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16 *Interim Co-Lead Counsel for Plaintiffs and the Proposed Class*

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

19 **IN RE BANK OF AMERICA**
20 **CALIFORNIA UNEMPLOYMENT**
21 **BENEFITS LITIGATION**

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

Related Case No. 3:21-cv-01084-GPC-MSB

**DECLARATION OF BRIAN
DANITZ IN SUPPORT OF JOINT
MOTION FOR SUBSTITUTION
OF COUNSEL FOR PLAINTIFF
BRIAN WIGGINS**

22
23 This Document Relates to All Actions

Judge: Hon. Gonzalo P. Curiel
Crtm: 2D (2nd Floor)

1 I, **BRIAN DANITZ**, declare as follows:

2 1. I am a partner with the law firm of Cotchett, Pitre & McCarthy, LLP,
3 Co-Lead Counsel for Plaintiffs and the Proposed Class in this action. I submit this
4 declaration in support of Plaintiff's Motion for Substitution of Counsel for Plaintiff
5 Brian Wiggins. I make this declaration of my own personal knowledge and, if
6 called to testify as a witness, could and would testify competently to the matters
7 stated herein.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of the fully
9 executed Substitution of Attorney for Plaintiff Brian Wiggins.

10 3. As required by S.D. Cal. Civ. L.R. 83.3 (f) (2), the attached **Exhibit A**
11 sets forth the appointment of another attorney by written substitution of attorney
12 signed by the party, the attorney ceasing to act, and the newly appointed attorney.

13
14 I declare, under penalty of perjury, that the foregoing is true and correct.
15 Executed this 13th day of August 2024 at Burlingame, California.

16
17 /s/ Brian Danitz
18 BRIAN DANITZ
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Exhibit A

1 JOSEPH W. COTCHETT (SBN 36324)
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18 *Interim Co-Lead Counsel for Plaintiffs and the Proposed Class*

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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

Related Case No. 3:21-cv-01084-GPC-MSB

**SUBSTITUTION OF ATTORNEY
FOR PLAINTIFF BRIAN WIGGINS**

This Document Relates to All Actions

Judge: Hon. Gonzalo P. Curiel

TO: The Clerk of the Court and to All Parties and Counsel of Record:

Notice is hereby given that, subject to approval by the court, Plaintiff Brian Wiggins substitutes Cotchett, Pitre & McCarthy, LLP as counsel of record in place of James V. Nolan of Gardner, Janes, Nakken, Hugo & Nolan.

Plaintiff's new substituted counsel in the above-referenced matter on whom all notices and papers shall be served is:

Joseph W. Cotchett (SBN 36324)
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Brian Danitz (SBN 247403)
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Telephone: (650) 697-6000
Fax: (650) 697-0577

I consent to this substitution.

Dated: June 29, 2024

By:



Plaintiff Brian Wiggins

I consent to this substitution.

COTCHETT, PITRE & McCARTHY, LLP

Dated: July 8, 2024

By:

/s/ Brian Danitz

JOSEPH W. COTCHETT
BRIAN DANITZ
KARIN B. SWOPE
ANDREW F. KIRTLEY
BLAIR V. KITTLE
VASTI S. MONTIEL

1 I consent to this substitution.

**GARDNER, JANES, NAKKEN, HUGO &
NOLAN LAWYERS**

2
3 Dated: July 8, 2024

By: /s/ James V. Nolan

JAMES V. NOLAN
CHRISTOPHER R. HUGO
ROBERT P. NAKKEN
DAVID W. JANES