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12 **UNITED STATES DISTRICT COURT**

13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 **IN RE BANK OF AMERICA**
15 **CALIFORNIA UNEMPLOYMENT**
16 **BENEFITS LITIGATION**

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

DECLARATION OF CONNIE K.
CHAN IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO STAY PENDING
RESOLUTION OF 23(F) PETITION

Judge: Hon. Gonzalo P. Curiel

Ctrm: 2D (2nd Floor)

Date: September 16, 2025

Time: 1:30 PM

23 This Document Relates to All Actions

DECLARATION OF CONNIE K. CHAN

I, Connie K. Chan, hereby declare as follows:

1. I am a partner at the law firm of Altshuler Berzon LLP, co-lead counsel for Plaintiffs and the certified classes in this action. I submit this declaration in support of Plaintiffs' Opposition to Defendant's Motion to Stay Pending Resolution of Rule 23(f) Petition. I have personal knowledge of the facts set forth in this declaration and if called as a witness in this action, I could and would testify competently to these facts.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of Plaintiffs' Deposition of Paul Simpson, taken on February 21, 2025. On July 25, 2025, the Bank agreed to de-designate an excerpt at 12:10-17, which is reflected in both Plaintiffs' Opposition to Defendant's Motion to Stay Pending Resolution of the Rule 23(f) Petition and in the attached Exhibit 1.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript of Plaintiffs' Deposition of Faiz Ahmad, taken on January 29, 2025.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of Plaintiffs' Deposition of William J. Fox, taken on February 13, 2025.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of Plaintiffs' Deposition of Bradley Garfield, taken on December 10, 2024.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript of Plaintiffs' Deposition of Anne Holt, taken on January 8, 2025.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the transcript of Plaintiffs' Deposition of Renee Johnson, taken on May 7, 2024.

8. Consistent with the parties' Stipulated Proposed Notice Plan (ECF 518 at 3-4), the parties have agreed to use Simpluris as the notice administrator for the distribution of class notice in this case.

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1 I declare under penalty of perjury that that the foregoing is true and correct.
2 Executed this 25th day of July, 2025 in Burlingame, California.

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4 s/ Connie K. Chan
5 Connie K. Chan
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