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6 Attorneys for Defendant
7 BANK OF AMERICA, N.A.
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10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA –**
12 **SAN DIEGO DIVISION**

13 IN RE: BANK OF AMERICA
14 CALIFORNIA UNEMPLOYMENT
15 BENEFITS LITIGATION
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Case No. 21-MD-02992-LAB-MSB

**DECLARATION OF SHANE
DANIELS IN SUPPORT OF
DEFENDANT BANK OF
AMERICA, N.A.’S MOTION TO
DISMISS MASTER
CONSOLIDATED COMPLAINT
PURSUANT TO FED. R. CIV. P.
12(B)(1) AND 12(B)(6)**

Date: January 10, 2022
Time: 11:30 a.m.
Ctrm: 14A – 14th Floor
Judge: Hon. Larry Alan Burns

Filed/Lodged Concurrently with:

1. Notice of Motion & Motion
2. Memorandum
3. Request for Judicial Notice
4. Declaration of Robert Chestnut
5. [Proposed] Order

1
2 I, Shane Daniels, declare as follows:

3 1. I am employed by Bank of America, N.A. (“BANA”) as a Senior Vice
4 President, Business Executive Operations for Claims Administration. I make this
5 declaration based upon personal knowledge and belief, upon BANA’s records
6 maintained in the ordinary course and scope of business, and upon information
7 gathered from other BANA employees. If called to testify as to any of the matters
8 set forth in this declaration, I could and would competently testify thereto.

9 2. In my capacity as Senior Vice President, Business Executive Operations
10 for Claims Administration, I am familiar with BANA’s practices for handling and
11 investigating claims made by cardholders with debit cards issued by BANA for the
12 California Employment Development Department (“EDD”). As part of my
13 responsibilities, I routinely review and analyze account level files and claim records
14 for EDD cards.

15 3. I have reviewed BANA’s claim records for a number of Plaintiffs in this
16 case. These records reflect that those claims have been fully paid for the following
17 individual Plaintiffs:

- 18 a. Jennifer Meza
19 b. Stanley Robinson
20 c. Alex Yuan
21 d. Jory Zoelle
22 e. Audrey Grant
23 f. Brian Jones
24 g. Courtney Alvarez
25 h. Crystal Horath
26 i. Daniel Byrn
27 j. David Vasquez
28 k. Derrick Jabara

1 l. Heather Morris
2 m. Idemudia John
3 n. Janette Mouck
4 o. Jason Turnbull
5 p. Jonathan Aguirre
6 q. Jonathan Sparks
7 r. Jordan Aders
8 s. Joseph Friend
9 t. Joseph Magallan
10 u. Juan Valenzuela
11 v. Lacey Wise
12 w. Lizet Gonzalez
13 x. Lyndsey Gutchner
14 y. Manuel Villagomez
15 z. Marcus De Hoyos
16 aa. Monica Garcia
17 bb. Philip Chavez
18 cc. Randle Posten
19 dd. Rebekah Anderson
20 ee. Sara Morales
21 ff. Shant Hakopian
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23 I declare under the penalty of perjury that the foregoing is true and correct.

24 Executed on this 1st day of October, 2021.

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26
27 By: s/ Shane Daniels
28 SHANE DANIELS

