

EXHIBIT

C

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 YADIRA ESTRADA

I, YADIRA DENISSE ESTRADA, pursuant to 28 U.S.C. § 1746, declare as follows:

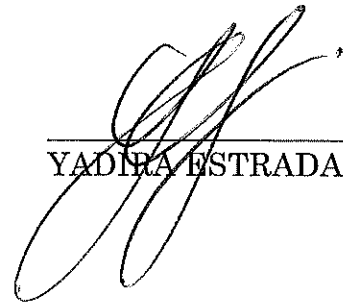
1. The statements made in this Declaration are based on personal knowledge, I am competent to testify to them and, if called as a witness at trial, my testimony would be consistent with them.
2. I am one of the Plaintiffs in the above-captioned federal case.
3. I am a police sergeant for the City of Houston. I have been employed by the City of Houston for more than nine years.
4. On July 23, 2013, I married Jennifer Flores in Maine, where same-sex couples could legally marry. We had been in a committed relationship with one another

for seven and a half years when we married.

5. I enrolled Jennifer for spousal benefits, including healthcare coverage, about a week after learning about the change in the City of Houston's eligibility policy. Jennifer's employer did not provide healthcare benefits at that time. While Jennifer is still employed, and her employer does now provide healthcare coverage, her employer's benefits plan is far more expensive and offers fewer options. Jennifer and I share a primary care physician and her physical therapy treatments are provided through Kelsey-Seybold Clinic which is not an option under her employer's plan. Jennifer's employer does not offer coverage for vision and dental care like the City does.
6. Jennifer relies upon her health insurance coverage via the City of Houston for continued prescriptions, medical care, physical therapy for a knee injury, and access to behavioral/mental health care services and providers.
7. As a spouse of a police officer, Jennifer is eligible for added protections if I am injured or die in the line of duty. As someone who has pledged my service to the City of Houston, it is important to me to know that Jennifer would be treated with the same dignity and respect as any other spouse of a fellow police officer.
8. Jennifer and I are considering starting a family soon and continuous healthcare coverage is important.
9. I respectfully reserve the right to modify and expand upon my testimony as the facts are developed in this matter.

Executed this 20 day of July, 2017 in Harris County, Texas.

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



YADIRA ESTRADA