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17 Attorneys for Defendant
18 **BANK OF AMERICA, N.A.**

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

IN RE: BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION

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

**DECLARATION OF LAURA G.
BRYN IN SUPPORT OF
DEFENDANT BANK OF
AMERICA, N.A.'S MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

Date: April 17, 2026
Time: 1:30 p.m.
Cttrm: 12AD – 12th Floor
Judge: Hon. Gonzalo P. Curiel

1 I, Laura Brys, hereby declare as follows:

2 1. I am an attorney licensed to practice before this Court.

3 2. I am a senior attorney at Goodwin Procter LLP, attorneys of record for
4 Defendant BANK OF AMERICA, N.A. (BANA) in this action.

5 3. I make this declaration in support of BANA's Motion for Partial
6 Summary Judgment. I have personal knowledge of the matters set forth in this
7 Declaration and/or upon a review of non-privileged records kept by Goodwin Procter
8 LLP in the regular course of its business, and if called upon to do so, I could and
9 would testify competently to same.

10 4. BANA's Exhibits to this Declaration shall be referred to as "DX" in
11 BANA's Motion for Partial Summary Judgment and its supporting documents.

12 **Fact Declarations**

13 5. Attached hereto as **Exhibit 1** is a true and correct copy of the
14 Declaration of Robert Chestnut in Support of Defendant's Motion for Partial
15 Summary Judgment dated October 16, 2025.

16 6. Attached hereto as **Exhibit 2** is a true and correct copy of the
17 Declaration of William Golden in Support of Defendant's Motion for Partial
18 Summary Judgment dated October 15, 2025.

19 7. Attached hereto as **Exhibit 3** is a true and correct copy of the
20 Declaration of Jennifer Lennon in Support of Defendant's Motion for Partial
21 Summary Judgment dated October 16, 2025.

22 8. Attached hereto as **Exhibit 4** is a true and correct copy of the
23 Declaration of Michael J. Letson in Support of Defendant's Motion for Partial
24 Summary Judgment dated October 16, 2025.

25 9. Attached hereto as **Exhibit 5** is a true and correct copy of the
26 Declaration of William M. Martin in Support of Defendant's Motion for Partial
27 Summary Judgment dated October 16, 2025.

28 10. Attached hereto as **Exhibit 6** is a true and correct copy of the

1 Declaration of Don Robart in Support of Defendant's Motion for Partial Summary
2 Judgment dated October 16, 2025.

3 **Expert Declarations and Reports**

4 11. Attached hereto as **Exhibit 7** is a true and correct copy of the
5 Declaration of Victor Stango in Support of Defendant's Motion for Partial Summary
6 Judgment dated October 16, 2025.

7 12. Attached hereto as **Exhibit 7.A** is a true and correct copy of the Expert
8 Report of Victor Stango, and appendices thereto, dated April 4, 2025.

9 13. Attached hereto as **Exhibit 8** is a true and correct copy of the
10 Declaration of Justin McCrary in Support of Defendant's Motion for Partial
11 Summary Judgment dated October 13, 2025.

12 14. Attached hereto as **Exhibit 8.A** is a true and correct copy of the Expert
13 Report of Professor Justin McCrary, and appendices thereto, dated April 4, 2025.

14 15. Attached hereto as **Exhibit 9** is a true and correct copy of the
15 Declaration of Carl Pry in Support of Defendant's Motion for Partial Summary
16 Judgment dated October 10, 2025.

17 16. Attached hereto as **Exhibit 9.A** is a true and correct copy of the Expert
18 Rebuttal Report of Carl Pry, and appendices thereto, dated April 4, 2025.

19 17. Attached hereto as **Exhibit 10** is a true and correct copy of the
20 Declaration of Russell Cronan in Support of Defendant's Motion for Partial
21 Summary Judgment dated October 13, 2025.

22 18. Attached hereto as **Exhibit 10.A** is a true and correct copy of the Expert
23 Report of Russell Cronan, and appendices thereto, dated March 4, 2025.

24 19. Attached hereto as **Exhibit 11** is a true and correct copy of the
25 Declaration of Teresa A. Pesce in Support of Defendant's Motion for Partial
26 Summary Judgment dated October 13, 2025.

27 20. Attached hereto as **Exhibit 11.A** is a true and correct copy of the Expert
28 Rebuttal Report of Teresa A. Pesce, and appendices thereto, dated April 4, 2025.

21. Attached hereto as Exhibit **11.B** is a true and correct copy of the Expert Report of Teresa A. Pesce, and appendices thereto, dated March 4, 2025.

22. Attached hereto as **Exhibit 12** is a true and correct copy of the Declaration of Pamela Joseph dated October 11, 2025.

23. Attached hereto as Exhibit **12.A** is a true and correct copy of the Expert Report of Pamela Joseph, and appendices thereto, dated March 4, 2025.

