

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

ANDREA SCHMITT; ELIZABETH
MOHUNDRO; and O.L. by and through
her parents, J.L. and K.L., each on their own
behalf, and on behalf of all similarly
situated individuals,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN
OF WASHINGTON; KAISER
FOUNDATION HEALTH PLAN OF
WASHINGTON OPTIONS, INC.; KAISER
FOUNDATION HEALTH PLAN OF THE
NORTHWEST; and KAISER
FOUNDATION HEALTH PLAN, INC.,

Defendants.

NO. 2:17-cv-01611-RSL

DECLARATION OF J. L. L.
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY JUDGMENT

I, J. L. L., declare:

1. I am over the age of 18 and competent to testify to all matters stated herein.

All statements are made upon my personal knowledge.

2. I am the mother of C. L. ("O.L.") She is a named plaintiff in the
above-captioned litigation. Currently, and at all times at least since April 17, 2019, O.L.
has been insured under a Kaiser Foundation Health Plan of Washington Options Inc.

DECLARATION OF J.L. IN SUPPORT OF PLAINTIFFS' - 1
MOTION FOR PARTIAL SUMMARY JUDGMENT
[Case No. 2:17-CV-1611-RSL]

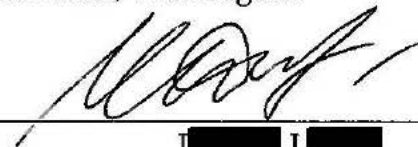
SIRIANNI YOUTZ
SPOONEMORE HAMBURGER PLLC
3101 WESTERN AVENUE, SUITE 350
SEATTLE, WASHINGTON 98121
TEL. (206) 223-0303 FAX (206) 223-0246

1 health plan. She received and continues to receive this coverage through my
2 employment at Richmark Label.

3 3. C [REDACTED] was recently evaluated by her audiologist at Seattle Children's
4 Hospital. The audiologist did not recommend treatment with over-the-counter hearing
5 aids. The audiologist recommended continued use of her current prescription hearing
6 aids.

7 I declare under penalty of perjury under the laws of the State of Washington and
8 the United States of America that the foregoing is true and correct.

9 DATED this 30 day of May, 2023, at Seattle, Washington.

10
11 
12 _____ J [REDACTED] L [REDACTED]
13
14
15
16
17
18
19
20
21
22
23
24
25
26