

Exhibit 19

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA
3

4 _____)
IN RE BANK OF AMERICA)
5 CALIFORNIA UNEMPLOYMENT) No. 3:21-02992-md-LAB-MSB
BENEFITS LITIGATION,)
6 _____)

7 _____)
This document relates to all)
8 actions.)
_____)

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12 VIDEOTAPED DEPOSITION OF JENNIFER LENNON
13 30(B)(6) ON BEHALF OF BANK OF AMERICA
14 Los Angeles, California
15 Friday, February 23, 2024
16 Volume I
17
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21 Stenographically Reported By:
Melissa M. Villagran, RPR
22 CSR No. 12543
23 Job No. 6459992
24 PAGES 1 - 326
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Videotaped deposition of JENNIFER LENNON,
Volume I, taken on behalf of Plaintiffs at 601 South
Figueroa Street, 41st Floor, Los Angeles,
California, beginning at 9:22 a.m. and ending at
6:02 p.m. on Friday, February 23, 2024, before
Melissa M. Villagran, RPR, Certified Shorthand
Reporter No. 12543.

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INFORMATION REQUESTED

(None.)

INSTRUCTION NOT TO ANSWER

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85	14
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1 Los Angeles, California; Friday, February 23, 2024

2 9:22 a.m.

3
4 THE VIDEOGRAPHER: We are on the record at

5 9:22 a.m. on February 23, 2024.

09:22:43

6 Please note that the microphones are
7 sensitive and may pick up whispers, private
8 conversations, and cellular interference.

9 Audio and video recording will continue to
10 take place unless all parties agree to go off the
11 record.

09:23:00

12 This is Media Unit No. 1 of the
13 video-recorded 30(b)(6) deposition of defendant Bank
14 of America, N.A., regarding certain topics through
15 Jennifer Lennon, taken by counsel for the plaintiffs
16 In Re Bank of America California Unemployment
17 Benefits Litigation filed in the United States
18 District Court for the Southern District of
19 California, Case No. 3:21-MD-02992-LAB-MSB.

09:23:16

20 This deposition is being held at Goodwin
21 Procter located at 601 South Figueroa Street,
22 Los Angeles, California 90017.

09:23:43

23 My name is Steven Togami from the firm
24 Veritext Legal Solutions, and I am the videographer.

25 The court reporter is Melissa Villagran from the

09:24:01

1 firm Veritext Legal Solutions.

2 I am not related to any party in this action
3 nor am I financially interested in the outcome.

4 If there are any objections to proceeding,
5 please state them at the time of your appearance. 09:24:15

6 At this time, will counsel and all present
7 please state their appearances and affiliations for
8 the record, starting with the noticing party.

9 MR. DANITZ: Good morning.

10 Brian Danitz of Cotchett Pitre & McCarthy for 09:24:33
11 the plaintiffs.

12 MS. CHAN: Connie Chan of Altshuler Berzon
13 LLP for the class plaintiffs.

14 MR. RIFFEE: Good morning.

15 Matt Riffée of Goodwin Procter for Bank of 09:24:40
16 America.

17 THE VIDEOGRAPHER: Thank you.

18 Counsel on Zoom, could you please state your
19 appearance.

20 MR. SHAY: Yes. Good morning. 09:24:51

21 Daniel Shay representing the individual
22 plaintiffs. We've also got Joshua Swigart. He may
23 or may not be on the line, but he's here as well.
24 And then Ilana -- I forget how to say her last name,
25 but she's here as well for the individual 09:25:04

1 plaintiffs.

2 MS. MCCORKLE: Good morning.

3 You also have Virginia Selden McCorkle from
4 Goodwin on behalf of the defendant.

5 THE VIDEOGRAPHER: Thank you. 09:25:19

6 Can we please have the oath.

7 COURT REPORTER: Please raise your right
8 hand.

9 Do you solemnly swear that the testimony you
10 are about to give will be the truth, the whole
11 truth, and nothing but the truth, so help you God?

