

# **EXHIBIT**

# **B**

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

NOEL FREEMAN and WILLIAM  
BRADLEY PRITCHETT, a married couple;  
YADIRA ESTRADA and JENNIFER  
FLORES, a married couple; and  
RONALD REESER and VINCENT  
OLIVIER, a married couple,

Plaintiffs,

*versus*

SYLVESTER TURNER, in his official  
capacity as Mayor of the City of Houston;

THE CITY OF HOUSTON, a Texas  
municipality;

JACK PIDGEON; and

LARRY HICKS,

Defendants.

CASE NO. 4:17-cv-

**DECLARATION OF NOEL FREEMAN**


I, NOEL AARON FREEMAN, pursuant to 28 U.S.C. § 1746, declare as follows:

1. The statements made in this Declaration are based on personal knowledge, I am competent to testify to them and, if called as a witness at trial, my testimony would be consistent with them.
2. I am one of the Plaintiffs in the above-captioned federal case.
3. I am a Division Manager for the Public Works and Engineering Department of the City of Houston. I have been employed by the City of Houston for nearly 13 years.

4. On August 1, 2010, I married William Bradley Pritchett (“Brad”) in Washington, D.C., where same-sex couples could legally marry. At that point, we had already been in a committed relationship together for eight years.
5. I enrolled Brad for spousal benefits, including healthcare coverage, within about 45 minutes of learning about the change in the City of Houston’s eligibility policy. Up to that time, for the entire twelve years we had been together, Brad had not had healthcare coverage—a fact that had always loomed over us like a dark cloud. Upon enrolling for spousal benefits, which included healthcare coverage, Brad made appointments to update his eyeglasses’ prescription and to identify and treat various ailments, such as disorientation and vertigo, as well as little-to-no hearing in his right ear.
6. Although Brad is employed, he only had healthcare benefits through his employer beginning in 2015. Brad now receives medical and dental health insurance through his employer. Brad remains enrolled for vision care benefits with the City of Houston.
7. Aside from spousal healthcare coverage, because the City currently recognizes our marriage, Brad and I continue to benefit from access to Family Medical Leave and the Employee Assistance Programs.
8. Also of great importance to us is knowing that, should Brad lose his job, he would once again have access to spousal and medical benefits through the City.
9. I respectfully reserve the right to modify and expand upon my testimony as the facts are developed in this matter.

Executed this 21<sup>st</sup> day of July, 2017 in Harris County, Texas.

I declare under penalty of perjury that the foregoing is true and correct.

  
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NOEL FREEMAN