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8
 9 UNITED STATES BANKRUPTCY COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION

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

Case No. 2012-32118
 DC No. SLF-1
 Chapter 9

16 **DECLARATION OF CHARLES A. DALE, III IN SUPPORT OF CALPERS' MOTION TO DISQUALIFY WINSTON & STRAWN LLP**

17
 18 Date: July 2, 2013
 19 Time: 9:30 a.m.
 20 Place: United States Courthouse
 Dept. C, Courtroom 35
 501 I Street
 Sacramento, CA 95814

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22
23 I, Charles A. Dale, III, hereby declare:

24 1. I am an attorney with K&L Gates LLP ("K&L Gates") and am one of the partners in
 25 K&L Gates' Boston, Massachusetts office. I am the Practice Group Coordinator of K&L Gates'
 26 Restructuring and Insolvency Practice Group. I make this declaration in support of the CalPERS'
 27 Motion to Disqualify Winston & Strawn LLP. Except as to those matters as set forth on information
 28 and belief, I have personal knowledge of the facts set forth herein and if called as a witness I could

1 testify competently to such facts.

2 2. In April 2013, I had telephonic communications with one of K&L Gates' partners, Jo
3 Ann J. Brighton, who has since left the firm and joined Winston & Strawn LLP ("Winston"). On
4 April 12, 2013, Ms. Brighton told me that she was going to be leaving K&L Gates and going to
5 Winston. At that time, she also told me that everyone in the Restructuring and Insolvency Practice
6 Group from K&L Gates' Charlotte office was going with her. In this conversation, she specifically
7 mentioned one of our partners, Felton Parrish, and two associates, William Petraglia and Nathan
8 Lebioda as persons who would be going to Winston.

9 3. Ms. Brighton gave her formal resignation a few days later, on April 15, 2013.

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

12
13
14 Dated: May 14, 2013

By: /s/ Charles A. Dale, III
Charles A. Dale, III