

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

MATTHEW E. KELLER,

Plaintiff,

-against-

ST. JOHN'S UNIVERSITY, RSC INSURANCE
BROKERAGE, INC., AETNA STUDENT HEALTH
AGENCY INC., AETNA LIFE INSURANCE CO.,

Defendants.

Index No.: 723071/2025

PLAINTIFF'S
AFFIDAVIT OF IN
SUPPORT OF ORDER
TO SHOW CAUSE WITH
TEMPORARY
RESTRAINING ORDER

MATTHEW E. KELLER, being duly sworn, deposes and says:

1. I am a law student currently enrolled in St. John's University (hereinafter referred to as St. John's) School of Law. I am fully familiar with all the facts and circumstances set forth herein. I have read the Complaint, the Order to Show Cause with Temporary Restraining Order, and Memorandum of Law in Support of Order to Show Cause.
2. I have taken many advanced mathematics courses, achieving a grade of A or A- in Calculus II, Introduction to Differential Equations, Multivariable Calculus and Matrix Algebra, and Engineering Probability (My undergraduate transcript has been attached hereto as Exhibit "H").
3. Before starting law school, I worked as a software engineer for 12 years at Google, LLC and other technology companies.

4. I am a registered Patent Agent with the USPTO (Reg #: 83,442).
5. In an attempt to address my concerns with St. John's, on Wednesday, July 16th, I met with Dr. Luis Manzo. Dr. Manzo is the Assistant Vice President for Student Wellness at St. John's. In the meeting, Dr. Manzo indicated that the "loss ratio" (i.e. the medical expenses incurred by the insurance company divided by the premiums) of the students for the voluntary group was 340%. I asked Dr. Manzo whether it was possible that that loss ratio was due to outliers but that it didn't reflect the experience of the typical student. He indicated that that was possible and that he would look into that.
6. In the July 16th meeting, Dr. Manzo acknowledged that he is aware of scenarios of particular students requiring medical care costing upwards of \$100,000.
7. In the July 16th meeting, Dr. Manzo indicated that the number of members in the group is approximately 120.
8. In the July 16th meeting, Dr. Manzo indicated that, had the groups not been split, the cost of the healthcare plan would have increased by approximately 10%.
9. On July 20th, I emailed Dr. Manzo requesting that he provide the distribution of loss ratios of students both in the resident group and the non-resident group.
10. On July 22nd, Dr. Manzo replied that he was unable to investigate outliers or provide the distribution of loss ratios.

Matthew E. Keller

Matthew E. Keller

Plaintiff

8/14/25



MICHELLE G. ENRIQUEZ

NOTARY PUBLIC-STATE OF NEW YORK

No. 01EN6195452

Qualified in Queens County

My Commission Expires 10-20-28