

1 JOSEPH W. COTCHETT (SBN 36324)

2 jcotchett@cpmlegal.com

3 BRIAN DANITZ (SBN 247403)

4 bdanitz@cpmlegal.com

5 KARIN B. SWOPE (Pro Hac Vice)

6 kswope@cpmlegal.com

7 BLAIR V. KITTLE (SBN 336367)

8 bkittle@cpmlegal.com

9 VASTI S. MONTIEL (SBN 346409)

10 vmontiel@cpmlegal.com

11 **COTCHETT, PITRE & McCARTHY, LLP**

12 840 Malcolm Road, Suite 200

13 Burlingame, CA 94010

14 Telephone: (650) 697-6000

15 Fax: (650) 697-0577

MICHAEL RUBIN (SBN 80618)

mrubin@altber.com

STACEY M. LEYTON (SBN 203827)

sleyton@altber.com

CONNIE K. CHAN (SBN 284230)

cchan@altber.com

KATHERINE G. BASS (SBN 344748)

kbass@altber.com

COLIN C. JONES (SBN 354301)

cjones@altber.com

ALTSHULER BERZON LLP

177 Post Street, Suite 300

San Francisco, CA 94108

Telephone: (415) 421-7151

Fax: (415) 362-8064

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 BRIAN DANITZ
IN SUPPORT OF JOINT MOTION TO
EXTEND TIME RE: EXPERT
DISCLOSURES AND PRETRIAL
MOTIONS**

Judge: Hon. Gonzalo P. Curiel

Ctrm: 2D (2nd Floor)

This Document Relates to All Actions

1 I, **BRIAN DANITZ**, declare as follows:

2 1. I am a partner at the law firm of Cotchett, Pitre & McCarthy, LLP, Co-Lead
3 Counsel for Plaintiffs and the Proposed Class in this multi-district litigation. I submit this
4 declaration in support of the Joint Motion to Extend Time Re: Expert Disclosures and
5 Pretrial Motions. I have personal knowledge of the matters stated herein and, if called as
6 a witness, I could and would testify competently thereto.

7 2. On January 27, 2025, the Parties exchanged expert designations. Several
8 days later, but prior to the February 3 date for rebuttal expert designations, Plaintiffs
9 learned of the availability of an additional expert, Prof. Chloe East of the University of
10 Colorado, a labor economist whom Plaintiffs would like to designate as an expert for
11 their case-in-chief.

12 3. On February 3, 2025, the Parties met and conferred and agreed to continue
13 the time for rebuttal expert designations. Plaintiffs served Defendant with a
14 Supplemental Expert Designation for Prof. East that same day.

15 4. On February 6, 2025, Defendant stated it would not contest Plaintiffs'
16 designation of Prof. East on timeliness grounds provided the Parties jointly request a 14-
17 day extension of existing expert and pretrial motion deadlines. The Parties agreed to
18 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

1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 on February 7, 2025 at Burlingame, California.

3
4 /s/ Brian Danitz

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