

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

C. P., by and through his parents, Patricia  
Pritchard and Nolle Pritchard; and  
PATRICIA PRITCHARD,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF ILLINOIS,

Defendant.

NO. 3:20-cv-06145-RJB

DECLARATION OF ELEANOR  
HAMBURGER IN SUPPORT OF  
PLAINTIFFS' RESPONSE TO BCBSIL'S  
MOTION TO SEAL MOTION TO  
COMPEL BRIEFING

**Note on Motion Calendar:**

- **BCBSIL's Motion to Seal: June 17, 2022**
- **Pltfs' Motion to Seal: June 24, 2022**

**Confidential Exhibit 1 Filed Under Seal  
Pursuant to Protective Order (Dkt. No. 25)**

I, Eleanor Hamburger, declare under penalty of perjury and in accordance with the laws of the United States and State of Washington that:

1. I am a partner at Sirianni Youtz Spoonemore Hamburger and am one of the attorneys for plaintiffs in this action.

2. The approximate number of enrollees in a particular ERISA health plan can be determined by reviewing the plan's Form 5500 filed with the U.S. Department of Labor. Additionally, the language of various summary plan descriptions is not



***C.P. v. Blue Cross Blue Shield of Illinois***  
**USDC (W.D. Wash.), No. 3:20-cv-06145-RJB**

**CONFIDENTIAL EXHIBIT**  
**Filed Under Seal**  
**Pursuant to Protective Order (Dkt. No. 25)**

**Exhibit 1**