



and to administer psychoactive medications against her/his will, thereby depriving her/him of a substantial liberty interest, as a result of its allegations as to her/his mental status and need for psychiatric care, treatment and hospitalization. *See, Ake v. Oklahoma*, 470 U.S. 68 (1985).

4. Allowance of the within Motion for Funds is also required pursuant to G.L. c.261, §27C in that the services of a clinician are necessary to assure that Petitioner is able to prosecute this action in as effective a manner as would be available to a person of means. *Commonwealth v. Lockley*, 381 Mass. 156 (1980). In respect thereto, Petitioner asserts that it cannot reasonably be argued that a person of means, facing the possibility of continued involuntary confinement at a psychiatric facility and treatment with psychoactive medications, would ever knowingly choose not to expend her/his funds to secure the assistance of an independent clinical expert. *See, e.g., Guardianship of a Mentally Ill Person*, Mass.App.Ct. No. 85-0018 Civ. (Dreben, J. 1/28/85).

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(date)

By her/his Attorney:

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