

**KAMALA D. HARRIS**  
Attorney General

State of California  
**DEPARTMENT OF JUSTICE**



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

Public: (415) 703-5500  
Telephone: (415) 703-5553  
Facsimile: (415) 703-1234  
E-Mail: Maneesh.Sharma@doj.ca.gov

December 12, 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, Michael Puisis, D.O., and Joe Goldenson, M.D.:

- (1) Ms. LaMarre, invoice dated 12/3/13, professional fees and expenses: \$11,950.00;
- (2) Dr. Puisis, invoice dated 12/2/13, professional fees and expenses: \$4,950.00; and
- (3) Dr. Goldenson, invoice dated 12/1/13, professional fees and expenses: \$8,305.00.

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

For KAMALA D. HARRIS  
Attorney General

Enclosures

APPROVED:

Thelton E. Henderson  
United States District Judge

Dated:  
12/16/13

The Honorable Thelton E. Henderson

December 12, 2013

Page 2

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  
-10840351.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)

---

December 3, 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

Professional Fees:		
Date	Hours	Activity
11/1/2013	6.50	SAC Report
11/11/2013	8.50	SAC Report
11/12/2013	8.00	SAC Report
11/14/2013	2.50	Participation in OIG nurse interviews
11/15/2013	8.50	SAC Report
11/18/2013	2.50	CIM Final Draft Review
11/19/2013	8.50	CIM Final Draft Review, conference calls with Starr Babcock and Court Medical Experts
11/20/2013	4.50	CIM Report
11/25/2013	8.00	CIM Final Draft, Proposal to assist CCHCS/OIG
11/26/2013	2.25	Proposal to assist CCHCS/OIG
<b>Total Professional Hours</b>	<b>59.75</b>	
<b>Total at Hourly Rate of \$200.00</b>	<b>\$11,950.00</b>	

Travel Fees:		
Date	Hours	Activity
<b>Total Travel Hours</b>	<b>0.0</b>	
<b>Total at Hourly Rate of \$100</b>	<b>\$0.00</b>	

Expenses:		
Date	Expense	Description
	\$0.00	
<b>Total Expenses</b>	<b>\$0.00</b>	

<b>Professional Fees</b>	<b>\$11,950.00</b>	
<b>Travel Fees</b>	<b>\$0.00</b>	
<b>Expenses</b>	<b>\$0.00</b>	
<b>Total Due</b>	<b>\$11,950.00</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

---

**Invoice #11**

Plata v. Davis C-01-1351  
December 2, 2013

Date	Service	Hours	Rate	Total
11/12/2013	OIG interviews	7	275	\$1,925.00
11/13/2013	OIG interviews	3.5	275	\$962.50
11/17/2013	CIM report	3	275	\$825.00
11/19/2013	Expert conference call	2	275	\$550.00
11/21/2013	OIG interviews	1	275	\$275.00
11/22/2013	CIM report	1.5	275	\$412.50
<b>TOTAL</b>				<b>\$4,950.00</b>

Joe Goldenson, MD  
650 5th Street, Suite 309, SF, CA 94107  
510-524-3102  
[jgoldenson@gmail.com](mailto:jgoldenson@gmail.com)

**Invoice: Plata**

Date of Invoice: December 1, 2013

Billing Period: Nov-13

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

Amount to be paid this period: **\$8,305.00**

Date	Hours	Hourly Fee	Total	Task Performed
11/12/13	7.00 @	\$275.00 =	\$1,925.00	OIG physician interviews
11/13/13	1.50 @	\$275.00 =	\$412.50	OIG physician interviews
11/16/13	8.00 @	\$275.00 =	\$2,200.00	Report writing
11/17/13	6.45 @	\$275.00 =	\$1,773.75	Report writing
11/19/13	2.00 @	\$275.00 =	\$550.00	Conference call with Starr Babcock, experts
11/21/13	2.25 @	\$275.00 =	\$618.75	OIG physician interviews
11/30/13	3.00 @	\$275.00 =	\$825.00	Report writing
Total			\$8,305.00	

Professional Fees **\$8,305.00**

Travel Expenses

**TOTAL DUE \$8,305.00**



---