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**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 DISCOVERY
CUTOFF**

This Document Relates to All Actions

Judge: Hon. Gonzalo P. Curiel

1 Pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4), Civil Local
2 Rule 7.2, and this Court's Civil Chambers Rules and Civil Pretrial and Trial
3 Procedures, Plaintiffs and Defendant Bank of America, N.A. (the "Parties") jointly
4 request that the expert discovery deadline be continued until June 11, 2025.

5 The Parties requested in their most recent Joint Statement (Dkt. No. 441) that
6 the Court continue the expert discovery deadline from April 25, 2025 until May 16,
7 2025. The Court granted the Parties' request at the March 28, 2025 Status Conference
8 (Dkt. No. 447) and further stated its willingness to accommodate a further extension
9 of the deadline to complete expert discovery if the Parties needed additional time to
10 complete their expert depositions.

11 Given the logistical challenges involved and the availability and schedules of
12 the Parties' respective experts and counsel, the Parties subsequently agreed to a
13 schedule that would result in the completion of all expert depositions by June 11, and
14 the parties have now completed all but five of those depositions.

15 Accordingly, the Parties respectfully request that the Expert Discovery Cutoff
16 be extended from the current May 16, 2025 deadline to June 11, 2025.

17
18 Respectfully submitted,
19 Dated: May 16, 2025 **COTCHETT, PITRE & McCARTHY, LLP**

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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, Laura Brys, 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/ Laura Brys

Laura Brys