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1 MARC A. LEVINSON (STATE BAR NO. 57613)  
malevinson@orrick.com

2 NORMAN C. HILE (STATE BAR NO. 57299)  
nhile@orrick.com

3 PATRICK B. BOCASH (STATE BAR NO. 262763)  
pbocash@orrick.com

4 ORRICK, HERRINGTON & SUTCLIFFE LLP

400 Capitol Mall, Suite 3000

5 Sacramento, California 95814-4497

Telephone: +1-916-447-9200

6 Facsimile: +1-916-329-4900

7 Attorneys for Debtor  
City of Stockton

9 UNITED STATES BANKRUPTCY COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 SACRAMENTO DIVISION

12 In re:

13 CITY OF STOCKTON, CALIFORNIA,

14 Debtor.

Case No. 2012-32118

D.C. No. OHS-15

Chapter 9

**CITY OF STOCKTON'S RESPONSE  
TO FRANKLIN HIGH YIELD TAX-  
FREE INCOME FUND AND  
FRANKLIN CALIFORNIA HIGH  
YIELD MUNICIPAL FUND'S  
EVIDENTIARY OBJECTIONS TO  
DIRECT TESTIMONY  
DECLARATION OF PATRICK B.  
BOCASH IN SUPPORT OF  
CONFIRMATION OF FIRST  
AMENDED PLAN FOR THE  
ADJUSTMENT OF DEBTS OF CITY  
OF STOCKTON, CALIFORNIA  
(NOVEMBER 15, 2013)**

23 WELLS FARGO BANK, et al.  
Plaintiffs,

24 v.

25 CITY OF STOCKTON, CALIFORNIA,  
Defendant.

Adv. No. 2013-02315

Date: May 12, 2014

Time: 9:30 a.m.

Dept: Courtroom 35

Judge: Hon. Christopher M. Klein

1 Pursuant to paragraph 44 of the Order Governing The Disclosure And Use Of Discovery  
 2 Information And Scheduling Dates, Etc. [Dkt. Nos. 1224 (Case), 16 (Proceeding)], as amended  
 3 by the Order Modifying Order Governing The Disclosure And Use Of Discovery Information  
 4 And Scheduling Dates, Etc. [Dkt. Nos. 1242 (Case), 18 (Proceeding)] (collectively, the “Orders”),  
 5 the City of Stockton, California (the “City”), the debtor and defendant in the above-captioned  
 6 case and adversary proceeding, hereby submits the following responses to Franklin High Yield  
 7 Tax-Free Income Fund and Franklin California High Yield Municipal Fund’s (collectively,  
 8 “Franklin’s”) Evidentiary Objections to Direct Testimony Declaration of Patrick B. Bocash In  
 9 Support Of Confirmation Of First Amended Plan For The Adjustment Of Debts Of City Of  
 10 Stockton California (November 15, 2013) [Dkt. Nos. 1410 (Case), 99 (Proceeding)].

PARAGRAPH OBJECTED TO	GROUNDS FOR OBJECTION	RESPONSE TO OBJECTION
11 8. Attached hereto as 12 <b>Exhibit G</b> is a true and 13 correct copy of a September 14 23, 2013 email from Lisa 15 Gallegos to Johnston and 16 Stacey Johnston Coleman with subject “RE: Stockton heads up.” This document was produced by Franklin.	Franklin objects to the admission of this exhibit because it is irrelevant, as it does not have the tendency to make a fact of consequence in determining the action more or less probable than it would be without the evidence. FED. R. EVID. 401, 402.	The statements in this exhibit are relevant under FED. R. EVID. 401 because they have a tendency to make a fact of consequence more or less probable than it would be without the evidence.
17 9. Attached hereto as 18 <b>Exhibit H</b> is a true and 19 correct copy of a print-out retrieved from the Franklin 20 Templeton Investments website for the Franklin California High Yield 21 Municipal Fund, showing “Total Net Assets” of 22 \$1,641,500,000 as of February 28, 2014 for all 23 share classes of the Franklin California High Yield 24 Municipal Fund. This print- out was retrieved from 25 <a href="https://www.franklintempleton.com/retail/app/product/view/s/fund_page.jsf?fundNumber=227">https://www.franklintempleton.com/retail/app/product/view/s/fund_page.jsf?fundNumber=227</a> on March 31, 2014.	Franklin objects to the admission of this exhibit because it is irrelevant, as it does not have the tendency to make a fact of consequence in determining the action more or less probable than it would be without the evidence. FED. R. EVID. 401, 402.	The statements in this exhibit are relevant under FED. R. EVID. 401 because they have a tendency to make a fact of consequence more or less probable than it would be without the evidence.

