

EXHIBIT 22

RE: In re BANA California Unemployment Benefits Litig. - Meet and Confer re additional ESI custodians

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Fri 12/8/2023 3:21 PM

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Counsel,

In response to your request for additional custodians, please find below BANA's counterproposal for additional ESI collection. We believe that the below custodians are the most likely to possess non-duplicative, relevant ESI pertaining to the issues remaining in the case, and that the collection of any further ESI files would be unreasonable in light of the significant number of custodians and documents produced to date on each of the issues that you identified (and the time and expense that went into that). We further believe that the collection of additional custodians beyond those identified below would be unnecessary and duplicative in light of what BANA has already produced from ESI and non-ESI collections, and that it would be unduly burdensome and unlikely to lead to additional non-duplicative, relevant information pertaining to the issues in this case.

Topic	Custodian	Date Range	Search Terms
Fraud Filter	Christine Channels	3/1/2020 – 6/8/2021	Run modified search terms for RFPs 39, 40, 41, 44 and 45
	Jennifer Boussuge		
Claims Processing & Vendor Oversight	Renee Johnson	3/1/2020 – 12/31/2021	Run modified search terms for RFPs 33, 34, 35, 36, and 37, 39, 40, 41 and 66
Customer Service Call Centers	Scott Robbins	3/1/2020 – 12/31/2021	Run modified search terms for RFPs 61, 64, 65 and 66

We look forward to meeting and conferring on this topic and others with you on Monday.

Best,
Lindsay

Lindsay E. Hoyle



Goodwin Procter LLP