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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-GPC-MSB

**DECLARATION OF VASTI S.
MONTIEL IN SUPPORT OF JOINT
MOTION TO EXTEND TIME RE: ECF
365**

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

This Document Relates to All Actions

1 I, **VASTI S. MONTIEL**, declare as follows:

2 1. I am an attorney with the law firm of Cotchett, Pitre & McCarthy, LLP, Co-
3 Lead Counsel for Plaintiffs and the Proposed Class in this action. I submit this
4 declaration in support of the Joint Motion to Extend Time regarding ECF 365 (the
5 “Order”). I have personal knowledge of the matters stated herein and, if called as a
6 witness, I could and would testify competently thereto.

7 2. On November 12, 2024, the Parties met and conferred regarding the Court’s
8 order granting in part and denying in part Defendant’s motion to seal certain documents
9 supporting Plaintiffs’ motion for class certification (ECF 361), which was amended on
10 November 15, 2024 (ECF 365).

11 3. The Parties agreed that a two-week extension of time, from November 22 to
12 December 6, 2024, for submitting a joint motion outlining the parties’ positions
13 regarding redactions pursuant to the Order would enable the Parties to complete their
14 discussions and further party and judicial economy. The extension of time will also
15 allow the Parties to meet and confer regarding the appropriate redaction and sealing of
16 documents to be filed in connection with Plaintiffs’ Reply to Defendants Opposition to
17 Plaintiffs’ Motion for Class Certification, which is due November 21, 2024.

18
19 I declare, under penalty of perjury, that the foregoing is true and correct. Executed
20 this 20th day of November 2024 at Burlingame, California.

21
22 /s/ Vasti S. Montiel

23 Vasti S. Montiel
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