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 7 Employees of the City of Stockton, Shelley Green,
 8 Patricia Hernandez, Reed Hogan, Glenn E.
 Matthews, Patrick L. Samsell, Alfred J. Siebel,
 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**

<p>12 In re: 13 CITY OF STOCKTON, CALIFORNIA, 14 Debtor.</p>	<p>Case No. 12-32118 Chapter 9</p>
<p>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, 20 Plaintiffs, 21 vs. 22 CITY OF STOCKTON, CALIFORNIA, 23 Defendant.</p>	<p>Adv. No. DECLARATION OF LEWIS PATRICK SAMSELL IN SUPPORT OF APPLICATION FOR TEMPORARY RESTRAINING ORDER OR RELIEF FROM STAY</p>

1 I, Lewis Patrick Samsell, 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 February 20, 1943 and am 69 years old. I live at 7034 Bridgeport
5 Circle, Stockton, CA 95207.

6 3. I have one dependent on the City's Medical Plan. I am eligible and receiving
7 Medicare.

8 4. I was hired by the City of Stockton in November 1986 and retired in February
9 2000 as Director of Finance.

10 5. My gross CALPERS retirement check is \$5,063.39. My net annual household
11 income in 2011 was \$64,645.80.

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 \$150 subsidy from the City for one year, my monthly premium would be \$621.53,

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1 or \$7,458.36 annually. This would represent almost 12% of our net annual income. In addition
2 to the premium, I have co-pays on a large number of medications.

3 7. I have had type II diabetes for the past 15 years and recently have been diagnosed
4 as being in stage 2/stage 3 of kidney disease. I am regularly seen by my endocrinologist,
5 cardiologist and nephrologist. I take 5 prescription medications, and without the City plan would
6 spend more than \$4,700 out of pocket on prescription medications. My wife is also on several
7 medications.

8 8. I declare under penalty of perjury under the law of the United States of America
9 that the foregoing is true and correct and that this declaration was executed in Stockton,
10 California on July 2, 2012.

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13 LEWIS PATRICK SAMSELL

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