12 THE DEPONENT: I do.

13

14 JENNIFER LENNON,
15 having been administered an oath, was examined and
16 testified as follows:

17

18 EXAMINATION

19 BY MR. DANITZ:

20 Q Good morning, Ms. Lennon. 09:25:36

21 A Good morning.

22 Q Please state and spell your name for the
23 record.

24 A Jennifer Lennon, J-e-n-n-i-f-e-r,

25 L-e-n-n-o-n. 09:25:48

Page 18

1 Q Thank you.

2 And you're an employee of Bank of America?

3 A Yes.

4 Q And what is your current title?

5 A Senior vice president, product and state 09:25:55
6 liaison.

7 Q Thank you.

8 And you've been designated as a corporate
9 representative for purposes of this deposition; is
10 that correct? 09:26:06

11 A That's correct.

12 Q All right. Let's -- I'll show you the
13 exhibit premarked as 128.

14 (Exhibit 128 was marked for
15 identification and is attached 09:26:17
16 hereto.)

17 BY MR. DANITZ:

18 Q Take a look at that.

19 Exhibit 128 is the Revised Notice of
20 Deposition of Defendant Bank of America. 09:26:23

21 Have you seen this document?

22 A I have.

23 Q Thank you.

24 And you've been designated as the corporate
25 representative on a number of topics that are in 09:26:39

1 this notice; is that correct?

2 A That's correct.

3 Q Specifically, you've been designated under

4 Topic 28; is that right?

5 A Yes.

09:26:50

6 Q And that's the CFPB and OCC remediation plan

7 and Bank of America's implementation of the

8 remediation plan; is that correct?

9 A That's correct.

10 Q And also Topic 29 is something you're

09:27:00

11 designated for; is that correct?

12 A That's correct.

13 Q And that's the basis for and status of

14 payments under the CFPB, OCC remediation plan; is

15 that right?

09:27:16

16 A Yes.

17 MR. DANITZ: And for the court reporter,

18 that's "remediation."

19 BY MR. DANITZ:

20 Q And you're also designated for Topic 30; is

09:27:24

21 that correct?

22 A That's correct.

23 Q And that's the meaning of the data produced

24 to date in this case in response to interrogatories

25 regarding affected consumers, Bank of America's use

09:27:37

1 or implementation of the claim fraud filter and/or
2 Bank of America's freezing or blocking of accounts,
3 and the bases for the dollar amounts in those
4 spreadsheets; is that correct?

5 A That's correct.

09:27:54

6 Q And I believe there's been an agreement for
7 the -- specifically, you will be addressing
8 interrogatories 2 through 6, 14 through 15, 21
9 through 22, 27, 30, and 32 to 33; is that correct?

10 A That sounds correct.

09:28:24

11 Q You have also been designated as the
12 corporate representative on the Topic 31; is that
13 right?

14 A Yes, that's right.

15 Q And that's the categories of data maintained
16 by Bank of America related to unauthorized
17 transaction claims for EDD prepaid debit card
18 accounts, including notice of claim, the reasons for
19 denials, use of the claim fraud filter, freezing
20 accounts, unfreezing accounts, related
21 investigations, if any, and account balance
22 information; is that correct?

09:28:39

09:28:55

23 A That's correct.

24 Q And for Topic 32, you are also the designated
25 witness; is that correct?

09:29:13

1 A That's correct.

2 Q And that is the content of and basis for Bank
3 of America's Second Supplemental Response to
4 Plaintiff Yick's First Set of Interrogatories in
5 Exhibits 1 through 5, and Bank of America's Revised 09:29:29
6 Second Supplemental Response to Plaintiff Yick's
7 First Set of Interrogatories and revised Exhibits 1
8 through 5.

9 Is that your understanding?

10 A It is. 09:29:43

11 Q And you're also the designee to testify
12 regarding Topic 33; is that correct?

13 A Yes.

14 Q And Topic 33 is Bank of America's compliance
15 or noncompliance with each paragraph of the 09:29:57
16 preliminary injunction entered in this case; is that
17 correct?

18 A That's correct.

19 MR. RIFFEE: To be clear for the record.

20 BY MR. DANITZ: 09:30:06

21 Q And, for the record, that's been
22 limited -- your testimony is limited to the
23 following paragraphs in the preliminary injunction:
24 1 through 7, 8C, 9B, and 11; is that correct?

