

**CJA AD HOC COMMITTEE TESTIMONY OF
MARILYN E. BEDNARSKI and ANTHONY M. SOLIS**

Judge Cardone and Members of the Committee. Thank you for the opportunity to testify before the Committee.

We are, and have been for the last two years, the co-national panel representatives for the Criminal Justice Act Panel for the Central District of California. By way of background, Marilyn E. Bednarski is a former Federal Public Defender of 16 years. At the time of her departure from the office in 2003, she was the Chief Deputy Federal Public Defender in the Central District of California. Since 2003, Marilyn has been a member of the CJA Panel in the Central District and maintains an active practice of private criminal and civil cases as well as appointed panel cases.

Anthony M. Solis has been in private practice since 1998, practicing state and federal criminal defense in the Central District of California and federal criminal defense in districts across the country. Since 2008, he has been an active member of the CJA Panel in the Central District of California.

In your letter, the Committee requested us to focus on case budgeting and mega-case issues. We speak primarily as representatives of our entire panel. As

you may know, the Central District is one of, if not the largest, federal judicial district in terms of population, covering seven Southern California counties. As such, we get a disproportionate number of “mega-cases.” To us, the term “mega case” usually means a multi-defendant indictment arising from a lengthy task-force type investigation. It is often gang-related. It is not uncommon for the U.S. Attorney’s Office to indict 25 or more defendants at a time. We have had several cases charging over 50 persons, and one case has charged approximately 200 defendants. We also include within the “mega case” category, gang cases charging multiple defendants, with conduct spanning years, where the discovery universe is in the hundreds of thousands of pages and includes vast stores of recorded calls, videos, and numerous other media and data.

These cases present unique challenges for the court, counsel and the defendant. These cases absorb inordinate amounts of resources and require a commitment on the part of defense counsel to maintain a relationship with a defendant who is likely unfamiliar with the federal system and may not understand how a case can take, 2, 3 or even 4 years to get trial. The trials in “mega cases” can often extend for months, threatening the life of an attorney’s practice. The Court is best served by dedicated CJA counsel who have the capacity to provide start to finish representation. This requires prompt and complete compensation for

services.

In our district, the “mega case” has generated a host of concerns from the court, mainly focused around their cost. At the same time, responses to the costs have caused our court to impose measures which have constricted or contracted the defense function. We’ll discuss some of these issues and welcome any district-specific questions the panel might have.

A. Payments

Payment for services rendered is the lifeblood of private attorney’s practice. It is the *sine qua non* legal work. In our district, the Court places a number of obstacles in the way of receiving prompt and complete payment. We’ll discuss some of these obstacles and thereafter suggest a remedy that will still respect the Court’s statutory oversight function.

1. Recordkeeping obligations.

After discussing this matter with other panel representatives, we believe that in the Central District, we are subject to a *greater* level of record keeping than most districts. This creates a significant burden on our panel.

First, we must keep not only a log of the tasks that we perform, we must sufficiently detail those tasks. Further, our work must be recorded to the minute with a time parameter included. For instance, we must write down the time each

task begins and when each task ends. If the task lasts 4 minutes, we must log two other minutes of service in order to bill “.1.” Those logs are subject to random audits. Panel members have their time sheets regularly audited. As a result, panel attorneys are chilled from billing for smaller tasks, from fear of audits and reductions and/or further delay in payment. Many attorneys on our panel suspect that this is precisely the effect the Court intends.

Next, in our district we are now required to completed a customized 9-page long “CJA 26” form the first time a voucher in a case exceeds the \$10,000 presumptive case maximum, which form must be updated and resubmitted *every* voucher thereafter. A copy of the Central District’s new “CJA 26” is attached for your review.

2. Delays in Payment.

In our district, payment of a submitted voucher routinely takes five months from the first date of service rendered. This is because we are only permitted to bill quarterly and once bills are submitted, they can take 6 to 8 weeks to pay. However, if there are any errors found, those weeks can take months because the rejected vouchers must be re-submitted. Until the summer of 2014, we were permitted to bill monthly, which provided panel members with sufficient cash flow to operate their practices and still assist the court by taking a number of panel

cases. When our payment structure changed to quarterly billing, a number of panel members decided to shed their panel cases and solicit more retained work in order to support themselves and their practices. Several panel members reported because of these delays in payments having to take loans, and even withdraw money from retirement accounts to keep their practice afloat.¹

While the implementation of e-voucher brought the promise of faster payments, last month the Central District panel was informed that the 9th Circuit Judge who oversees our district intends to review each and every voucher, including interim vouchers. This promises to slow payments significantly.

