

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JULIE ANN ROEHM,

Plaintiff,

vs

Case 2:07-cv-10168-LPZ-RSW Document 16 Filed 05/10/2007 Page 1

Case No. 2:07-CV-10168

HON. LAWRENCE P. ZATKOFF

WAL-MART STORES, INC.,

Defendant.

THE LAW FIRM OF JOHN F. SCHAEFER

BY: JOHN F. SCHAEFER, (P-19948)
ANDREW RIFKIN, (P-46147)

Attorneys for Plaintiff
380 North Old Woodward, Suite 320
Birmingham, Michigan 48009
(248) 642-6665

SOMMERS SCHWARTZ, P.C.
BY: SAM G. MORGAN, (P-36694)
Co-Counsel for Plaintiff
2000 Town Center, Suite 900
Southfield, Michigan 48075
(248) 355-0300

DYKEMA GOSSETT, PLLC

BY: DEBRA M. McCULLOCH, (P-31995)
Attorney for Defendant
39577 Woodward Avenue, Suite 300
Bloomfield Hills, Michigan 48304
(248) 203-0756

GIBSON DUNN & CRUTCHER, LLP
BY: EUGENE SCALIA
KARL G. NELSON
DAVID J. DEBOLD, (P-39278)
Co-Counsel for Defendant
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 955-8500

AFFIDAVIT OF JULIE ANN ROEHM

STATE OF Arkansas)
COUNTY OF Washington)ss.

Julie Ann Roehm, being first duly sworn, deposes and says as follows:

1. I make this Affidavit upon personal knowledge and state that the information specified below is true to the best of my knowledge, and if sworn as a witness, I would be competent to testify to same.

2. I was a citizen of the State of Michigan when I entered into the employment contract and Post Termination Agreement with Wal-Mart.

Case 2:07-cv-10168-LPZ-RSW Document 16 Filed 05/10/2007 Page 2 of 3

3. Along with my husband, I owned and lived in a home in Rochester Hills, Michigan at the time I accepted the job with Wal-Mart and entered into the employment contract and Post Termination Agreement. My husband and I put that home on the market for sale, listing it with a realtor, as we looked for and eventually purchased a home in Bentonville, Arkansas.

4. I commenced employment with Wal-Mart in Bentonville, Arkansas, on February 6, 2006.

5. In June 2006, after the school year was completed, my husband and our two children moved out of our Rochester Hills, Michigan home, and into our Bentonville, Arkansas home, with me.

6. My husband and I continue to own and (with our children) live in our home in Arkansas.

7. As is a common occurrence in Southeast Michigan, in 2006 and 2007, due to an extremely poor housing market (for sellers), our Rochester Hills home sits empty and has not yet sold.

8. Upon moving to Arkansas, I had no intention of remaining a citizen of Michigan or moving my family back to Michigan. I intended to stay in Arkansas as long as my employment with Wal-Mart continued, and I continue to live in my Arkansas as I search for new employment.

9. Upon moving to Arkansas, my minor children (grades 2 and Pre-K) were enrolled in school in the city of Fayetteville, Arkansas, where they continue to attend school.

10. Additionally, upon moving to Arkansas I purchased an automobile which is registered in Arkansas, as is our other family vehicle.

11. After moving to Arkansas, I registered to vote in Arkansas.

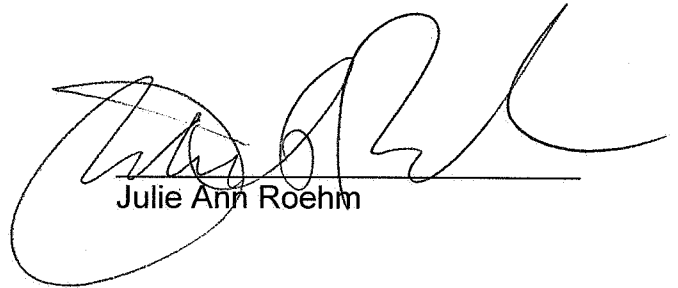
Case 2:07-cv-10168-LPZ-RSW Document 16 Filed 05/10/2007 Page 3 of 3

12. I joined a local Catholic Church parish in Arkansas.

13. My husband and I reported Arkansas as our home and State of residence on our 2006 Federal Income Tax returns.


14. Furthermore, I changed the billing address on all of my credit cards, insurance and other bills to my Arkansas home.

FURTHER AFFIANT SAYETH NOT.



Julie Ann Roehm

Subscribed and sworn to before
me this 20 day of April, 2007.



Notary Public
Washington County, State of Arkansas
My Commission Expires: Oct 18, 2015

CHRIS S. MITCHEL
Washington County
Notary Public - Arkansas
My Commission Expires Oct. 18, 2015