EXHIBIT 53

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Co-Lead Counsel for Plaintiffs and the Proposed Class

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 PLAINTIFF STEPHANIE SMITH'S OBJECTIONS AND RESPONSES TO BANK OF AMERICA, N.A.'S FIRST SET OF INTERROGATORIES
This Document Relates to All Actions	Judge: Hon. Larry Alan Burns

Accordingly, Plaintiff will limit their response to the period from January 1, 2020, to present.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff did not authorize a third party to access their account in connection with the transactions at issue in this case.

INTERROGATORY NO. 5:

If you allege that any TRANSACTIONS on YOUR ACCOUNT were unauthorized or made in error, state the principal facts RELATING TO each distinct TRANSACTION that YOU allege was unauthorized or made in error, including IDENTIFYING the TRANSACTION, the type of error (including whether the error was an "error" under EFTA Regulation E (15 U.S.C. § 1693 *et seq*.) and if so, which type of error), any fees YOU allege were improperly assessed RELATING TO the TRANSACTION (including the amount of the fee(s) and the date(s) of assessment), and the basis for YOUR belief that each TRANSACTION was an error.

RESPONSE TO INTERROGATORY NO. 5:

Plaintiff incorporates by reference the Preliminary Statement and General Objections.

Plaintiff objects to this Interrogatory as unduly burdensome to the extent that it seeks information that is more readily accessible to or already in the possession, custody, or control of Defendant, including because to the extent any portion of these Requests are relevant, the information requested has been or may be incorporated into the payment schedules required by the CFPB/OCC Remediation Plan. Plaintiff further objects to this Interrogatory as compound and counting as multiple distinct interrogatories. Plaintiff also objects that it calls for a legal conclusion, premature disclosure of expert opinions and conclusions and it is overbroad in that it requests information that is subject to the attorney-client and attorney work-product privilege.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff did not authorize a third party to access their account in connection with the transactions at issue in this case. Plaintiff received her EDD Debit Card in or about June 2020 and activated it on Bank of America's website the same day that she received it.

Immediately after activating the Card, she locked the Card in a safe inside her home, and she did not subsequently take the Card out of the safe or use it in any way. Her only activity on her EDD Debit Card Account thereafter was to use Bank of America's website to transfer funds from her EDD Debit Card Account to her personal consumer bank account (also with Bank of America). She never used the Card at an ATM, for an online purchase, at a retail store, or for any other transaction. She also never disclosed her Card number or PIN to anyone and never authorized anyone to use her Card. Despite all this, an unknown person or persons used the Cardholder Information associated with her EDD Debit Card and/or Account to make three unauthorized transactions with DoorDash in San Francisco, California. The first unauthorized transaction occurred on or about November 23, 2020, with a charge of 90.89. The second unauthorized transaction occurred on or about November 27, 2020, with a charge of 44.31. The third unauthorized transaction occurred on or about November 30, 2020, with a charge of $90.64. These unauthorized transactions totaled $225.84.

INTERROGATORY NO. 6:

State the principal facts RELATING TO why YOU believe that BANA should have identified the allegedly unauthorized TRANSACTIONS as suspicious, including IDENTIFYING the allegedly unauthorized TRANSACTIONS YOU claim BANA should have identified as suspicions, the facts that form the basis for YOUR belief, such as the location of the merchant and YOUR location on that date, and whether BANA did in fact identify the TRANSACTION as suspicious.

Dated: October 19, 2023

ALTSHULER BERZON LLP

By: */s/ Michael Rubin*
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In re Bank of America California Unemployment Benefits Litigation
Case No. 3:21-md-02992-LAB-MSB (N.D. California)

VERIFICATION

I, Stephanie Smith, declare:

I am one of the plaintiffs in the above-entitled action. I have reviewed my Objections and Responses to Bank of America, N.A.'s First Set of Interrogatories. The responses contained therein are true and correct to the best of my knowledge.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on October 20, 2023, at San Diego, CA.
(City, State)

[signature]
STEPHANIE SMITH