3. Arbitrary Voucher Cutting.

In our district, in 2015, we had two celebrated instances of significant voucher cutting. These two cases have had a chilling effect on our entire panel and have dissuaded panel members from wanting to take “mega” cases or even be on the panel at all.

In the first case, the court in a multi-defendant case deemed a case “extended or complex,” justifying payments exceeding \$9,800 to a number of counsel whose clients plead out, but determined it was not “extended or complex”

¹Many panel members, however, have noticed an increased efficiency and more prompt payments with the institution of e-voucher.

for the one panel member who took his client to trial. That panel counsel ultimately billed approximately \$57,000. After the trial concluded, the Circuit Court judge who oversees CJA payments in this district delegated the review of that lawyer's billing to the judge that presided over the trial. The district judge determined that the case was not "extended or complex"—only for that defendant-- and denied payment over the then-statutory maximum of \$9,800. Because the panel lawyer had 4 or 5 interim vouchers already been paid in the amount of about \$47,000, he was ordered to reimburse the court all funds paid over \$9,800. The panel attorney has been informed he has no right to rely on the interim voucher approvals (over the maximum) from our CJA office or the fact that the matter was deemed extended or complex for the co-defendants (who pled out). In the case of one defendant's counsel, that counsel was paid nearly three times the statutory maximum for a plea while the counsel who went to trial is ordered to pay the court back all but \$9,800. It is worth mentioning that there was no allegation of fraud; the services were provided and accounted for.

Another outrage occurred later in 2015. In this instance, a panel attorney represented a defendant in a multi-defendant "mega case." That case started out as a potential death penalty case, although death was ultimately not sought; the case proceeded to a three week trial. After vigorously defending his client, who was

later sentenced to a life term, after the case concluded the counsel had his bill reduced by about one-half of the “out of court” hours he had documented and billed for reviewing the discovery. That attorney is being made to pay back over \$44,000. The district judge who conducted the “reasonableness review” characterized the panel attorney of pursuing a “scorched earth” defense, essentially conveying that a client whom the government is trying to divest of the remainder of his life should not receive “too vigorous” of a defense.

Both of these cases offend our panel and effectively chill us from doing our essential defense work. Most of our panel works in fear of having their services stolen from them after they have provided them in good faith to the court.

Ironically, the Criminal Justice Act provides little to no due process for a panel attorney to challenge the decision of a district judge. There is no review or opportunity to be heard beyond asking the circuit’s oversight judge (who delegated the task to the presiding judge) to reconsider the decision. The standard of review is abuse of discretion.

B. CONSTRICTING THE DEFENSE FUNCTION.

The arbitrary cuts of panel members who defended their clients in trials only later to be told to repay funds expended in that representation chill defense counsel’s representation of future clients, particularly in the “mega” cases, which

can drag on for years and require extraordinary commitment. This natural effect corrodes the essential function of the CJA panel within the overall justice system. A federal defender need not worry if he or she will get paid for defending a client in a trial. Retained counsel likewise need not worry because there is a contract for payment and fair process to litigate a breach of contract. Neither a federal defender nor retained counsel is made to wait months on end for payment for services rendered long prior. In the context of “mega” cases, a lengthy jury trial—some extending 6, 8 or 12 weeks--the payment issue can crush a small law practice which is required to sustain monthly expenses.

Further, the panel members have no due process rights. Each is on his own in preparing and advocating for his or her own payments. The voucher review process in our district is not transparent. Billing practices have changed vastly over the past few years from prior years.

The district’s CJA committee issues the billing practices and procedures memoranda. There is a committee and we, as national representatives, are allowed to participate in some discussions, but we are excluded from the “executive sessions” where any decisionmaking occurs. Draft policies are proposed and presented at these meetings to members which were not privy to the underlying data or problem that promoted the proposal, and which policies are presented in a

nearly completed fashion for “review” by the other members. There is no real opportunity for study of the underlying problem or analysis or consideration of other solutions.

