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DOCUMENT SOUGHT TO
BE SEALED PURSUANT TO
STIPULATED
PROTECTIVE ORDER**

Videotaped Deposition of
Russell Wayne Cronan, Sr.
May 01, 2025

In Re Bank of America CA Unemployment Benefits Litigation
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

- - - - -x
IN RE BANK OF AMERICA : Case No.
CALIFORNIA UNEMPLOYMENT :
BENEFITS LITIGATION : 3:21-md-02992-GPC-MSB
:
- - - - -x

VIDEOTAPED DEPOSITION OF

RUSSELL WAYNE CRONAN, SR.

TAKEN ON BEHALF OF THE PLAINTIFF

Thursday, May 1, 2025

10:02 a.m. - 5:25 p.m.

**** CONFIDENTIAL ****

REPORTED BY:

Okeemah S. Henderson, Court Reporter

Job No. 10163117

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1 Q. That was submitted in
2 connection with the motion for class
3 certification, correct?

4 A. Right.

5 Q. Now, moving on to Exhibit 4.
6 Exhibit 4 is the expert report of Russell
7 Cronan dated March 4th, 2025.

8 Do you see that?

9 A. Yes, I do.

10 Q. And do you recognize this
11 document?

12 A. Yes.

13 Q. And is that your expert report?

14 A. Yes.

15 Q. All right. And Exhibit 5 is
16 the expert rebuttal report of Russell Cronan
17 dated April 4th, 2025.

18 Do you see that?

19 A. Yes.

20 Q. And do you recognize that
21 document?

22 A. Yes.

23 Q. Is that a true and correct copy
24 of your expert rebuttal report?

25 A. Yes.

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1 Q. Thank you. Now, you're
2 familiar with these three documents, correct?

3 A. I am.

4 Q. All right. Do these three
5 documents, these -- the declaration, the report
6 and the rebuttal report, do they contain the
7 opinions that you are providing in this case?

8 A. Yes.

9 Q. Now, do you have any opinions
10 in this case that are not contained in exhibits
11 3, 4 or 5?

12 A. No.

13 Q. Who wrote these reports?

14 A. I did.

15 Q. Who did you work with?

16 A. I worked with counsel at
17 Goodwin and with the consultants at Ankura.

18 Q. And when did you start working
19 with Ankura in this case?

20 A. I was initially contacted in
21 December of 2023.

22 Q. And it was Ankura that reached
23 out to you?

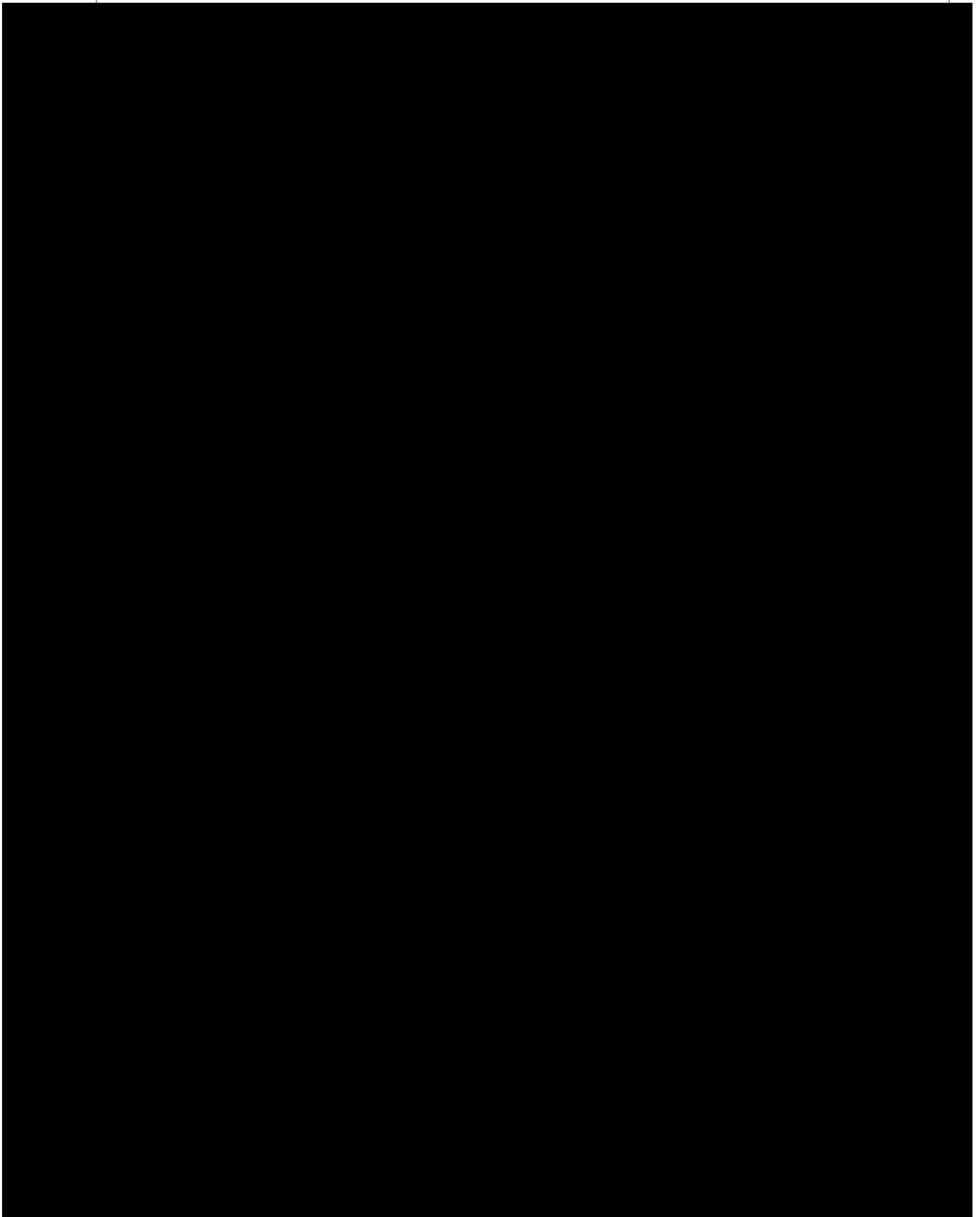
24 A. That's correct.

