			\$8.36
10/7/2013	meal-dinner			\$39.48
10/8/2013	meal-dinner			\$40.00
10/9/2013	meal-dinner			\$40.00
10/10/2013	meal-dinner			\$40.00
10/11/2013	meal-breakfast			\$14.91
10/1/2013	review of policies	6	275	\$1,650.00
10/2/2013	chart reviews	7.5	275	\$2,062.50
10/3/2013	chart reviews	7.5	275	\$2,062.50
10/4/2013	chart reviews	8	275	\$2,200.00
10/6/2013	travel	6	137.5	\$825.00
10/7/2013	SAC tour	10	275	\$2,750.00
10/8/2013	SAC tour	10	275	\$2,750.00
10/9/2013	SAC tour	10	275	\$2,750.00
10/10/2013	SAC tour	10	275	\$2,750.00
10/11/113	SAC tour	3	275	\$825.00

10/11/2013	travel	7	137.5	\$962.50
10/14/2013	SAC report	9	275	\$2,475.00
10/17/2013	SAC report and call with Receiver	8.5	275	\$2,337.50
10/18/2013	Expert conference call and Report	3	275	\$825.00
10/29/2013	SAC report	3	275	\$825.00
<b>TOTAL</b>				<b>\$29,801.34</b>







835 Airport Blvd. • Burlingame, CA 94010  
Phone: (650) 344-5500 • Fax: (650) 340-8851  
For reservations across the nation  
www.doubletree.com or 1 800 222 TREE

**Name & Address**

PUISIS, MICHAEL  
932 WESLEY AVE  
EVANSTON, IL 60202  
US

Room 827/ND2D  
Arrival Date 10/6/2013 7:58:00PM  
Departure Date 10/7/2013  
Adult/Child 1/0  
Room Rate \$111.00

RATE PLAN S-GVT  
HH# 736265396 SILVER  
AL DL #2042493151  
BONUS AL CAR

Confirmation: 85034147

10/7/2013 PAGE 1

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DATE	REFERENCE	DESCRIPTION	AMOUNT
10/6/2013	4597137	GUEST ROOM	\$111.00
10/6/2013	4597137	CITY TAX	\$13.32
10/6/2013	4597137	TOURISM ASSESSMENTS	\$1.00
		WILL BE SETTLED TO VS *5239	\$125.32
		EFFECTIVE BALANCE OF	\$0.00
ESTIMATED CURRENCY TOTAL			

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**EXPRESS CHECK-OUT**

Good Morning! We hope you enjoyed your stay. With Express Check-Out there is no need to stop at the Front Desk to check out.

- Please review this statement. It is a record of your charges as of late last evening.
- For any charges after your account was prepared, you may:
  - + pay at the time of purchase.
  - + charge purchases to your account, then stop by the Front Desk for an updated statement.
  - + or request an updated statement be mailed or e-mailed to you within two business days.

Simply call extension 169 from your room and follow the automated instructions or call the Front Desk and tell us when you are ready to depart. Your account will be automatically checked out and you may use this statement as your receipt. Feel free to leave your key(s) in the room.

Please call the Front Desk if you wish to extend your stay or if you have any questions about your account.

DATE OF CHARGE	FOLIO NO./CHECK NO
	967113 A
AUTHORIZATION	INITIAL
PURCHASES & SERVICES	
TAXES	
TIPS & MISC.	
TOTAL AMOUNT	0.00

PAYMENT DUE UPON RECEIPT - 1.5% PER MONTH INTEREST CHARGE WILL BE APPLIED TO ALL PAST DUE INVOICES.



221 Iron Point Road • Folsom, CA 95630  
 Phone (916) 353-1717 • Fax (916) 353-1021  
 Reservations  
 www.hiltongardeninn.com or 1 877 STAY HGI

Name & Address

PUISIS, MICHAEL  
 932 WESLEY AVE  
 EVANSTON, IL 60202-1655  
 US

Room 213/K1  
 Arrival Date 10/7/2013 6:27:00PM  
 Departure Date 10/11/2013

Adult/Child 1/0  
 Room Rate 102.00

RATE PLAN L-GV  
 HH# 736265396 SILVER  
 AL: UA #03069734862  
 BONUS AL: CAR:

CONFIRMATION NUMBER : 3540517091

10/11/2013 PAGE 1

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DATE	REFERENCE	DESCRIPTION	AMOUNT
10/7/2013	945451	GUEST ROOM	\$102.00
10/7/2013	945451	ROOM TAXES	\$12.31
10/8/2013	945684	GUEST ROOM	\$102.00
10/8/2013	945684	ROOM TAXES	\$12.31
10/9/2013	945783	*GREAT AMERICAN GRILL	\$14.91
10/9/2013	945897	GUEST ROOM	\$102.00
10/9/2013	945897	ROOM TAXES	\$12.31
10/10/2013	946020	*GREAT AMERICAN GRILL	\$14.41
10/10/2013	946158	GUEST ROOM	\$102.00
10/10/2013	946158	ROOM TAXES	\$12.31
		WILL BE SETTLED TO VS *5239	\$486.56
		EFFECTIVE BALANCE OF	\$0.00
EXPENSE REPORT SUMMARY			
	10/07/13	00:00:00B 12:00:00AM 013 12:00:00AM13 12:00:00AM	STAY TOTAL
ROOM & TAX		\$114.31 \$114.31 \$114.31 \$114.31	\$457.24
FOOD & BEVERAGE		\$0.00 \$0.00 \$14.91 \$14.41	\$28.32
DAILY TOTAL		\$114.31 \$114.31 \$129.22 \$128.72	\$486.56

**Zip-Out Check-Out<sup>®</sup>**

Good Morning! We hope you enjoyed your stay. With Zip-Out Check-Out<sup>®</sup> there is no need to stop at the Front Desk to check out.

