

UNSWORN DECLARATION OF ROGER WRISTON

In the matter of:

Graham et al. v. Justice Energy, Inc., et al.

I, Roger Wriston, of 676 Cranberry Road, Mount Hope, WV 25880, pursuant to 28

U.S.C. § 1476 do hereby solemnly declare the following:

- 1) I was formerly employed by Bluestone Coal Corporation, with my last day of credited service on or about June 22, 2012. On or about that date I retired.
- 2) During my years of service, Bluestone Coal Corporation was bound by a series of collective bargaining agreements with the United Mine Workers of America. Those collective bargaining agreements included promises by Bluestone Coal Corporation to provide pension, healthcare, and prescription drug benefits to qualified retirees.
- 3) Under those collective bargaining agreements, and as a result of my credited service at Bluestone Coal Corporation, I qualified for pension, healthcare, and prescription drug benefits. My wife (Tammie Lynn Wriston) and I are entitled to those benefits during our retirement.
- 4) Since in or about October 2017, Bluestone Coal Corporation has failed to provide the level of healthcare and prescription drug benefits to which my wife and I are entitled.
- 5) Bluestone Coal Corporation has periodically cut off my medical and prescription drug coverage without warning or explanation. Not knowing if or when I will have medical and prescription drug coverage is a constant concern.
- 6) Bluestone Coal Corporation has failed to pay for medical and hospitalization bills. One individual unpaid bill is in the amount of \$12,367.76. I have received calls from

collection agencies regarding these unpaid bills, which are distressing and embarrassing.

I do not have enough money to pay these bills.

- 7) Bluestone Coal Corporation's insurance company has sent me Explanations of Benefits regarding some of the medical bills which state that I owe \$0. Nonetheless, the bills are not paid and I have received invoices for the full amount.
- 8) My wife and I have foregone medical treatment, because we know that our bills will not be paid. For instance, my wife needs medical treatment for her back, which requires injections. But we know the bills will not be paid, so she has not received those injections. We know that avoiding medical treatment can do irreparable harm to our health, but we cannot afford to pay the bills.

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

8-5-19

Date



Roger Wriston (Signature)