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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

**[CORRECTED] INDEX OF EXHIBITS
TO DECLARATION OF CONNIE K.
CHAN IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION**

Judge: Hon. Gonzalo P. Curiel
Crm: 2D (2nd Floor)
Date: January 17, 2025
Time: 1:30pm

This Document Relates to All Actions

REDACTED PUBLIC VERSION

[CORRECTED] INDEX OF EXHIBITS TO CHAN DECLARATION

Ex.	Document Description	Bates Range	Conf. Desig.
1	Expert Report of J. Daniel Kreis in Support of Plaintiffs' Motion for Class Certification, and appendices thereto ("Kreis Rep.")		Contains Conf./ AEO Material
2	Expert Report of Jane Cloninger in Support of Plaintiffs' Motion for Class Certification, and appendices thereto ("Cloninger Rep.")		Contains Conf./ AEO Material
3	Expert Report of Jay Minnucci in Support of Plaintiffs' Motion for Class Certification, and appendices thereto ("Minnucci Rep.")		Contains Conf./ AEO Material
4	Expert Report of Greg J. Regan, CPA/CFF, CFE in Support of Plaintiffs' Motion for Class Certification, and appendices thereto ("Regan Rep.")		Contains Conf./ AEO Material
5	Declaration of proposed class representative Plaintiff Kuang Ting Chong ("Chong Dec.").		
6	Declaration of proposed class representative Plaintiff Candace Koole ("Koole Dec.")		
7	Declaration of proposed class representative Plaintiff Lindsey McClure ("McClure Dec.")		
8	Declaration of proposed class representative Plaintiff Azuri Moon ("Moon Dec.")		
9	Declaration of proposed class representative Plaintiff Stephanie Moore ("Moore Dec.")		
10	Declaration of proposed class representative Plaintiff Roland Oosthuizen ("Oosthuizen Dec.")		

11	Declaration of proposed class representative Plaintiff Vanessa Rivera (“Rivera Dec.”).		
12	Declaration of proposed class representative Plaintiff J. Michael Willrich (“Willrich Dec.”)		
13	Declaration of proposed class representative Plaintiff Alex Yuan (“Yuan Dec.”)		
14	Excerpts from the transcript of Plaintiffs’ deposition of Defendant Bank of America, N.A.’s (the “Bank”) Rule 30(b)(6) designee, Shane Daniels, taken on February 6, 2024 (“Daniels Tr.”)		Conf.
15	Excerpts from the transcript of Plaintiffs’ deposition of the Bank’s Rule 30(b)(6) designee, Robert Chestnut, taken on February 8, 2024 (“Chestnut Tr.”)		Conf.
16	Excerpts from the transcript of Plaintiffs’ deposition of the Bank’s Rule 30(b)(6) designee, William (“Matt”) Martin, taken on February 14, 2024 (“Martin Tr.”)		Conf./ AEO
17	Excerpts from the transcript of Plaintiffs’ deposition of the Bank’s Rule 30(b)(6) designee, Michael Letson, taken on February 16, 2024 (“Letson Tr.”)		Conf./ AEO
18	Excerpts from the transcript of Plaintiffs’ deposition of the Bank’s Rule 30(b)(6) designee, William Golden, taken on February 22, 2024 (“Golden Tr.”)		Conf.
19	Excerpts from the transcript of Plaintiffs’ deposition of the Bank’s Rule 30(b)(6) designee, Jennifer Lennon, taken on February 23, 2024 (“Lennon Tr.”)		Conf./ AEO
20	Excerpts from the transcript of Plaintiffs’ deposition of Renee Johnson, taken on May 7, 2024 (“Johnson Tr.”)		Conf.
21	Revised Notice of Rule 30(b)(6) Deposition of Defendant Bank of America		