- Please review this statement. It is a record of your charges as of late last evening.
  - For any charges after your account was prepared, you may:
    - + pay at the time of purchase.
    - + charge purchases to your account, then stop by the Front Desk for an updated statement.
    - + or request an updated statement be mailed to you within two business days.
- If the statement meets with your approval, simply press the Zip-Out Check-Out button on your guest room telephone. Your account will be automatically checked out and you may use this statement as your receipt. Feel free to leave your key(s) in the room. Please call the Front Desk if you wish to extend your stay or if you have any questions about your account.

DATE OF CHARGE	FOLIO NO. CHECK NO. 216517 A
AUTHORIZATION	INITIAL
PURCHASES & SERVICES	
TAXES	
TIPS & MISC	
TOTAL AMOUNT	0.00

Il Fornaio Cucina Italiana  
 327 Lorton Avenue  
 Burlingame, CA 94010  
 (650) 375-8000

Date: Oct 06 '13 07:40PM  
 Card Type: Visa  
 Acct #: XXXXXXXXXXXX5239  
 Card Entry: SWIPED  
 Trans Type: PURCHASE  
 Trans Key: C1C008996566298  
 Auth Code: 01503C  
 Check: 770  
 Table: 55/1  
 Server: 33852 JOSE C

Subtotal: 41.18

Gratuity 8  
 Total 49.18  
 \* \* \* \* \* GUEST Copy \* \* \* \* \*

charge 40.00

**AMERICAN TAXI**

**RECEIPT**

NORTHWEST (847) 253-4411  
 SUBURBS  
 WEST & SOUTH (708) 424-7878  
 SUBURBS  
 LAKE COUNTY (847) 568-3131  
 NORTH (847) 873-1000  
 SUBURBS  
 DUPAGE CO. EAST (630) 820-9480  
 DUPAGE CO. WEST (630) 305-0700

DATE 10/6/13  
 AMOUNT 35.00

FROM  
 TO  
 NAME  
 CAB NUMBER

ALPDET

\* THANK YOU \*  
 \* THE DOUBLETREE SFO \*  
 \* 37 NORTH \*  
 CHECK: 1354  
 TABLE: 8/2  
 SERVER: 2 BUTCH  
 DATE: OCT07'13 7:42AM  
 CARD TYPE: VISA  
 ACCT #: XXXXXXXXXXXX5239  
 EXP DATE: XX/XX  
 AUTH CODE: 07293C  
 MICHAEL PUISIS

SUBTOTAL: 7.36

TIP: 1

TOTAL: 8.36

CUSTOMER SIGNATURE  
*Michael PUISIS*

I AGREE TO PAY ABOVE TOTAL  
 AMOUNT ACCORDING TO CARD ISSUER  
 AGREEMENT  
 \* PLEASE KEEP SECOND COPY \*

*breakfast*

# SCOTT'S SEAFOOD

## SCOTT'S SEAFOOD

9611 Greenback Lane  
Folsom, Ca. 95630  
PHONE (916) 989-6711

Date: Oct07'13 08:06PM  
Card Type: Visa /Mc  
Acct #: XXXXXXXXXXXX5239  
Card Entry: SWIPED  
Trans Type: PURCHASE  
Auth Code: 09544C  
Check: 2368  
Table: 32/1  
Server: 7012 PM Bar

Subtotal: 33.48  
Customer COPY 6

Tip \_\_\_\_\_  
Total 39.48

Customer  
Copy

## SCOTT'S SEAFOOD

9611 Greenback Lane  
Folsom, Ca. 95630  
PHONE (916) 989-6711

Date: Oct08'13 08:05PM  
Card Type: Visa /Mc  
Acct #: XXXXXXXXXXXX5239  
Card Entry: SWIPED  
Trans Type: PURCHASE  
Auth Code: 06458C  
Check: 2508  
Table: 41/3  
Server: 5 Jacob S

Subtotal: 39.42  
Customer COPY 8

Tip \_\_\_\_\_  
Total 47.42

Customer  
Copy

*charge*  
\$40

## SCOTT'S SEAFOOD

9611 Greenback Lane  
Folsom, Ca. 95630  
PHONE (916) 989-6711

Date: Oct09'13 07:47PM  
Card Type: Visa /Mc  
Acct #: XXXXXXXXXXXX5239  
Card Entry: SWIPED  
Trans Type: PURCHASE  
Auth Code: 02721C  
Check: 2624  
Table: 32/2  
Server: 7012 PM Bar

Subtotal: 36.72  
Customer COPY 7

Tip \_\_\_\_\_  
Total 43.72

Customer  
Copy

*charge*  
\$46.00

# SCOTT'S SEAFOOD

## SCOTT'S SEAFOOD

9611 Greenback Lane

Folsom, Ca. 95630

PHONE (916) 989-6711

Date: Oct 10 '13 07:13PM

Card Type: Visa /Mc

Acct #: XXXXXXXXXXXX5239

Card Entry: SWIPED

Trans Type: PURCHASE

Auth Code: 09819C

Check: 2719

Table: 47/1

Server: 67 Janelle

Subtotal: 37.80

Customer COPY

Tip

Total

Customer  
Copy

*Charge \$43.80*

*breakfast*



221 Iron Point Rd  
Folsom CA. 95530

Date: Oct 11 '13 07:40AM

Card Type: Visa/M.C.

Acct #: XXXXXXXXXXXX5239

Exp Date: XX/XX

Auth Code: 00507C

Check: 3347

Table: 7/5

Server: 309 Allison

Subtotal: 12.91

Tip: 2

Total: 14.91

I Agree To Pay Above Total  
According To My Card issuer  
Agreement.

\*\* Customer Copy \*\*