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16 *Co-Lead Counsel for Plaintiffs and the Proposed Class*
17 *(Additional Counsel Listed Below)*

18 **UNITED STATES DISTRICT COURT**
19 **SOUTHERN DISTRICT OF CALIFORNIA**
20 **SAN DIEGO DIVISION**

21 **IN RE BANK OF AMERICA**
22 **CALIFORNIA UNEMPLOYMENT**
23 **BENEFITS LITIGATION**

Case No. 3:21-md-02992-LAB-MSB

JOINT MOTION TO ENTER
PROTECTIVE ORDER

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This Document Relates to All Actions

1 The parties respectfully request that the Court enter the stipulated protective
2 order submitted herewith as **Exhibit A** to protect confidential records from public
3 disclosure.

4 IT IS SO STIPULATED.

5 **COTCHETT, PITRE & MCCARTHY, LLP**

6
7 Dated: September 24, 2021 By: /s/ Brian Danitz
8 JOSEPH W. COTCHETT
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14 *Proposed Class*

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17 Dated: September 24, 2021 By: /s/ Michael Rubin
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26 Dated: September 24, 2021 By: /s/ Yvonne W. Chan
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1 Dated: September 24, 2021

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3 By: /s/ Arlene R. Yang

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6 *Counsel for Defendant Bank of America, N.A.*

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I, Brian Danitz, hereby certify that the content of this document is acceptable to all the signatories herein and that I have obtained counsel's authorization to affix their electronic signatures to this document.

/s/ Brian Danitz

BRIAN DANITZ