

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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-1611-RSL

DECLARATION OF ELEANOR  
HAMBURGER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR LEAVE TO  
FILE FIFTH AMENDED COMPLAINT

**Note on Motion Calendar:  
April 14, 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 PLLC and am  
one of the attorneys for Plaintiffs in this action.

