

**KAMALA D. HARRIS**  
**Attorney General**

**State of California**  
**DEPARTMENT OF JUSTICE**



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E-Mail: [Maneesh.Sharma@doj.ca.gov](mailto:Maneesh.Sharma@doj.ca.gov)

July 29, 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.:

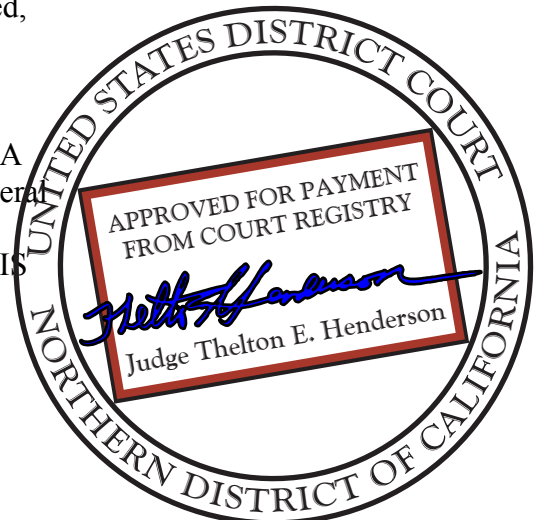
- (1) Ms. LaMarre, invoice dated 7/1/16, professional fees and expenses: \$13,800.00;
- (2) Dr. Puisis, invoice dated 7/6/16, professional fees and expenses: \$11,275.00; and
- (3) Dr. Goldenson, invoice dated 6/30/16, professional fees and expenses: \$4,042.50.

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:

The Honorable Thelton E. Henderson

July 29, 2016

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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)

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July 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

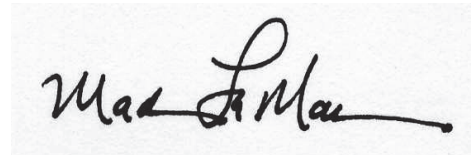
Dear Maneesh,

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

<b>Professional Fees:</b>		
<b>Date</b>	<b>Hours</b>	<b>Activity</b>
6/1/2016	5.50	CEN Record Review
6/2/2016	4.50	CEN Record Review , Call from Don Specter
6/3/2016	7.50	CEN Record Review
6/13/2016	1.75	CEN Report
6/14/2016	8.00	CEN Report and PBSP reports
6/15/2016	4.75	PBSP Report
6/17/2016	4.00	CIM OIG report review, Supporting documents Record Review
6/20/2016	4.00	CIM Record Review, supporting documents Death Summary review
6/21/2016	0.50	Delegaton conference call
6/22/2016	5.00	CIM Record Review
6/23/2016	4.50	CIM Record Review
6/24/2016	4.75	CIM Record Review
6/27/2016	1.00	CIM Record Review
6/28/2016	4.50	CIM Record Review
6/29/2016	5.00	CIM Record Review
6/30/2016	3.75	CIM Record Review
<b>Total Professional Hours</b>	<b>69.00</b>	
<b>Total at Hourly Rate of \$200</b>	<b>\$13,800.00</b>	

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

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

<b>Professional Fees</b>	<b>\$13,800.00</b>	
<b>Travel Fees</b>	<b>\$0.00</b>	

<b>Expenses</b>	<b>\$0.00</b>	
<b>Total Due</b>	<b>\$13,800.00</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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July 6, 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. Maneesh Sharma

Find enclosed my invoice for June 2016.

Sincerely,

A handwritten signature in cursive script that reads "Michael Puisis" followed by a small mark.

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

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**Invoice #40**

Plata v. Davis C-01-1351

July 6, 2016

Date	Service	Hours	Rate	Subtotal
6/2/2016	Centinela Chart reviews	7	\$275.00	\$1,925.00
6/4/2016	Centinela/ PBSP report	6	\$275.00	\$1,650.00
6/26/2016	CIM chart reviews	4	\$275.00	\$1,100.00
6/27/2016	CIM chart reviews	6	\$275.00	\$1,650.00
6/28/2016	CIM chart reviews	8	\$275.00	\$2,200.00
6/29/2016	SCC chart reviews	10	\$275.00	\$2,750.00
			TOTAL	\$11,275.00

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

### Invoice: Plata

Date of Invoice: June 30, 2016

Billing Period: Jun-16

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

Amount to be paid this period: **\$4,042.50**

Date	Hours	Hourly Fee	Total	Task Performed
6/2/16	1.00 @	\$275.00 =	\$275.00	Review of records
6/3/16	0.50 @	\$275.00 =	\$137.50	Teleconference: M. LaMarre
6/6/16	2.00 @	\$275.00 =	\$550.00	Review of records, report writing
6/13/16	1.25 @	\$275.00 =	\$343.75	Review of records
6/14/16	1.00 @	\$275.00 =	\$275.00	Review of records, report writing
6/15/16	1.25 @	\$275.00 =	\$343.75	Review of records, report writing
6/16/16	1.50 @	\$275.00 =	\$412.50	Review of records
6/17/16	1.25 @	\$275.00 =	\$343.75	Review of records
6/19/16	2.50 @	\$275.00 =	\$687.50	Review of records
6/21/16	0.45 @	\$275.00 =	\$123.75	Conference call: Receiver
6/23/16	2.00 @	\$275.00 =	\$550.00	Review of documents
<b>Total</b>			\$4,042.50	

**Professional Fees**  
\$4,042.50

**Travel Expenses**  
\$0.00

**TOTAL DUE** **\$4,042.50**

