

EXHIBIT E

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In re Bank of America Unemployment Benefits Litigation

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

There is a class action lawsuit, and you may be a class member. Key things to know:

What is this lawsuit about? People who received unemployment insurance and other public benefits from the California Employment Development Department (EDD) on Bank of America-issued prepaid debit cards and reported unauthorized ATM transactions on their EDD prepaid debit card account to Bank of America between April 1, 2020 and June 8, 2021 have filed a lawsuit against Bank of America. They allege that Bank of America violated federal and California laws by implementing a “Claim Fraud Filter” to close certain claims of unauthorized transactions and to freeze certain cardholders’ accounts, by failing to include certain security chip technology in EDD prepaid debit cards for a period of time, and by understaffing a call center responsible for receiving inquiries regarding unauthorized transaction claims during a certain period of time. Plaintiffs are seeking money damages, including treble and punitive damages. Bank of America denies that the alleged conduct violated any law, and maintains that its challenged conduct was reasonable and consistent with its legal obligations.

Why did I get this notice? A federal court has approved this lawsuit proceeding as a class action. You are receiving this notice because Bank of America’s records indicate that you may be a member of one or more of the five approved classes.

What are my legal rights and options? You need to decide if you want to stay in the class or not.

- **If you want to be part of the case, you don’t need to do anything.** If you take no action, you will be part of the case and may be bound by any judgments entered for or against the classes or any settlement that may be entered into on behalf of the classes. Additionally, if you take no action, you also consent to Bank of America sharing your name, contact information, and certain prepaid unemployment account information with class counsel who would be acting as your legal representative in this case. The Court hasn’t decided yet whether Bank of America’s alleged conduct violated any law. If the classes win or reach a court-approved settlement with Bank of America, class members may receive payment. If Bank of America wins, class members will receive nothing, and any judgment entered in Bank of America’s favor will be binding on all class members.
- **If you do not want to be part of the case, you must follow the instructions at [website] for opting out by [DATE].** If you opt out from the case, you will not be bound by any judgments entered for or against the classes. If the classes win or reach a court-approved settlement with Bank of America, you will not receive payment. The deadline to opt out is [DATE].

Questions? For more information, visit [website] or call [toll free number]. You may also contact the lawyers appointed by the Court to serve as Class Counsel: Cotchett Pitre & McCarthy (650-697-6000) and Altshuler Berzon LLP (415-421-7151).

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**Court-Approved
Legal Notice**

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

If you received California EDD unemployment insurance or other public benefits and reported an unauthorized ATM transaction to Bank of America between April 1, 2020 and June 8, 2021, your rights may be affected by this lawsuit.

<<MAIL ID>>

<<NAME 1>>

<<NAME 2>>

<<ADDRESS LINE 1>>

<<ADDRESS LINE 2>>

<<CITY>>, <<STATE>>

<<ZIP>>

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