# Exhibit 175

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|---|---|
| **Subject:** | RE: In re BANA California Unemployment Litig. - Call center data |
| **Date:** | Friday, February 9, 2024 at 7:25:25 PM Pacific Standard Time |
| **From:** | Hoyle, Lindsay E |
| **To:** | Stacey Leyton, Connie Chan, Riffee, Matthew L, Brian Danitz, Michael Rubin, Karin B. Swope, Andrew F. Kirtley, Matthew Murray, Peter Luc, jtoomey |
| **CC:** | McGarry, James W, ychan@jonesday.com, Hefferon, Thomas M, Rose-Smith, Sabrina M, Stoll, Laura A, Haggans, Valerie A, Briggs, Michelle T, Brys, Laura, Colin Jones, Caroline Drysdale |
| **Attachments:** | image007.png, image001.png, image002.png, image003.png, image004.png, image005.png, image006.png |



Stacey,

We write to follow up regarding the remaining questions in your January 30, 2024 letter. With respect to your question regarding the Prepaid Fraud Call Center Data, the data produced at BANA_EDD_MDL-00694849 reflects the data that was housed on BANA's platform. From June 1, 2020 through May 12, 2021, a portion of the Fraud Call Center data was housed on a vendor's platform; this data is not included in BANA_EDD_MDL-00694849 as BANA does not have access to that platform and therefore cannot export that data into the form you requested. Beginning on May 13, 2021, all of the Fraud Call Center data was housed on BANA's platform, and is reflected in BANA_EDD_MDL-00694849. As for data between June 1, 2020 through May 12, 2021, for the portion of the Fraud Call Center housed on the vendor's platform, BANA received vendor reports reflecting the metrics for that portion of the Fraud Call Center, and those reports have been produced to you, as you note. BANA's production, taken together, is sufficient to show the metrics Plaintiffs have requested, and BANA is under no obligation to create new documents or conduct any further analysis.

As for data regarding "Average Abandonment Delay," we will produce to you shortly the data that is housed on BANA's platform. Data that was housed on a vendor platform (for a portion of the Fraud Call Center, as described above, and for the period prior to May 2022 for the Main Servicing Call Center) will not be included in BANA's report, but has been produced to you via the vendor reports BANA received, as you note.

Best,
Lindsay

**Lindsay E. Hoyle**

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**From:** Hoyle, Lindsay E
**Sent:** Tuesday, February 6, 2024 12:38 PM
**To:** 'Stacey Leyton' <sleyton@altshulerberzon.com>; Connie Chan <cchan@altshulerberzon.com>; Riffee, Matthew L <MRiffee@goodwinlaw.com>; Brian Danitz <BDanitz@cpmlegal.com>; Michael Rubin <mrubin@altshulerberzon.com>; Karin B. Swope <KSwope@cpmlegal.com>; Andrew F. Kirtley <AKirtley@cpmlegal.com>; Matthew Murray <mmurray@altshulerberzon.com>; Peter Luc <PLuc@cpmlegal.com>; jtoomey <jtoomey@cpmlegal.com>
**Cc:** McGarry, James W <JMcGarry@goodwinlaw.com>; ychan@jonesday.com; Hefferon, Thomas M <THefferon@goodwinlaw.com>; Rose-Smith, Sabrina M <SRoseSmith@goodwinlaw.com>; Stoll, Laura A <LStoll@goodwinlaw.com>; Haggans, Valerie A <VHaggans@goodwinlaw.com>; Briggs, Michelle T <MBriggs@goodwinlaw.com>; Brys, Laura <LBrys@goodwinlaw.com>; Colin Jones <cjones@altshulerberzon.com>; Caroline Drysdale <cdrysdale@altshulerberzon.com>
**Subject:** RE: In re BANA California Unemployment Litig. - Call center data

Stacey,

We write in response to your January 30, 2024 letter regarding call center data.