Over the past several years, new memos directing new and different requirements or procedures for CJA billing in the CD-CA have been issued. (Requiring the logging of time increments by the precise minute, logging the exact Bates stamp numbers on discovery reviewed, requiring investigators and paralegals to type their timesheets rather than handwrite them etc.) Each time one of these memos is issued to the panel, the panel views the court as imposing more requirements and obstacles, designed to make review easier for the court, but not designed to improve or facilitate their representation of the client. Most panel members simply view new billing and record keeping requirements as an attempt to shrink the defense function, dissuade members from billing for their time, or otherwise creating obstacles to receiving payment for their services.

These constantly-increasing impositions on panel counsel –which result in burdensome and time consuming billing and record keeping which is not compensated--have adversely affected panel morale. We recently took a survey from our panel about how they feel about their membership on the panel compared to past years. Uniformly, our panel members reported morale at an average of a

level 4 on a scale of 1 to 10, and reported that their morale was much lower than in past years. The survey requested specific written reasons and repeatedly the panel members reported that: (1) the court did not respect them;² (2) the court treated them with persistent suspicion in billing; (3) the court questioned their judgment in how to defend a case by reducing payments for review of discovery (by directing presumptive time for review (60 pages per hour)), docking conversations with family, for litigation of motions the court felt lacked merit³ and questioning length and frequency of meetings with clients. The lawyers surveyed all required anonymity in providing the information for fear of reprisals from the Court—itsself a reflection of how our members feel.

Vibrant collaboration has deteriorated among the panel. The primary conversation among members has become about billing issues, delays in payment, and the increasingly burdensome court requirements. The panel “List serve,” which ideally should be a forum for sharing ideas, legal theories, information

²Some of this perception of a lack of respect stems from our Court’s termination of secure identification cards which permitted faster entry into the Central District’s numerous federal and/or court buildings. Panel members enter these buildings daily and must remove clothing, shoes, etc., while “externs” and “interns” breeze into the courthouse. As panel reps, we are advised that we beat a dead horse when we bring this issue up.

³Our court has also attempted to deem as “personal services” and therefore not compensable, certain filings such as requests for travel, requests for the return of property, etc. At the same, those represented by the FPD, have no such issues.

about government experts and judges' practices, is a further reflection of this dissatisfaction. The Listserve emails are now primarily about complaints of increasing billing obstacles, audits, requests for repayment, additional new forms. As the panel representatives for the Central District, we are the recipients of these daily email streams. They are constant and persistent. Unfortunately, we can offer little in the way of redress for our panel.

Panel lawyers are discouraged from communicating with the CJA office (the office processing bills) about their payment issues and those of their ancillary providers, because "it slows the processing of vouchers." In addition to this directive not to call and further burden the busy staff, the panel members are chilled from seeking help from the CJA office because the perception is that anything they say, will be communicated to the court: their emails forwarded or the content of their phone calls reported. The lawyers are chilled from calling for help without being "tattled on." This fosters a perception that the CJA office is an obstacle to payment, not a facilitator of payments for the CJA/defense function.

Several experienced and well-qualified panel members have quit over the last two years or stayed on the panel but avoided taking cases because it is "not worth the hassle." One panel member does not bill at all because of the hassle. While the court may perceive this as welcome "pro bono" work, this system of old

where the panel member serves at the court's request without compensation, was rejected in 1964 when the Criminal Justice Act was enacted. Such a system fosters cronyism and lackluster representation. In the context of "mega" cases, no attorneys or law firms are doing this work pro bono. No pro bono counsel are going to participate in a multi-year case with terabytes of discovery which culminates in a multi-week or -month trial. Panel members in firms are increasingly finding it more difficult to justify to their partners being on the panel. The billing is so complicated that it cannot, as it has been in the past, be delegated to a staff member to prepare, and since lawyers are not able to bill for billing, it is just a further reduction to the already insufficient hourly rate to continue to attract highly qualified lawyers. Thus one panel member of many years and former deputy federal public defender is just such an example, he simply went off the panel because he did not want to keep up with and deal with the increasingly picky obstacles to billing for his own services and that of his ancillary service providers.

