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2012-02302

FILED

July 10, 2012

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

1 G. SCOTT EMBLIDGE, State Bar No. 121613 RACHEL J. SATER, State Bar No. 147976 KATHRYN J. ZOGLIN, State Bar No. 121187 MOSCONE EMBLIDGE & SATER LLP 3 220 Montgomery Street, Suite 2100 San Francisco, California 94104-4238 4 Telephone: (415) 362-3599 Facsimile: (415) 362-2006 5 Attorneys for Plaintiffs Association of Retired 6 Employees of the City of Stockton, Shelley Green, Patricia Hernandez, Reed Hogan, Glenn E. 7 Matthews, Patrick L. Samsell, Alfred J. Siebel, Brenda Jo Tubbs, and Teri Williams on Behalf of 8 | Themselves and Others Similarly Situated

11000	Themserves and Others Similarly Situated	
9		
10	UNITED STATES BA	NKRUPTCY COURT
11	EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION	
12	In re:	Case No. 12-32118
13	CITY OF STOCKTON, CALIFORNIA,	Chapter 9
14	Debtor.	
15		
16	ASSOCIATION OF RETIRED EMPLOYEES OF THE CITY OF STOCKTON, a nonprofit	Adv. No.
17	California corporation, SHELLEY GREEN, PATRICIA HERNANDEZ, REED HOGAN,	DECLARATION OF CHRISTINE LUMPKIN IN SUPPORT OF
18	GLENN E. MATTHEWS, PATRICK L. SAMSELL, ALFRED J. SIEBEL, BRENDA	APPLICATION FOR TEMPORARY RESTRAINING ORDER OR RELIEF
19	JO TUBBS, TERI WILLIAMS, on Behalf of Themselves and Others Similarly Situated,	FROM STAY
20	Plaintiffs,	
21	VS.	
22	CITY OF STOCKTON, CALIFORNIA,	
23	Defendant.	
24		,
25		
26		
27		

DECLARATION OF CHRISTINE LUMPKIN

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1	I, Christine Lumpkin, declare:	
2	I have personal knowledge of the facts set forth in this declaration and, if called a	
3	a witness, I could and would testify competently to these facts under oath.	
4	2. I was born on May 23, 1951 and am 62 years old. I live at 1989 Picadilly Way,	
5	Manteca, CA 95336.	
6	3. I was hired by the City of Stockton in February of 1996 and retired in December	
7	of 2009 as an Office Specialist.	
8	4. My spouse is my dependent on the City's Health Plan. We both have enough	
9	quarters to qualify for Medicare when we reach 65 years of age.	
10	 My CALPERS pension check is \$2485.05. Our taxable income last year 	
11	including deferred income withdrawn was \$57,862.	
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	
14	the City's \$150 subsidy, my monthly premium would be \$1426.66 monthly, or 17,119.92	
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28	<i>//</i>	

Case No. 12-32118 Adv. No. ____

DECLARATION OF CHRISTINE LUMPKIN 1

even with the \$300 subsidy from the City for one year, my monthly premium would be \$1,276.66, or \$15,319.92 annually. This represents approximately 26% of our 2011 net annual household income.

7. I have Parkinson's and my spouse has chronic kidney dysfunction. We both have high blood pressure and high cholesterol. With our medical history, I am afraid that we will be unable to get health insurance at all, and the City is offering only a very expensive option.

I declare under penalty of perjury under the law of the Untied States of America that the foregoing is true and correct and that this declaration was executed in Stockton, California on

July 05 , 2012.

CHRISTINE LUMPKIN

WILNES