25 A That's correct. 09:30:29

1 Q How did you prepare for today's deposition,
2 Ms. Lennon?

3 A I met with counsel and reviewed documentation
4 related to those topics.

5 Q And about how long did you meet with counsel? 09:30:37

6 A About ten hours or so.

7 Q Okay.

8 Over how many days?

9 A Over maybe about a month, a month's time.

10 Q So you met for about ten hours over a month's 09:30:50
11 time to prepare for this deposition; is that right?

12 A Yes.

13 Q And how many documents did you review to
14 prepare for the deposition?

15 A About seven or so documents, to my 09:31:01
16 recollection.

17 Q Seven.

18 And you feel fully prepared to respond to all
19 those topics today?

20 A I do. 09:31:18

21 Q How long have you been with the bank?

22 A 14 years.

23 Q And as of June 2021, what was your job
24 description?

25 A June 2021. 09:31:32

1 In June of 2021, I was senior vice president.
2 My job title was focused around client care related
3 to support of operations within Bank of America.

4 But I was also supporting the unemployment
5 work. I just didn't have that job title at the 09:32:04
6 time.

7 Q Okay.

8 And what were you doing to support the
9 unemployment work?

10 A I was helping to implement the communications 09:32:14
11 that were required under the preliminary injunction
12 order and related activity.

13 So supporting identification of accounts that
14 would require those communications and so forth.

15 Q Great. 09:32:35

16 And who were your direct reports at that
17 time?

18 A At that time, my direct reports were Douglas
19 Brown, Nicki Ruschell, Lisa Henzler, George Lee.

20 There may have been others doing other things, but 09:33:08
21 primarily those were the folks that were focused on
22 unemployment-related activity.

23 Q Who did you report to?

24 A I reported to Natalie Kieffer (phonetic) at
25 the time. 09:33:18

1 Q And what was her role?

2 A Her role was focused on the -- my kind of day
3 job, client-care-related activity, which supported
4 just Bank of America's operations unit as a whole.

5 So -- but she didn't manage anything related to 09:33:34
6 unemployment.

7 So it was like I was on the loan, basically,
8 to the unemployment team.

9 Q So for the unemployment side, I might refer
10 to UI, just because it's unemployment insurance. 09:33:49

11 Is that a good shorthand?

12 A Sounds fine.

13 Q Okay.

14 And for the prepaid EDD accounts or cards, I
15 may refer to the EDD cards or EDD cardholders. 09:34:02

16 Is that a fair shorthand?

17 A Sure.

18 Q Okay.

19 Just so we all know what we are talking
20 about. 09:34:11

21 Have you ever been deposed before?

22 A No.

23 Q But I'm sure you have a sense of how this
24 goes. It's question, answer.

25 A Yes. 09:34:23

■

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02:03:37

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[REDACTED]

■

[REDACTED]

[REDACTED]

[REDACTED]

■

[REDACTED]

Q I'm going to pull up -- I'm going to ask you some questions about Exhibit 135-1, which was the original Exhibit 1 to the bank's interrogatory responses, and then also Exhibit 136-1, which is the bank's revised Exhibit 1 in response to interrogatories 2 and 6.

So let me go ahead and call up Exhibit 135-1.

Do you see that on your screen?

A Yes.

Q And I'm also going to call up 136-1, which is the revised Exhibit 1. And I'll just kind of put them side by side.

Do you see both of the documents in front of you on the screen?

A I do.

Q So the claim entry date that's in Column C of Exhibit 135-1 and Column C of Exhibit 136-1 -- I'm sorry, 136-1, that claim entry date is the date that the caller calls and reports the claim, correct?

A Yes.

02:03:53

02:04:11

02:04:46

02:05:09

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1 (Exhibit 140-6 was marked for
2 identification and is attached
3 hereto.)

4 BY MS. CHAN:

5 Q Those are the supplemental Exhibit 6 response 02:36:02
6 to Interrogatory 21.

7 And a document marked Exhibit 140-7. That is
8 the data dictionary provided for Exhibit 8.

9 (Exhibit 140-7 was marked for
10 identification and is attached 02:36:14
11 hereto.)

12 BY MS. CHAN:

13 Q Do you have all of those documents?

14 A I do.

15 Q Great. 02:36:18

16 So other than adding features of Indicator 3
17 on supplemental Exhibit 6, is supplemental Exhibit 6
18 identical to the original Exhibit 6?

