

EXHIBIT 19



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Re: In re Bank of America California Unemployment Benefits Litigation, 3:21-md-02992-LAB-MSB, Prepaid Organizational Structure

Counsel:

I write on behalf of Defendant Bank of America, N.A. ("Defendant" or "BANA") in response to Plaintiffs' October 4, 2023 Notice of Deposition and pursuant to the Parties' agreement during the October 6, 2023 status conference that BANA would provide an expedited written response in lieu of a deposition setting forth the organizational structure of BANA's prepaid program from 2020 to 2022. The Parties agreed that this approach enabled BANA to provide Plaintiffs with the relevant Prepaid organizational structure and reporting lines in the most comprehensive and efficient manner possible. Accordingly, as agreed at the October 6 conference, BANA's enclosed response identifies:

- the groups that had a relevant role with respect to BANA's EDD prepaid debit card accounts as of January 2020, January 2021, and under the new Prepaid structure starting in January 2022;
- the role and responsibilities of each relevant group during the 2020 to 2022 time period;
- the managers and executives and the reporting lines within each relevant group as of January 2020, January 2021, and under the new Prepaid structure starting in January 2022;



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- the relevant contractor(s) that each relevant group oversaw, if any, and who the contractor agents reported to; and
- the reporting lines up to the highest level executives responsible for overseeing each relevant group as of January 2020, January 2021, and under the new Prepaid structure starting in January 2022.

The enclosed response has been designated Confidential pursuant to the Stipulated Protective Order (the "Protective Order") entered by the Court on September 24, 2021 (ECF No. 82). Consistent with our representations on our meet and confers, we will make ourselves available for further meet-and-confer discussions regarding BANA's prepaid organizational structure to address any follow-up questions.

Sincerely,

/s/ Matthew L. Riffie

Matthew L. Riffie