

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

**Note on Motion Calendar:  
October 6, 2023**

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. On or about August 16, 2023, Patricia Pritchard gave notice to her then-employer, St. Michael's Hospital, part of Catholic Health Initiatives and CommonSpirit Health. As a result, both Pritchard and C.P. terminated their participation in the CHI Plan administered by BCBSIL as of August 31, 2023.

3. Ms. Pritchard is now employed by the Kitsap School District. She and C.P. have health coverage through the Washington state School Employees Benefit Board, which covers gender affirming care. The new health coverage started as of September 1, 2023.

4. Class counsel informed BCBSIL counsel of this change on or about August 30, 2023 by email and subsequent telephone call. Class counsel also informed BCBSIL that they were aware of several class members impacted by the Exclusion and were seeking to identify if any were able and willing to be added if necessary.

5. On September 19, 2023, Class counsel informed BCBSIL counsel that they intended to move to amend the complaint to add Emmett Jones and S.L. as additional named plaintiffs. Two minutes later, BCBSIL's counsel responded that it would oppose the amendment.

DATED this 21st day of September, 2023, at Seattle, Washington.

/s/ Eleanor Hamburger

Eleanor Hamburger (WSBA #26478)  
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