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12 Attorneys for Defendant
13 **BANK OF AMERICA, N.A.**

14 **UNITED STATES DISTRICT COURT**
15 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
16 **SAN DIEGO DIVISION**

17 IN RE: BANK OF AMERICA
18 CALIFORNIA UNEMPLOYMENT
19 BENEFITS LITIGATION

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

20 **DECLARATION OF LINDSAY E.**
21 **HOYLE IN SUPPORT OF**
22 **DEFENDANT'S MOTION TO**
23 **EXCLUDE THE PURPORTED**
24 **EXPERT OPINIONS OF JANE**
25 **CLONINGER**

26 Date: April 17, 2026
27 Time: 1:30 p.m.
28 Ctrm: 12A – 12th Floor
Judge: Hon. Gonzalo P. Curiel

EXHIBITS FILED PROVISIONALLY UNDER
SEAL PURSUANT TO STIPULATED
PROTECTIVE ORDER

1 I, Lindsay E. Hoyle, 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 Motion to Exclude the
7 Purported Expert Opinions of Jane Cloninger.

8 4. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert
9 Report of Jane Cloninger, and appendices thereto, dated March 4, 2025.

10 5. Attached hereto as **Exhibit 2** is a true and correct copy of the Expert
11 Rebuttal Report of Jane Cloninger, and appendices thereto, dated April 4, 2025.

12 6. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from
13 the official transcript of BANA's deposition of Plaintiffs' expert Jane Cloninger,
14 taken on June 11, 2025.

15 7. Attached hereto as **Exhibit 4** is a true and correct copy of a document
16 produced by BANA in this action Bates stamped BANA_EDD_MDL-00700098.

17 8. Attached hereto as **Exhibit 5** is a true and correct copy of a document
18 produced by BANA in this action Bates stamped BANA_EDD_MDL-00232665.

19 9. Attached hereto as **Exhibit 6** is a true and correct copy of a document
20 produced by BANA in this action Bates stamped BANA_EDD_MDL-00624545.

21 10. Attached hereto as **Exhibit 7** is a true and correct copy of a document
22 produced by BANA in this action Bates stamped BANA_EDD_MDL-00351839.

23 11. Attached hereto as **Exhibit 8** is a true and correct copy of a document
24 produced by BANA in this action Bates stamped BANA_EDD_MDL-00102964.

25 12. Attached hereto as **Exhibit 9** is a true and correct copy of a document
26 produced by BANA in this action Bates stamped BANA_EDD_MDL-00059687.

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1 I declare under penalty of perjury that the foregoing is true and correct.
2 Executed on October 17, 2025, in Old Greenwich, CT.

3 /s/ Lindsay E. Hoyle
4 LINDSAY E. HOYLE
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