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**FILED
PROVISIONALLY
UNDER SEAL WITH
REDACTIONS
PURSUANT TO
STIPULATED
PROTECTIVE ORDER**

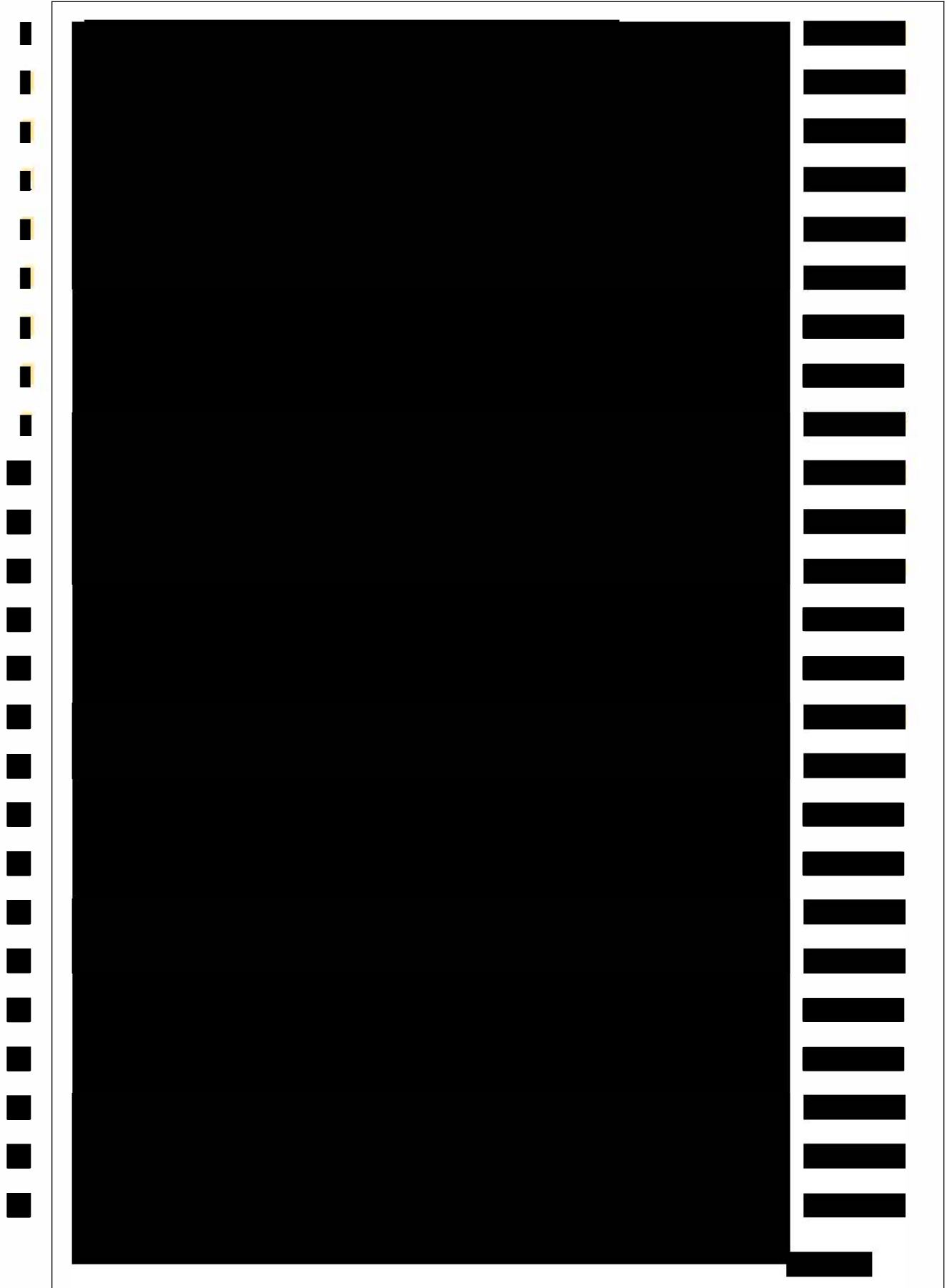
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THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
IN RE BANK OF AMERICA) Case No.
CALIFORNIA UNEMPLOYMENT) 3:21-md-02992-LAB-MSB
BENEFITS LITIGATION)
-----)

VIDEOTAPED ORAL DEPOSITION OF
BANK OF AMERICA, N.A.
BY AND THROUGH ITS DESIGNATED REPRESENTATIVE
SHANE DANIELS
FEBRUARY 6, 2024

On the 6th day of February, 2024, at 9:09 a.m.,
the videotaped oral deposition of the above-named
witness was taken at the instance of the Plaintiffs,
before Michelle L. Munroe, Certified Shorthand
Reporter in and for the State of Texas, at Jones Day,
2727 N. Harwood Street, Suite 500, Dallas, Texas,
pursuant to Notice and the agreement hereinafter set
forth.

1



1 STATE OF TEXAS)

2 COUNTY OF DALLAS)

3 I, Michelle L. Munroe, Certified Shorthand
4 Reporter in and for the State of Texas, certify that
5 the foregoing deposition of SHANE DANIELS was
6 reported stenographically by me at the time and place
7 indicated, said witness having been placed under oath
8 by me, and that the deposition is a true record of
9 the testimony given by the witness;

10 That the amount of time used by each party at
11 the deposition is as follows:

Mr. Kirtley - 7 hours, 4 minutes

12
13 I further certify that I am neither counsel for
14 nor related to any party in this cause and am not
15 financially interested in its outcome.

16 Given under my hand on this the 21st day
17 of February, 2024.

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Michelle L. Munroe, CSR No. 6011

Commission expires 1-31-26

Firm Registration #571

22 VERITEXT LEGAL SOLUTIONS

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