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11 Attorneys for Defendant
12 BANK OF AMERICA, N.A.

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**
15 **SAN DIEGO DIVISION**

16 IN RE: BANK OF AMERICA
17 CALIFORNIA UNEMPLOYMENT
18 BENEFITS LITIGATION

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

19 **APPENDIX OF EXHIBITS TO**
20 **THE DECLARATION OF LAURA**
21 **BRYN IN SUPPORT OF**
22 **DEFENDANT'S MEMORANDUM**
23 **IN OPPOSITION TO PLAINTIFFS'**
24 **MOTION FOR CLASS**
25 **CERTIFICATION**

26 Date: January 17, 2025

27 Time: 1:30 p.m.

28 Ctrm: 2D – 2nd Floor

Judge: Hon. Gonzalo P. Curiel

FILED PROVISIONALLY UNDER
SEAL PURSUANT TO
STIPULATED PROTECTIVE
ORDER

INDEX OF EXHIBITS TO BRY'S DECLARATION

Exhibit #	Document Description	Bates Range	Conf. Desig.
1	Expert Report of Victor Stango	-	AEO
2	Expert Declaration of Teresa A. Pesce	-	AEO
3	Expert Declaration of Russell Cronan	-	AEO
4	Expert Declaration of Pamela Joseph	-	Conf.
5	Expert Declaration of Stephen Hindle	-	Conf.
6	Declaration of Michael J. Letson	-	AEO
7	Declaration of William M. Martin	-	AEO
8	Declaration of Jennifer Lennon	-	AEO
9	Declaration of Kelley Lorenzen	-	Conf.
10	Patrick McGreevy, "California unemployment fraud could top \$9 billion, double previous estimate, expert warns," L.A. Times, January 15, 2021	-	N/A
11	David Manoucheri, "Analysis shows California EDD fraud at \$32.6 billion and counting," KCRA3, October 6, 2022	-	N/A
12	[REDACTED]	BANA_EDD_MDL-00884200	Conf.
13	"Legislative Oversight of Ongoing Challenges at EDD," January 26, 2021	-	N/A
14	"Examining Widespread Fraud in Pandemic Unemployment Relief Programs," September 10, 2024	-	N/A
15	Matt Weidinger, "New Report Details Lessons from the Massive Pandemic	-	N/A

Exhibit #	Document Description	Bates Range	Conf. Desig.
	Unemployment Fraud,” AEI, September 11, 2024		
16	Employment Development Department “Fraud Deterrence and Detection Activities,” 2020	-	N/A
17	Letter from Elaine M. Howle, November 19, 2020	-	N/A
18	William Golden Deposition Excerpts	-	AEO
19	[REDACTED]	BANA_EDD_MDL-00719114	Conf.
20	[REDACTED]	BANA_EDD_MDL-00719116	Conf.
21	[REDACTED]	BANA_EDD_MDL-00014090	Conf.
22	Cardholder Agreement	BANA_EDD_MDL-00440225	Conf.
23	Excerpt of BANA’s Response to Fourth Set of ROGs (ROGs 28 and 34)	-	Conf.
24	Robert A. Chestnut Deposition Excerpts	-	Conf.
25	[REDACTED]	BANA_EDD_MDL-00353033	Conf.
26	[REDACTED]	BANA_EDD_MDL-00678567	Conf.
27	[REDACTED]	BANA_EDD_MDL-00117094	Conf.
28	[REDACTED]	BANA_EDD_MDL-00087245	Conf.
29	Renee Johnson Deposition Excerpts	-	Conf.
30	[REDACTED]	BANA_EDD_MDL-00884196	AEO
31	[REDACTED]	BANA_EDD_MDL-00884195	AEO
32	[REDACTED]	BANA_EDD_MDL-00044103	AEO

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33	[REDACTED]	BANA_EDD_MDL-00882697	AEO
34	Quoc Huynh ROG Response Excerpt (ROG 7)	-	N/A
35	[REDACTED]	BANA_EDD_MDL-00044190	AEO
36	[REDACTED]	BANA_EDD_MDL-00044206	AEO
37	Perez ROG Responses Excerpt (ROG 7)	-	N/A
38	[REDACTED]	BANA_EDD_MDL-00044237	AEO
39	Rodriguez ROG Responses Excerpt (ROG 7)	-	N/A
40	[REDACTED]	BANA_EDD_MDL-00044256	AEO
41	[REDACTED]	BANA_EDD_MDL-00164188	Conf.
42	[REDACTED]	BANA_EDD_MDL-00164189	Conf.
43	BANA's Second Set of Responses to Plaintiffs' Seventh Set of ROG's (ROG 39)	-	Conf.
44	January 29, 2024 Letter from Karin B. Swope	-	N/A
45	[REDACTED]	BANA_EDD_MDL-00883990	AEO
46	[REDACTED]	BANA_EDD_MDL-00044243	AEO
47	[REDACTED]	Yick_J_0000089	Conf.
48	February 9, 2021 email from Rosemary Mathews	Mathews_R_0000100-01	N/A
49	Wiggins Notice of Determination from EDD	Wiggins_B_0000196-204	N/A
50	Cajas Notice of Determination from EDD	Cajas_C_0000383	N/A
51	[REDACTED]	Smith_J_0000070	Conf.