In the past two years, several lawyers have left the Federal Public Defender's office and not even applied to join the panel because of the horror stories that abound. Some who have left have joined but have since quit or are considering quitting because of dissatisfaction for the reasons discussed in this

testimony. This trend is bad for the court and the panel, because the federal defenders office has been a historically strong feeder to the panel of highly skilled and trained defense lawyers. The former panel representative from our district quit the position because it took too much time and he could no longer afford the uncompensated time in running his law practice. We split the position between the two of us who took over the task of CJA representation in this district, but even for the two of us, it takes a huge amount of time to deal with the fallout on the panel from the increasingly burdensome policies, and arbitrary cuts to lawyers' bills.

Solutions:

1. The CJA Panel requires some independence from the court. We simply cannot have a district judge who is presiding over a case deciding (a) whether the defendant before them is entitled to certain ancillary services; (b) the compensation an attorney appearing before them should receive. Certainly, no government attorney fears getting their pay decimated by a judge before whom they are appearing;

It is also important that the budget concerns of the Court not interfere with zealous defense representation. We need to have our "CJA Supervising Attorney" and CJA Office understand the defense function and be advocates for the panel,

not necessarily for the Court. In our district, our CJA office is not autonomous from the Court. In addition, the court's CJA committee is comprised of judges who preside over CJA cases. That should change.

2. The CJA Panel requires some due process. We acknowledge that not every CJA lawyer in the country will bill honestly and correctly. Every stakeholder in the system requires a system of oversight. However, any system requires due process and an opportunity to be heard by, at least, someone who understands the defense function and what it takes to represent a criminal defendant. There must be some process or mechanism where billing disputes can be resolved. Currently, it can go to the district judge, who can rule arbitrarily and by fiat. Appellate review currently is conducted by a Circuit Judge whose job is oversight of the panel and whose standard of review is "abuse of discretion," a nearly impossible standard for panel attorneys.

3. The record-keeping and timekeeping requirements must be streamlined so panel attorneys could focus more on defending their clients. If the Court wants increasingly detailed records in order to perform their oversight function, panel attorneys should get paid for generating that material. As it stands, we get paid for applying for ancillary services, but not for generating all the recordkeeping (timesheets, billing records, CJA 26s, other summaries justifying our work)

required from the Court.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CJA-26 CACD

*SUPPLEMENTAL INFORMATION STATEMENT FOR A COMPENSATION CLAIM
IN EXCESS OF THE STATUTORY CASE MAXIMUM*

I. BASIC INFORMATION ABOUT REPRESENTATION

Attorney Name:	
Defendant Name:	
Case Title:	
Case Number:	
Defendant Number:	
Number of Co-Defendants:	
Other Pending Cases (<i>give case numbers</i>) of Defendant During Representation:	

II. SUBMISSION OF CJA-26 (PLEASE UPDATE THIS SECTION EACH TIME FORM IS SUBMITTED)

Date of completion of this CJA-26 form:	Click here to enter a date.
Is this form being submitted with a final voucher or an interim voucher?	<input type="checkbox"/> Final <input type="checkbox"/> Interim
Have you submitted a CJA-26 (in any format) with any voucher previously submitted in this case?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, when? (<i>if multiple previous submissions, give date of most recent</i>)	Click here to enter a date.

III. BRIEF SUMMARY OF CASE TO DATE

- A. Through Submission of Initial CJA-26** (*A detailed summary of the case is not necessary. Please note facts or issues that support your claim that (1) this case is “extended” or “complex” and (2) the hours you have claimed to date were “reasonably expended completing work necessary for adequate representation.”*)

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B. Submission of Vouchers Subsequent to Submission of Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case; describe anything significant that may have impacted your billing, or note anything you wish to highlight in support of your claim that your hours during the period of service covered by a voucher were “reasonably expended completing work necessary for adequate representation.” You may leave a row blank if the hours billed during a period were minimal or sufficiently explained in your worksheets.)*

Voucher No.	Noteworthy Developments During This Period of Service
0000.0000000	

IV. HOURS/FEE PER VOUCHER *(PLEASE UPDATE THIS SECTION EACH TIME FORM IS SUBMITTED; add rows as needed for each subsequent voucher submitted in case.)*

