

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' CONSOLIDATED CROSS-
MOTION FOR PARTIAL SUMMARY
JUDGMENT AND OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

**Note on Motion Calendar:
November 21, 2022 (see Dkt. No. 90)**

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

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

2. *Exhibits.* Attached are true and correct copies of the following documents, with underlining where appropriate for the Court's convenience:

Exhibit	Description	Date
1.	Excerpts of Zoom Video Deposition Upon Oral Examination of Telisa Drake (BCBSIL Rule 30(b)(6)) - CONFIDENTIAL	05/13/2022

Exhibit	Description	Date
2.	Excerpts of Summary Plan Description – Catholic Health Initiatives Medical Plan – Blue Cross Blue Shield Integrated	0/01/2017
3.	Letter from Kevin Hatfield, M.D. [Dkt. No. 38-9]	07/11/2019
4.	Letter from Sharon Booker, M.A., L.M.H.C.	07/24/2019
5.	Notes from Jeffrey Kylo, M.D.	04/30/2019
6.	Expert Report of Dr. Randi C. Ettner, Ph.D. – CONFIDENTIAL	04/04/2022
7.	Expert Report of Dr. Dan H. Karasic, M.D. – CONFIDENTIAL	04/04/2022
8.	Expert Report of Dr. Loren S. Schechter, M.D. – CONFIDENTIAL	04/02/2022
9.	E. Coleman, et al., (2022) <i>Standards of Care for the Health of Transgender and Gender Diverse People, Version 8</i> , International Journal of Transgender Health, 23:sup1, S1-S259, DOI: 10.1080/26895269.2022.2100644, accessed at: https://www.tandfonline.com/doi/pdf/10.1080/26895269.2022.2100644 (last visited 10/23/2022)	09/15/2022
10.	Excerpts of Zoom Video Deposition Upon Oral Examination of Kim Reed (BCBSIL Rule 30(b)(6)) – CONFIDENTIAL	06/02/2022
11.	Excerpts of Remote Videotaped Deposition Upon Oral Examination of Sharon Booker, MA, LMHC	05/06/2022
12.	Excerpts of Remote Videotaped Deposition Upon Oral Examination of Patricia Pritchard	03/11/2022
13.	Excerpts of Remote Videotaped Deposition Upon Oral Examination of Randi C. Ettner, Ph.D.	08/24/2022
14.	Excerpts of Remote Videotaped Deposition Upon Oral Examination of Dan H. Karasic, MD	07/13/2022

Exhibit	Description	Date
15.	Excerpts of Zoom Video Deposition Upon Oral Examination of Michael Laidlaw	09/02/2022
16.	Excerpts of Remote Videotaped Deposition Upon Oral Examination of Kevin Hatfield, M.D.	06/14/2022
17.	Excerpts of Zoom Video Deposition Upon Oral Examination of Mark Larson (BCBSIL Rule 30(b)(6))	06/02/2022
18.	Blake, Valarie K., <i>An Opening for Civil Rights in Health Insurance After the Affordable Care Act</i> , 36 B.C. J.L. & SOC. JUST. 235	06/2016
19.	Plaintiff's Answer to Defendant's Interrogatory No. 5	01/26/2022
20.	BCBSIL denial of second Vantas Implant	08/08/2019
21.	Voir dire Examination of Dr. Laidlaw taken in <i>Dekker, et al. v. Marstiller, et al.</i> , USDC (N.D. Florida), Case No. 4:22cv325	10/12/2022

DATED this 24th day of October, 2022, at Seattle, Washington.

/s/ Eleanor Hamburger

Eleanor Hamburger (WSBA #26478)
SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 Western Avenue, Suite 350
Seattle, WA 98121
Tel. (206) 223-0303; Fax (206) 223-0303
Email: ehamburger@sylaw.com

Attorneys for Plaintiffs