

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

May 27, 2016

*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 5/1/16, professional fees and expenses: \$18,350.00;
- (2) Dr. Puisis, invoice dated 5/3/16, professional fees and expenses: \$3,781.25; and
- (3) Dr. Goldenson, invoice dated 4/23/16, professional fees and expenses: \$7,700.00.

I have reviewed the invoices and believe they appear appropriate to pay. Please contact me with any questions.

Respectfully submitted,

s/ Maneesh Sharma  
MANEESH SHARMA  
Deputy Attorney General

For KAMALA D. HARRIS  
Attorney General

Enclosures

cc:

APPROVED for payment from Court  
registry:

A handwritten signature in blue ink, appearing to read "Thelton E. Henderson", written over a horizontal line.

Thelton E. Henderson  
United States District Judge

Dated: 5/31/2016

The Honorable Thelton E. Henderson  
May 27, 2016  
Page 2

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

Madeleine LaMarre MN, FNP-BC  
3200 19<sup>th</sup> Ave S.E.  
Rio Rancho, NM 87124-1709  
Phone: (404) 694-0655  
[mlamarre55@gmail.com](mailto:mlamarre55@gmail.com)

---

May 1, 2016

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 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 Tax ID #32-0079309  
 3200 19th Ave SE  
 Rio Rancho NM 87124

Client: Plata v. Brown

Professional Fees:		
Date	Hours	Activity
4/7/2016	4.00	KVSP Records
4/11/2016	8.00	Review of Receiver's CVSP Delegation Report, conference call with Court Experts, response to Receiver, review of KVSP records, edits to final report
4/12/2016	6.50	KVSP Record review
4/13/2016	2.50	Preparation for delegation conference calls, KVSP review
4/14/2016	8.00	Delegation conference calls with Clark Kelso and the parties, conderecne call with court experts, KVSP review
4/15/2016	7.00	Conference call with court experts, KVSP and CCI record review
4/17/2016	5.50	KVSP Report
4/22/2016	4.50	KVSP Report
4/23/2016	7.50	KVSP Report
4/25/2016	9.00	KVSP Report Final Edits
4/26/2016	8.00	CCI Record Review
4/27/2016	8.00	CCI Record Review
4/28/2016	4.75	CCI Record Review
4/29/2016	4.50	CCI Review
4/30/2016	4.00	CCI Review
<b>Total Professional Hours</b>	<b>91.75</b>	
<b>Total at Hourly Rate of \$200</b>	<b>\$18,350.00</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
<b>Total Expenses</b>	<b>\$0.00</b>	

<b>Professional Fees</b>	<b>\$18,350.00</b>	
<b>Travel Fees</b>	<b>\$0.00</b>	
<b>Expenses</b>	<b>\$0.00</b>	
<b>Total Due</b>	<b>\$18,350.00</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

---

May 3, 2016

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. Mancesh Sharma

Find enclosed my invoice for April 2016.

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 #38**

Plata v. Davis C-01-1351  
May 3, 2016

Date	Service	Hours	Rate	Subtotal
4/11/2016	CVSP chart reviews/report	5	\$275.00	\$1,375.00
4/14/2016	Delegation calls and call with Experts	2.75	\$275.00	\$756.25
4/15/2016	Experts conf call	1	\$275.00	\$275.00
4/23/2016	CCI/KVSP reports	5	\$275.00	\$1,375.00
			TOTAL	\$3,781.25

Joe Goldenson, MD  
1406 Cypress Street  
Berkeley, CA 94703  
510-524-3102  
[jgoldenson@gmail.com](mailto:jgoldenson@gmail.com)

**Invoice: Plata**

Date of Invoice: April 23, 2016

Billing Period: Apr-16

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

**Amount to be paid this period: \$7,700.00**

Date	Hours	Hourly Fee	Total	Task Performed
4/12/16	4.00 @	\$275.00 =	\$1,100.00	Record and documents review
4/13/16	3.25 @	\$275.00 =	\$893.75	Record and documents review; report writing
4/14/16	6.50 @	\$275.00 =	\$1,787.50	Conference calls: 1.experts 2.Receiver and attorneys; report writing
4/15/16	5.00 @	\$275.00 =	\$1,375.00	Conference call: experts; report writing
4/17/16	2.75 @	\$275.00 =	\$756.25	Report writing
4/18/16	2.50 @	\$275.00 =	\$687.50	Record and documents review
4/23/16	4.00 @	\$275.00 =	\$1,100.00	Record review
<b>Total</b>			<b>\$7,700.00</b>	

**Professional Fees**  
**\$7,700.00**

**Travel Expenses**  
**\$0.00**

**TOTAL DUE \$7,700.00**

