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8 Attorneys for Plaintiffs Christopher Ellis, Bradley D. Elow,  
9 Robert Finch and Howard LaBore individually, and on  
10 behalf of all others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF SAN DIEGO**

13 CHRISTOPHER ELLIS, BRADLEY D. ELOW,  
14 ROBERT FINCH and HOWARD LaBORE,  
15 individually, and on behalf of all others similarly  
16 situated,

17 Plaintiffs,

18 v.

19 JACKSON, DeMARCO, TIDUS &  
20 PECKENPAUGH, A LAW CORPORATION,  
21 GREGORY GLENN PETERSEN, an individual,  
22 CHRISTOPHER D. NISSEN, an individual,  
23 BRADLEY MATHEWS, an individual,  
24 STEPHENEY R. WINDSOR, an individual,  
25 MICHAEL ANTHONY JENKINS, an individual,  
26 and DOES 1-50,

27 Defendants.

CASE NO: 37-2010-00086284-  
CU-PN-CTL

DECLARATION OF JEFF JORDON  
IN SUPPORT OF MOTION FOR  
CERTIFICATION OF CLASS  
ACTION

Date: November 19, 2010  
Time: 10:00 a.m.  
Judge: Hon. Ronald S. Prager  
Dept: C-71  
Complaint Filed: February 24, 2010  
Trial: July 15, 2011

28 I, Jeff Jordon, declare as follows:

1. I have personal knowledge of the matters stated herein and if called to do so could testify competently thereto.

2. I am the Vice President of the San Diego Police Officers Association. The San Diego Police Officers Association ("SDPOA") is a mutual benefit corporation organized and doing business as a State of California sanctioned employee organization representing police officers holding the rank of lieutenant and below who are employed by the City of San Diego ("City"). The scope of the SDPOA's representation of San Diego Police officers in negotiating

1 labor-management agreements, and the City's duty to meet and confer in good faith, are set forth  
 2 in the Meyers-Millas-Brown Act. (Gov. Code, §§ 3500-3510.) The SDPOA has approximately  
 3 1,820 members.

4 3. For the past several months, I have been carefully studying the effect of the cap on  
 5 the amount of health insurance premium reimbursement the City will pay under San Diego  
 6 Municipal Code section 24.1202(a)(8). (See the accompany Request for Judicial Notice in  
 7 Support of Motion for Certification of Class, Exhibit 3.) That law, which became effective on  
 8 July 1, 2009, applies to "all Safety Members in the San Diego Police Officers Association" who  
 9 retire after July 1, 2009. (RJN, Exh. 3; San Diego Municipal Code, § 24.1201(a)(8)(ii).)

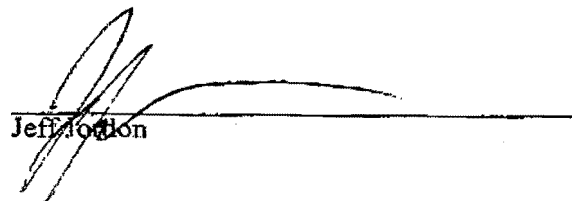
10 4. The City does not permit any employees, including SDPOA members, hired on or  
 11 after July 1, 2005, to qualify for any insurance premium reimbursement the City will pay under  
 12 San Diego Municipal Code section 24.1202(a)(8).

13 5. I have been informed that the proposed definition of the class is: "All Safety  
 14 Members in the San Diego Police Officers Association who began their employment for the City  
 15 of San Diego before July 1, 2005, and have retired, or will retire, after July 1, 2009."

16 6. As part of my job responsibilities for the past several weeks, I am familiar with  
 17 the approximate number of SDPOA members within that proposed class definition. The class  
 18 consists of approximately 1,463 persons.

19 I declare under penalty of perjury under the laws of the State of California that the  
 20 foregoing is true and correct.

21 Executed this 14th day of October, 2010, at San Diego, California.

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