With respect to your question about the EDD Main Servicing Call Center, data from prior to May 1, 2022 was housed on the vendors' platforms. BANA does not have access to those platforms and therefore cannot export or pull that data into a single metrics report, as we did for data from May 2022 onwards, which is housed on BANA's own platform. At no point did we suggest that BANA "failed to receive or review reports" from its vendors; to the contrary, as you point out in your letter, we have produced those reports to you. BANA is not able to generate new reports of pre-May 2022 data for the EDD Main Servicing Call Center in any other format, nor is it under any obligation to do so.

We are looking into your remaining questions and will work to make a supplemental production, if needed, as soon as possible.

Best,
Lindsay

**Lindsay E. Hoyle**

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**From:** Stacey Leyton <sleyton@altshulerberzon.com>

**Sent:** Monday, February 5, 2024 8:57 PM
**To:** Connie Chan <cchan@altshulerberzon.com>; Riffee, Matthew L <MRiffee@goodwinlaw.com>; Brian Danitz <BDanitz@cpmlegal.com>; Michael Rubin <mrubin@altshulerberzon.com>; Karin B. Swope <KSwope@cpmlegal.com>; Andrew F. Kirtley <AKirtley@cpmlegal.com>; Matthew Murray <mmurray@altshulerberzon.com>; Peter Luc <PLuc@cpmlegal.com>; jtoomey <jtoomey@cpmlegal.com>
**Cc:** McGarry, James W <JMcGarry@goodwinlaw.com>; ychan@jonesday.com; Hefferon, Thomas M <THefferon@goodwinlaw.com>; Rose-Smith, Sabrina M <SRoseSmith@goodwinlaw.com>; Stoll, Laura A <LStoll@goodwinlaw.com>; Haggans, Valerie A <VHaggans@goodwinlaw.com>; Hoyle, Lindsay E <LHoyle@goodwinlaw.com>; Briggs, Michelle T <MBriggs@goodwinlaw.com>; Brys, Laura <LBrys@goodwinlaw.com>; Colin Jones <cjones@altshulerberzon.com>; Caroline Drysdale <cdrysdale@altshulerberzon.com>
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***EXTERNAL***
Counsel,

Our correspondence asked for a response on the discovery deficiencies identified in this letter before today. As you know, we have a 30b6 deposition on these subjects coming up in just over two weeks, and we need time to analyze the missing data. Can you please let us know whether you will be producing the missing documents and if so whether you will be able to do so by February 9?

Thank you,
Stacey

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**From:** Stacey Leyton
**Sent:** Wednesday, January 31, 2024 9:20 AM
**To:** Connie Chan <cchan@altshulerberzon.com>; Riffee, Matthew L <MRiffee@goodwinlaw.com>; Brian Danitz <BDanitz@cpmlegal.com>; Michael Rubin <mrubin@altshulerberzon.com>; Karin B. Swope <KSwope@cpmlegal.com>; Andrew F. Kirtley <AKirtley@cpmlegal.com>; Matthew Murray <mmurray@altshulerberzon.com>; Peter Luc <PLuc@cpmlegal.com>; jtoomey <jtoomey@cpmlegal.com>
**Cc:** McGarry, James W <JMcGarry@goodwinlaw.com>; ychan@jonesday.com; Hefferon, Thomas M <THefferon@goodwinlaw.com>; Rose-Smith, Sabrina M <SRoseSmith@goodwinlaw.com>; Stoll, Laura A <LStoll@goodwinlaw.com>; Haggans, Valerie A <VHaggans@goodwinlaw.com>; Hoyle, Lindsay E <LHoyle@goodwinlaw.com>; Briggs, Michelle T <MBriggs@goodwinlaw.com>; Brys, Laura <LBrys@goodwinlaw.com>; Colin Jones <cjones@altshulerberzon.com>; Caroline Drysdale <cdrysdale@altshulerberzon.com>
**Subject:** In re BANA California Unemployment Litig. - Call center data

Counsel,

Please see the attached correspondence.

Thank you,
Stacey

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