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13 *[ADDITIONAL COUNSEL LISTED IN SIGNATURE BLOCK]*

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

20 **DECLARATION OF VALERIE A.**
21 **HAGGANS IN SUPPORT OF**
22 **DEFENDANT'S REPLY BRIEF IN**
23 **SUPPORT OF ITS MOTION TO**
24 **STAY PENDING RESOLUTION**
25 **OF ITS RULE 23(f) PETITION**

26 Date: September 16, 2025
27 Time: 1:30 PM
28 Ctrm: 12-A – 12th Floor
Judge: Hon. Gonzalo P. Curiel

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

2 1. I am Counsel at Goodwin Procter LLP, and counsel of record for
3 Defendant Bank of America, N.A. (“BANA”) in the above-captioned lawsuit.

4 2. I have personal knowledge of the facts set forth in this declaration, and
5 if called upon to do so, I could and would competently testify thereto.

6 3. I make this declaration in support of BANA’s Reply Brief in Support of
7 its Motion to Stay Pending Resolution of its Rule 23(f) Petition.

8 4. On June 26, 2025, Class Counsel sent BANA a copy of its class notice
9 vendor Request for Proposal (“RFP”). The RFP included a provision for use of the
10 National Change of Address (“NCOA”) database to be used to verify addresses in
11 the event of undelivered or changed physical addresses.

12 5. On July 24, 2025, BANA and Plaintiffs agreed to accept Simpluris’s bid
13 to serve as the class notice vendor. Simpluris’s bid promised to utilize the NCOA,
14 the Coding Accuracy Support System (“CASS”), a USPS system used to standardize
15 and verify addresses, and the Locatable Address Conversion System (“LACS”), a
16 USPS system used to update and convert addresses, and further promised to conduct
17 skip tracing for undeliverable current email addresses.

18 6. Skip tracing is an analysis undertaken when mail or email is returned as
19 non-deliverable in order to locate more recent contact information for a given
20 individual.

21 **Exhibits**

22 7. Attached hereto as **Exhibit 1** is a true and correct copy of BANA’s
23 Reply Brief in Support of its Petition for Leave to Appeal Under Fed. R. Civ. P. 23(f),
24 dated August 6, 2025.

1 I declare under the penalty of perjury that the foregoing is true and correct.

2 Executed August 8, 2025, in Mamaroneck, NY.

3 By: s/ Valerie A. Haggans

4 VALERIE A. HAGGANS (pro hac vice)

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