Exhibit #	Document Description	Bates Range	Conf. Desig.
52	December 2, 2023 email to Cindy Baker	Baker_C_0000360-61	N/A
53	Smith ROG Response Excerpt (ROG 5)	-	N/A
54	OIG Report, December 15, 2023	-	N/A
55	Aders Copy of Conviction	-	N/A
56	Gage Minutes from Preliminary Hearing	-	N/A
57	Corella Plea Agreement	-	N/A
58	[REDACTED]	BANA_EDD_MDL-00884193	AEO
59	[REDACTED]	BANA_EDD_MDL-00884004	AEO
60	[REDACTED]	BANA_EDD_MDL-00884000	AEO
61	[REDACTED]	BANA_EDD_MDL-00884002	AEO
62	[REDACTED]	BANA_EDD_MDL-00884006	AEO
63	Meza Deposition Excerpt	-	N/A
64	[REDACTED]	BANA_EDD_MDL-00138908	AEO
65	Morales ROG Responses Excerpt (ROG 7)	-	N/A
66	[REDACTED]	BANA_EDD_MDL-00134198-202	AEO
67	[REDACTED]	BANA_EDD_MDL-00699378-80	AEO
68	[REDACTED]	BANA_EDD_MDL-00136297-301	AEO
69	[REDACTED]	BANA_EDD_MDL-00136304-05	AEO
70	[REDACTED]	BANA_EDD_MDL-0013606-308	AEO
71	[REDACTED]	BANA_EDD_MDL-00000002	Conf.
72	[REDACTED]	BANA_EDD_MDL-00000001	Conf.

Exhibit #	Document Description	Bates Range	Conf. Desig.
73	[REDACTED]	BANA_EDD_MDL-00044219	AEO
74	Johnson's ROG Response Excerpt (ROG 12)	-	N/A
75	Murphy Supp. ROG Response Excerpt (ROG 3)	-	N/A
76	Glassflowers Supp. ROG Response Excerpt (ROG 3)	-	N/A
77	[REDACTED]	BANA_EDD_MDL-00044172	AEO
78	[REDACTED]	BANA_EDD_MDL-00741475	AEO
79	Larry D. Turner Testimony, February 8, 2023	-	N/A
80	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Conf.
81	[REDACTED] [REDACTED]	-	Conf.
82	[REDACTED]	BANA_EDD_MDL-00718718	AEO
83	Brian Faler, "Unemployment assistance to millionaires soared during pandemic," Politico, November 22, 2022	-	N/A
84	[REDACTED] [REDACTED]	-	Conf.
85	BANA Revised Supplemental Responses to ROGS (Set 1) (ROGS 14 and 15)	-	Conf.
86	Exhibit 4 to BANA's Responses to ROGS 14 and 15	-	AEO
87	U.S. GAO Report, Mar. 17, 2022	-	N/A
88	CA State Auditor; "Weaknesses in EDD's Approach," Jan. 2021	-	N/A
89	CA State Auditor; "EDD's Poor Planning," Jan. 2021	-	N/A

Exhibit #	Document Description	Bates Range	Conf. Desig.
90	Letter to the CA State Auditor, Jan. 11, 2021	BANA_EDD_MDL-00080296	Conf.
91	Milbourn, Orange County Register, Mar. 16, 2021	-	N/A
92	Collection of FinCen Press Releases	-	N/A
93	OCC; "Semi-Annual Risk Perspective," Spring 2021	-	N/A
94	DOJ: "COVID-19 Fraud Enforcement Task Force 2024 Report"	-	N/A
95	DOJ: "Unemploment Insurance Fraud Consumer Protection Guide" Sept. 21, 2020	-	N/A
96	Secret Service Warning, May 14, 2020	-	N/A
97	Michael J. Letson Deposition Transcript Excerpts	-	AEO
98	Shane Daniels Deposition Transcript Excerpts		Conf.
99	[REDACTED]	BANA_EDD_MDL-00087715	Conf.
100	[REDACTED]	BANA_EDD_MDL-00570333	Conf.
101	[REDACTED]	BANA_EDD_MDL-00884199	Conf.
102	[REDACTED]	BANA_EDD_MDL-00019602	Conf.
103	[REDACTED]	BANA_EDD_MDL-00088501	Conf.
104	BANA's Responses to Fifth ROGs Excerpts	-	Conf.
105	Exhibit 11 to BANA's Fifth Set of ROG Responses	-	Conf.
106	OCC Handbook: Corporate and Risk Governance	-	N/A
107	OCC Handbook: Internal Controls	-	N/A

Exhibit #	Document Description	Bates Range	Conf. Desig.
108	OCC Bulletin 2019-37, July 24, 2019	-	N/A
109	OCC Handbook: Large Bank Supervision	-	N/A
110	Fed. Reserve System, Electronic Fund Transfers, 71 Fed. Reg. 1638, 1654 (Jan 10. 2006)	-	N/A
111	OCC Handbook: Compliance Management Systems	-	N/A
112	[REDACTED]	BANA_EDD_MDL-00073529	Conf.
113	[REDACTED]	BANA_EDD_MDL-00151781	Conf.
114	[REDACTED]	BANA_EDD_MDL-00118617	Conf.
115	[REDACTED]	BANA_EDD_MDL-00061630	Conf.
116	[REDACTED]	BANA_EDD_MDL-00719115	Conf.
117	[REDACTED]	BANA_EDD_MDL-00012816	Conf.
118	[REDACTED]	BANA_EDD_MDL-00013111	AEO
119	ContactBabel, 2021 US Contact Decision-Makers' Guide, 13th Ed.	-	N/A
120	[REDACTED]	BANA_EDD_MDL-00884198	Conf.
121	[REDACTED]	BANA_EDD_MDL-00088506	Conf.
122	Martin Deposition Transcript Excerpts	-	AEO