

1 JOSEPH W. COTCHETT (SBN 36324) jcotchett@cpmlegal.com

2 BRIAN DANITZ (SBN 247403) bdanitz@cpmlegal.com

3 KARIN B. SWOPE (pro hac vice) kswope@cpmlegal.com

4 **COTCHETT PITRE & McCARTHY, LLP**

5 840 Malcolm Road
6 Burlingame, CA 94010
7 Telephone: (650) 697-6000
8 Fax: (650) 697-0577

9 MICHAEL RUBIN (SBN 80618) mrubin@altber.com

10 CONNIE K. CHAN (SBN 284230) cchan@altber.com

11 **ALTSHULER BERZON LLP**

12 177 Post Street, Suite 300
13 San Francisco, CA 94108
14 Telephone: (415) 421-7151
15 Fax: (415) 362-8064

16 *Co-Lead Counsel for Plaintiffs and*
17 *the Proposed Class*
18 *(Additional Counsel Listed Below)*

19 **UNITED STATES DISTRICT COURT**
20 **SOUTHERN DISTRICT OF CALIFORNIA**

21 **IN RE BANK OF AMERICA**
22 **CALIFORNIA UNEMPLOYMENT**
23 **BENEFITS LITIGATION**

24
25 This Document Relates to All Actions
26
27
28

JAMES W. McGARRY (pro hac vice) JMcGarry@goodwinlaw.com

MICHELLE T. BRIGGS (pro hac vice) MBriggs@goodwinlaw.com

GOODWIN PROCTER LLP

100 Northern Avenue
Boston, MA 02210
Tel.: +1 617 570 1000
Fax: +1 617 523 1231

SABRINA M. ROSE-SMITH (pro hac vice) SRoseSmith@goodwinlaw.com

MATTHEW L. RIFFEE (pro hac vice) MRiffee@goodwinlaw.com

GOODWIN PROCTER LLP

1900 N Street NW
Washington, DC 20036
Tel.: +1 202 346 4000
Fax: +1 202 346 4444

Attorneys for Defendant
BANK OF AMERICA, N.A.

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

**JOINT MOTION TO EXTEND
TIME RE: ECF 365**

Judge: Hon. Gonzalo P. Curiel
Ctrm: 2D (2nd Floor)

1 In light of the Court's analysis in its November 15, 2024, amended order
2 granting in part and denying in part Defendant's motion to seal certain documents
3 supporting Plaintiffs' motion for class certification (ECF 365; the "Order"), the
4 Parties met and conferred and Plaintiffs on November 13, 2024, filed a Notice of
5 Withdrawal of their Opposition to Defendant's pending motion to seal (ECF 363).

6 Pursuant to the Parties' further agreement, as well as Federal Rules of Civil
7 Procedure 6(b) and 16(b)(4), Civil Local Rule 7.2, and ¶ 6 of this Court's Civil
8 Procedures, the Parties now jointly request an extension of the November 22, 2024
9 deadline set forth in the Order. The requested extension is needed for two principal
10 reasons, as set forth below and in the accompanying declaration of Plaintiffs' counsel
11 Vasti S. Montiel ("Montiel Decl.").

12 After meeting and conferring, the Parties agreed that:

13 (1) an extension would enable the Parties to complete their meet and confer
14 regarding which portions of documents should be redacted and sealed pursuant to the
15 Order, in accordance with the guidance set forth in the Order; and

16 (2) the Parties also plan to meet and confer regarding the appropriate redaction
17 and sealing of documents to be filed in connection with Plaintiffs' Reply to
18 Defendants Opposition to Plaintiffs' Motion for Class Certification, which is due
19 November 21, 2024, in accordance with the guidance set forth in the Order and
20 Section 12.5 of the Stipulated Protective Order (ECF 82).

21 Accordingly, the Parties jointly request a two-week extension of time from the
22 November 22, 2024 date set forth in the Order to December 6, 2024. The Parties
23 believe the requested extension would further party and judicial economy by
24 providing time to complete meet and confer discussions in an effort to reach an
25 agreement regarding redactions in accordance with the Court's guidance.

PROPOSED MODIFIED SCHEDULE:

Event	Current Date	Proposed Date
Joint Motion Outlining Parties' Positions Regarding Redactions (ECF 365)	11/22/2024	12/6/2024

Respectfully submitted,

Dated: November 20, 2024

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Brian Danitz
 JOSEPH W. COTCHETT
 BRIAN DANITZ
 KARIN B. SWOPE
 BLAIR V. KITTLE
 VASTI S. MONTIEL

Dated: November 20, 2024

ALTSHULER BERZON LLP

By: /s/ Connie Chan
 MICHAEL RUBIN
 STACEY M. LEYTON
 CONNIE K. CHAN
 KATHERINE G. BASS
 COLIN C. JONES

Co-Lead Counsel for Plaintiffs and the Proposed Class

Dated: November 20, 2024

By: /s/ Matthew L. Riffie
 MATTHEW L. RIFFEE (pro hac vice)
 MRiffie@goodwinlaw.com
 THOMAS M. HEFFERON (pro hac vice)
 THefferon@goodwinlaw.com
 SABRINA M. ROSE-SMITH (pro hac vice)
 SRoseSmith@goodwinlaw.com
GOODWIN PROCTER LLP
 1900 N Street NW
 Washington, DC 20036
 Tel.: +1 202 346 4000
 Fax: +1 202 346 4444

 JAMES McGARRY (pro hac vice)
 JMcGarry@goodwinlaw.com
 MICHELLE T. BRIGGS (pro hac vice)
 MBriggs@goodwinlaw.com
GOODWIN PROCTER LLP
 100 Northern Avenue
 Boston, MA 02210
 Tel.: +1 617 570 1000

Fax: +1 617 523 1231

YVONNE W. CHAN (pro hac vice)
YChan@jonesday.com

JONES DAY
100 High Street
Boston, MA 02210
Tel.: +1 617 960 3939
Fax: +1 617 449 6999

Counsel for Defendant Bank of America, N.A.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of this Court's Electronic Case Filing
Administrative Policies and Procedures Manual, I, Brian Danitz, hereby certify that
the content of this document is acceptable to all the signatories herein and that I have
obtained counsel's authorization to affix their electronic signatures to this document.

/s/ Brian Danitz

BRIAN DANITZ