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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 JOSEPHINE WEBER  
IN SUPPORT OF APPLICATION FOR  
TEMPORARY RESTRAINING ORDER  
OR RELIEF FROM STAY

28 Plaintiffs,

vs.

CITY OF STOCKTON, CALIFORNIA,

Defendant.

1 I, Josephine Weber 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 7, 1947, and am 65 years of age. I live at 3541 Harpers Ferry  
5 Drive, Stockton, California.

6 3. I was hired by the City of Stockton in June of 1975 and retired in December of  
7 2004 as a Supervising Deputy City Clerk. There were some service breaks in my tenure at the  
8 City. I have a total of 20 years of service in PERS.

9 4. I have one dependent on the City's Medical Plan. We both have enough quarters  
10 to qualify for Medicare.

11 5. My PERS check is \$2,563.63. My net annual income is \$61,132.

12 6. I am informed and believe the City has adopted a monthly premium for retiree  
13 health benefits. If required to pay this premium to receive City Health Plan benefits, even with a

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1 \$300 subsidy that has been offered by the City for one year, my premium would be \$471.53  
2 monthly or \$5658.36 annually. That represents 9% of my monthly net income.

3 7. My husband is under frequent care for cancer. It is chronic lymphoma and  
4 requires chemotherapy. It is not clear that we would be able to get affordable insurance or  
5 insurance at all with this pre-existing condition.

6 I declare under penalty of perjury under the law of the United States of America that the  
7 foregoing is true and correct and that this declaration was executed in Stockton, California  
8 on June 24, 2012.

*Josephine Weber*  
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JOSEPHINE WEBER

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