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1 MARC A. LEVINSON (STATE BAR NO. 57613)
 malevinson@orrick.com
 2 NORMAN C. HILE (STATE BAR NO. 57299)
 nhile@orrick.com
 3 PATRICK B. BOCASH (STATE BAR NO. 262763)
 pbocash@orrick.com
 4 ORRICK, HERRINGTON & SUTCLIFFE LLP
 400 Capitol Mall, Suite 3000
 5 Sacramento, California 95814-4497
 Telephone: +1-916-447-9200
 6 Facsimile: +1-916-329-4900

7 Attorneys for Debtor
 City of Stockton
 8

9 UNITED STATES BANKRUPTCY COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION
 12

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

Case No. 2012-32118
 D.C. No. JTS-02
 Chapter 9

16 **DECLARATION OF BETTY J.**
 17 **RAMIREZ IN SUPPORT OF CITY OF**
 18 **STOCKTON'S OPPOSITION TO**
 19 **DEAN ANDAL'S MOTION FOR**
 20 **ORDER SHORTENING TIME TO**
 21 **HEAR MOTION FOR RELIEF FROM**
 22 **AUTOMATIC STAY**

[No Hearing Scheduled]

Judge: Hon. Christopher M. Klein

23 I, Betty J. Ramirez, declare:

24 1. I am a legal secretary employed by Orrick, Herrington & Sutcliffe LLP ("Orrick"),
 25 counsel of record for the City of Stockton, California (the "City") in this chapter 9 case. I make
 26 this declaration in support of the City's Opposition To Dean Andal's Motion For Order
 27 Shortening Time To Hear Motion For Relief From Automatic Stay. I have personal knowledge
 28 of the matters stated herein and if called as a witness, I could and would testify as follows:

Exhibit A



MEMORANDUM

TO Marc A. Levinson

FROM Betty J. Ramirez, Legal Secretary

DATE August 2, 2013

RE Stockton - Verbatim Transcript of Voicemail Message Left by Joseph Speaker for Marc Levinson at 2:35 p.m. on July 31, 2013

Hi Mr. Levinson, my name is Joseph Speaker. I sent you an email yesterday regarding a proposed stipulation for relief from the automatic stay in the In Re City of Stockton matter for my client to proceed in state court on our writ of mandate, and I got your email in response asking for the moving papers. And I just wanted to call and discuss it with you a little bit further. Part of the problem with providing the moving papers now is there's slightly, or there could be a slight change to them depending on the published ballot language, which will come out in about a week or so. But I could give you something that's – you know – is gonna be almost 99 percent what's going to be filed. But I can't say 100 percent in the event that something is slightly altered on the published ballot. But please give me a call, and we can discuss this further. Unfortunately, time is kind of the essence with regard to filing this. So, by the end of the day, I am either going to hopefully be able to enter into a stipulation with you, or I have to file a motion for relief.

But give me a call back here at 916-724-5700. Thanks a lot.