24. Attached hereto as Exhibit **12.B** is a true and correct copy of the Expert Rebuttal Report of Pamela Joseph in Support of Defendant's Motion for Partial Summary Judgment, dated April 4, 2025.

25. Attached hereto as **Exhibit 13** is a true and correct copy of the Declaration of Stephen Hindle in Support of Defendant's Motion for Partial Summary Judgment dated October 10, 2025.

26. Attached hereto as Exhibit **13.A** is a true and correct copy of the Expert Rebuttal Report of Steve Hindle dated April 4, 2025.

Deposition Transcripts

27. Attached hereto as **Exhibit 14.A** is a true and correct copy of excerpts of the official transcript of Plaintiffs' deposition of Faiz A. Ahmad, taken on January 29, 2025.

28. Attached hereto as **Exhibit 14.B** is a true and correct copy of excerpts of the official transcript of Plaintiffs' deposition of Robert A. Chestnut, taken on February 8, 2024.

29. Attached hereto as **Exhibit 14.C** is a true and correct copy of excerpts of the official transcript of BANA's deposition of Jane Cloninger, taken on June 11, 2025.

30. Attached hereto as Exhibit **14.C.1** is a true and correct copy of the Expert Report of Jane Cloninger, and appendices thereto, dated March 4, 2025.

31. Attached hereto as Exhibit **14.C.2** is a true and correct copy of the Expert Rebuttal Report of Jane Cloninger, and appendices thereto, dated April 4,

1 2025.

2 32. Attached hereto as **Exhibit 14.D** is a true and correct copy of excerpts
3 of the official transcript of Plaintiffs' deposition of Russell Wayne Cronan, Sr., taken
4 on May 1, 2025.

5 33. Attached hereto as **Exhibit 14.E** is a true and correct copy of excerpts
6 of the official transcript of Plaintiffs' deposition of Shane Daniels, taken on February
7 6, 2024.

8 34. Attached hereto as **Exhibit 14.F** is a true and correct copy of excerpts
9 of the official transcript of Plaintiffs' deposition of Chloe Noel East, Ph.D., taken on
10 May 15, 2025.

11 35. Attached hereto as **Exhibit 14.F.1** is a true and correct copy of the
12 Expert Report of Chloe Noel East, and appendices thereto, dated March 4, 2025.

13 36. Attached hereto as **Exhibit 14.G** is a true and correct copy of excerpts
14 of the official transcript of Plaintiffs' deposition of Jennifer Ehresman, taken on
15 February 19, 2025.

16 37. Attached hereto as **Exhibit 14.H** is a true and correct copy of excerpts
17 of the official transcript of Plaintiffs' deposition of William Fox, taken on February
18 13, 2025.

19 38. Attached hereto as **Exhibit 14.I** is a true and correct copy of excerpts of
20 the official transcript of Plaintiffs' deposition of Bradley Garfield, taken on
21 December 10, 2024.

22 39. Attached hereto as **Exhibit 14.J** is a true and correct copy of excerpts
23 of the official transcript of Plaintiffs' deposition of William Golden, taken on
24 February 22, 2024.

25 40. Attached hereto as **Exhibit 14.K** is a true and correct copy of excerpts
26 of the official transcript of Plaintiffs' deposition of Stephen Hindle, taken on April
27 29, 2025.

28 41. Attached hereto as **Exhibit 14.L** is a true and correct copy of excerpts

1 of the official transcript of Plaintiffs' deposition of Anne Holt, taken on January 8,
2 2025.

3 42. Attached hereto as **Exhibit 14.M** is a true and correct copy of excerpts
4 of the official transcript of Plaintiffs' deposition of Renee Johnson, taken on May 7,
5 2024.

6 43. Attached hereto as **Exhibit 14.N** is a true and correct copy of excerpts
7 of the official transcript of Plaintiffs' deposition of Pamela Ann Joseph, taken on
8 May 12, 2025.

9 44. Attached hereto as **Exhibit 14.O** is a true and correct copy of excerpts
10 of the official transcript of BANA's deposition of J. Daniel Kreis, taken on May 5,
11 2025.

12 45. Attached hereto as **Exhibit 14.O.1** is a true and correct copy of excerpts
13 of the Expert Report of J. Daniel Kreis, and appendices thereto, dated March 4, 2025.

14 46. Attached hereto as **Exhibit 14.P** is a true and correct copy of excerpts
15 of the official transcript of Plaintiffs' deposition of Jennifer Lennon, taken on
16 February 23, 2024.

17 47. Attached hereto as **Exhibit 14.Q** is a true and correct copy of excerpts
18 of the official transcript of Plaintiffs' deposition Michael Letson, taken on February
19 16, 2024.

20 48. Attached hereto as **Exhibit 14.R** is a true and correct copy of excerpts
21 of the official transcript of BANA's deposition of David I. Levine, taken on May 28,
22 2025.

