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CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

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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:
18 CITY OF STOCKTON, CALIFORNIA,
19 Debtor.

20 Case No. 12-32118
21 Chapter 9

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

Adv. No.
DECLARATION OF CATHY SLOAN IN
SUPPORT OF APPLICATION FOR
TEMPORARY RESTRAINING ORDER
OR RELIEF FROM STAY

Plaintiffs,
vs.
CITY OF STOCKTON, CALIFORNIA,
Defendant.

1 I, Cathy Sloan 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 1, 1957 and am 55 years old. I live at 7138 DaLee Road,
5 Valley Springs, CA 95252.

6 3. My spouse is no longer a dependent on the City Plan.

7 4. I was hired by the City of Stockton in January of 1985 and retired on February 29,
8 2008.

9 5. My job title was Administrative Aide II (confidential).

10 6. My monthly gross CALPERS retirement check is \$2090.61.

11 7. My gross income is \$74,196 and my net income is \$68,160.

12 8. My husband qualifies for Medicare and I will qualify when I reach age 65.

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

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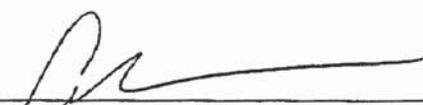
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the City's \$300 subsidy, my monthly premium would be \$575.92 per month, or \$6,911.04 per year. This represents approximately 10% of my gross annual income, and we have to pay another \$158 plus drug deductibles and copays for the Medigap and Medicare Part D policies we had to purchase to replace City coverage we could not afford. I am having a hard enough time right now paying the current \$500 annual medical deductible. Adding this additional expense will be an extreme financial burden.

10. I was diagnosed with breast cancer in 2008 and went through surgery, chemo and radiation. I visit 2 doctors at Stanford every 6 months for follow-up and occasionally need additional testing. I have also been diagnosed with osteoporosis which requires follow-up and medications. With my medical history and pre-existing conditions it will be difficult, if not impossible, for me to find medical insurance on the open market. Losing our health insurance will take a financial and emotional toll on us that will be impossible to overcome.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct and that this declaration was executed on

July 3, 2012.



CATHY SLOAN