

EXHIBIT 15

**FILED
PROVISIONALLY
UNDER SEAL WITH
REDACTIONS
PURSUANT TO
STIPULATED
PROTECTIVE ORDER**

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

THIS DOCUMENT RELATES TO ALL
ACTIONS

REMOTE VIDEOTAPED DEPOSITION OF MELISSA RAMIREZ
TUESDAY, FEBRUARY 11, 2025

JOB NO.: 10157864

REPORTED BY HEIDI FUEHRER, CSR 14145

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 VIDEOTAPED DEPOSITION OF MELISSA RAMIREZ, TAKEN ON
2 BEHALF OF THE PLAINTIFFS, AT 9:35 A.M., TUESDAY,
3 FEBRUARY 11, 2025, AT CHARLOTTE, NORTH CAROLINA, BEFORE
4 HEIDI FUEHRER, CSR NUMBER 14145.

5

6 APPEARANCES OF COUNSEL:

7

8 FOR THE PLAINTIFFS AND THE PROPOSED CLASS:

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Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

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26

27

28 ALSO PRESENT:

29 MARISA RAMOS, VIDEOGRAPHER
30

31

32

33

1 A I have been with the bank for 20 years.

2 There are so many org changes. I'm so sorry. It was

3 Cathy. I apologize.

4 Q No need to apologize. So Paul Simpson reported
5 to Cathy Bessant?

6 A Yes.

7 Q And what was, what was Cathy Bessant's role at
8 the bank?

9 A She was the head of tech and ops.

10 Q And who did Cathy Bessant report to?

11 A Brian Moynihan.

12 Q And Brian Moynihan is the CEO?

13 A That's correct.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column, with the longest bars at the top and bottom, and the shortest in the middle. The chart is set against a white background with a vertical gray line on the left. The bars represent a distribution of data, with the longest bars at the top and bottom, and the shortest in the middle. The chart is a simple, minimalist representation of data, with no labels or titles. The bars are arranged in a single column, with the longest bars at the top and bottom, and the shortest in the middle. The chart is a simple, minimalist representation of data, with no labels or titles. The bars are arranged in a single column, with the longest bars at the top and bottom, and the shortest in the middle. The chart is a simple, minimalist representation of data, with no labels or titles.

1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.
3

4 I, HEIDI FUEHRER, CSR No. 14145, in and for the
5 State of California, do hereby certify:

6 That prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify to the truth, the whole truth, and nothing but
9 the truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct, and complete transcript
14 of said proceedings;

15 That if the foregoing pertains to the original
16 transcript of a deposition in a Federal Case, before
17 completion of the proceedings, review of the transcript
18 { } Was { X } was not required.

19 I further certify that I am not interested in
20 the event of the action.

21 Witness my hand this 12th day of February,
22 2025.

23 

24 Certified Shorthand Reporter
25 for the State of California