23 49. Attached hereto as **Exhibit 14.R.1** is a true and correct copy of excerpts
24 of the Expert Report of David I. Levine dated March 4, 2025.

25 50. Attached hereto as **Exhibit 14.S** is a true and correct copy of excerpts
26 of the official transcript of Plaintiffs' deposition of William Matthew Martin, taken
27 on February 14, 2024.

28 51. Attached hereto as **Exhibit 14.T** is a true and correct copy of excerpts

1 of the official transcript of BANA's deposition of Lindsay McClure, taken on March
2 12, 2024.

3 52. Attached hereto as **Exhibit 14.U** is a true and correct copy of excerpts
4 of the official transcript of Plaintiffs' deposition of Jay Minnucci, taken on April 23,
5 2025.

6 53. Attached hereto as **Exhibit 14.U.1** is a true and correct copy of excerpts
7 of the Expert Report of Jay Minnucci, and appendices thereto, dated March 4, 2025.

8 54. Attached hereto as **Exhibit 14.V** is a true and correct copy of excerpts
9 of the official transcript of Plaintiffs' deposition of Thomas Montag, taken on
10 September 24, 2025.

11 55. Attached hereto as **Exhibit 14.W** is a true and correct copy of excerpts
12 of the official transcript of BANA's deposition of Azuri Moon, taken on February
13 27, 2024.

14 56. Attached hereto as **Exhibit 14.X** is a true and correct copy of excerpts
15 of the official transcript of Plaintiffs' deposition of Brian T. Moynihan, taken on
16 October 2, 2025.

17 57. Attached hereto as **Exhibit 14.Y** is a true and correct copy of excerpts
18 of the official transcript of Plaintiffs' deposition of Teresa Pesce, taken on May 8,
19 2025.

20 58. Attached hereto as **Exhibit 14.Z** is a true and correct copy of excerpts
21 of the official transcript of Plaintiffs' deposition of Carl Pry, taken on May 16, 2025.

22 59. Attached hereto as **Exhibit 14.AA** is a true and correct copy of excerpts
23 of the official transcript of Plaintiffs' deposition of Melissa Ramirez, taken on
24 February 11, 2025.

25 60. Attached hereto as **Exhibit 14.AB** is a true and correct copy of excerpts
26 of the official transcript of BANA's deposition of Greg Regan, taken on May 19,
27 2025.

28 61. Attached hereto as **Exhibit 14.AB.1** is a true and correct copy of the

1 Expert Report of Greg J. Regan, CPA/CFF, CFE, and appendices thereto, dated
2 March 4, 2025.

3 62. Attached hereto as **Exhibit 14.AC** is a true and correct copy of excerpts
4 of the official transcript of BANA's deposition of Vanessa Rivera, taken on February
5 29, 2025.

6 63. Attached hereto as **Exhibit 14.AD** is a true and correct copy of excerpts
7 of the official transcript of Plaintiffs' deposition of Ryan Schwartz, taken on
8 December 4, 2025.

9 64. Attached hereto as **Exhibit 14.AE** is a true and correct copy of excerpts
10 of the official transcript of Plaintiffs' deposition of Paul Simpson, taken on February
11 21, 2025.

12 65. Attached hereto as **Exhibit 14.AF** is a true and correct copy of excerpts
13 of the official transcript of the deposition of Shameel Singh, taken on May 8, 2025.

14 66. Attached hereto as **Exhibit 14.AG** is a true and correct copy of excerpts
15 of the official transcript of Plaintiffs' deposition of Victor Stango, taken on May 30,
16 2025.

17 **Plaintiffs' Discovery Responses**

18 67. Attached hereto as **Exhibit 15** is a true and correct copy of an excerpt
19 from Plaintiff Kuang Ting Chong's Supplemental Responses to BANA's First Set of
20 Interrogatories Directed to Plaintiffs.

21 68. Attached hereto as **Exhibit 16** is a true and correct copy of an excerpt
22 from Plaintiff Candace Koole's Supplemental Responses to BANA's First Set of
23 Interrogatories Directed to Plaintiffs.

24 69. Attached hereto as **Exhibit 17** is a true and correct copy of an excerpt
25 from Plaintiff Lindsey McClure's Supplemental Responses to BANA's First Set of
26 Interrogatories Directed to Plaintiffs.

27 70. Attached hereto as **Exhibit 18** is a true and correct copy of an excerpt
28 from Plaintiff Azuri Moon's Supplemental Responses to BANA's First Set of

Interrogatories Directed to Plaintiffs.

71. Attached hereto as **Exhibit 19** is a true and correct copy of an excerpt from Plaintiff Stephanie Moore's Supplemental Responses to BANA's First Set of Interrogatories Directed to Plaintiffs.

72. Attached hereto as **Exhibit 20** is a true and correct copy of an excerpt from Plaintiff Roland Oosthuizen's Supplemental Responses to BANA's First Set of Interrogatories Directed to Plaintiffs.

