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PROFESSIONAL ENGINEERS IN CALIFORNIA
GOVERNMENT; CALIFORNIA ASSOCIATION
OF PROFESSIONAL SCIENTISTS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

DEBBIE L. ENDSLEY; CALIFORNIA
DEPARTMENT OF PERSONNEL
ADMINISTRATION,

Petitioners/Plaintiffs,

v.

JOHN CHIANG, sued herein in his official capacity
only; OFFICE OF THE STATE CONTROLLER,

Respondents/Defendants.

Case No. 34-2010-80000591

**DECLARATION OF
WILBURN L. THOMPSON JR.
IN SUPPORT OF EX PARTE
APPLICATION FOR LEAVE
TO INTERVENE AND IN
SUPPORT OF OPPOSITION
TO APPLICATION FOR
TEMPORARY RESTRAINING
ORDER**

Hearing Date: July 16, 2010
Time: 11:00 a.m.
Dept.: 19
Judge: Hon. Patrick Marlette

Action Filed: July 6, 2010

JOHN CHIANG, in his official capacity as
CONTROLLER OF THE STATE OF CALIFORNIA;
OFFICE OF THE STATE CONTROLLER,

Cross-Complainants,

v.

DEBBIE L. ENDSLEY, sued herein in her official
capacity only; CALIFORNIA DEPARTMENT OF
PERSONNEL ADMINISTRATION,

Cross-Defendants.

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CALIFORNIA ASSOCIATION OF PROFESSIONAL
SCIENTISTS; PROFESSIONAL ENGINEERS IN
CALIFORNIA GOVERNMENT,

Intervenors.

1 I, Wilburn L. Thompson Jr., declare as follows:

2 1. I make this declaration on the basis of my own personal knowledge and if called
3 to testify to the facts stated herein, am competent to do so.

4 2. I am employed at the California Department of Transportation ("Caltrans") as a
5 Transportation Surveyor, Range C. I have worked for Caltrans for approximately 19 years.

6 3. As a Transportation Surveyor, I work in the Right-of-Way Engineering Division
7 of Caltrans' District 3 in Marysville. The Right-of-Way Engineering Division, and my position
8 within the Division, is part of Caltrans' Capital Outlay Support.

9 3. As a Transportation Surveyor at Caltrans, I am represented by the Professional
10 Engineers in California Government ("PECG"), and am a member of PECG.

11 4. I was employed at Caltrans when Governor Schwarzenegger's initial two-day
12 furlough was put into effect, as well as later, when the three-day furlough was instituted.

13 5. These furloughs were in effect for the past 17 months, and only recently ended.
14 As a result of the furloughs, my income decreased significantly. When there were two furlough
15 days each month, my salary was reduced by approximately 9.2%. When, in July 2009, the
16 number of furlough days was increased to three each month, the cut to my pay was approximately
17 13.8%. The reduction in my salary over the past 17 months has resulted in a depletion of my
18 savings.

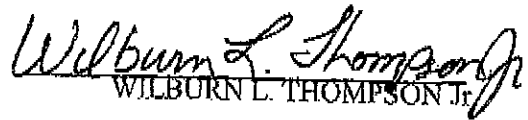
19 6. I am the sole provider for my household, which includes my longtime partner of
20 more than 32 years. She is disabled and is largely dependent upon my income for her expenses
21 and support.

22 7. If my pay for the month of July 2010 is reduced to \$7.25 per hour, my pay will be
23 reduced to only 16.4% of my normal wages. In other months with 22 work days, the reduction
24 would be to only 17.2% of my normal wages. This will cause me and my family severe hardship.
25 This drastically reduced income, once payroll deductions are made, simply will not be sufficient
26 to allow me to pay for necessary living expenses: I will not be able to make my mortgage
27 payment, pay my auto loan for the vehicle I need to commute to work, make other recurring debt
28 payments, or provide the other necessities to support myself and my household, which is entirely

1 dependent on my income. As a result of the furloughs my savings have been depleted and I do
2 not have savings that I can use to pay my and my family's monthly living expenses.
3

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

6 Executed on July 12, 2010, at Marysville, California.
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9 WILBURN L. THOMPSON Jr.

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