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7 [ADDITIONAL COUNSEL LISTED IN SIGNATURE BLOCK]

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA -**
10 **SAN DIEGO DIVISION**

11
12 IN RE: BANK OF AMERICA
13 CALIFORNIA UNEMPLOYMENT
14 BENEFITS LITIGATION

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

**JOINT MOTION TO EXTEND
TIME FOR BANA TO RESPOND
TO THE FIRST AMENDED
MASTER CONSOLIDATED
COMPLAINT**

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JOINT MOTION TO EXTEND TIME
FOR BANA TO RESPOND TO THE
FAMCC

CASE No. 21-MD-02992-LAB-MSB

1 Bank of America, N.A. (“BANA”) and Plaintiffs in this Multidistrict
2 Litigation (“MDL”), by and through their attorneys, (collectively, the “Parties”),
3 hereby stipulate and jointly move to extend the deadline for BANA to respond to the
4 First Amended Master Consolidated Complaint (the “FAMCC”) 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
10 Plaintiffs’ MCC in its entirety. (Dkt. 84).

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

14 WHEREAS, Plaintiffs filed their FAMCC on June 13, 2022 (Dkt. 136) after
15 the Parties agreed to extend the original deadline by one week (Dkt. 132).

16 WHEREAS, BANA has requested to extend the deadline for BANA to file its
17 response to the FAMCC by two weeks, from June 27, 2023, to July 11, 2023, and
18 Plaintiffs do not oppose BANA’s request.

19 IT IS HEREBY STIPULATED AND AGREED, subject to the approval of
20 the Court, that:

21 1. BANA’s deadline to file its response to the FAMCC is hereby extended
22 from June 27, 2023, July 11, 2023.

1 Dated: June 22, 2023

Respectfully submitted,

3 By: s/ James W. McGarry
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ATTESTATION OF E-FILED SIGNATURE

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I, James W. McGarry, 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/ James W. McGarry
James W. McGarry

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the clerk of the court for the United States District Court for the Southern District of California by using the CM/ECF system on June 22, 2023. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. I certify under penalty of perjury that the foregoing is true and correct.

Executed: June 22, 2023

s/ James W. McGarry