Exhibit 21

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Co-Lead Counsel for Plaintiffs
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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**
This Document Relates to All Actions	**PLAINTIFFS' REVISED NOTICE OF DEPOSITION OF DEFENDANT BANK OF AMERICA, N.A. PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), Plaintiffs, by and through undersigned counsel, will take the deposition of Defendant Bank of America, N.A. ("Defendant" or "BofA"). The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Pursuant to Federal Rule of Civil Procedure Rule 30(b)(6), Defendant is hereby notified of its duty to designate one or more officers, directors, managing agents or other persons most knowledgeable or qualified to testify on its behalf concerning the topics identified in Schedule A, attached. Plaintiffs request that BofA provide written notice at least five (5) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on BofA's behalf and, as to each individual designated to testify with respect to fewer than all of the designated topics, of the specific topics to which such individual(s) have been designated to testify.

BofA has designated the following individuals to testify on its behalf, and the parties have agreed to the following dates and locations:

Designee	**Date**	**Location**
Shane Daniels	Feb. 6, 2024 9:00 AM	Offices of Jones Day 2727 North Harwood Street, Suite 500 Dallas, Texas 75201
Bobby Chestnut	Feb. 8, 2024 9:00 AM	Offices of Jones Day 2727 North Harwood Street, Suite 500 Dallas, Texas 75201
Matt Martin	Feb. 14, 2024 9:00 AM	Offices of Jones Day 1221 Peachtree Street, N.E., Suite 400 Atlanta, Georgia 30361
Mike Letson	Feb. 16, 2024 9:00 AM	Charlotte, NC (exact location TBD)
Bill Golden	Feb. 22, 2024 9:00 AM	Offices of Goodwin Procter The New York Times Building, 620 Eighth Avenue

		New York, New York 10018
Jenn Lennon	Feb. 23, 2024 9:00 AM	Offices of Goodwin Procter 601 South Figueroa Street, Suite 4100 Los Angeles, California 90017

Plaintiffs intend and reserve the right to record the deposition testimony of the person(s) designed to testify on BofA's behalf by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial. Plaintiffs further reserve the right to notice and conduct additional Rule 30(b)(6) depositions of Defendant on non-duplicative topics.

Dated: February 4, 2024

COTCHETT, PITRE & McCARTHY, LLP

By: *__/s/ Brian Danitz__*
JOSEPH W. COTCHETT
BRIAN DANITZ
KARIN B. SWOPE
ANDREW F. KIRTLEY

Dated: February 4, 2024

ALTSHULER BERZON LLP

By: *__/s/ Michael Rubin__*
MICHAEL RUBIN
STACEY M. LEYTON
MATTHEW MURRAY
CONNIE K. CHAN
CHRISTINE M. SALAZAR
Co-Lead Counsel for Plaintiffs and the Proposed Class

SCHEDULE A

MATTERS FOR TESTIMONY

In accordance with Federal Rule of Civil Procedure 30(b)(6), Plaintiffs designate the topics identified below for examination. In construing these topics, all terms shall be construed to encompass as broad a range of information as permitted under the Federal Rules of Civil Procedure. For purposes of this notice, the person(s) designated to testify on BofA's behalf shall be prepared to address the following topics. Unless otherwise stated, the relevant period encompassed by these topics is June 2019 through December 2022.

1. BofA's decisions and analyses considered from 2014 to the present regarding whether to include EMV chips on its EDD debit cards and on its other BofA-issued credit and debit cards.
2. BofA's information, knowledge, and analyses concerning the rate and risk of card-present transaction fraud and/or card skimming for EDD debit cardholders compared to BofA's other customers with BofA-issued credit and debit cards containing an EMV chip.
3. BofA's information and knowledge concerning fraudulent unauthorized-transaction claims, and the rates and extent of such fraudulent unauthorized-transaction claims, submitted by EDD debit cardholders and other BofA-issued credit and debit card accounts.
4. BofA's policies, procedures, methodologies, and standards for developing and implementing tools and strategies for identifying fraudulent unauthorized-transaction claims.
5. BofA's policies, procedures, methodologies, and standards for developing and implementing tools and strategies for identifying fraudulent accounts.
6. BofA's policies, procedures, methodologies, and standards for developing and implementing tools and strategies for identifying suspicious transactions.