Voucher Sequence <i>(add rows as needed)</i>	Voucher No.	Dates of Service	Total Fees: Paid <i>(previous vouchers)</i> or Claimed <i>(current & still pending)</i>	Total No. Hours	Breakdown of Hours by Category				
					In-Court	Out-of-Court			
						16(a) Intvs./ Confs.	16(b) Records	16(c) Briefs	16(d) Travel
First	0000.0000000	00/00/00-00/00/00	\$						
Second									
Third									
Fourth									
<i>Etc.</i>									

V. EXPLANATION OF BREAKDOWN BY CATEGORY/TASK

A. Hours in Court *(List all in-court proceedings – e.g., change of plea hearing, sentencing, etc. – and provide explanation as necessary.)*

1. Through Submission of Initial CJA-26

_____ hours were spent in court, including:

2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of In-Court Hours During Period of Service
0000.0000000	_____ hours were spent in court, including:

B. Hours Out of Court

1. 16(a) Interviews and Conferences *(Identify participants and purpose. Remember that you may not bill for conversations with your client's family and friends to update them about the status of the case. If you include time for any meetings or phone calls with family members or friends, explain why each was necessary to the representation.)*

a. Through Submission of Initial CJA-26

_____ hours were spent in interviews and conferences, including:

b. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Interviews and Conferences During Period of Service
0000.0000000	_____ hours were spent in interviews and conferences, including:

2. 16(b) Obtaining and Reviewing Documents *(Describe the types (search warrant material, wiretap material, audio or video, photographs, digital devices, written documents) and a reasonably detailed description of the volume (number or Bates range of pages, number of photos, videos, or wiretaps) of the discovery reviewed. The presumptive max rate for general document review is 60 pages per hour, though some types of documents may take substantially less time to review. While certain limited types of documents may require additional time, such documents must be specifically identified by type if the billing demonstrates a rate of review slower than the presumptive max. In addition, describe other factors that may have impacted billing by either driving up discovery costs (e.g., the form in which discovery was produced by the government, the presence or absence of indices, the existence of a protective order, foreign language, coded language, etc.) or reducing them (e.g., whether you are using the services of a paralegal to assist in discovery review, and how that has assisted the process, whether there is a coordinating discovery attorney, whether there have there been efforts by defense counsel to coordinate regarding the review of discovery, whether the scope of discovery review been limited in any way, etc.) If you are not using a paralegal or other methods of reducing discovery costs, explain why.)*

a. Through Submission of Initial CJA-26

____ hours were expended reviewing discovery and other documents, including:

b. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Discovery Tasks Conducted During Period of Service
0000.0000000	____ hours were expended reviewing discovery and other documents, including:

3. 16(c) Legal Research and Brief Writing *(Specify type of research and purpose, list cases reviewed, and provide an explanation for significant time spent on motions.)*

a. Through Submission of Initial CJA-26

____ hours were spent on legal research and brief writing, including:

b. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Research and Writing Tasks Conducted During Period of Service
0000.0000000	____ hours were spent on legal research and brief writing, including:

4. 16(d) Travel Time (*Remember that, absent unusual circumstances, you should not bill for travel to meet an out-of-custody client.*)

a. Through Submission of Initial CJA-26

____ hours were expended for travel, including:

b. For Each Subsequent Voucher Submitted after Initial CJA-26 (*Add rows as needed for each subsequent voucher submitted in case.*)

Voucher No.	Description of Travel Conducted During Period of Service
0000.0000000	____ hours were expended for travel, including:

5. 16(e) Investigative and Other Work

a. Through Submission of Initial CJA-26

____ hours were spent in investigative and other work, including:

b. For Each Subsequent Voucher Submitted after Initial CJA-26 (*Add rows as needed for each subsequent voucher submitted in case.*)

Voucher No.	Description of Investigative and Other Work Performed During Period of Service
0000.0000000	____ hours were spent in investigative and other work, including:

VI. OTHER FACTORS DEMONSTRATING THAT REPRESENTATION IS “EXTENDED”

AND/OR “COMPLEX” (The first time you submit this form, please use the boxes below (a) to highlight reasons why this case should be considered “extended” or “complex,” and (b) to demonstrate that payment in excess of the statutory maximum is necessary to provide fair compensation. In addition, every time you submit this form, use this section to provide support for a finding that the hours you have claimed to-date in this case were reasonably expended to complete work necessary for the adequate representation of your client. You may incorporate by reference information provided above.)

