

1 JAMES W. MCGARRY (pro hac vice)

2 *JMcGarry@goodwinlaw.com*

3 **GOODWIN PROCTER LLP**

4 100 Northern Avenue

5 Boston, MA 02210

6 Tel.: +1 617 570 1000

7 Fax: +1 617 523 1231

8 SABRINA M. ROSE-SMITH (pro hac vice)

9 *SRoseSmith@goodwinlaw.com*

10 MATTHEW L. RIFFEE (pro hac vice)

11 *MRiffee@goodwinlaw.com*

12 **GOODWIN PROCTER LLP**

13 1900 N Street, NW

14 Washington, DC 20036

15 Tel.: +1 202 346 4000

16 Fax: +1 202 346 4444

17 Attorneys for Defendant

18 BANK OF AMERICA, N.A.

19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

IN RE: BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION

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

**DECLARATION OF VALERIE A.
HAGGANS IN SUPPORT OF
DEFENDANT'S MOTION TO
STAY PENDING RESOLUTION
OF RULE 23(f) PETITION**

Date: September 16, 2025

Time: TBD

Ctrm: 2D – 2nd Floor

Judge: Hon. Gonzalo P. Curiel

1 I, Valerie A. Haggans, state and declare as follows:

2 1. I am an attorney licensed to practice before this Court.

3 2. I am a counsel at Goodwin Procter LLP, attorneys of record for
4 Defendant BANK OF AMERICA, N.A. ("BANA") in this action.

5 3. I make this declaration in support of Defendant's Motion to Stay
6 Pending Resolution of Rule 23(f) Petition. I have personal knowledge of the matters
7 set forth in this Declaration and/or upon a review of non-privileged records kept by
8 Goodwin Procter LLP in the regular course of its business, and if called upon to do
9 so, I could and would testify competently to same.

10 **Exhibit**

11 4. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant's
12 Petition for Leave to Appeal Under Fed. R. Civ. P. 23(f), and appendices thereto, and
13 dated June 30, 2025.

14
15 I declare under the penalty of perjury that the foregoing is true and correct.
16 Executed on this 3rd day of July, 2025.

17
18
19 By: /s/ Valerie A. Haggans
20 VALERIE A. HAGGANS
21
22
23
24
25
26
27
28