UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH DAKOTA

WESTERN DIVISION

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

UNITED STATES OF AMERICA, CR.

 Plaintiff,

 vs. DEFENDANT’S EX PARTE

 CASE BUDGETING

 Defendant. PROPOSAL

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 COMES NOW Defendant by and through, , his undersigned court-appointed attorney, and pursuant to Section VII(A)(2) of the Plan for Adequate Representation of Defendant pursuant to the Criminal Justice Act of 1964, as amended January 2011 ( hereinafter “The Act”) submits this ex parte Case Budgeting Proposal.

**A. Brief Summary of the Case**

**B. Work Completed So Far**

**C. Outline of Proposed Budget**

The following proposal budget is a reasonable “best guess” estimate. Additional discovery and naming of witnesses by the government is expected. Other unforeseen matter may also alter the budget.

 1). Attorney/s Fees in Hours:

1. Hours to 4/14/2013 40.00
2. Conferences with Assistant United States Attorney 10.00
3. Meetings with Witnesses 20.00
4. Reviewing New Discovery 14.00
5. Meeting with Client 20.00
6. Trial Preparation 80.00
7. In Trial 60.00
8. Drafting Motions 15.00
9. K. Attending Pre-trial Hearings 10.00

Total Hours: 269.00

Total Attorney Fees in dollars (269 @ $125 per hour) $33,625.00

2). Investigative Fees $3,600.00

4). Computer Expert Fees $4,400.00

5). Cost and Expenses $2,000.00

TOTAL BUDGET $43,625.00

**D. Explanation of Costs**

*Investigative Services*

*Computer Services*

**E. Conclusion**

 Defendant’s attorney is mindful of the current budget issues before the United States Courts and is aware of In Re Carlyle, 644 F. 3d 694 (8th Cir. 2011). Every effort has and will be made to keep costs and expenses associated with the litigation reduced, while at the same time preserving Defendant’s right to counsel within a fair trial. Counsel has already secured significant discounts from the experts.

Dated