



1 G. SCOTT EMBLIDGE, State Bar No. 121613
 2 RACHEL J. SATER, State Bar No. 147976
 3 KATHRYN J. ZOGLIN, State Bar No. 121187
 4 MOSCONE EMBLIDGE & SATER LLP
 5 220 Montgomery Street, Suite 2100
 6 San Francisco, California 94104-4238
 7 Telephone: (415) 362-3599
 8 Facsimile: (415) 362-2006

9 Attorneys for Plaintiffs Association of Retired
 10 Employees of the City of Stockton, Shelley Green,
 11 Patricia Hernandez, Reed Hogan, Glenn E.
 12 Matthews, Patrick L. Samsell, Alfred J. Siebel,
 13 Brenda Jo Tubbs, and Teri Williams on Behalf of
 14 Themselves and Others Similarly Situated

15 **UNITED STATES BANKRUPTCY COURT**
 16 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

17 In re:

Case No. 12-32118

18 CITY OF STOCKTON, CALIFORNIA,

Chapter 9

19 Debtor.

20 ASSOCIATION OF RETIRED EMPLOYEES
 21 OF THE CITY OF STOCKTON, a nonprofit
 22 California corporation, SHELLEY GREEN,
 23 PATRICIA HERNANDEZ, REED HOGAN,
 24 GLENN E. MATTHEWS, PATRICK L.
 25 SAMSELL, ALFRED J. SIEBEL, BRENDA
 26 JO TUBBS, TERI WILLIAMS, on Behalf of
 27 Themselves and Others Similarly Situated,

Adv. No.

DECLARATION OF LINDA L. FRENCH
 IN SUPPORT OF APPLICATION FOR
 TEMPORARY RESTRAINING ORDER
 OR RELIEF FROM STAY

28 Plaintiffs,

vs.

CITY OF STOCKTON, CALIFORNIA,

Defendant.

1 I, Linda L. French, declare:

2 1. I have personal knowledge of the facts set forth in this declaration and, if called as
3 a witness, I could and would testify competently to these facts under oath.

4 2. I was born on October 20, 1953 and am 58 years old. I live at 5642 Tam O
5 Shanter Dr, Stockton, CA 95210.

6 3. I was hired on April of 1975 and retired in December of 2008 as a Revenue
7 Collector.

8 4. I have one dependent on the City's medical plan. I do not have enough quarters
9 to qualify for Medicare, but my spouse does, and I believe I will be eligible under his coverage.

10 5. My gross monthly CalPers income is \$3,628.020. My anticipated net annual
11 household income in 2012 is \$57,834.

12 6. I am informed and believe that the City has adopted a monthly premium for
13 retiree health benefits. If required to pay this premium to receive City Health Plan benefits,
14 even with the \$450 subsidy from the City for one year, my monthly premium would be

15 //
16 //
17 //
18 //
19 //
20 //
21 //
22 //
23 //
24 //
25 //
26 //
27 //
28 //

1 \$1,126.66, or \$13,519.92 annually. This represents more than 23% of our annual household
2 income.

3 7. I had kidney cancer in 2005. My doctor says there is a "virtually 100%
4 recurrence in 20 years." I have high blood pressure and associated age related conditions. My
5 husband had quadruple heart bypass surgery in 2000. He is currently treated as a heart patient
6 with all the necessary annual tests and treatments. He currently has two blockages that they are
7 watching. With my medical history, I believe it will be difficult or impossible to secure
8 individual health insurance, and if I were able to get it, the premium would be very high.

9 I declare under penalty of perjury under the law of the Untied States of America that the
10 foregoing is true and correct and that this declaration was executed in Stockton, California on
11 July, 5, 2012.

12
13 
14 LINDA L. FRENCH

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28