A. Describe Discovery Materials (Nature and Volume) and/or Discovery Practices That Are a Noteworthy Factor in the Number of Hours Claimed

1. Through Submission of Initial CJA-26

2. For Each Subsequent Voucher Submitted after Initial CJA-26 (Add rows as needed for each subsequent voucher submitted in case.)

Voucher No.	Description of Any Continued or Additional Factors Present During Period of Service
0000.0000000	

B. List and Describe Motions, Legal Memoranda, Jury Instructions, and Sentencing Documents, or Legal Research Not Resulting in Such, That Are Noteworthy Factors in the Number of Hours Claimed and That Were Drafted Originally for This Case (Do Not Bill for Standardized Motions, Unless Content Was Modified Significantly)

1. Through Submission of Initial CJA-26

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2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Any Continued or Additional Factors Present During Period of Service
0000.0000000	

C. Summarize Investigation and Case Preparation (e.g., Number and Accessibility of Witnesses Interviewed, Record Collection) That Is a Noteworthy Factor in the Number of Hours Claimed

1. Through Submission of Initial CJA-26

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2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Any Continued or Additional Factors Present During Period of Service
0000.0000000	

D. Explain, if Noteworthy, Impact on the Number of Hours Claimed of Investigative, Expert, or Other Services Used (CJA 21 Voucher)

1. Through Submission of Initial CJA-26

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2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Any Continued or Additional Factors Present During Period of Service
0000.0000000	

E. Check Whether Any of the Following Client Considerations Are Noteworthy Factors in the Number of Hours Claimed and Explain Each

1. Through Submission of Initial CJA-26

<input type="checkbox"/> communication with client/family <input type="checkbox"/> accessibility of client	<input type="checkbox"/> language difference <input type="checkbox"/> other: _____
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2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Any Continued or Additional Factors Present During Period of Service
0000.0000000	<input type="checkbox"/> communication with client/family <input type="checkbox"/> language difference <input type="checkbox"/> accessibility of client <input type="checkbox"/> other: _____
	<input type="checkbox"/> communication with client/family <input type="checkbox"/> language difference <input type="checkbox"/> accessibility of client <input type="checkbox"/> other: _____
	<input type="checkbox"/> communication with client/family <input type="checkbox"/> language difference <input type="checkbox"/> accessibility of client <input type="checkbox"/> other: _____
	<input type="checkbox"/> communication with client/family <input type="checkbox"/> language difference <input type="checkbox"/> accessibility of client <input type="checkbox"/> other: _____
	<input type="checkbox"/> communication with client/family <input type="checkbox"/> language difference <input type="checkbox"/> accessibility of client <input type="checkbox"/> other: _____

F. Explain Any Expense (Items 17 and 18 of the CJA 20 Voucher) Greater Than \$500

1. Through Submission of Initial CJA-26

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2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Explanation of Expenses Over \$500 During Period of Service
0000.0000000	

G. Explain Any Other Noteworthy Circumstances Regarding the Case and the Representation Provided To Support This Compensation Request *(Include, if applicable: (a) negotiations with U.S. Attorney's office or law enforcement agency; (b) complexity or novelty of legal issues and factual complexity; (c) responsibilities involved measured by the magnitude and importance of the case; (d) manner in which duties were performed and knowledge, skill, efficiency, professionalism, and judgment required of and used by counsel; (e) nature of counsel's practice and hardship or injury resulting from the representation; (f) any extraordinary pressure of time or other factors under which services were rendered; (g) length of representation; and (h) client's cooperation with the government.)*

1. Through Submission of Initial CJA-26

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2. For Each Subsequent Voucher Submitted after Initial CJA-26 *(Add rows as needed for each subsequent voucher submitted in case.)*

Voucher No.	Description of Any Continued or Additional Factors Present During Period of Service
0000.0000000	