25 Q. And were you -- was Ankura

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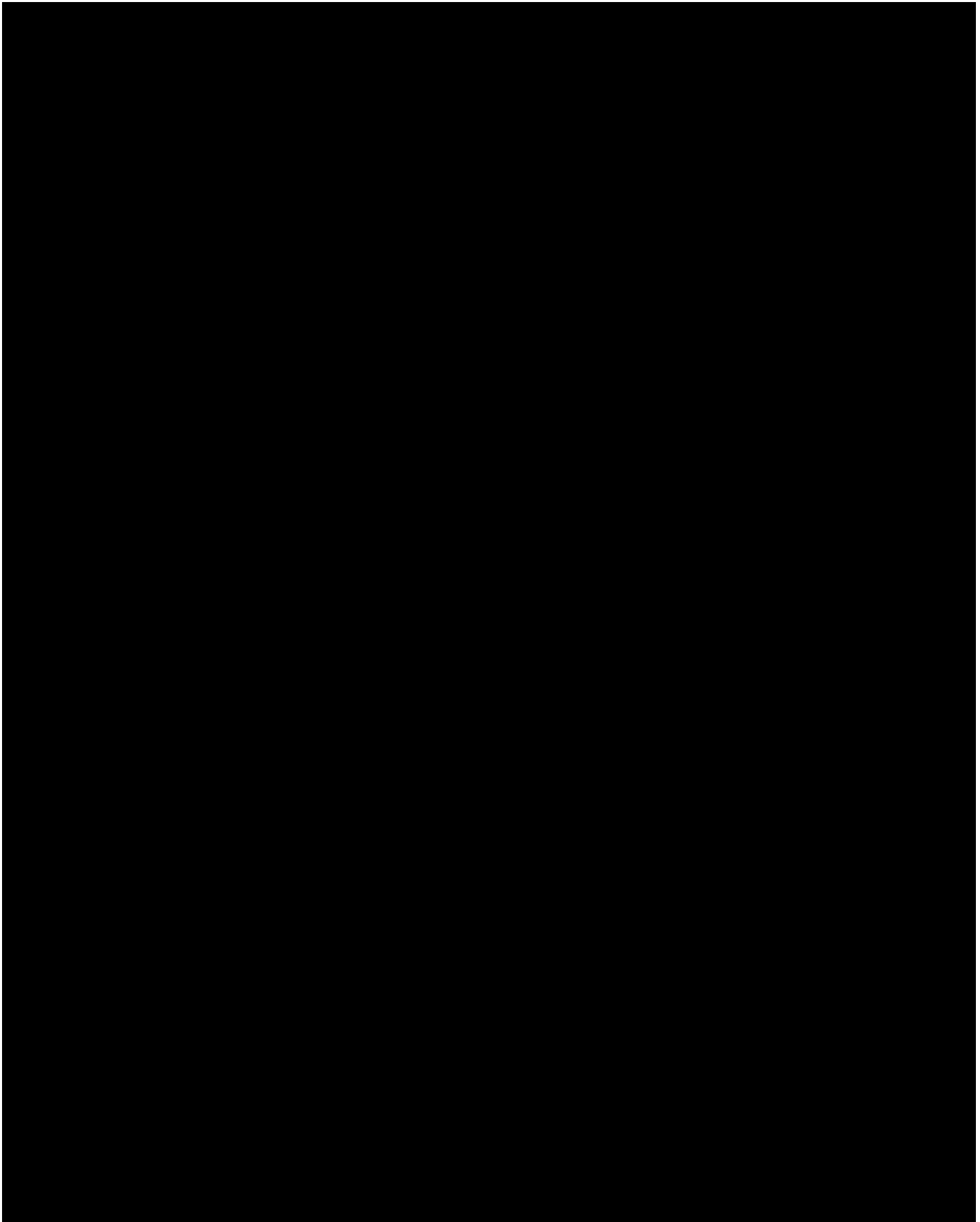