19 A I believe that would be the case, if memory
20 serves. 02:36:48

21 Q And the contents of these documents are true
22 and correct?

23 A Yes.

24 Q You reviewed them at the time they were
25 prepared? 02:36:55

1 A Yes.

2 Q And you determined that the contents were
3 true and correct?

4 A Yes. Based on my knowledge, yes.

5 Q And who did you speak with in order to verify 02:37:02
6 that the contents were true and correct?

7 A For this document, that would be Kenneth
8 Coyle and Christian Jalbert.

9 Q And did you do anything else to verify that
10 the contents were true and correct? 02:37:21

11 MR. RIFFEE: Objection; form.

12 THE DEPONENT: That would be all.

13 BY MS. CHAN:

14 Q I'm going to pull up the electronic version
15 of Exhibit 140-6. 02:37:46

16 And Exhibit 140-6 has four separate tabs,
17 correct?

18 A Yes.

19 Q And I'm going to have you also open up
20 Exhibit 139, which is the bank's responses to 02:38:21
21 Plaintiff's third set of interrogatories so we can
22 pull up the bank's written response that accompanies
23 Exhibit 6.

24 So I'm looking at page 9 of Exhibit 139. And
25 I'm looking at the supplemental Exhibit 6 which has 02:38:50

1 been marked Exhibit 140-6.

2 So looking at Exhibit 140-6, the Excel

3 spreadsheet, Part 1 contains a list of all of the

4 card alias IDs of EDD debit cardholders who

5 submitted a claim that were denied based on

02:39:07

6 Indicator 1 of the claim fraud filter, correct?

7 A Whose claims triggered the fraud filter --

8 Indicator 1 of the fraud filter.

9 Q And, I'm sorry, that's Column B, right?

10 Everybody who has a 1 under Column B, Indicator 1,

02:39:21

11 submitted a claim that triggered Indicator 1 of the

12 claim fraud filter, correct?

13 A That's right.

14 Q And everybody who has a 1 under Column C

15 submitted a claim that triggered Indicator 2 of the

02:39:38

16 claim fraud filter, correct?

17 A That's right.

18 Q And everybody who has a 1 under Column D,

19 Indicator 3, submitted a claim that triggered

20 Indicator 3 of the claim fraud filter, correct?

02:39:49

21 A That's right.

22 Q And all of these individuals submitted claims

23 that were denied, correct?

24 MR. RIFFEE: Objection; form.

25 THE DEPONENT: All -- excuse me. All of

02:40:17

1 these individuals had a claim that triggered the
2 fraud filter.

3 BY MS. CHAN:

4 Q And those claims were denied, correct?

5 MR. RIFFEE: Objection; form.

02:40:27

6 THE DEPONENT: Those claims would have been
7 denied. I believe that's correct.

8 BY MS. CHAN:

■ ■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

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■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED] [REDACTED]

3 MS. CHAN: Okay.

4 Counsel for the bank pointed out to me during
5 the break that I forgot to mark one of the documents 03:28:09
6 that I handed to the witness earlier. It should be
7 marked Document 141-13 is the verification to the
8 bank's responses to Plaintiff's fifth set of
9 interrogatories.

10 (Exhibit 141-13 was marked for 03:28:23
11 identification and is attached
12 hereto.)

13 BY MS. CHAN:

14 Q I believe you had a copy of that, right? I
15 just didn't mark it in the record. 03:28:28

16 A Yes.

17 Q Okay.

18 I'm going to ask you some questions about
19 Exhibit 136-2, which is the bank's revised Exhibit 2
20 in response to Interrogatory 3. 03:29:03

21 And do you see Exhibit 136-2 called up on the
22 screen in front of you?

23 A Yes.

24 Q Great.

25 And this document contains a list of the card 03:29:48

1 alias IDs for all EDD debit cardholders who BANA's
2 records indicate the claim received a permanent
3 credit from BANA in connection with their claim that
4 was subsequently rescinded based on application of
5 the claim fraud filter, correct? 03:30:09

6 MR. RIFFEE: Objection; form.

7 THE DEPONENT: That's right.

8 BY MS. CHAN:

9 Q If you could look at column -- I'm sorry.
10 Column C, the claim entry date, that refers to the 03:30:22
11 date that the claim was originally filed, correct?

12 A That's right.

13 Q And Column D contains the amount of that
14 claim, correct?

15 A Yes. 03:30:36

16 Q And Column E, the credit date, that refers to
17 the date that the permanent credit was issued for
18 that claim, correct?

19 MR. RIFFEE: Objection; form.

20 THE DEPONENT: That's correct. 03:30:47

21 BY MS. CHAN:

22 Q And Column F, the fraud filter date, refers
23 to the date that the fraud filter was applied and
24 triggered, correct?

25 A Correct. 03:31:05

[illegible]

1 BY MS. CHAN:

2 Q The amount of the credit rescinded based on
3 application of the claim fraud filter is the same as
4 the amount of the claim shown in Column D, correct?