73. Attached hereto as **Exhibit 21** is a true and correct copy of an excerpt from Plaintiff Vanessa Rivera's Supplemental Responses to BANA's First Set of Interrogatories Directed to Plaintiffs.

74. Attached hereto as **Exhibit 22** is a true and correct copy of an excerpt from Plaintiff J. Michael Willrich's Supplemental Responses to BANA's First Set of Interrogatories Directed to Plaintiffs.

75. Attached hereto as **Exhibit 23** is a true and correct copy of an excerpt from Plaintiff Alex Yuan's Supplemental Responses to BANA's First Set of Interrogatories Directed to Plaintiffs.

Subpoena Responses

76. Attached hereto as **Exhibit 24** is a true and correct copy of the Declaration of Marc D. Keller in response to Plaintiffs' Subpoena, dated May 14, 2024.

77. Attached hereto as **Exhibit 25** is a true and correct copy of TTEC's Response to Plaintiff Lindsay McClure's Subpoena.

BANA's Discovery Responses

78. Attached hereto as **Exhibit 26** is a true and correct copy of an excerpt from BANA's Responses to Plaintiffs' First Set of Requests for Admission.

79. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts from BANA's Revised Second Supplemental Responses to Plaintiffs' First Set of Interrogatories.

1 80. Attached hereto as **Exhibit 27.A** is a true and correct copy of Exhibit 1
2 of BANA's Revised Second Supplemental Responses to Plaintiffs' First Set of
3 Interrogatories.

4 81. Attached hereto as **Exhibit 27.B** is a true and correct copy of Exhibit 3
5 of BANA's Revised Second Supplemental Responses to Plaintiffs' First Set of
6 Interrogatories.

7 82. Attached hereto as **Exhibit 27.C** is a true and correct copy of Exhibit 4
8 of BANA's Revised Second Supplemental Responses to Plaintiffs' First Set of
9 Interrogatories.

10 83. Attached hereto as **Exhibit 27.D** is a true and correct copy of Exhibit 5
11 of BANA's Revised Second Supplemental Responses to Plaintiffs' First Set of
12 Interrogatories.

13 84. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts from
14 BANA's Responses to Plaintiffs' Fourth Set of Interrogatories.

15 85. Attached hereto as **Exhibit 28.A** is a true and correct copy of an excerpt
16 from BANA's Revised Responses to Plaintiffs' Third Set of Interrogatories.

17 86. Attached hereto as **Exhibit 28.A.1** is a true and correct copy of an
18 excerpt from BANA's Revised Responses to Plaintiffs' Third Set of Interrogatories.

19 87. Attached hereto as **Exhibit 29** is a true and correct copy of an excerpt
20 from BANA's Responses to Plaintiffs' Eighth Set of Interrogatories.

21 88. Attached hereto as **Exhibit 30** is a true and correct copy of an excerpt
22 from BANA's Responses to Plaintiffs' Fifth Set of Interrogatories.

23 89. Attached hereto as **Exhibit 30.A** is a true and correct copy of excerpts
24 from BANA's Responses to Plaintiffs' Fifth Set of Interrogatories.

25 90. Attached hereto as **Exhibit 30.B** is a true and correct copy of BANA's
26 Supplemental Responses to Plaintiffs' Fifth Set of Interrogatories.

27 91. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts from
28 BANA's Second Set of Responses to Plaintiffs' Seventh Set of Interrogatories.

1 92. Attached hereto as **Exhibit 31.A** is a true and correct copy of excerpts
2 from BANA's Second Supplemental Responses to Plaintiffs' Seventh Set of
3 Interrogatories.

4 93. Attached hereto as **Exhibit 31.B** is a true and correct copy of an excerpt
5 from BANA's Revised Second Supplemental Responses to Plaintiffs' Seventh Set of
6 Interrogatories.

7 94. Attached hereto as **Exhibit 31.B.1** is a true and correct copy of excerpts
8 from BANA's Revised Second Supplemental Responses to Plaintiffs' Seventh Set of
9 Interrogatories.

10 **Plaintiff Produced Documents**

11 95. Attached hereto as **Exhibit 32** is a true and correct copy of a document
12 produced by Plaintiff Candace Koole in this action Bates stamped
13 Koole_C_00000055.

14 96. Attached hereto as **Exhibit 33** is a true and correct copy of a document
15 produced by Plaintiff Candace Koole in this action Bates stamped
16 Koole_C_00000067.

17 97. Attached hereto as **Exhibit 34** is a true and correct copy of a document
18 produced by Plaintiff Azuri Moon in this action Bates stamped Moon_A_00000006.

19 98. Attached hereto as **Exhibit 35** is a true and correct copy of a document
20 produced by Plaintiff Azuri Moon in this action Bates stamped Moon_A_00000088.