22	Excerpts of BANA's Response to State of California Electronic Benefits Payments RFP Vol I & II		
23	Article re "Bank of America Begins Rollout of Chip Debit Cards"		
24	[REDACTED]	BANA_EDD_MDL -123235-123236	Conf.
25	[REDACTED]	BANA_EDD_MDL -167019-167024	Conf.
26	[REDACTED]	BANA_EDD_MDL -370150-370155	Conf.
27	[REDACTED]	BANA_EDD_MDL -351839-351840	Conf.
28	[REDACTED]	BANA_EDD_MDL -116001-116002	Conf.
29	[REDACTED]	BANA_EDD_MDL -124142	Conf.
30	[REDACTED]	BANA_EDD_MDL -352396-352397	Conf.
31	[REDACTED]	BANA_EDD_MDL -059312-59318	Conf.
32	[REDACTED]	BANA_EDD_MDL -228914-228915	Conf.
33	[REDACTED]	BANA_EDD_MDL -455617-455619	Conf.
34	[REDACTED]	BANA_EDD_MDL -297295	Conf.
35	[REDACTED]	BANA_EDD_MDL -001312-1330	AEO
36	[REDACTED]	BANA_EDD_MDL -004535-4580	Conf.
37	[REDACTED]	BANA_EDD_MDL -290330-290334	Conf.
38	[REDACTED]	BANA_EDD_MDL -630836	Conf.
39	[REDACTED]	BANA_EDD_MDL -371977	Conf.
40	[REDACTED]	BANA_EDD_MDL -372012-362013	Conf.

41	[REDACTED]	BANA_EDD_MDL -694889-694890	Conf.
42	[REDACTED]	BANA_EDD_MDL -087760-87765	Conf.
43	[REDACTED]	BANA_EDD_MDL -087749-87751	Conf.
44	[REDACTED]	BANA_EDD_MDL -450516-450518	Conf.
45	[REDACTED]	BANA_EDD_MDL -125863-125864	Conf.
46	[REDACTED]	BANA_EDD_MDL -497802-497804	Conf.
47	[REDACTED]	BANA_EDD_MDL -100634-100679	Conf.
48	[REDACTED]	BANA_EDD_MDL -090695-90698	Conf.
49	Excerpts from BANA's Verified Responses & Objections to Plaintiffs Fourth Set of Interrogatories (Nos. 28, 30 and exhibits thereto)		Conf./ AEO
50	[REDACTED]	BANA_EDD_MDL -090640-90647	Conf.
51	[REDACTED]	BANA_EDD_MDL -159125	Conf.
52	Template Claim Denial Letter	BANA_EDD_MDL -012790	
53	Class Representative Close Letters	BANA_EDD_MDL -411205, -556094, - 556122, -556152, - 556324, -558991, - 558996, -559094, - 559101; PLFF00000008; Yuan_A_0000003-4	
54	[REDACTED]	BANA_EDD_MDL -273305-273307	Conf.

55	[REDACTED]	BANA_EDD_MDL -163307-163308	Conf.
56	[REDACTED]	BANA_EDD_MDL -172469-172473	Conf.
57	[REDACTED]	BANA_EDD_MDL -107327-107335	Conf.
58	[REDACTED]	BANA_EDD_MDL -090683-90686	Conf.
59	Excerpts from BANA's Verified Responses & Objections to Plaintiffs Third Set of Interrogatories (No. 21 and exhibit thereto)		Conf./ AEO
60	Plaintiff Alias IDs for Exhibits 1-5 to BANA's Responses to Interrogatory Nos. 2-6, 14-15 (First Set)		AEO
61	Letter to Plaintiff Moore re Permanent Credit	Moore_S_0000367	
62	Letter to Plaintiff Chong re Permanent Credit	PLFF00000011	De- desig. by Pls.
63	Excerpts of "Employment Development Department Strike Team Detailed Assessment & Recommendations" report		
64	[REDACTED]	BANA_EDD_MDL -090721-90726	Conf.
65	[REDACTED]	BANA_EDD_MDL -452786-452802	Conf.
66	[REDACTED]	BANA_EDD_MDL -874570-874571	Conf.
67	[REDACTED]	BANA_EDD_MDL -452826-452827	Conf.
68	[REDACTED]	BANA_EDD_MDL -630754-630758	Conf.
69	[REDACTED]	BANA_EDD_MDL -347350	Conf.
70	Yick Preliminary Injunction		
71	Yick PI Order		
72	Consumer Financial Protection Bureau ("CFPB") Consent Order		