5 A It would very likely be the same amount, but 03:32:31
6 we don't have that data here for certain. But if
7 the claim was -- you paid either fully or partially
8 and then subsequently rescinded, this is telling us
9 that that occurred. But I'm not certain if the
10 exact amount that was rescinded would match with the 03:32:54
11 claim amount. That would depend on what amount was
12 credited as the permanent credit.

■ ■ [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED] [REDACTED]
■ [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED]
■ [REDACTED] [REDACTED]

21 BY MS. CHAN:

22 Q Okay.

23 And Column G, the paid date, that's the date
24 that the rescinded credit was restored to the -- to
25 the cardholder's account, correct? 03:34:02

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<u>1</u>	A	<u>That's correct.</u>
----------	---	------------------------

2 Q And the restored amount was the amount of the
3 claims shown in Column D, correct?

4 A It would have been whatever -- it would have
5 been what was rescinded, which if it was the same 03:34:16
6 amount as the claim, then it would match Column D.

7 Q And it's your -- strike that.

8	<u>So the difference between Column F, the fraud</u>	
9	<u>filter date, and Column G, the paid date, is the</u>	
10	<u>length of time that the cardholder was without</u>	<u>03:34:39</u>
11	<u>access to the amount of the claim shown in Column D,</u>	
12	<u>correct?</u>	

13 MR. RIFFEE: Objection; form.

14 THE DEPONENT: Not necessarily. The Column F
15 is telling us when this claim triggered the fraud 03:34:48
16 filter. There isn't a column here that is
17 identifying when the funds were rescinded. It would
18 be after -- on or after that date, but that date
19 specifically is not listed.

20 BY MS. CHAN: 03:35:03

21 Q But the bank has that information, correct?

22 MR. RIFFEE: Objection; form.

23 THE DEPONENT: I would expect that we would
24 be able to gather that information.

25 /// 03:35:15

1 BY MS. CHAN:

2 Q Okay.

3 I'm going to pull up previously marked

4 Exhibit 140-6.

5 This is the bank's supplemental Exhibit 6 in 03:35:42
6 response to Interrogatory 21. And I'm going to be
7 looking at Part 2 now, Tab 2.

8 Do you see it in front of you on the screen,
9 Exhibit 140-6?

10 A I do. 03:36:14

11 Q So Tab 2 contains a list of the card alias
12 IDs for EDD debit cardholders who received permanent
13 credit that the bank subsequently rescinded based on
14 the claim fraud filter, correct?

15 MR. RIFFEE: Objection; form. 03:36:27

16 THE DEPONENT: I'm opening the interrogatory.

17 Yes.

18 BY MS. CHAN:

19 Q And every cardholder in supplemental
20 Exhibit 6, Exhibit 140-6, Part 2, Column B, received 03:36:50
21 permanent credit that the bank subsequently
22 rescinded because the claim triggered Indicator 1 of
23 the claim fraud filter, correct?

24 MR. RIFFEE: Objection; form.

25 THE DEPONENT: Correct. 03:37:05

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, Registered
3 Professional Reporter, Certified Live Note Reporter,
4 do hereby certify:

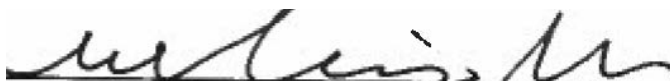
5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any witnesses in the foregoing proceedings,
8 prior to testifying, were duly sworn; that a record
9 of the proceedings was made by me using machine
10 shorthand which was thereafter transcribed under my
11 direction; that the foregoing transcript is a true
12 record of the testimony given.

13 Further, that if the foregoing pertains to
14 the original transcript of a deposition in a Federal
15 Case, before completion of the proceedings, review
16 of the transcript ☐ was ☒ was not requested.