21 99. Attached hereto as **Exhibit 36** is a true and correct copy of a document
22 produced by Plaintiff Azuri Moon in this action Bates stamped Moon_A_00000118.

23 100. Attached hereto as **Exhibit 37** is a true and correct copy of a document
24 produced by Plaintiff Azuri Moon in this action Bates stamped Moon_A_00000141.

25 101. **Exhibit 38** is intentionally omitted.

26 **BANA Documents**

27 102. Attached hereto as **Exhibit 39** is a true and correct copy of a document
28 produced by BANA in this action Bates stamped BANA_EDD_MDL-00002286.

1 103. Attached hereto as **Exhibit 40.A** is a true and correct copy of a
2 document produced by BANA in this action Bates stamped BANA_EDD_MDL-
3 00001500.

4 104. Attached hereto as **Exhibit 40.B** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00086396.

6 105. Attached hereto as **Exhibit 41** is a true and correct copy of the Consent
7 Order of the Office of the Comptroller of the Currency (OCC).

8 106. Attached hereto as **Exhibit 42** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00387807.

10 107. Attached hereto as **Exhibit 43.A** is a true and correct copy of a
11 document produced by BANA in this action Bates stamped BANA_EDD_MDL-
12 00102554.

13 108. Attached hereto as **Exhibit 43.B** is a true and correct copy of a document
14 produced by BANA in this action Bates stamped BANA_EDD_MDL-00102520.

15 109. Attached hereto as **Exhibit 43.C** is a true and correct copy of a
16 document produced by BANA in this action Bates stamped BANA_EDD_MDL-
17 00102578.

18 110. Attached hereto as **Exhibit 44** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00012816.

20 111. Attached hereto as **Exhibit 45** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00354749.

22 112. Attached hereto as **Exhibit 46** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00012801.

24 113. Attached hereto as **Exhibit 47** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00013111.

26 114. Attached hereto as **Exhibit 48** is a true and correct copy of a document
27 produced by BANA in this action Bates stamped BANA_EDD_MDL-00013107.

28 115. Attached hereto as **Exhibit 49** is a true and correct copy of a document

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00013096.

2 116. Attached hereto as **Exhibit 50** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00002852.

4 117. Attached hereto as **Exhibit 51** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00005509.

6 118. Attached hereto as **Exhibit 52** is a true and correct copy of a document
7 produced by BANA in this action Bates stamped BANA_EDD_MDL-00012790.

8 119. Attached hereto as **Exhibit 53** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014090.

10 120. Attached hereto as **Exhibit 54** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014091.

12 121. Attached hereto as **Exhibit 55** is a true and correct copy of a document
13 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014099.

14 122. Attached hereto as **Exhibit 56** is a true and correct copy of a document
15 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014817.

16 123. Attached hereto as **Exhibit 57** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014819.

18 124. Attached hereto as **Exhibit 58** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014820.

20 125. Attached hereto as **Exhibit 59** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00014821.

22 126. Attached hereto as **Exhibit 60** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00015433.

24 127. Attached hereto as **Exhibit 61** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00019602.

26 128. Attached hereto as **Exhibit 62** is a true and correct copy of a document
27 produced by BANA in this action Bates stamped BANA_EDD_MDL-00019618.

28 129. Attached hereto as **Exhibit 63** is a true and correct copy of a document

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00019846.

2 130. Attached hereto as **Exhibit 64** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00043600.

4 131. Attached hereto as **Exhibit 65** is a true and correct copy of an excerpt
5 of a document produced by BANA in this action Bates stamped BANA_EDD_MDL-
6 00044098.

7 132. Attached hereto as **Exhibit 66** is a true and correct copy of an excerpt
8 of a document produced by BANA in this action Bates stamped BANA_EDD_MDL-
9 00044180.

10 133. Attached hereto as **Exhibit 67** is a true and correct copy of an excerpt
11 of a document produced by BANA in this action Bates stamped BANA_EDD_MDL-
12 00044201.

13 134. Attached hereto as **Exhibit 68** is a true and correct copy of an excerpt
14 of a document produced by BANA in this action Bates stamped BANA_EDD_MDL-
15 00044202.

16 135. Attached hereto as **Exhibit 69** is a true and correct copy of an excerpt
17 of a document produced by BANA in this action Bates stamped BANA_EDD_MDL-
18 00044295.

19 136. Attached hereto as **Exhibit 70** is a true and correct copy of a document
20 produced by BANA in this action Bates stamped BANA_EDD_MDL-00054835.

21 137. Attached hereto as **Exhibit 71** is a true and correct copy of a document
22 produced by BANA in this action Bates stamped BANA_EDD_MDL-00057488.

23 138. Attached hereto as **Exhibit 72** is a true and correct copy of a document
24 produced by BANA in this action Bates stamped BANA_EDD_MDL-00059677.

25 139. Attached hereto as **Exhibit 73** is a true and correct copy of a document
26 produced by BANA in this action Bates stamped BANA_EDD_MDL-00073529.

