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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-GPC-MSB

**DECLARATION OF CONNIE K.
CHAN IN SUPPORT OF JOINT
MOTION TO EXTEND
CASE SCHEDULE**

This Document Relates to All Actions

Judge: Hon. Gonzalo P. Curiel

DECLARATION OF CONNIE K. CHAN

I, Connie K. Chan, hereby declare as follows:

1. I am a partner at the law firm of Altshuler Berzon LLP, co-lead counsel for Plaintiffs and the putative class in this action. I submit this declaration in support of the parties' Joint Motion to Extend the Case Schedule. I have personal knowledge of the facts set forth in this declaration and if called as a witness in this action, I could and would testify competently to these facts.

2. Because the Court has not yet ruled on Plaintiffs' Motion for Reconsideration of Dismissal with Prejudice of the UCL Claim (ECF 151), Plaintiffs do not know whether the UCL claim is a live claim in this case properly addressed in their forthcoming motion for class certification. Similarly, because the Bank has not yet filed its Answer, Plaintiffs do not yet know what affirmative defenses the Bank will assert and therefore cannot address any such affirmative defenses in their class certification motion.

3. The parties have met and conferred and agree the proposed case schedule set forth in their Joint Motion is fair, reasonable, and supported by good cause.

4. I declare under penalty of perjury that that the foregoing is true and correct.

Executed this 3rd day of May, 2024 in Burlingame, California.

/s/ Connie K. Chan

Connie K. Chan