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

**IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION**

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

**INDEX OF EXHIBITS TO
DECLARATION OF CONNIE K.
CHAN IN SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL ADDITIONAL ESI
CUSTODIANS**

This Document Relates to All Actions

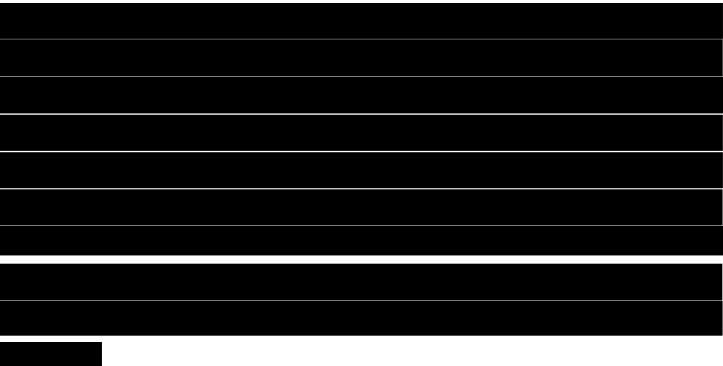
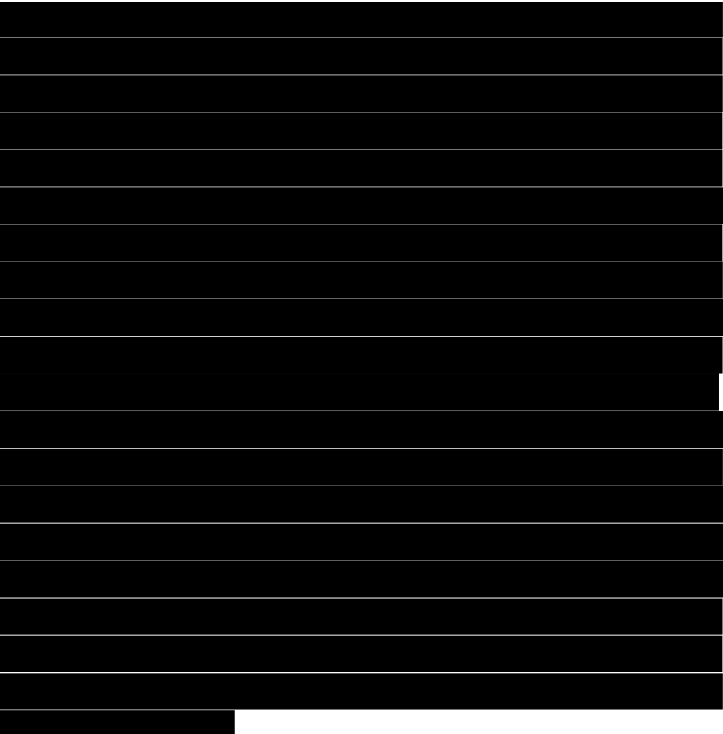
Judge: Hon. Larry Alan Burns

**REDACTED VERSION FOR PUBLIC
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**INDEX OF EXHIBITS TO DECLARATION OF CONNIE K. CHAN IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL ADDITIONAL ESI
CUSTODIANS**

Ex.	Beginning Bates Number	Document Description	Confid. Desig.
1	BANA_EDD_ MDL-00106092	[REDACTED]	CONF.
2	BANA_EDD_ MDL-00106573	[REDACTED]	CONF.
3	BANA_EDD_ MDL-00118366	[REDACTED]	CONF.
4	BANA_EDD_ MDL-00118379	[REDACTED]	CONF.

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5	BANA_EDD_ MDL-00141860		CONF.
6	BANA_EDD_ MDL-00188970		CONF.
7	BANA_EDD_ MDL-00293818		CONF.
8	BANA EDD		CONF.

1		MDL-00376191	[REDACTED]	
2	9	BANA_EDD_ MDL-00389408	[REDACTED]	CONF.
3	10	BANA_EDD_ MDL-00516000	[REDACTED]	CONF.
4			[REDACTED]	
5			[REDACTED]	
6	11	BANA_EDD_ MDL-00516010	[REDACTED]	CONF.
7			[REDACTED]	
8			[REDACTED]	
9			[REDACTED]	
10			[REDACTED]	
11			[REDACTED]	
12	12	BANA_EDD_ MDL-00516058	[REDACTED]	CONF.
13			[REDACTED]	
14	13	BANA_EDD_ MDL-00571044	[REDACTED]	CONF.
15			[REDACTED]	
16			[REDACTED]	
17			[REDACTED]	
18	14	BANA_EDD_ MDL-00171972	[REDACTED]	CONF.
19			[REDACTED]	
20			[REDACTED]	
21			[REDACTED]	
22			[REDACTED]	
23			[REDACTED]	
24			[REDACTED]	
25	15	BANA_EDD_ MDL-00105556	[REDACTED]	CONF.
26			[REDACTED]	
27			[REDACTED]	
28			[REDACTED]	

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2	16	BANA_EDD_ MDL-00090683	CONF.
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12	17	BANA_EDD_ MDL-00018423	CONF.
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14	18		CONF.
15		Bank of America's Responses and Objections to Plaintiffs' Interrogatories 11-13, and Verification	
16	19	Bank's production cover letter dated 10/20/23 describing documents Bates-stamped BANA_EDD_MDL-00057837-78 as identifying "the relevant Prepaid organizational structure and reporting lines," including "the groups that had a relevant role with respect to BANA's EDD prepaid debit card accounts," and "the reporting lines up to the highest level executives responsible for overseeing each relevant group."	
17	20	Excerpts from BANA_EDD_ MDL- 00057837-78	CONF.
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28	21		Bank of America's Responses and Objections to

		Plaintiffs’ Requests for Production of Documents (Set Three), RFPs 76-79	
22		12/8/23 E-mail from Bank’s counsel to Plaintiffs’ counsel proposing Channels, Boussuge, Johnson , and Robbins as additional ESI custodians because they are “the most likely to possess non-duplicative, relevant ESI pertaining to the issues remaining in the case[.]”	
23		12/15/23 E-mail from Bank’s counsel to Plaintiffs’ counsel following the parties’ meet-and-confer, setting forth the Bank’s “revised counterproposal for additional ESI custodians” and identifying eight additional custodians, including Blasi .	