

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES HOUSE OF
REPRESENTATIVES,

Plaintiff-Appellee,

v.

No. 16-5202

SYLVIA M. BURWELL, in her official
capacity as Secretary of Health and
Human Services; and. JACOB J. LEW,
in his official capacity as Secretary of
the Treasury,

Defendants-Appellants.

**DECLARATION OF LA TRINA PATTON
IN SUPPORT OF HER MOTION FOR LEAVE TO INTERVENE**

I, La Trina Patton, declare as follows:

1. I am a United States citizen and a resident of Elk Grove, California.
2. I am a small-business owner—a hairstylist—and I run my own salon. My estimated annual household income for 2017 is between 138% and 250% of the applicable Federal Poverty Level.
3. I have purchased a Silver Plan health insurance policy with Kaiser Permanente through the California insurance exchange. My Silver Plan policy covers me for the 2017 coverage year, and I will pay a monthly premium of approximately \$45 in 2017.

4. Earlier in my life, I did not have health insurance because I could not afford to pay the premiums. I was afraid to go to the doctor because I might be charged for treatment—and I knew I could not afford the treatment. When I got sick, instead of going to the doctor, I would usually go online and try to figure out what was wrong. For example, I might use an icepack or buy over-the-counter medication based on what I learned online. I was always worried about what would happen if I got hit by a car or had an accident.

5. Now that I have health insurance, I use it for several ongoing conditions. I receive mental-health treatment for depression and anxiety, physical therapy for my "frozen shoulder," and pain management for my shoulder, my neck, and an ovarian cyst. I take prescription medication for depression and to assist with pain management. I have a primary doctor who I see for preventative checkups.

6. I have also had several one-time expenses that I would not have been able to afford without insurance. In July 2015, I was hospitalized for a week in connection with my mental-health issues. In November 2016, I was in a car accident necessitating treatment for an injury to my neck. Also in 2016, I received an MRI, diagnostic procedures,

and cortisone shots for my frozen shoulder. If I had not received those cortisone shots, I would not be moving my shoulder today.

7. My health insurance gives me peace of mind because I know that if I need medical treatment I can get it. If I lost my health insurance, I would be right back where I started: I would not go to the doctor unless it was an emergency and I had no choice. My mental health would suffer, and my anxiety would increase.

8. Loosing my health insurance would also affect my ability to work and support myself. As a hairstylist, I need the use of my arm, neck, and shoulder to do my job. I could not do my job without ongoing access to physical therapy and pain-management medication. I am concerned that if I lose my health insurance I will no longer be able to support myself.

I declare under penalty of perjury that the foregoing is true and correct. Executed at EIK Grove, CA, on December 20, 2016.


La Trina Patton