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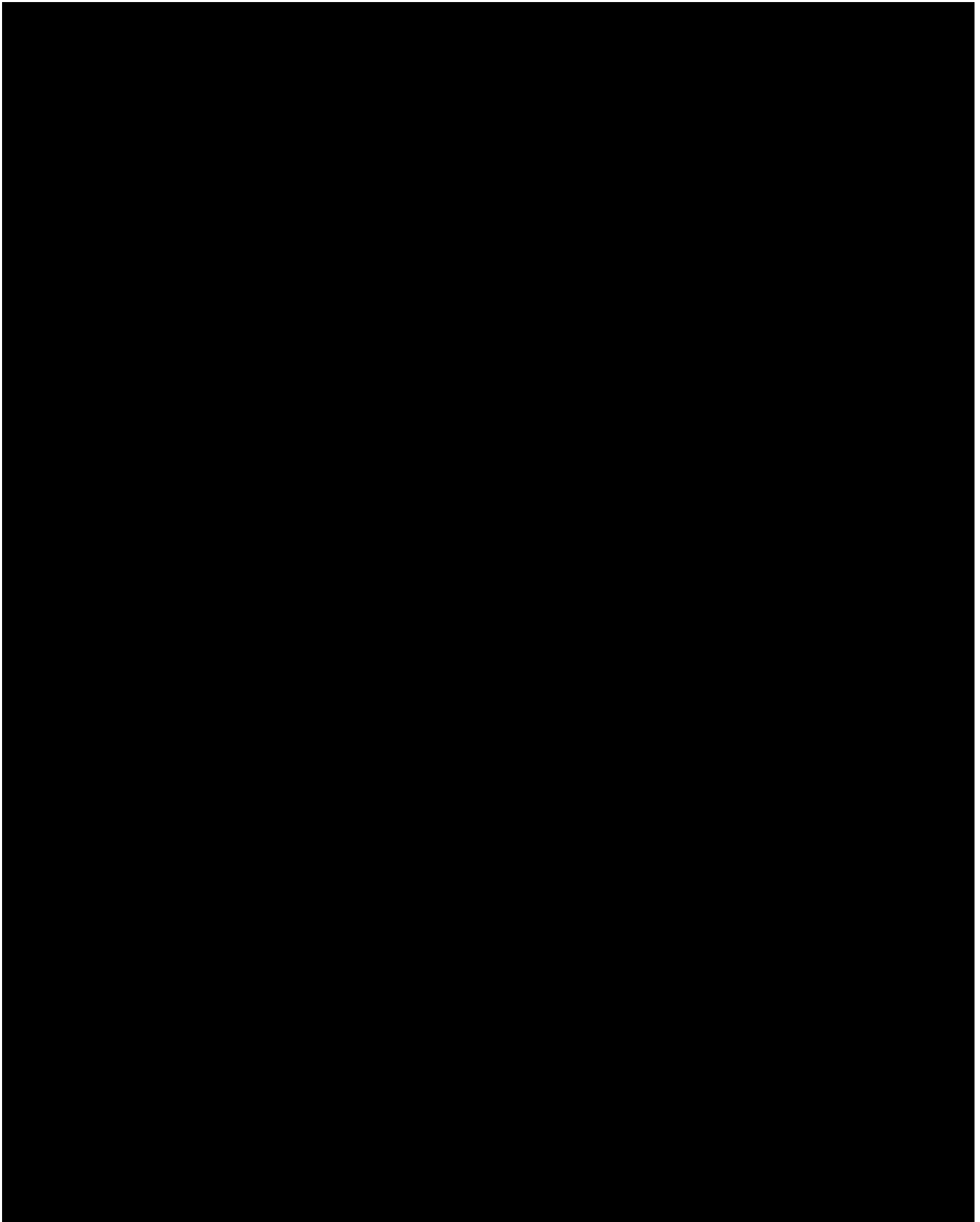
