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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT  
THE DISTRICT OF OREGON

SANDY L. HENDERSON, ANNA  
MARGARET WICKER, JANE GRAY, and  
CARMELLE L. HARTIN,

Plaintiffs,

v.

THE STATE OF OREGON BY AND  
THROUGH THE BUREAU OF LABOR  
AND THE BOARD OF HIGHER  
EDUCATION; NORMAN O. NILSEN,  
COMMISSIONER OF LABOR; DR. ROY  
LIEUALLEN, CHANCELLOR OF THE  
BOARD OF HIGHER EDUCATION; THE  
PUBLIC EMPLOYEES RETIREMENT  
SYSTEM; and JOSEPH J. ADAMS, HUGH  
McKINELY, CHALMERS L. JONES,  
ROGER S. MEIER and EDWIN H.  
ARMSTRONG, in their capacity as members  
of the PUBLIC EMPLOYEES RETIREMENT  
BOARD,

Defendants.

CV 74-538

AFFIDAVIT OF GINA M.  
SANTACROCE



males of the same age and amount of contributions received prior to [July 1, 1978].”<sup>6</sup> The newly adopted tables were implemented July 1, 2003.

5. As a result of the implementation of the new life expectancy tables, my total benefits upon retirement will be substantially *lower* than they would have been had the PERS Board complied with the stipulated judgment and permanent injunction issued by the court in the above-captioned action. Specifically, the refund annuity portion of my benefits will decrease below the level that would result from application of the pre-July 1, 1978 tables.

6. No previous application has been made for the order or relief sought in this proceeding.

Plaintiff requests:

1. An order requiring James Dalton, Eva Kripalani, Michael Pittman, Thomas Grimsley, and Brenda Rocklin, to show cause why they should not be held in contempt because of the above-mentioned violations of the judgment and injunction;

2. An order compelling the PERS Board to use life expectancy tables which comply with the judgment and permanent injunction issued in the above-captioned action; and

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<sup>6</sup> Quoted language is from Judge Solomon’s September 20, 1978 Judgment.

3. Such other and further relief as the court may deem proper.

DATED this 29<sup>th</sup> day of September, 2003.

Gina M. Santacroce

Gina M. Santacroce

SUBSCRIBED AND SWORN TO before me this 29 day of September, 2003.

Monique Myers

Notary Public for Oregon

My Commission Expires:

