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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 TODD SCHIESS IN  
SUPPORT OF APPLICATION FOR  
TEMPORARY RESTRAINING ORDER  
OR RELIEF FROM STAY

Plaintiffs,

vs.

CITY OF STOCKTON, CALIFORNIA,

Defendant.

1 I, Todd Schiess, 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 November 15, 1961 and am 50 years old. I live at 4312 Heritage  
5 Place, Stockton, California.

6 3. I was hired by the City of Stockton in August of 1992 and retired in November of  
7 2011 as a Fire Captain.

8 4. My spouse is my dependent on the City's Health Plan and we both have enough  
9 quarters to be eligible for Medicare.

10 5. My CALPERS retirement check is \$5221.77 monthly and my annual household  
11 income is \$62,661.00.

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 with a

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1 \$150 subsidy that has been offered by the City for one year, my premium would be \$1426.66  
2 monthly or \$17,119.92 annually. That represents 27% of my income.

3 7. My wife and I both have chronic conditions that would likely preclude our ability  
4 to get medical coverage in the marketplace. It would likely be unaffordable if we could get it at  
5 all. It will be at least 15 years before I will be eligible for Medicare.

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, on  
8 25 June, 2012.

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10   
11 TODD SCHIESS

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