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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
CASE NO. 3:21-md-02992-LAB-MSB
- - - - -
IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION
- - - - -

TRANSCRIPT of the stenographic notes of
the videotaped deposition of RYAN SCHWARTZ in the
above-entitled matter, as taken by and before
LORRAINE B. ABATE, a Certified Shorthand Reporter and
Notary Public of the State of New York, and
Registered Professional Reporter, held at the offices
of Goodwin Procter LLP, New York Times Building, 620
Eighth Avenue, New York, New York 10018, on December
4, 2024, commencing at 9:43 a.m., pursuant to Notice.

Job No.: 10154398

1 Schwartz - December 4, 2024

2 Q. Who's your supervisor now?

3 A. Let me think about that. It's the same
4 answer. My formal supervisor, I've never spoken to.
5 My functional supervisor is Amy Pierce.

6 Q. Who is her supervisor?

7 A. Sara Walsh.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Schwartz - December 4, 2024

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14 MR. JONES: I think we can take a break
15 now.

16 THE VIDEOGRAPHER: The time is 11:01
17 a.m. We're going off the record.

18 (There was a recess taken.)

19 THE VIDEOGRAPHER: The time is 11:20
20 a.m. We're back on the record.

21 BY MR. JONES:

22 Q. Before we took a break, we had been
23 talking about various e-mails and some of your
24 colleagues on those e-mails.

25 A. Yes.

1 Schwartz - December 4, 2024

2 Q. And so is it correct to say that Letson,
3 Holt, and Michel are the folks you were working
4 closest -- most close with --

5 A. Yes.

6 Q. -- in this period?

7 A. My immediate colleagues, yes, that's
8 correct.

9 Q. What was Letson's background and
10 expertise?

11 A. I'm not sure I know for certain.

12 Q. What was your sense of it at the time?

13 A. He had either an auditing or accounting
14 background. I know he had been with the bank for
15 decades. I did not know Mike very well at all prior
16 to these events. He hired me, obviously, and knew
17 who I was, but I don't know Mike personally or
18 professionally. I've never actually met him in
19 person.

20 Q. And what was Holt's background?

21 A. I have the same answer. I don't know.
22 I only met her very briefly, before she was on
23 medical leave -- maternity leave. I don't think
24 she'd mind me saying that.

25 Q. You had mentioned that she had some

1 **Schwartz - December 4, 2024**

2 **expertise in fraud rings; is that right?**

3 A. That was my understanding of her time at
4 the bank, had been primarily within either financial
5 crimes specifically or fraud group, but I can't
6 testify to her specific background or resume. I've
7 never seen it.

8 **Q. Did you find her to have useful**
9 **contributions to this work?**

10 A. Absolutely, yes. I absolutely did, yes.
11 She had a different perspective and different
12 background than mine.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 **Q. And what was Michel's background, as far**
20 **as you remember?**

21 A. As far as I remember, prior coming --
22 prior to coming to the bank, she had worked for a law
23 enforcement agency in an analytical capacity. I
24 don't recall which one.

[REDACTED]

1**Schwartz - December 4, 2024**

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2 [REDACTED]
3 Q. Were you the primary person on the team
4 with expertise in data analytics?

5 A. Yes. That's why they hired me. And
6 when you -- when I say team, I want to be clear I'm
7 talking about Mike's team specifically.

8 Q. Yes.

9 And Mike's team is larger than the four
10 of you; is that correct?

11 A. At the time, I can't recall specifically
12 what his team was. I'd be -- this is my best guess,
13 is that he had probably three teams of equivalent
14 size. Typically at the bank, a team would be about
15 eight or ten people reporting to a common manager. I
16 believe he had -- I believe he had three managers at
17 the time.

18 Q. And one of those three was Holt?

19 A. Again, it was -- she was on leave, so
20 there was some, you know, temporary management by
21 other people, but one of them was Anne, yes.

22 Q. And so you spent a fair amount of time
23 working with Holt, Michel, and Letson on prepaid --

24 A. Absolutely, yes.

25 Q. -- issues?

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2 A. Absolutely. Once it became -- it came
3 to our attention that there was a pretty severe
4 problem with that product.

5 Q. And was it your experience that all of
6 you had valuable things to contribute to the work
7 that you were doing?

8 A. I think all of my colleagues are
9 valuable, yes.

10 MR. JONES: Good on-the-record answer.

[REDACTED]

[REDACTED]

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[REDACTED]

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Schwartz - December 4, 2024

A horizontal bar chart with 25 black bars of varying lengths, representing a distribution of data. The bars are arranged in descending order of length from top to bottom. The longest bar is the 7th bar from the top, and the shortest is the 14th bar.

Bar Index (from top)	Relative Length (approximate percentage of the longest bar)
1	85%
2	90%
3	75%
4	88%
5	98%
6	82%
7	100%
8	98%
9	85%
10	65%
11	95%
12	15%
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