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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

IN RE: BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION

Case No.: 21-md-2992-LAB-MSB

**JOINT MOTION TO EXTEND
DATE FOR PLAINTIFFS TO FILE
AMENDED MASTER
CONSOLIDATED COMPLAINT
FOLLOWING RULING ON
MOTION TO DISMISS**

1 Plaintiffs in this Multidistrict Litigation (“MDL”), by and through their attorneys,
2 and Bank of America, N.A. (“BANA”), by and through its attorneys (collectively, the
3 “Parties”), hereby stipulate and jointly move to extend the deadline for Plaintiffs to file
4 their Amended Master Consolidated Complaint as follows:

5 **WHEREAS**, this MDL was established by the Judicial Panel on Multidistrict
6 Litigation by Order of June 4, 2021. (Dkt. 1).

7 **WHEREAS**, on August 17, 2021, Plaintiffs filed their Master Consolidated
8 Complaint (MCC). (Dkt. 72).

9 **WHEREAS**, on October 21, 2021, BANA filed a Motion to Dismiss Plaintiffs’
10 MCC in its entirety. (Dkt. 84).

11 **WHEREAS**, on May 25, 2023, the Court DENIED in part and GRANTED in part
12 BANA’s Motion to Dismiss with leave to amend certain of Plaintiffs’ claims. (Dkt. 126).

13 **WHEREAS**, the Parties have agreed that the deadline for Plaintiffs to file their
14 Amended MCC shall be extended one week, from June 6, 2023, to June 13, 2023.

15 **IT IS HEREBY STIPULATED AND AGREED**, subject to the approval of the
16 Court, that:

- 17 1. Plaintiffs’ deadline to file their Amended Master Consolidated Complaint in
18 response to the Court’s Order on BANA’s Motion to Dismiss (Dkt. 126) is
19 hereby extended from June 6, 2023, to June 13, 2023.

20 Dated: June 2, 2023

Respectfully submitted,

21 **CASEY GERRY SCHENK FRANCAVILLA**
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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures manual, I hereby certify that the content of this document is acceptable to counsel for defendant Bank of America N.A., and that I have obtained authorization to affix Bank of America N.A.'s counsel's electronic signature to this document.

/s/ Gayle M. Blatt
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