

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, SS.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
ACTION NO. 1479CR00675

COMMONWEALTH OF MASSACHUSETTS,)

VS.)

JOEL NIEVES CRUZ,)
Defendant)

EX PARTE MOTION FOR
TRAVEL RELATED FUNDS
FOR EXPERT WITNESS

Now comes the Defendant in the above entitled matter and moves this Honorable Court pursuant to G.L. c. 261 §§27A-G to allocate additional funds not to exceed \$1,500.00 for the travel related expenses for the expert witness, Paul V. Sheridan, to assist in the preparation and presentation of this case through trial.

As additional reasons therefor:

1. The Defendant is indigent and without funds to pay for the travel and related expenses of the expert. But for this indigency, these expenses would be paid.
2. The expert is necessary in order to prepare and present trial testimony to provide an adequate defense to the serious charges pending against the Defendant at trial.
3. The funds requested are reasonable.
4. Justice dictates that this motion be allowed.
5. In further support of this motion, Defendant submits his affidavit of counsel herewith.

THE DEFENDANT

By His Attorney
 Joseph A. Franco, Esq.
 BBO# 543038
 51 Park Avenue, Suite 8
 West Springfield, MA 01089
 Tel: (413) 737-2675
 Fax: (413) 747-1721

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SUPERIOR COURT DEPARTMENT
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COMMONWEALTH OF MASSACHUSETTS,)

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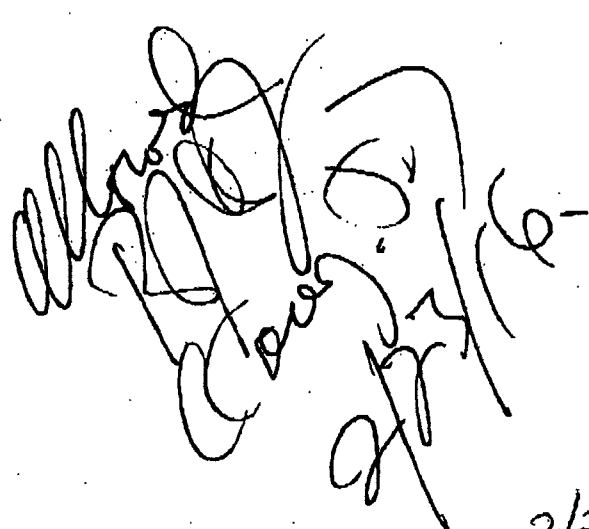
JOEL NIEVES CRUZ,)
Defendant)

EX PARTE MOTION FOR
ADDITIONAL FUNDS
FOR EXPERT WITNESS

Now comes the Defendant in the above-entitled matter and moves this Honorable Court pursuant to G.L. c. 261 §§27A-G to allocate additional funds not to exceed \$3,000.00 at a rate of \$200.00 per hour for the expert witness, Paul V. Sheridan, to assist in the preparation and presentation of this case through trial.

As additional reasons therefor:

1. The Defendant is indigent and without funds to pay for the services of the expert. But for this indigency, the services of the expert would be secured.
2. The expert is necessary in order to prepare and present trial testimony to provide an adequate defense to the serious charges pending against the Defendant at trial.
3. The funds requested are reasonable.
4. Justice dictates that this motion be allowed.
5. In further support of this motion, Defendant submits his affidavit of counsel herewith.



Handwritten signature of Paul V. Sheridan, the expert witness mentioned in the text.

THE DEFENDANT

By His Attorney
 Joseph A. Franco, Esq.
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