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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

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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 REED HOGAN IN  
SUPPORT OF APPLICATION FOR  
TEMPORARY RESTRAINING ORDER  
OR RELIEF FROM STAY

Plaintiffs,

vs.

CITY OF STOCKTON, CALIFORNIA,

Defendant.

1 I, Reed Hogan, 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 August 21, 1949 and am 62 years old. I live at 7756 South Oak  
5 Way, Sacramento, California 95831.

6 3. I was hired by the City of Stockton on January of 1995 and retired on June 30,  
7 2011 as a Senior Civil Engineer.

8 4. My spouse is my dependent on the City's Medical Plan and I will be eligible for  
9 Medicare when I reach the age of 65.

10 5. My net PERS retirement check is \$3,284.00. My net income for the tax year 2012  
11 after taxes is estimated to be \$58,858.00.


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

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1 with the \$150 subsidy for one year, it would be \$1,426.66 per month, or \$17,119.92 annually.  
2 That would amount to 29% of my entire net income, a blow that would impact us severely.

3 7. I have a thyroid condition and very high cholesterol which require regular  
4 monitoring. My wife has a thyroid condition which requires regular monitor by a medical  
5 specialist. Both of these medical conditions require expensive medications on a regular basis.  
6 Attempting to obtain other insurance for these pre-existing conditions will be very expensive  
7 if we could even get such coverage.

8 I declare under penalty of perjury under the law of the United States of America that the  
9 foregoing is true and correct and that this declaration was executed in Sacramento, California  
10 on JUNE 25, 2012.

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13 REED HOGAN  
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