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13
14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**
16 **SAN DIEGO DIVISION**

17 IN RE: BANK OF AMERICA
18 CALIFORNIA UNEMPLOYMENT
19 BENEFITS LITIGATION

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

**DEFENDANT'S NOTICE OF
MOTION AND MOTION FOR A
PROTECTIVE ORDER**

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

NOTICE OF MOTION AND MOTION FOR A PROTECTIVE ORDER

PLEASE TAKE NOTICE that counsel for Defendant Bank of America, N.A. (“Defendant” or “BANA”) hereby moves for a protective order precluding the noticed depositions of BANA executives Brian Moynihan and Thomas Montag.

The Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities in support thereof, the Declaration of Matthew L. Riffée and exhibits thereto, the Declaration of Stacey Ruiz, all papers from this case on file with the Court, all other matters of which the Court may take judicial notice, any further evidence or argument offered to the Court at the hearing on this Motion, and any other evidence and argument the Court may consider.

Dated: April 11, 2025

Respectfully submitted,

By: s/ Matthew L. Riffée

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the clerk of the court for the United States District Court for the Southern District of California by using the CM/ECF system on April 11, 2025. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. I certify under penalty of perjury that the foregoing is true and correct.

Executed: April 11, 2025

s/ Matthew L. Riffie