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1 JOSEPH W. ROSE (STATE BAR No. 232261)
joe@joeroselaw.com
2 LISA L. BRADNER (STATE BAR No. 197952)
lisa@joeroselaw.com
3 ROSE LAW APC
11335 Gold Express Drive, Suite 135
4 Gold River, CA 95670
Telephone: (916) 273-1260
5 Facsimile: (916) 290-0148

6 Attorneys for Amicus Curiae
INTERNATIONAL ASSOCIATION
7 OF FIREFIGHTERS

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

11
12 In re:
13 CITY OF STOCKTON, CALIFORNIA,
14 Debtor.

Case No. 2012-32118
D.C. No. 15
Chapter 9

**APPLICATION FOR SUBMISSION
AND CONSIDERATION OF AN
AMICUS CURIAE BRIEF ON BEHALF
OF THE INTERNATIONAL
ASSOCIATION OF FIRE FIGHTERS**

Date: October 1, 2014
Time: 10:00am
Dept.: Courtroom 35
Judge: Hon. Christopher M. Klein

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21 The International Association of Fire Fighters (“IAFF”) respectfully seeks leave to file
22 the attached brief *amicus curiae* in support of the Stockton Professional Firefighters – Local 456
23 and in support of confirmation of the proposed Plan of Adjustment of the City of Stockton.

24 The IAFF is an organization representing more than 300,000 professional fire fighters,
25 paramedics, and other emergency responders in the United States and Canada. More than 3,200
26 IAFF affiliates protect the lives and property of over 85 percent of the continent’s population in
27 nearly 6,000 communities in every state in the United States and in Canada. The IAFF’s local
28 affiliates represent fire fighters throughout California with respect to collective bargaining over

ROSE LAW APC
 11335 GOLD EXPRESS DRIVE, SUITE 135
 GOLD RIVER, CA 95670
 (916) 273-1260

1 the terms and conditions of employment including compensation issues. The IAFF is familiar
 2 with the issues in this case, and consistent with its interest and capacity as an advocate for
 3 professional fire fighters, paramedics, and emergency responders in California and across the
 4 United States, and due to its extensive expertise and knowledge, the IAFF believes that it will
 5 provide a unique perspective to this Court regarding the issues herein.

6 Ensuring that the pension benefits that public employees have been promised are
 7 protected is an extremely important issue for fire fighters. Fire fighters risk their health and
 8 safety to protect the general public. In many jurisdictions, especially including California, fire
 9 fighters accept these risks based on the understanding that they will be compensated now and in
 10 the future through their pension benefits. An attempt to unilaterally alter those benefits through
 11 the Chapter 9 municipal bankruptcy process runs afoul of the California Constitution and
 12 California state law. As this case may have a precedential effect, the IAFF has a substantial
 13 interest in ensuring that the Chapter 9 municipal bankruptcy process is not used as a method for
 14 circumventing California’s strong pension protections and that fire fighters continue to receive
 15 those pension benefits they have been promised in return for their service to the people of
 16 California.

17 For the above reasons, the International Association of Fire Fighters respectfully requests
 18 this Court grant the IAFF leave to file the attached brief as *amicus curiae* in support of the
 19 Stockton Professional Firefighters – Local 456 and in support of confirmation of the proposed
 20 Plan of Adjustment of the City of Stockton.

21 Dated: August 18, 2014

JOSEPH W. ROSE
 LISA L. BRADNER
 Rose Law APC

22 By: /s/ Joseph W. Rose
 23 JOSEPH W. ROSE
 24 Attorneys for *Amicus Curiae*
 25 International Association of Firefighters

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Thomas A. Woodley
Douglas L. Steele
WOODLEY & MCGILLIVARY
1101 Vermont Ave, N.W.
Suite 1000
Washington, D.C. 20005
Phone: (202) 833-8855
taw@wmlaborlaw.com
dls@wmlaborlaw.com

Counsel for Amicus Curiae IAFF

ROSE LAW APC
11335 GOLD EXPRESS DRIVE, SUITE 135
GOLD RIVER, CA 95670
(916) 273-1260