

THE HONORABLE LAUREN KING

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PREMERA BLUE CROSS,

Plaintiff,

v.

GS LABS, LLC,

Defendant.

Case No. 2:21-cv-01399-LK

**DECLARATION OF CHRISTINE SEIFERT
IN SUPPORT OF PREMERA BLUE CROSS'S
MOTION FOR AN ORDER TO PRESERVE
EVIDENCE**

I, Christine Seifert, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am employed by Premera Blue Cross as the Director of Premera's Special Investigation Unit. The following is based on my firsthand knowledge, and if called to testify to it, I could do so competently.

2. Earlier this month, I visited two of GS Labs' Washington testing sites: the Bellevue location (520 112th Ave NE, Bellevue, WA 98004) and the Federal Way location (31823 Gateway Center Blvd S, Federal Way, WA 98003).

3. I visited the Bellevue location on October 7th. The site no longer looked to be in use and there was no GS Labs signage or advertising banners left at the location.

4. Another tenant of the building that housed the Bellevue testing site informed me that GS Labs had vacated the testing site roughly a week and a half earlier.

5. I visited the Federal Way location on October 8th. That site did still have up GS Labs signage, but there was a message taped to the site's entryway advising customers that the site was now closed.

