

HONORABLE JUDGE ROBERT J. BRYAN

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

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

Plaintiffs,

vs.

BLUE CROSS BLUE SHIELD OF  
ILLINOIS,

Defendant.

Case No. 3:20-cv-06145-RJB

**DECLARATION OF TELISA DRAKE IN  
SUPPORT OF BLUE CROSS BLUE  
SHIELD OF ILLINOIS’S SUPPLEMENTAL  
DECERTIFICATION BRIEF**

**NOTE ON MOTION CALENDAR:  
November 20, 2023**

Pursuant to 28 U.S.C. § 1746, I, Telisa Drake, hereby declare as follows:

1. I am a Senior Strategic Account Executive at Health Care Service Corporation, a Mutual Legal Reserve Company, which does business as Blue Cross Blue Shield of Illinois (“BCBSIL”). I have personal knowledge or knowledge based on records and information available to me of the facts contained in this declaration and, if called to testify in this matter, I could competently testify to each of the facts set forth herein.

2. CommonSpirit Health (formerly Catholic Health Initiatives) removed the exclusion relating to gender-affirming care in its plans as of July 1, 2023. The group no longer has any exclusion relating to gender-affirming care in its plans administered by BCBSIL.

\\ \ \

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

3. I declare, under penalty of perjury under the laws of the United States of America,  
that the foregoing is true and correct.

DATED this 6th day of November 2023, at Jacksonville, Illinois.

DocuSigned by:  
*Telisa Drake*  
798FC0B8400E4C7  
\_\_\_\_\_  
Telisa Drake

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below I electronically filed the foregoing, DECLARATION OF TELISA DRAKE IN SUPPORT OF BLUE CROSS BLUE SHIELD OF ILLINOIS’S SUPPLEMENTAL DECERTIFICATION BRIEF with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Eleanor Hamburger  
SIRIANNI YOUTZ SPOONEMORE HAMBURGER  
3101 WESTERN AVENUE STE 350  
SEATTLE, WA 98121  
206-223-0303  
Fax: 206-223-0246  
Email: ehamburger@sylaw.com

Jennifer C Pizer  
LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC.  
4221 WILSHIRE BLVD., STE 280  
LOS ANGELES, CA 90010  
213-382-7600  
Email: jpizer@lambdalegal.org

Omar Gonzalez-Pagan  
LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC. (NY)  
120 WALL STREET  
19TH FLOOR  
NEW YORK, NY 10005  
212-809-8585  
Email: ogonzalez-pagan@lambdalegal.org

DATED this November 8, 2023.

**Kilpatrick, Townsend & Stockton LLP**

By: /s/ Gwendolyn C. Payton  
Gwendolyn C. Payton, WSBA #26752  
gpayton@kilpatricktownsend.com

*Counsel for Defendant Health Care Service Corporation, a Mutual Legal Reserve Company, doing business in Illinois as Blue Cross and Blue Shield of Illinois*