

DEFENSE ATTORNEY FEES SENT TO MEDICAL MALPRACTICE VICTIM'S PARENTS

Defense attorney fees sent to medical malpractice victim's parents. Corruption at its finest. The Doctors Company bankrolled unequal court footing in civil case. Doctor kills 30 year old by sending her home with 100 percocets. Victim dies 11 hours later. Jury given tap dance, smoke and mirrors from million dollar DEFENSE funding by insurance company - The Doctors Company.
What next?

MC-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Form 176180)
 Raymond L. Blessey (Bar # 176180)
 Patricia M. Tazzara (Bar # 272539)
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ATTORNEY FOR OPPOSING PARTY
 Defendant

BRIEF NAME OF COURT, JUDICIAL DISTRICT AND BRANCH COURT, IF ANY
 SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

PLAINTIFF: Linda De Rogatis, et al.
 DEFENDANT: Karen M. Shainsky, D.O.

RECEIVED
 DEC 17 2013

MEMORANDUM OF COSTS (SUMMARY)

CASE NUMBER: BC 457891

The following costs are requested:

	TOTALS
1. Filing and motion fees	1 \$ 785.00
2. Jury fees	2 \$ 1,032.49
3. Jury food and lodging	3 \$
4. Deposition costs	4 \$ 32,652.20
5. Service of process	5 \$ 5,514.35
6. Attachment expenses	6 \$
7. Surety bond premiums	7 \$
8. Witness fees	8 \$ 62,534.50
9. Court-ordered transcripts	9 \$
10. Attorney fees (enter item if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required)	10 \$
11. Models, blowups, and photocopies of exhibits	11 \$ 6,841.00
12. Court reporter fees (as established by statute)	12 \$ 5,498.00
13. Other	13 \$ 8,826.73
TOTAL COSTS	\$ 123,684.27

I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

Date: December 16, 2013

Patricia M. Tazzara
 (Print or type name)

(Proof of service on review)

MEMORANDUM OF COSTS (SUMMARY)

Lawlor® Annotated California Judicial Council Forms

MC-011

SHORT TITLE: De Rogatis, et al. v. Shainsky

CASE NUMBER: BC 457891

MEMORANDUM OF COSTS (WORKSHEET)

1. Filing and motion fees

Date filed	Filing fee
a. Clerk of the Court - First appearance fee	\$ 395.00
b. Clerk of the Court - Motion to Strike 4/21/11	\$ 40.00
c. Stipulation on Ex Parte 11/22/11	\$ 40.00
d. Motion Fee 12/13/11	\$ 40.00
e. Ex Parte 7/25/12	\$ 60.00
f. Ex Parte 7/31/12	\$ 60.00
<input type="checkbox"/> Information about additional filing and motion fees is contained in Attachment 1g.	
TOTAL 1:	\$ 785.00

2. Jury fees

Date	Fee & Mileage
a. 11/20/2013	\$ 1,032.49
b.	\$
c.	\$
d.	\$
<input type="checkbox"/> Information about additional jury fees is contained in Attachment 2a.	
TOTAL 2:	\$ 1,032.49

3. Juror food: \$ and lodging: \$

TOTAL 3: \$ 0.00

4. Deposition costs

Name of deponent	Taking	Transcribing	Travel	Video-taping	Subtotal
a. Bruce Stark, M.D.	\$ 1,200.00	\$ 920.30	\$ 12.21	\$	\$ 2,132.51
b. Rodney Bluestone	\$ 3,750.00	\$ 1,247.10	\$ 9.99	\$	\$ 5,007.09
c. Manfred Wolff, M.D.	\$ 1,485.00	\$ 723.00	\$	\$	\$ 2,208.00
d. F. David Rudnick	\$ 1,260.00	\$ 2,213.40	\$ 16.65	\$	\$ 3,490.05
<input checked="" type="checkbox"/> Information about additional deposition costs is contained in Attachment 4a.					
TOTAL 4:					\$ 32,652.20

(Continued on reverse) Page 1 of 13

MEMORANDUM OF COSTS (WORKSHEET)

Lawlor® Annotated California Judicial Council Forms

SHORT TITLE: De Rogatis, et al. v. Shainsky

CASE NUMBER: BC 457891

5. Service of process

Name of person served	Public officer	Registered process	Publication	Other (specify)
a. Neuro and Rehab	\$	\$ 84.50	\$	\$
b. SNP Enterprises, Inc.	\$	\$ 73.29	\$	\$
c. Paul Robn, M.D.	\$	\$ 122.07	\$	\$
<input checked="" type="checkbox"/> Information about additional costs for service of process is contained in Attachment 5d.				
TOTAL:		\$ 5,514.35		

6. Attachment expenses (specify):

\$ 0.00

7. Surety bond premiums (specify bonds and amounts):

\$ 0.00

8. Ordinary witness fees

Name of witness	Daily fee	Mileage	Total
(1)	_____ days at \$_____	_____ miles at \$_____	\$_____
(2)	_____ days at \$_____	_____ miles at \$_____	\$_____
(3)	_____ days at \$_____	_____ miles at \$_____	\$_____
(4)	_____ days at \$_____	_____ miles at \$_____	\$_____
(5)	_____ days at \$_____	_____ miles at \$_____	\$_____
<input type="checkbox"/> Information about additional ordinary witness fees is contained in Attachment 8a(5).			
SUBTOTAL 8a:			\$ 0.00

(Continued on next page) Page 2 of 13

MEMORANDUM OF COSTS (WORKSHEET)

Lawlor® Annotated California Judicial Council Forms

SHORT TITLE: De Rogatis, et al. v. Shainsky

CASE NUMBER: BC 457891

MEMORANDUM OF COSTS (WORKSHEET) (Continued)

8. b. Expert fees (per Code of Civil Procedure section 998)

Name of witness	Fee
(1) Michael Safini, MD	_____ hours at \$_____ /hr ... \$ 20,018.00
(2) Laura Audell, MD	_____ hours at \$_____ /hr ... \$ 21,162.50
(3) Alan Weinberger, MD	_____ hours at \$_____ /hr ... \$ 10,204.00
(4) Lukas Alexanian, MD	_____ hours at \$_____ /hr ... \$ 11,150.00
<input type="checkbox"/> Information about additional expert witness fees is contained in Attachment 8b(5).	
SUBTOTAL 8b:	\$ 62,534.50

9. Court-ordered expert fees

Name of witness	Fee
(1)	_____ hours at \$_____ /hr ... \$
(2)	_____ hours at \$_____ /hr ... \$
<input type="checkbox"/> Information about additional court-ordered expert witness fees is contained in Attachment 8c(3).	
SUBTOTAL 8c:	\$ 0.00

TOTAL (8a, 8b, & 8c): \$ 62,534.50

9. Court-ordered transcripts (specify):

\$ 0.00

10. Attorney fees (enter item if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required):

\$ 0.00

11. Models, blowups, and photocopies of exhibits (specify):

Trial presentation/creation of exhibits \$6,841.00

\$ 6,841.00

12. Court reporter fees (as established by statute)

(Name of reporter: Karen Kay Fees: \$ 5,498.00

(Name of reporter): Fees: \$

Information about additional court reporter fees is contained in Attachment 12c.

TOTAL 12: \$ 5,498.00

13. Other (specify): Private investigator - Josette witness Maccoachern \$789.35 13. Continued in Attachment 13 \$ 8,826.73

TOTAL COSTS: \$ 123,684.27

(Additional information may be supplied on the reverse) Page 3 of 13

MEMORANDUM OF COSTS (WORKSHEET)

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