27 140. Attached hereto as **Exhibit 74** is a true and correct copy of a document
28 produced by BANA in this action Bates stamped BANA_EDD_MDL-00074993.

1 141. Attached hereto as **Exhibit 75** is a true and correct copy of a document
2 produced by BANA in this action Bates stamped BANA_EDD_MDL-00076984.

3 142. Attached hereto as **Exhibit 76** is a true and correct copy of a document
4 produced by BANA in this action Bates stamped BANA_EDD_MDL-00077224.

5 143. Attached hereto as **Exhibit 77** is a true and correct copy of a document
6 produced by BANA in this action Bates stamped BANA_EDD_MDL-00082907.

7 144. **Exhibit 77.A** is intentionally omitted.¹

8 145. Attached hereto as **Exhibit 78** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00085548.

10 146. Attached hereto as **Exhibit 79** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00086221.

12 147. Attached hereto as **Exhibit 80** is a true and correct copy of a document
13 produced by BANA in this action Bates stamped BANA_EDD_MDL-00086827.

14 148. Attached hereto as **Exhibit 81** is a true and correct copy of a document
15 produced by BANA in this action Bates stamped BANA_EDD_MDL-00086931.

16 149. Attached hereto as **Exhibit 82** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00086932.

18 150. Attached hereto as **Exhibit 83** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00087715.

20 151. Attached hereto as **Exhibit 84** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00087749.

22 152. Attached hereto as **Exhibit 85** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00087772.

24 153. Attached hereto as **Exhibit 86** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00087776.

26 154. Attached hereto as **Exhibit 87** is a true and correct copy of a document

27 ¹ **Exhibit 77.A** (BANA_EDD_MDL-00082909) is an email attachment to Exhibit 77
28 (BANA_EDD_MDL-00082907) and is intentionally omitted given its large file size.
BANA would be happy to provide a copy of Exhibit 77.A to the Court upon request.

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00088501.

2 155. Attached hereto as **Exhibit 88** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00088506.

4 156. **Exhibit 89** is intentionally omitted.

5 157. Attached hereto as **Exhibit 90** is a true and correct copy of a document
6 produced by BANA in this action Bates stamped BANA_EDD_MDL-00090725.

7 158. Attached hereto as **Exhibit 91** is a true and correct copy of a document
8 produced by BANA in this action Bates stamped BANA_EDD_MDL-00107342.

9 159. Attached hereto as **Exhibit 92** is a true and correct copy of a document
10 produced by BANA in this action Bates stamped BANA_EDD_MDL-00116204.

11 160. Attached hereto as **Exhibit 93** is a true and correct copy of a document
12 produced by BANA in this action Bates stamped BANA_EDD_MDL-00116445.

13 161. Attached hereto as **Exhibit 94** is a true and correct copy of a document
14 produced by BANA in this action Bates stamped BANA_EDD_MDL-00117094.

15 162. Attached hereto as **Exhibit 95** is a true and correct copy of a document
16 produced by BANA in this action Bates stamped BANA_EDD_MDL-00117097.

17 163. Attached hereto as **Exhibit 96** is a true and correct copy of a document
18 produced by BANA in this action Bates stamped BANA_EDD_MDL-00117903.

19 164. Attached hereto as **Exhibit 97** is a true and correct copy of a document
20 produced by BANA in this action Bates stamped BANA_EDD_MDL-00118436.

21 165. Attached hereto as **Exhibit 98** is a true and correct copy of a document
22 produced by BANA in this action Bates stamped BANA_EDD_MDL-00120424.

23 166. Attached hereto as **Exhibit 99** is a true and correct copy of a document
24 produced by BANA in this action Bates stamped BANA_EDD_MDL-00123624.

25 167. Attached hereto as **Exhibit 100** is a true and correct copy of a document
26 produced by BANA in this action Bates stamped BANA_EDD_MDL-00124522.

27 168. Attached hereto as **Exhibit 101** is a true and correct copy of a document
28 produced by BANA in this action Bates stamped BANA_EDD_MDL-00125059.

1 169. Attached hereto as **Exhibit 102** is a true and correct copy of a document
2 produced by BANA in this action Bates stamped BANA_EDD_MDL-00125116.

3 170. **Exhibit 103** is intentionally omitted.

4 171. Attached hereto as **Exhibit 104** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00125919.

6 172. Attached hereto as **Exhibit 105** is a true and correct copy of a document
7 produced by BANA in this action Bates stamped BANA_EDD_MDL-00125920.

8 173. Attached hereto as **Exhibit 106** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00140121.

10 174. Attached hereto as **Exhibit 107** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00142739.

12 175. Attached hereto as **Exhibit 108** is a true and correct copy of a document
13 produced by BANA in this action Bates stamped BANA_EDD_MDL-00143488.