17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22 Dated: March 1, 2024

23
24 

MELISSA M. VILLAGRAN

25 CSR No. 12543 RPR

In re Bank of America California Unemployment Benefits Litigation
Case No. 3:21-MD-02992-LAB-MSB

Errata for Deposition of Jennifer Lennon, February 23, 2024

Page	Line(s)	Change	Reason
19	5	Change “Senior vice president, product and state liaison” to “Senior Vice President, Product and State Liaison”	Transcription error
24	24	Change “Natalie Keiffer” to “Natalie Keefer”	Transcription error
25	7	Change “I was on the loan” to “I was on loan”	Transcription error
29	25	Change from “So when our vendors share” to “So our vendors share”	Clarification
31	1	Change “W” to “the W”	Transcription error
36	17	Change “that is” to “that it”	Transcription error
41	7	Change “global information security group” to “Global Information Security Group”	Transcription error
45	12	Change “latter” to “later”	Transcription error
50	20	Change “numbers” to number”	Transcription error
51	22-23	Change “2021. So do the math. But I haven’t done that math” to “2021. I haven’t done that math”	Transcription error
52	19	Change “defendant” to “defendants”	Transcription error
55	1	Change “Erin” to “Erin McCullen”	Clarification
70	18	Change “verify free statuses” to “verify statuses”	Transcription error
70	20	Change “claims that meet” to “claim that meets”	Transcription error
72	6	Change “no” to “yes”	Clarification
77	17	Change “operators” to “operations”	Transcription error
81	13	Change “a” to “with”	Transcription error
87	19	Change “without them requiring” to “without requiring them”	Transcription error
90	4	Change “dialog” to “dialogue”	Transcription error
97	23	Change “EDD” to “EDD cardholders”	Clarification

Page	Line(s)	Change	Reason
101	14	Change “is - - varies” to “varies”	Transcription error
101	25	Change “Global financial crimes” to “Global Financial Crimes”	Transcription error
114	13	Remove “, or if the account - -”	Transcription error
127	15-16	Change “, request review” to “and requested review”	Transcription error
128	23-24	Change “or remediation” to “remediation”	Transcription error
147	10	Change “AR” to “error”	Transcription error
155	16	Change “claim fraud filter, and it” to “Claim Fraud Filter and that it”	Transcription error
155	18-19	Change “investigated previously closed claim” to investigated (Previously Closed Claim)”	Transcription error
159	2	Change “claims initiation call center” to “Claims Initiation Call Center”	Transcription error
172	3	Change “and scale” to “and the scale”	Transcription error
187	23	Change “be deny claim” to “be to deny the claim”	Transcription error
189	3	Change “they” to “there”	Transcription error
192	6	Change “fraud strategies” to “Fraud Strategies”	Transcription error
192	8	Change “call center” to “Call Center”	Transcription error
200	1-2	Change “global financial crimes” to “Global Financial Crimes”	Transcription error
213	6	Change “it triggered indicators of the filter” to “triggered indicators of the filter”	Transcription error
213	18	Change “Those just” to “That’s just”	Transcription error
225	7-8	Change “- - excuse me. That triggered the fraud filter” to “- - excuse me - - that triggered the fraud filter”	Transcription error
233	12	Change “investigatory notes. That are” to “investigatory notes that are”	Transcription error
243	22	Add “BY MS. CHAN”	Clarification
247	25	Change “it’s” to “is”	Transcription error
254	16	Change “representing population” to “representing a population”	Transcription error

Page	Line(s)	Change	Reason
259	22	Change “global financial crimes” to “Global Financial Crimes”	Transcription error
264	16	Change “wasn’t” to “was”	Transcription error
265	1	Change “that is is” to “that was is”	Transcription error
265	7	Change “global financial crimes” to “Global Financial Crimes”	Transcription error
268	11	Change “IVR off” to “IVR Auth”	Transcription error
271	10	Change “how” to “yes”	Clarification
272	5	Change “already, then when” to “already, when”	Transcription error
272	9	Change “unblock” to “unblocked”	Transcription error
285	1	Change “here in” to “here and in”	Transcription error
299	6-7	Change “More significantly, by the end of the year, there” to “Most significantly, by the end of the year, but there”	Clarification
304	25	Change “that” to “then”	Transcription error
305	12-13	Change “with disqualification” to “with a disqualification”	Transcription error
306	18	Change “have paid her a” to “have paid direct”	Transcription error
310	13, 21-22	Change “global financial crimes” to “Global Financial Crimes”	Transcription error
313	22	Change “individualized review process” to “Individualized Review Process”	Transcription error
314	3	Change “prepaid” to “Prepaid”	Transcription error
319	7	Change “claims” to “Claims”	Transcription error

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. I have listed my changes on the above Errata Sheet, listing page and line numbers. I request that these changes be entered as part of the record of my testimony, and request and authorize that this Errata Sheet be appended to the transcript of my testimony and be incorporated therein..

Executed this 1st day of April, 2024.


Jennifer Lennon