

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
HUNTINGTON DIVISION**

**CHRISTOPHER FAIN,  
SHAWN ANDERSON,**  
a/k/a Shauntae Anderson;  
individually and on behalf of all others  
similarly situated,

**Plaintiffs,**

**Civil Action No. 3:20-cv-00740  
Hon. Robert C. Chambers, Judge**

**v.**

**WILLIAM CROUCH**, in his official capacity as  
Cabinet Secretary of the West Virginia  
Department Of Health and Human Resources;  
**CYNTHIA BEANE**, in her official capacity as  
Commissioner for the West Virginia Bureau for  
Medical Services; and **WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN  
RESOURCES, BUREAU FOR MEDICAL  
SERVICES;**

**Defendants.**

**NOTICE OF VIDEOTAPED DEPOSITION OF PLAINTIFF  
SHAWN ANDERSON (A/K/A SHAUNTAE ANDERSON)**

PLEASE BE ADVISED that the undersigned counsel for Defendant West Virginia Department of Health and Human Resources, Bureau for Medical Services, will take the videotaped deposition of **Shawn Anderson, a/k/a Shauntae Anderson, Plaintiff**, on **April 22, 2022**, commencing at **10:00 a.m. (EST)** This deposition will be taken remotely via video teleconference offered by Elite Court Reporting, before a person authorized by law to administer oaths, and will continue from hour to hour until completed.

You are invited to appear to protect your interests.

**WILLIAM CROUCH,  
CYNTHIA BEANE, and  
WEST VIRGINIA DEPARTMENT OF  
HEALTH AND HUMAN RESOURCES,  
BUREAU FOR MEDICAL SERVICES,  
By counsel**

/s/ Lou Ann S. Cyrus

Lou Ann S. Cyrus, Esquire (WVSB #6558)

Roberta F. Green, Esquire (WVSB #6598)

Caleb B. David, Esquire (WVSB #12732)

Kimberly M. Bandy, Esquire (WVSB #10081)

SHUMAN MCCUSKEY SLICER PLLC

P.O. Box 3953

Charleston, WV 25339

(304) 345-1400; (304) 343-1826 (fax)

[lcyrus@shumanlaw.com](mailto:lcyrus@shumanlaw.com)

[rgreen@shumanlaw.com](mailto:rgreen@shumanlaw.com)

[cdavid@shumanlaw.com](mailto:cdavid@shumanlaw.com)

[kbandy@shumanlaw.com](mailto:kbandy@shumanlaw.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
HUNTINGTON DIVISION**

**CHRISTOPHER FAIN,  
SHAWN ANDERSON,**  
a/k/a Shauntae Anderson;  
individually and on behalf of all others  
similarly situated,

**Plaintiffs,**

**Civil Action No. 3:20-cv-00740  
Hon. Robert C. Chambers, Judge**

**v.**

**WILLIAM CROUCH**, in his official capacity as  
Cabinet Secretary of the West Virginia  
Department Of Health and Human Resources;  
**CYNTHIA BEANE**, in her official capacity as  
Commissioner for the West Virginia Bureau for  
Medical Services; and **WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN  
RESOURCES, BUREAU FOR MEDICAL  
SERVICES;**

**Defendants.**

**CERTIFICATE OF SERVICE**

Now come Defendants William Crouch, Cynthia Beane and West Virginia Department of Health and Human Resources, by counsel, and do hereby certify that on the 6<sup>th</sup> day of April, 2022, a true and exact copy of *Notice of Videotaped Deposition of Plaintiff Shawn Anderson, a/k/a Shauntae Anderson* was served on counsel via electronic means as follows:

Walt Auvil (WVSB#190)  
**Counsel for Plaintiffs**  
The Employment Law Center, PLLC  
1208 Market Street  
Parkersburg, WV 26101-4323  
(304) 485-3058  
(304) 485-6344 (fax)  
[auvil@theemploymentlawcenter.com](mailto:auvil@theemploymentlawcenter.com)

Anna P. Prakash, Visiting Attorney  
Nicole J. Schladt, Visiting Attorney  
**Counsel for Plaintiffs**  
Nichols Kaster, PLLP  
IDS Center, 80 South 8<sup>th</sup> Street  
Suite 4600  
Minneapolis, MN 55402  
(612) 256-3200  
(612) 338-4878 (fax)  
[aprakash@nka.com](mailto:aprakash@nka.com)  
[nschladt@nka.com](mailto:nschladt@nka.com)

Sasha Buchert, Visiting Attorney  
**Counsel for Plaintiffs**  
Lambda Legal Defense and Education Fund,  
Inc.  
1776 K Street, N.W., 8<sup>th</sup> Floor  
Washington, DC 20006-2304  
(202) 804-6245  
(202) 429-9574 (fax)  
[sbuchert@lambdalegal.org](mailto:sbuchert@lambdalegal.org)

Avatara Smith-Carrington, Visiting Attorney  
**Counsel for Plaintiffs**  
Lambda Legal Defense and Education Fund,  
Inc.  
3500 Oak Lawn Avenue, Suite 500  
Dallas Texas 75219-6722  
(214) 219-8585  
(214) 219-4455 (fax)  
[asmithcarrington@lambdalegal.org](mailto:asmithcarrington@lambdalegal.org)

Nora Huppert, Visiting Attorney  
65 E. Wacker Pl, Suite 2000  
Chicago, IL 60601  
**Counsel for Plaintiffs**  
(312) 663-4413  
(312) 663-4307  
[nhuppert@lambdalegal.org](mailto:nhuppert@lambdalegal.org)

Carl. S. Charles, Visiting Attorney  
**Counsel for Plaintiffs**  
Lambda Legal Defense and Education Fund,  
Inc.  
730 Peachtree Street NE, Suite 640  
Atlanta, GA 30308  
(470) 225-5341  
(404) 897-1884 (fax)  
[ccharles@lamdalegal.org](mailto:ccharles@lamdalegal.org)

Tara L. Borelli, Visiting Attorney  
**Counsel for Plaintiffs**  
Lambda Legal Defense and Education Fund,  
Inc.  
158 West Ponce De Leon Avenue, Suite 105  
Decatur, GA 30030  
[tborelli@lambdalegal.org](mailto:tborelli@lambdalegal.org)

/s/ Lou Ann S. Cyrus

Lou Ann S. Cyrus, Esquire (WVSB #6558)

Roberta F. Green, Esquire (WVSB #6598)

Caleb B. David, Esquire (WVSB #12732)

Kimberly M. Bandy, Esquire (WVSB #10081)

***Counsel for William Crouch, Cynthia Beane, and West Virginia Department of Health and Human Resources, Bureau for Medical Services***

SHUMAN MCCUSKEY SLICER PLLC

P.O. Box 3953

Charleston, WV 25339

(304) 345-1400; (304) 343-1826 (fax)

[lcyrus@shumanlaw.com](mailto:lcyrus@shumanlaw.com)

[rgreen@shumanlaw.com](mailto:rgreen@shumanlaw.com)

[cdavid@shumanlaw.com](mailto:cdavid@shumanlaw.com)

[kbandy@shumanlaw.com](mailto:kbandy@shumanlaw.com)