

EXHIBIT

D

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 RONALD REESER

I, RONALD REESER, pursuant to 28 U.S.C. § 1746, declare as follows:

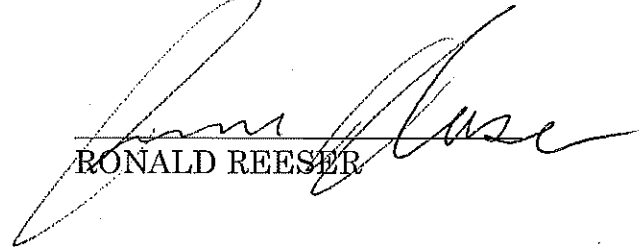
1. The statements made in this Declaration are based on personal knowledge, I am competent to testify to them and, if called as a witness at trial, my testimony would be consistent with them.
2. I am one of the Plaintiffs in the above-captioned federal case.
3. I am a Central Network Administrator for the City of Houston. I have been employed by the City of Houston for approximately 12 years.
4. I married Vincent Olivier (“Vince”) on August 18, 2008, in Vancouver, British Columbia, where same-sex couples could legally marry. We had been in a

committed relationship with one another for more than two years at the time we married.

5. I enrolled Vince for spousal benefits, including healthcare coverage, within one month after learning about the change in the City of Houston's eligibility policy.
6. Due to the advanced age of Vince's parents, I wanted to ensure access to the City of Houston's family bereavement leave if that became necessary. Both Vince's parents have since passed away and because of the benefits, I was able to take three days when each parent passed. The spousal health insurance available to Vince through the City is more financially advantageous with better coverage and better rates than he could obtain elsewhere—a benefit that saves us hundreds of dollars per month. Vince has high blood pressure and takes medications which are covered by the City's benefits plan.
7. We both consider ourselves fortunate to have continuing coverage through the City. Losing spousal coverage would pose significant hardship given that we are both aging, making replacement coverage increasingly more expensive and potentially unaffordable.
8. I respectfully reserve the right to modify and expand upon my testimony as the facts are developed in this matter.

Executed this 21 day of July, 2017 in Harris County, Texas.

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


RONALD REESER