7. BofA's policies and procedures for identifying, blocking, and/or alerting EDD debit cardholders of suspicious transactions before the transaction is completed.

8. BofA's policies and procedures for handling unauthorized-transaction claims submitted by EDD debit cardholders.

9. [REVISED] Any differences between BofA's policies and procedures for handling unauthorized-transaction claims submitted by EDD debit cardholders and BofA's policies and procedure for handling unauthorized-transaction claims submitted by BofA's California customers with BofA-issued debit cards that are not EDD debit cards.

10. BofA's Claim Fraud Filter, including:

a. BofA's development, assessment, validation, and implementation of its Claim Fraud Filter, including information concerning which person(s) participated in BofA's decision to use the Claim Fraud Filter and why BofA used and continued to use the Claim Fraud Filter.

b. [REVISED] Whether BofA took any steps to obtain approval from BofA's regulators for its use of the Claim Fraud Filter and whether it obtained approval from BofA's regulators for its use of the Claim Fraud Filter.

c. Effectiveness of the Claim Fraud Filter in identifying EDD debit cardholders who submitted fraudulent unauthorized-transaction claims to BofA, including information concerning the Claim Fraud Filter's false positive rates and steps considered, undertaken, or rejected by BofA for modifying the Claim Fraud Filter to potentially reduce the number or percentage of false positives.

d. All modifications to the Claim Fraud Filter or its use or implementation.

e. [REVISED] The lines of internal communications (including oral, written, and in-person communications, such as meetings) concerning the Claim Fraud Filter, including communications regarding fraudulent unauthorized-transaction claims submitted by prepaid debit card account holders and the efficacy of the Claim Fraud Filter in identifying or failing to identify such claims.

f. Communications with EDD regarding the Claim Fraud Filter, BofA's use of the Claim Fraud Filter, and/or BofA's policies and procedures for freezing or unfreezing EDD debit card accounts based on application of the Claim Fraud Filter.

11. Communications with the Department of Justice, Department of Homeland Security, Secret Service, or other federal or state law enforcement officials regarding fraudulent submission of unauthorized-transaction claims by EDD debit card holders and/or regarding the Claim Fraud Filter.

12. BofA's policies and procedures for freezing, unfreezing, blocking, and unblocking EDD debit card accounts.

13. The scope of BofA's responsibilities and authority under the EDD-Bank Contract, including for preventing and redressing fraudulent activity, including any communications between BofA and EDD regarding such fraud-related measures.

14. BofA's and EDD's revenue from the EDD-Bank Contract and details regarding the negotiation, terms, and results of BofA's revenue-sharing agreement with EDD.

15. The number and percentage of EDD benefits recipients that received their EDD benefits via a BofA-issued EDD debit card.

16. BofA's policies and procedures for handling telephone calls from EDD debit cardholders regarding their frozen or blocked EDD prepaid debit card accounts.

17. Training, instructions, and scripts provided to BofA call center agents for handling telephone calls from EDD debit cardholders regarding their frozen or blocked EDD prepaid debit card accounts.

18. BofA's policies and procedures for handling telephone calls from EDD debit cardholders seeking reconsideration of BofA's denial of their unauthorized-transaction claims.

19. Training, instructions, and scripts provided to BofA call center agents for handling telephone calls from EDD debit cardholders seeking reconsideration of BofA's denial of their unauthorized-transaction claims.