73	Office of Comptroller of the Currency ("OCC") Consent Order		
74	[REDACTED]	BANA_EDD_MDL -102554-102577	AEO
75	[REDACTED]	BANA_EDD_MDL -225375-225393	Conf.
76	EDD Debit Cardholder Agreement	BANA_EDD_MDL -536398-536406	De- desig. by Bank (ECF 328)
77	[REDACTED]	BANA_EDD_MDL -118438	Conf.
78	[REDACTED]	BANA_EDD_MDL -129422-129426	Conf.
79	[REDACTED]	BANA_EDD_MDL -012738-12739	Conf.
80	[REDACTED]	BANA_EDD_MDL -003887-3911	Conf.
81	[REDACTED]	BANA_EDD_MDL -592324-592330	Conf.
82	[REDACTED]	BANA_EDD_MDL _00559693-559694, -559893-559926, - 559979-559980	Conf.
83	[REDACTED]	BANA_EDD_MDL -100506-100529	Conf.
84	[REDACTED]	BANA_EDD_MDL -006482-6535	Conf.
85	[REDACTED]	BANA_EDD_MDL -718756-718770	Conf.
86	[REDACTED]	BANA_EDD_MDL -003912-3937	Conf.
87	[REDACTED]	BANA_EDD_MDL -100616-100633	Conf.
88	[REDACTED]	BANA_EDD_MDL -125177-125179	Conf.

89	[REDACTED]	BANA_EDD_MDL -057504-57506	Conf.
90	[REDACTED]	BANA_EDD_MDL -218256	Conf.
91	[REDACTED]	BANA_EDD_MDL -125919-125923	Conf.
92	[REDACTED]	BANA_EDD_MDL -570333-570334	Conf.
93	[REDACTED]	BANA_EDD_MDL -517105-517126	Conf.
94	[REDACTED]	BANA_EDD_MDL -159469-159474	Conf.
95	[REDACTED]	BANA_EDD_MDL -592192-592194	Conf.
96	[REDACTED]	BANA_EDD_MDL -090135-90143	Conf.
97	[REDACTED]	BANA_EDD_MDL -406128-406130	Conf.
98	BANA's Verified First Responses & Objections to Plaintiffs' Seventh Set of Interrogatories (Nos. 40-41, 44-46, and excerpts of exhibits thereto)		Conf./ AEO
99	[REDACTED]	BANA_EDD_MDL -547571-547577	Conf.
100	[REDACTED]	BANA_EDD_MDL -572766-572770	Conf.
101	[REDACTED]	BANA_EDD_MDL -510141-510148	Conf.
102	[REDACTED]	BANA_EDD_MDL -158953	Conf.
103	Contract between California EDD and Bank of America, Standard Agreement M6100352, Exhibit A (Scope of Work), Exhibit E (Confidentiality)	BANA_EDD_MDL -518186-518191	
104	[REDACTED]	BANA_EDD_MDL -663724-663745	Conf.

