



1 G. SCOTT EMBLIDGE, State Bar No. 121613
 2 RACHEL J. SATER, State Bar No. 147976
 3 KATHRYN J. ZOGLIN, State Bar No. 121187
 4 MOSCONE EMBLIDGE & SATER LLP
 5 220 Montgomery Street, Suite 2100
 San Francisco, California 94104-4238
 Telephone: (415) 362-3599
 Facsimile: (415) 362-2006

6 Attorneys for Plaintiffs Association of Retired
 7 Employees of the City of Stockton, Shelley Green,
 8 Patricia Hernandez, Reed Hogan, Glenn E.
 Matthews, Patrick L. Samsell, Alfred J. Siebel,
 Brenda Jo Tubbs, and Teri Williams on Behalf of
 Themselves and Others Similarly Situated

10 **UNITED STATES BANKRUPTCY COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

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

Case No. 12-32118
 Chapter 9

15 ASSOCIATION OF RETIRED EMPLOYEES
 16 OF THE CITY OF STOCKTON, a nonprofit
 17 California corporation, SHELLEY GREEN,
 18 PATRICIA HERNANDEZ, REED HOGAN,
 19 GLENN E. MATTHEWS, PATRICK L.
 SAMSSELL, ALFRED J. SIEBEL, BRENDA
 JO TUBBS, TERI WILLIAMS, on Behalf of
 Themselves and Others Similarly Situated,

Adv. No.
 DECLARATION OF DOUGLAS
 CARROLL WATKINS IN SUPPORT OF
 APPLICATION FOR TEMPORARY
 RESTRAINING ORDER OR RELIEF
 FROM STAY

20 Plaintiffs,
 21 vs.
 22 CITY OF STOCKTON, CALIFORNIA,
 23 Defendant.

1 I, Douglas Carroll Watkins, 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 12, 1957 and am 55 years old. I live at 3028 Butler
5 Lane, Valley Springs, CA 95252.

6 3. I was hired by the City of Stockton on January 1, 1984 and retired on July 3, 2009
7 as Deputy Director of Training in the Stockton Fire Department.

8 4. My daughter, who is mentally challenged, is my dependent on the City's Health
9 Plan and I do not have enough quarters to be eligible for Medicare.

10 5. My PERS monthly pension check is \$5387.37 and net annual income is \$60,044.50.

11 6. I am informed and believe that the City has adopted a monthly premium for retiree
12 health benefits. If I were required to pay the City's monthly Health Plan premium, even with the
13 City subsidy of \$300 per month, it would cost me \$1,276.66 monthly, or \$15,319.92 annually.


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This represents 26% of my annual income.

7. My daughter has to be monitored at all times, so losing my medical coverage is a serious issue, especially because I will not be eligible for Medicare.

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 in Valley Springs, CA on

June 23, 2012.


DOUGLAS CARROLL WATKINS