

MARY McNAMARA (SBN 147131)
SWANSON, McNAMARA & HALLER LLP
300 Montgomery Street, Suite 1100
San Francisco, CA 94104
Telephone No. 415/477-3800
Facsimile No. 415/477-9010

Attorney for

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

, et al.,

Defendants.

Case No. CR

**EX PARTE APPLICATION AND
DECLARATION OF MARY
McNAMARA IN SUPPORT OF
'S REQUEST FOR
AUTHORIZATION OF COSTS FOR
NECESSARY DEFENSE
EXPENDITURES,
18 U.S.C. § 3006A [PARALEGAL]
FILED IN CJA CONFIDENTIAL FILE**

Pursuant to the Criminal Justice Act, hereby applies ex parte for
authorization of costs for necessary defense expenditures. In support of this application,
submits the declaration of his counsel, Mary McNamara, which is attached hereto and
incorporated herewith.

I, MARY McNAMARA make the following declaration under penalty of perjury:

1. I am an attorney at law duly admitted to practice in the State of California and
admitted to the bar of this Court. By appointment under the Criminal Justice Act, I represent
defendant in the above-captioned matter. Unless otherwise noted, I make this
declaration of my own personal knowledge, and if called as a witness, I could and would testify

EX PARTE APP AND DEC IN SUPP OF
ORDER FOR PARALEGAL COSTS

--Case No. CR

1 competently to the contents hereof.

2 2. is charged with the following offenses: Distribution and Possession with
3 Intent to Distribute 3, 4 methylenedioxymethamphetamine in violation of Title 21, U.S.C. § 841
4 (a)(1) & (b)(1)(C); Distribution and Possession with Intent to Distribute Marijuana, in violation of
5 Title 21, U.S.C., § 841 (a)(1) and (b)(1)(B)(vii); Conspiracy to Distribute and Possess with Intent
6 to Distribute Marijuana and 3,4 methylenedioxymethamphetamine in violation of Title 21, U.S.C.
7 § 846; and Aiding and Abetting in violation of Title 18 U.S.C. § 2. This is a multi-defendant case
8 (19 people are currently charged as co-defendants), and the case involves the use of cell phone
9 wire-taps that span a period of approximately fifteen months. Undersigned counsel understands
10 that there are over two thousand pages of discovery and compact discs containing conversations in
11 this case.

12 3. This is first request for authorization of funds for a paralegal.
13 Undersigned counsel anticipates the use of the services of , a paralegal in my
14 office, as follows:

- 15 (a) Consolidating and organizing the discovery in this case; and
16 (b) Reviewing and summarizing the discovery, including phone call
17 transcripts and telephone calls that are not transcribed.

18 has experience reviewing wiretaps therefore I request that her hourly
19 rate be \$55.00. Based on my review of the case thus far, I estimate that she will devote
20 approximately 60 hours to this case.

21 5. Accordingly, I respectfully request the following orders:

- 22 (a) authorization for the amount of \$3,300, at the rate of \$55 an hour, for the
23 services of as a paralegal for ; and

24 \\\

25 \\\

26 \\\

27 \\\

28

**EX PARTE APP AND DEC IN SUPP OF
ORDER FOR PARALEGAL COSTS**

--Case No. CR

1 (b) the filing in the CJA Confidential File of this Ex Parte Application and
2 Declaration of Mary McNamara in Support of First Request
3 for Authorization of Costs for Necessary Defense Expenditures, 18 U.S.C.
4 § 3006a (Paralegal), and the [Proposed] First Order Authorizing Costs for
5 Necessary Defense Expenditures for , 18 U.S.C. § 3006a.
6

7 Executed under penalty of perjury of the laws of the United States, at San Francisco,
8 California, this 11th day of August of 2008.
9

10
11 _____
12 Mary McNamara
13 Attorney for
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Defendants.

**EX PARTE APPLICATION AND
DECLARATION OF MARY
McNAMARA IN SUPPORT OF
REQUEST FOR
AUTHORIZATION OF COSTS FOR
NECESSARY DEFENSE
EXPENDITURES,
18 U.S.C. § 3006A [PARALEGAL]
FILED IN CJA CONFIDENTIAL FILE**

IT IS FURTHER ORDERED that the clerk file in the CJA Confidential File this Order Authorizing Costs for Necessary Defense Expenditures for _____, 18 U.S.C. § 3006a and the Ex Parte Application and Declaration of Mary McNamara in Support of _____ Request for Authorization of Costs for Necessary Defense Expenditures, 18 U.S.C. § 3006a.

United States District Judge