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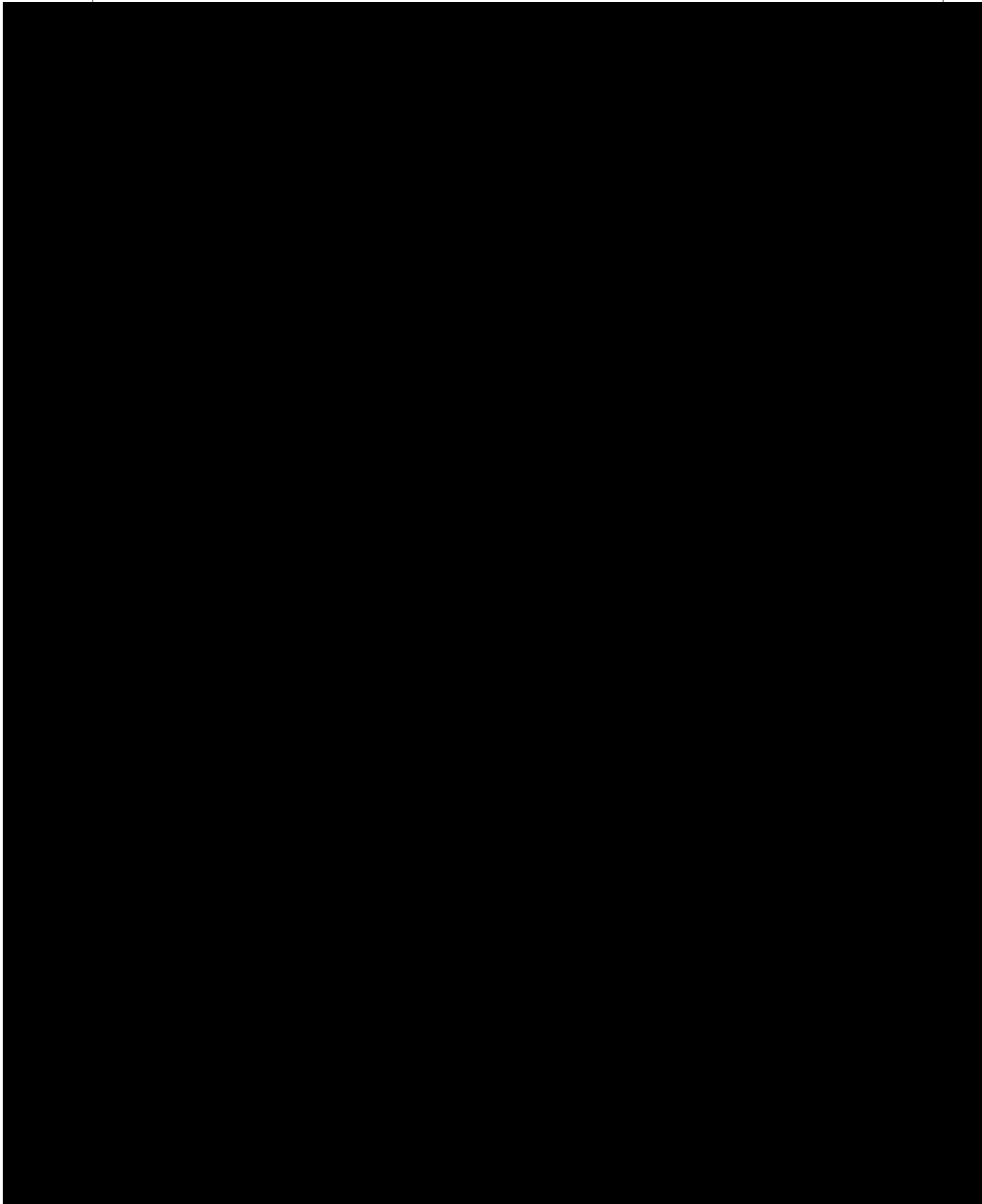
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