20. BofA's policies and procedures for handling requests for reconsideration of denied unauthorized-transaction claims from EDD debit cardholders whose unauthorized-transaction claims have been denied and BofA accounts frozen based on BofA's application of the Claim Fraud Filter.

21. Training, instructions, and scripts provided to BofA call center agents for handling requests for reconsideration of denied unauthorized-transaction claims from EDD debit cardholders whose unauthorized-transaction claims have been denied and BofA accounts frozen based on BofA's application of the Claim Fraud Filter.

22. BofA's policies and procedures for hardship escalations, executive escalations, and regulatory escalations of EDD debit cardholder issues relating to unauthorized transaction claims or frozen accounts.

23. Training, instructions, and scripts provided to BofA call center agents for hardship escalations, executive escalations, and regulatory escalations of EDD debit cardholder issues relating to unauthorized transaction claims or frozen accounts.

24. Performance metrics (including but not limited to wait times, disconnected calls, abandonment rates, average handle times, speed to answer, and transfer call times) for all BofA call centers servicing EDD debit cardholders, including but not limited to BofA's main call center, claims initiation call center, and fraud call center.

25. BofA's knowledge of the effectiveness, ineffectiveness, complaints, and/or problems with the customer service it purported to make available to EDD prepaid debit card account holders related to alleged unauthorized transactions on their accounts or freezing or blocking of their accounts (including volume of calls made, volume and percentage of calls personally answered by a customer service

representative, average waiting times, dropped calls, and customer and CSR complaints).

26. [REVISED] BofA's lines of communications, including meetings, with its CSR vendors, including TTEC, regarding policies, procedure, and practices for handling unauthorized-transaction claims of and/or the freezing or blocking of EDD prepaid debit card accounts.

27. BofA's modifications to its customer service operations during the pandemic, including working from home, changes in training, changes in background checks, and CSR training oversight and monitoring systems.

28. The CFPB/OCC Remediation Plan and BofA's implementation of the Remediation Plan.

29. The basis for and status of payments under the CFPB/OCC Remediation Plan.

30. The meaning of the data produced to date in this case in response to interrogatories regarding Affected Consumers, BofA's use or implementation of the Claim Fraud Filter, and/or BofA's freezing or blocking of accounts and the bases for the dollar amounts in those spreadsheets.

31. The categories of data maintained by BofA related to unauthorized-transaction claims for EDD prepaid debit card accounts, including notice of claim, the reasons for denials, use of the Claim Fraud Filter, freezing accounts, unfreezing accounts, related investigations (if any), and account balance information.

32. The content of and basis for BofA's Second Supplemental Response to Plaintiff Yick's First Set of Interrogatories and Exhibits 1-5, and BofA's Revised Second Supplemental Response to Plaintiff Yick's First Set of Interrogatories and Revised Exhibits 1-5.

33. BofA's compliance or non-compliance with each paragraph of the Preliminary Injunction entered in this case.

PROOF OF SERVICE

I am employed in the County of San Mateo, State of California. I am a citizen of the United States, over the age of 18 years and not a party to this action. My business address is 177 Post Street, Suite 300, San Francisco, California 94108.

On February 4, 2024, I served the following document(s) in the manner described below:

PLAINTIFFS' REVISED NOTICE OF DEPOSITION OF DEFENDANT BANK OF AMERICA, N.A. PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)

_ **BY MAIL:** I am readily familiar with this firm's practice for collection and processing of correspondence for mailing. Following that practice, I placed a true copy of the aforementioned document(s) in a sealed envelope, addressed to each addressee, respectively, as specified below. The envelope was placed in the mail at my business address, with postage thereon fully prepaid, for deposit with the United States Postal Service on that same day in the ordinary course of business.

✓ **BY E-MAIL:** My e-mail address is cchan@altber.com and service of this document(s) occurred on the date shown below. This document is being served electronically and the transmission was reported as complete and without error.

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed at Burlingame, California, on February 4, 2024.

Connie K. Chan

SERVICE LIST

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