14 176. Attached hereto as **Exhibit 109** is a true and correct copy of a document
15 produced by BANA in this action Bates stamped BANA_EDD_MDL-00143629.

16 177. Attached hereto as **Exhibit 110** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00153842.

18 178. Attached hereto as **Exhibit 111** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00154700.

20 179. Attached hereto as **Exhibit 112** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00163779.

22 180. Attached hereto as **Exhibit 113** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00164188.

24 181. Attached hereto as **Exhibit 114** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00164189.

26 182. Attached hereto as **Exhibit 115** is a true and correct copy of a document
27 produced by BANA in this action Bates stamped BANA_EDD_MDL-00167033.

28 183. Attached hereto as **Exhibit 116** is a true and correct copy of a document

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00186897.

2 184. Attached hereto as **Exhibit 117** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00198287.

4 185. Attached hereto as **Exhibit 118** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00202603.

6 186. Attached hereto as **Exhibit 119** is a true and correct copy of a document
7 produced by BANA in this action Bates stamped BANA_EDD_MDL-00206047.

8 187. Attached hereto as **Exhibit 120** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00225375.

10 188. Attached hereto as **Exhibit 121** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00265136.

12 189. Attached hereto as **Exhibit 122** is a true and correct copy of a document
13 produced by BANA in this action Bates stamped BANA_EDD_MDL-00283611.

14 190. Attached hereto as **Exhibit 123** is a true and correct copy of a document
15 produced by BANA in this action Bates stamped BANA_EDD_MDL-00287946.

16 191. Attached hereto as **Exhibit 124** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00287970.

18 192. Attached hereto as **Exhibit 125** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00296860.

20 193. Attached hereto as **Exhibit 126** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00298567.

22 194. Attached hereto as **Exhibit 127** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00353033.

24 195. Attached hereto as **Exhibit 128** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00354508.

26 196. Attached hereto as **Exhibit 129** is a true and correct copy of a document
27 produced by BANA in this action Bates stamped BANA_EDD_MDL-00368628.

28 197. Attached hereto as **Exhibit 130** is a true and correct copy of a document

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00370150.

2 198. Attached hereto as **Exhibit 131** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00370151.

4 199. Attached hereto as **Exhibit 132** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00405281.

6 200. Attached hereto as **Exhibit 133** is a true and correct copy of a document
7 produced by BANA in this action Bates stamped BANA_EDD_MDL-00416742.

8 201. Attached hereto as **Exhibit 134** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00422979.

10 202. Attached hereto as **Exhibit 135** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00428994.

12 203. Attached hereto as **Exhibit 136** is a true and correct copy of a document
13 produced by BANA in this action Bates stamped BANA_EDD_MDL-00430148.

14 204. Attached hereto as **Exhibit 137** is a true and correct copy of a document
15 produced by BANA in this action Bates stamped BANA_EDD_MDL-00433183.

16 205. Attached hereto as **Exhibit 138** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00433929.

18 206. Attached hereto as **Exhibit 139** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00436910.

20 207. Attached hereto as **Exhibit 140** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00436971.

22 208. Attached hereto as **Exhibit 141** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00447117.

24 209. Attached hereto as **Exhibit 142** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00448765.

26 210. Attached hereto as **Exhibit 143** is a true and correct copy of a document
27 produced by BANA in this action Bates stamped BANA_EDD_MDL-00450462.

28 211. Attached hereto as **Exhibit 144** is a true and correct copy of a document

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00450467.

2 212. Attached hereto as **Exhibit 145** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00450516.

4 213. Attached hereto as **Exhibit 146** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00452826.

6 214. Attached hereto as **Exhibit 147** is a true and correct copy of a document
7 produced by BANA in this action Bates stamped BANA_EDD_MDL-00468505.

8 215. Attached hereto as **Exhibit 148** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00493780.

10 216. Attached hereto as **Exhibit 149** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00497802.

12 217. Attached hereto as **Exhibit 150** is a true and correct copy of a document
13 produced by BANA in this action Bates stamped BANA_EDD_MDL-00500173.

14 218. Attached hereto as **Exhibit 151** is a true and correct copy of a document
15 produced by BANA in this action Bates stamped BANA_EDD_MDL-00505808.

16 219. Attached hereto as **Exhibit 152** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00515252.

18 220. Attached hereto as **Exhibit 153** is a true and correct copy of a document
19 produced by BANA in this action Bates stamped BANA_EDD_MDL-00531012.

20 221. Attached hereto as **Exhibit 154** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00534403.

22 222. Attached hereto as **Exhibit 155** is a true and correct copy of a document
23 produced by BANA in this action Bates stamped BANA_EDD_MDL-00534409.

24 223. Attached hereto as **Exhibit 156** is a true and correct copy of a document
25 produced by BANA in this action Bates stamped BANA_EDD_MDL-00546652.

26 224. Attached hereto as **Exhibit 157** is a true and correct copy of a document
27 produced by BANA in this action Bates stamped BANA_EDD_MDL-00570333.

