

2

1 MARC A. LEVINSON (STATE BAR NO. 57613)
 malevinson@orrick.com
 2 NORMAN C. HILE (STATE BAR NO. 57299)
 nhile@orrick.com
 3 JOHN W. KILLEEN (STATE BAR NO. 258395)
 jkilleen@orrick.com
 4 ORRICK, HERRINGTON & SUTCLIFFE LLP
 400 Capitol Mall, Suite 3000
 5 Sacramento, California 95814-4497
 Telephone: (916) 447-9200
 6 Facsimile: (916) 329-4900

7 Attorneys for Debtor
 City of Stockton
 8

9 UNITED STATES BANKRUPTCY COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION
 12

13 In re:
 14 CITY OF STOCKTON, CALIFORNIA,
 15 Debtor.

Case No. 2012-32118
 D.C. No. MH-001
 Chapter 9

**DECLARATION OF STEVEN J. HUNT
 IN SUPPORT OF CITY OF
 STOCKTON'S OPPOSITION TO
 MOTION BY RONALD HITTLE FOR
 RELIEF FROM AUTOMATIC STAY**

Date: November 20, 2012
 Time: 9:30 A.M.
 Dept: C, Courtroom 35
 Judge: Hon. Christopher M. Klein

21
 22
 23
 24
 25
 26
 27
 28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I, Steven J. Hunt, declare:

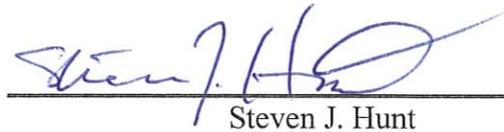
1. I am a Liability Claims Investigator for the City of Stockton (the "City"). I make this declaration in support of the City's Objection to the Motion by Ronald Hittle for Relief from the Automatic Stay. Except as to those matters set forth on information and belief, I have personal knowledge of the facts set forth herein and if called as a witness herein I could testify competently to such facts.

2. I have worked for the City in my present capacity as a claims investigator since January of 1990.

3. During the fiscal year beginning on July 1, 2011 and ending on June 30, 2012, the City expended approximately \$350,135 to litigate pending tort cases. This total expenditure includes approximately \$213,862 in fees to outside counsel and approximately \$136,273 for "special services." Special services include expert witness fees, court reporter fees for depositions, subpoena costs, mediation costs, and court costs. These expenditure figures do not include any fixed operating costs for the City Attorney's Office.

Executed this 6th day of November, 2012, at Stockton, California.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.



Steven J. Hunt