

# **EXHIBIT B**

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14 Attorneys for Defendant  
15 BANK OF AMERICA, N.A.

16 **UNITED STATES DISTRICT COURT**  
17 **SOUTHERN DISTRICT OF CALIFORNIA –**  
18 **SAN DIEGO DIVISION**  
19

20 IN RE: BANK OF AMERICA  
21 CALIFORNIA UNEMPLOYMENT  
22 BENEFITS LITIGATION

23 *This Document Relates to All Actions*  
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Case No. 21-MD-02992-GPC-MSB

**DEFENDANT BANK OF AMERICA,  
N.A.’S SECOND AMENDED  
NOTICE OF DEPOSITION TO  
CERTAIN INDIVIDUAL  
PLAINTIFFS**

Crtrm: 2D – 2nd Floor  
Judge: Hon. Gonzalo P. Curiel

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, Defendant Bank of America, N.A. (“Defendant” or “BANA”), by and through undersigned counsel, will take the deposition of the following Individual Plaintiffs on the dates and at the locations listed below. The depositions will be taken before a person authorized by law to administer oaths under Federal Rule of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

BANA intends and reserves the right to record the deposition testimony of the following deponents by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intends and reserves the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. BANA reserves the right to use the videotape deposition at the time of trial.

**Deposition Schedule**

| <b>Deponent</b>      | <b>Location</b>                                                      | <b>Date</b>                        |
|----------------------|----------------------------------------------------------------------|------------------------------------|
| Arnoldstarr, Robert  | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 16, 2024 at<br>8:30 a.m. |
| Glassflowers, Seante | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 16, 2024 at<br>1:30 p.m. |
| Johnson, Evett       | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 17, 2024 at<br>8:30 a.m. |
| Johnson, Lester      | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 17, 2024 at<br>1:30 p.m. |
| McCrary, Michael     | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 18, 2024 at<br>8:30 a.m. |

| Deponent                                     | Location                                                             | Date                                |
|----------------------------------------------|----------------------------------------------------------------------|-------------------------------------|
| Pitts, Darnell                               | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 18, 2024 at<br>1:30 p.m.  |
| Romo, Jose Rodriguez<br>(AKA Jose Rodriguez) | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 19, 2024 at<br>8:30 a.m.  |
| Vasquez, David                               | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 19, 2024, at<br>1:30 p.m. |
| Williams, Tyrisha                            | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 20, 2024 at<br>8:30 a.m.  |
| Yeats, Mathew                                | Goodwin Procter<br>520 Broadway Suite #500<br>Santa Monica, CA 90401 | September 20, 2024 at<br>1:30 p.m.  |

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