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BANK OF AMERICA, N.A.*

**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

**JOINT MOTION TO EXTEND
TIME RE: EXPERT DISCLOSURES
AND PRETRIAL MOTIONS**

This Document Relates to All Actions

Judge: Hon. Gonzalo P. Curiel

Pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4), Civil Local Rule 7.2, and this Court's Civil Chambers Rules and Civil Pretrial and Trial Procedures, Plaintiffs and Defendant Bank of America, N.A. (the "parties") jointly request that the schedule be extended as set forth in the parties' proposed modified case schedule below.

The Parties believe that good cause exists to grant the parties' joint request. Pursuant to the December 24, 2024 Order Modifying Case Schedule (Dkt. No. 401), on January 27, 2025, the Parties exchanged summary expert designations. Plaintiffs subsequently learned of the availability of an additional expert, Prof. Chloe East of the University of Colorado, a labor economist whom Plaintiffs would like to designate as an expert for their case-in-chief.

On February 3, 2025, the parties met and conferred and Plaintiffs informed Defendant that they wished to disclose Prof. East. Plaintiffs served Defendant with a Supplemental Expert Designation for Prof. East that same day. On February 6, 2025, Defendant stated it would not contest Plaintiffs' designation of Prof. East on timeliness grounds provided the Parties jointly request a 14-day extension of existing expert and pretrial motion deadlines to allow sufficient time to locate or identify additional experts and prepare reports.

Accordingly, the Parties respectfully request that the Court extend the expert and pretrial motion deadlines as follows:

Event	Current Date	Proposed Date
Expert Designation	January 27, 2025	February 10, 2025
Rebuttal Expert Designation	February 3, 2025	February 17, 2025
Expert Disclosures	February 18, 2025	March 4, 2025
Rebuttal Expert Disclosures	March 14, 2025	March 28, 2025
Expert Discovery Cutoff	April 11, 2025	April 25, 2025
Pretrial Motions Cutoff	May 14, 2025	May 28, 2025

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2 Dated: February 7, 2025

Respectfully submitted,

COTCHETT, PITRE & McCARTHY, LLP

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4 By: /s/ Brian Danitz

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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