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 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

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 16 **UNITED STATES BANKRUPTCY COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

18 In re:

Case No. 12-32118

19 CITY OF STOCKTON, CALIFORNIA,

Chapter 9

20 Debtor.

21 ASSOCIATION OF RETIRED EMPLOYEES
 22 OF THE CITY OF STOCKTON, a nonprofit
 23 California corporation, SHELLEY GREEN,
 24 PATRICIA HERNANDEZ, REED HOGAN,
 25 GLENN E. MATTHEWS, PATRICK L.
 26 SAMSELL, ALFRED J. SIEBEL, BRENDA
 27 JO TUBBS, TERI WILLIAMS, on Behalf of
 28 Themselves and Others Similarly Situated,

Adv. No.

DECLARATION OF ALFRED J. SEIBEL
 IN SUPPORT OF APPLICATION FOR
 TEMPORARY RESTRAINING ORDER
 OR RELIEF FROM STAY

Plaintiffs,

vs.

CITY OF STOCKTON, CALIFORNIA,

Defendant.

1 I, Alfred J. Seibel, 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 October 1, 1951 and am 60 years old. I live at 2428 E. Acacia St,
5 Stockton, CA 95205.

6 3. I was hired permanently by the City of Stockton in February 1975 and retired in
7 April 2006. I was a Parks Worker II when I retired.

8 4. My spouse is my dependent on the City Plan, and has no other income. I have
9 enough quarters to be eligible for Medicare when I turn 65.

10 5. My monthly CALPERS gross check is \$2,411.79. Our total net household annual
11 income after taxes is \$26,337.48.

12 5.1. 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
14 the \$450 subsidy the City is offering for one year only, my premium would be \$1,126.66 per

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1 month, or \$13,519.92 annually. Since my entire annual net income is only \$26,337.48, paying
 2 these new health care costs would leave me only \$12,817.56 for my annual income. Divided up
 3 into monthly installments, that would leave me approximately \$1,068.13 each month on which to
 4 live after paying for my health care benefit. My mortgage alone is \$536.11 a month.

5 6. I take 9 prescriptions daily. I suffer from GERD, bleeding ulcers, irritable bowel
 6 syndrome, high blood pressure, high cholesterol, high triglycerides, hypo-thyroid, dislocated
 7 collar bone, osteoarthritis, enlarged lymph nodes from chemicals used at work, a herniated
 8 disc in lower back after injury at work, enlarged prostate and clinical depression. I have an
 9 unidentified mass on the right bronchial tube that must be X-rayed annually. My wife takes 5
 10 prescriptions daily. She has permanent locked jaw and is on a very restrictive diet. She needs
 11 to be on a special diet we already can't afford. She has Tic-DA-La-Rue (a form of epilepsy),
 12 colitis, and rheumatoid arthritis. She takes female hormones due to having a hysterectomy at
 13 age 28. She has hypo-thyroid. She has to take pain meds and muscle relaxers to keep her jaw
 14 from getting worse. At this time her doctors have talked to her about a feeding tube.

15 7. Needless to say we cannot afford to lose our medical coverage. Paying \$1,126.66
 16 a month is obviously not an option. I am already taking generic meds for cholesterol and
 17 triglycerides against my doctor's advice. I can't afford the \$70 co-pay. My wife cries all the
 18 time. She don't understand how when you retire and they promise you all this stuff, then they
 19 just take it away.

20 I declare under penalty of perjury under the law of the United States of America that the
 21 foregoing is true and correct and that this declaration was executed in Stockton, California, on
 22 June 26, 2012.

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 25 ALFRED J. SEIBEL