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

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 10 **UNITED STATES BANKRUPTCY COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

12 In re:

Case No. 12-32118

13 CITY OF STOCKTON, CALIFORNIA,

Chapter 9

14 Debtor.

15 ASSOCIATION OF RETIRED EMPLOYEES
 16 OF THE CITY OF STOCKTON, a nonprofit
 California corporation, SHELLEY GREEN,
 17 PATRICIA HERNANDEZ, REED HOGAN,
 GLENN E. MATTHEWS, PATRICK L.
 18 SAMSELL, ALFRED J. SIEBEL, BRENDA
 JO TUBBS, TERI WILLIAMS, on Behalf of
 19 Themselves and Others Similarly Situated,

Adv. No.

DECLARATION OF GLENN E.
 MATTHEWS, JR. IN SUPPORT OF
 APPLICATION FOR TEMPORARY
 RESTRAINING ORDER OR RELIEF
 FROM STAY

20 Plaintiffs,

21 vs.

22 CITY OF STOCKTON, CALIFORNIA,

23 Defendant.

1 I, Glenn E. Matthews, Jr., 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 June 12, 1951 and am 61 years old. I live at 5462 Staples Way,
5 Linden, California 95236.

6 3. I was hired in July 1991 and retired in August 2009 as a Public Works Supervisor.

7 4. I have one dependent on the City's medical plan. I have enough quarters to
8 qualify for Medicare. My spouse is receiving Medicare.

9 5. My net monthly CalPers check is \$2,868.66. My net annual household income
10 last year after taxes was \$45,645.

11 6. I am informed and believe that the City has adopted a monthly premium for
12 retiree health benefits. If required to pay this premium to receive City Health Plan benefits,
13 even with the \$150 subsidy from the City for one year, my monthly premium would be
14 \$1,426.66, or \$17,199.92 annually. This represents more than 38% of our annual household

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1 income. Although she is over 65 and the City plan is secondary to Medicare, the City is charging
2 me as if both my wife and I were under 65.

3 7. My wife has Multiple Sclerosis and takes 14 medicines daily, including a daily
4 injection. We need insurance, but can't afford the City's premiums. We've looked into other
5 insurance, but the monthly cost of the injection alone is \$4,000/month, and even with Medicare
6 Part D, her drug costs would be over \$8,000 a year. She's going to have to stop taking 3 of her
7 medications because we can't afford it.

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

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12 Glenn E Matthews
13 GLENN E. MATTHEWS
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