105	[REDACTED]	BANA_EDD_MDL -169912-169915	Conf.
106	[REDACTED]	BANA_EDD_MDL -293818-293821	Conf.
107	[REDACTED]	BANA_EDD_MDL -104742-104746	Conf.
108	[REDACTED]	BANA_EDD_MDL -102937	Conf.
109	[REDACTED]	BANA_EDD_MDL -389851-389865	Conf.
110	[REDACTED]	BANA_EDD_MDL -059687-59690	AEO
111	[REDACTED]	BANA_EDD_MDL -171972-171973	Conf.
112	Excerpts of 2021 US Contact Decision-Makers' Guide		
113	[REDACTED]	BANA_EDD_MDL -643363, -643487-643488	Conf.
114	BANA's Responses & Objections to Plaintiffs Interrogatory No. 34 (Fifth Set)		Conf.
115	Excerpts of Bank of America and EDD "Standard Agreement"	BANA_EDD_MDL -002286-2287, -002453	De- desig. by Bank (ECF 328)
116	[REDACTED]	BANA_EDD_MDL -153666-153675	Conf.
117	[REDACTED]	BANA_EDD_MDL -859710	Conf.
118	[REDACTED]	BANA_EDD_MDL -172236-172244	Conf.
119	[REDACTED]	BANA_EDD_MDL -060229-60256	Conf.
120	[REDACTED]	BANA_EDD_MDL -246360-246363	Conf.

121	[REDACTED]	BANA_EDD_MDL -00356313, -356316	Conf.
122	[REDACTED]	BANA_EDD_MDL -171905	Conf.
123	[REDACTED]	BANA_EDD_MDL -013111, -13127- 13132, -13135- 13136, -13145- 13148	Conf.
124	[REDACTED]	BANA_EDD_MDL -719115	Conf.
125	[REDACTED]	BANA_EDD_MDL -719116	Conf.
126	[REDACTED]	BANA_EDD_MDL -090040-90047	Conf.
127	[REDACTED]	BANA_EDD_MDL -013086-13093	Conf.
128	[REDACTED]	BANA_EDD_MDL -012875-12885	Conf.
129	[REDACTED]	BANA_EDD_MDL -012792	Conf.
130	[REDACTED]	BANA_EDD_MDL -012800	Conf.
131	Excerpts of 2023 US Contact Decision-Makers' Guide		
132	[REDACTED]	BANA_EDD_MDL -013096-13106	Conf.
133	[REDACTED]	BANA_EDD_MDL -060337-60339	Conf.
134	[REDACTED]	BANA_EDD_MDL -106092-106094	Conf.
135	[REDACTED]	BANA_EDD_MDL -382181-382188	Conf.
136	[REDACTED]	BANA_EDD_MDL -352985-352987	Conf.
137	[REDACTED]	BANA_EDD_MDL -288637-288641	Conf.
138	[REDACTED]	BANA_EDD_MDL -424944-424949	Conf.

139	[REDACTED]	BANA_EDD_MDL -718992-719004	Conf.
140	[REDACTED]	BANA_EDD_MDL -021102-21136	AEO
141	[REDACTED]	BANA_EDD_MDL -571307-571310	Conf.
142	[REDACTED]	BANA_EDD_MDL -417487-417490	Conf.
143	[REDACTED]	BANA_EDD_MDL -077223-77225	Conf.
144	[REDACTED]	BANA_EDD_MDL -205620-205629	Conf.
145	[REDACTED]	BANA_EDD_MDL -125186-125187	Conf.
146	Excerpts from BANA's Verified Revised Second Supplemental Responses & Objections to Plaintiffs First Set of Interrogatories (Nos. 2-6 and exhibits thereto)		Conf./ AEO
147	[REDACTED]	BANA_EDD_MDL -102544-77; BANA_EDD_MDL -102520-102543; BANA_EDD_MDL -102578-87	AEO
148	[REDACTED]	BANA_EDD_MDL -282498-282523	Conf.
149	"Standard Agreement Amendment" to BANA-EDD Contract		
150	[REDACTED]	BANA_EDD_MDL -057837-57878	Conf.
151	[REDACTED]	BANA_EDD_MDL -103075-103083	Conf.
152	[REDACTED]	BANA_EDD_MDL -012816-12874	Conf.
153	[REDACTED]	BANA_EDD_MDL -421427-421428	Conf.
154	[REDACTED]	BANA_EDD_MDL -154042-154044	Conf.

155	[REDACTED]	BANA_EDD_MDL -087742-87743	Conf.
156	[REDACTED]	BANA_EDD_MDL -426935-426939	Conf.
157	Trial Plan		Contains Conf./ AEO Material