Exhibit 11

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 VANESSA RIVERA IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**
This Document Relates to All Actions	Judge: Hon. Gonzalo P. Curiel

I, VANESSA RIVERA, declare as follows:

1. I am one of the named Plaintiffs in this case. I submit this declaration in support of Plaintiffs' Motion for Class Certification. I have personal knowledge of the facts in this declaration, to which I could and would testify if called upon to do so.

2. In January 2020 and from April 2020 to August 2021, I received EDD unemployment insurance benefits that were paid through a Bank of America EDD debit card ("EDD debit card") that was directly linked to a Bank of America EDD debit card account ("EDD debit card account") in my name.

3. My Bank of America EDD debit card had a magnetic stripe. There was no EMV chip in the card.

4. On January 29, 2021, I got a text notification that the balance on my EDD debit card account was $4.17. This was a shock because I knew I should have had over $800 remaining in the account. I immediately logged into my EDD debit card account to see if there had been a mistake and found that someone had conducted a balance inquiry from an ATM in New Port Beach, CA, about an hour away from where I live, and then withdrew $800.

5. After checking my EDD debit card account, I called the Bank of America (the "Bank") customer service number to report these unauthorized transactions and to ask the Bank to credit my EDD debit card account for the $800 that was stolen from me.

6. When I finally reached the Bank, the first Bank representative transferred me to another department. From there, I spoke with a second Bank representative and made a claim concerning the unauthorized ATM withdrawal totaling $800. I explained to the Bank representative that I did not make or authorize the $800 withdrawal, and I had never given or disclosed the PIN for my EDD debit card to anyone, had never authorized anyone to use my EDD debit card, and was not in Newport Beach, CA on the day of the unauthorized withdrawal. The Bank representative I spoke with provided me with a claim number and I understood that the claim would be investigated.

7. On February 4, 2021, I called the Bank again and was told that the representative I had spoken with on January 29 never actually submitted a claim—that person had just put a "note" in my account and sent me a new card. Consequently, the February 4 representative informed me that she had successfully submitted my fraud claim for investigation.

8. The Bank mailed me a letter dated February 5, 2021, just one business day after the Bank representative had confirmed my unauthorized transaction claim was successfully submitted, informing me that it had closed my claim and would not be reimbursing me for the $800 taken from my account. The letter provided no explanation of the Bank's findings or decision, stating only: "Your claim has been closed because we believe the account or the claim have been the subject of fraud or suspicious activity."

9. On February 6, 2021, I received a replacement card in the mail. When I tried activating my card online, the Bank's website indicated I was not allowed to access my account. I then called the number on the back of the card to activate it and a Bank representative told me that my account had been frozen due to suspicious activity and fraudulent charges. The Bank did not provide me with any notice before freezing my account that my account would be frozen.

10. My EDD debit card account remained frozen for 41 days, from February 5, 2021, to March 18, 2021. During that period, I could not access any of the EDD benefits that were in my account as of the time of the freeze, and I could not receive or access any new periodic EDD benefits payments that I would have received and would have been able to use if the Bank had not frozen my account. I called the Bank repeatedly, informed it that I had verified my identity with EDD, expressed the extreme hardship this account freeze put me in, and received conflicting information from Bank representatives about what I could do to get the Bank to unfreeze my account. Through documents concerning my EDD debit card account that the Bank produced in this litigation, I later learned that on March 18, 2021, the Bank converted my account status from frozen to blocked and I

was still not able to access any of the EDD benefits that were in my account. The Bank finally unblocked my account on April 20, 2021, after I had filed this litigation.

11. On June 21, 2021, after the Consolidated Class Action Complaint was filed and 140 days after I submitted my unauthorized transaction claim to the Bank, the Bank finally credited to my EDD debit card account the $800 that had been stolen from me in January.

12. In this case, I seek to be appointed as a class representative.

13. Since becoming involved in this case, I have had many communications with my attorneys regarding discovery, case updates, case filings, and other matters. I have searched for and produced documents, responded to written discovery requests, and verified my responses. I was deposed by the Bank's attorneys in February 2024. I intend to continue working with my attorneys. If appointed by the Court as a class representative, I intend to continue to pursue this case by, among other things, reviewing important case filings, participating in the discovery and trial process, staying informed, and participating in discussions with my attorneys regarding significant developments in the case. I am committed to working with my attorneys to obtain the best possible result for the class consistent with good faith and sound judgment.

14. I understand that if I am appointed as a class representative, I will be responsible for overseeing the prosecution of this case by my attorneys. My interests in this matter are consistent with, and not antagonistic to, the interests of the members of each of the classes that I seek to represent. I understand and will fulfill the duties of a class representative, including the duties to prosecute this case on behalf of each class as a whole, and to consider the interests of each class as a whole just as I consider my own interests.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 07, 2024, at Rancho Cucamonga, California.

Vanessa Rivera (Aug 7, 2024 09:51 PDT)

VANESSA RIVERA