28 225. Attached hereto as **Exhibit 158** is a true and correct copy of a document

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00580207.

2 226. Attached hereto as **Exhibit 159** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00592324.

4 227. **Exhibit 160** is intentionally omitted.

5 228. Attached hereto as **Exhibit 161** is a true and correct copy of a document
6 produced by BANA in this action Bates stamped BANA_EDD_MDL-00617457.

7 229. **Exhibit 161.A** is intentionally omitted.²

8 230. Attached hereto as **Exhibit 162** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00617463.

10 231. **Exhibit 162.A** is intentionally omitted.³

11 232. Attached hereto as **Exhibit 163** is a true and correct copy of a document
12 produced by BANA in this action Bates stamped BANA_EDD_MDL-00624540.

13 233. Attached hereto as **Exhibit 164** is a true and correct copy of a document
14 produced by BANA in this action Bates stamped BANA_EDD_MDL-00624542.

15 234. Attached hereto as **Exhibit 165** is a true and correct copy of a document
16 produced by BANA in this action Bates stamped BANA_EDD_MDL-00624545.

17 235. Attached hereto as **Exhibit 166** is a true and correct copy of a document
18 produced by BANA in this action Bates stamped BANA_EDD_MDL-00624679.

19 236. Attached hereto as **Exhibit 167** is a true and correct copy of a document
20 produced by BANA in this action Bates stamped BANA_EDD_MDL-00637212.

21 237. Attached hereto as **Exhibit 168** is a true and correct copy of a document
22 produced by BANA in this action Bates stamped BANA_EDD_MDL-00640771.

23 238. Attached hereto as **Exhibit 169** is a true and correct copy of a document

24 ² **Exhibit 161.A** (BANA_EDD_MDL-00617459) is an email attachment to Exhibit
25 161 (BANA_EDD_MDL-00617457) and is intentionally omitted given its large file
26 size. BANA would be happy to provide a copy of Exhibit 161.A to the Court upon
request.

27 ³ **Exhibit 162.A** (BANA_EDD_MDL-00617465) is an email attachment to Exhibit
28 162 (BANA_EDD_MDL-00617463) and is intentionally omitted given its large file
size. BANA would be happy to provide a copy of Exhibit 162.A to the Court upon
request.

1 produced by BANA in this action Bates stamped BANA_EDD_MDL-00678567.

2 239. Attached hereto as **Exhibit 170** is a true and correct copy of a document
3 produced by BANA in this action Bates stamped BANA_EDD_MDL-00694846.

4 240. Attached hereto as **Exhibit 171** is a true and correct copy of a document
5 produced by BANA in this action Bates stamped BANA_EDD_MDL-00707598.

6 241. Attached hereto as **Exhibit 172** is a true and correct copy of a document
7 produced by BANA in this action Bates stamped BANA_EDD_MDL-00719114.

8 242. Attached hereto as **Exhibit 173** is a true and correct copy of a document
9 produced by BANA in this action Bates stamped BANA_EDD_MDL-00719115.

10 243. Attached hereto as **Exhibit 174** is a true and correct copy of a document
11 produced by BANA in this action Bates stamped BANA_EDD_MDL-00719116.

12 244. **Exhibit 175** is intentionally omitted.

13 245. Attached hereto as **Exhibit 176** is a true and correct copy of a document
14 produced by BANA in this action Bates stamped BANA_EDD_MDL-00720087.

15 246. Attached hereto as **Exhibit 177** is a true and correct copy of a document
16 produced by BANA in this action Bates stamped BANA_EDD_MDL-00855874.

17 247. Attached hereto as **Exhibit 178** is a true and correct copy of a document
18 produced by BANA in this action Bates stamped BANA_EDD_MDL-00871377.

19 248. Attached hereto as **Exhibit 179** is a true and correct copy of a document
20 produced by BANA in this action Bates stamped BANA_EDD_MDL-00881851.

21 249. Attached hereto as **Exhibit 180** is a true and correct copy of a document
22 produced by BANA in this action Bates stamped BANA_EDD_MDL-00884200.

23 250. Attached hereto as **Exhibit 181** is a true and correct copy of a document
24 produced by BANA in this action Bates stamped BANA_EDD_MDL-00654305.

25 251. Attached hereto as **Exhibit 182** is a true and correct copy of a document
26 produced by BANA in this action Bates stamped BANA_EDD_MDL_00071599.

27 252. Attached hereto as **Exhibit 183** is a true and correct copy of a document
28 produced by BANA in this action Bates stamped BANA_EDD_MDL-00055974.

253. Attached hereto as **Exhibit 184** is a true and correct copy of a document produced by BANA in this action Bates stamped BANA_EDD_MDL-00205361.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed on this 17th day of October, 2025.

/s/ Laura G. Brys
LAURA G. BRYs