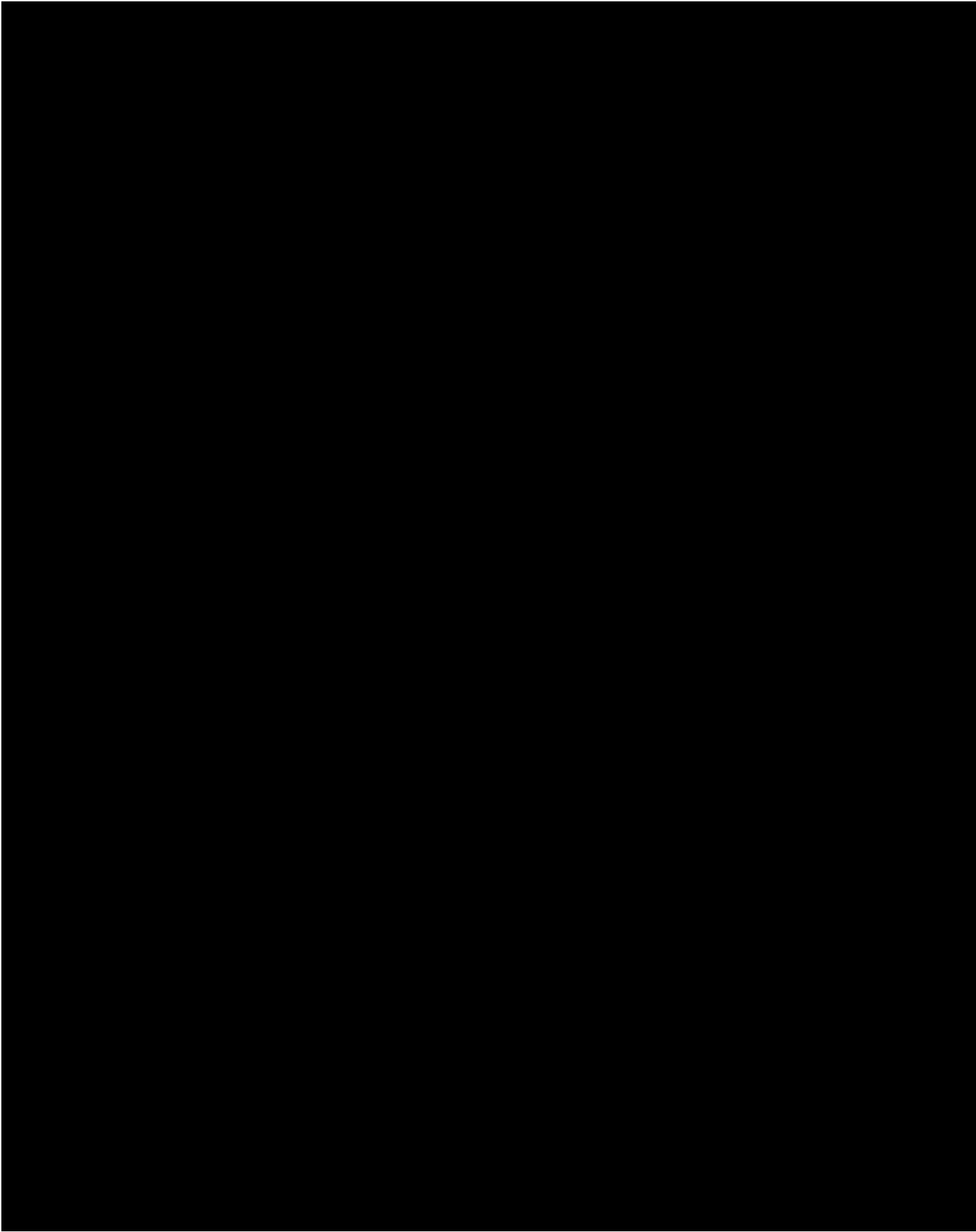
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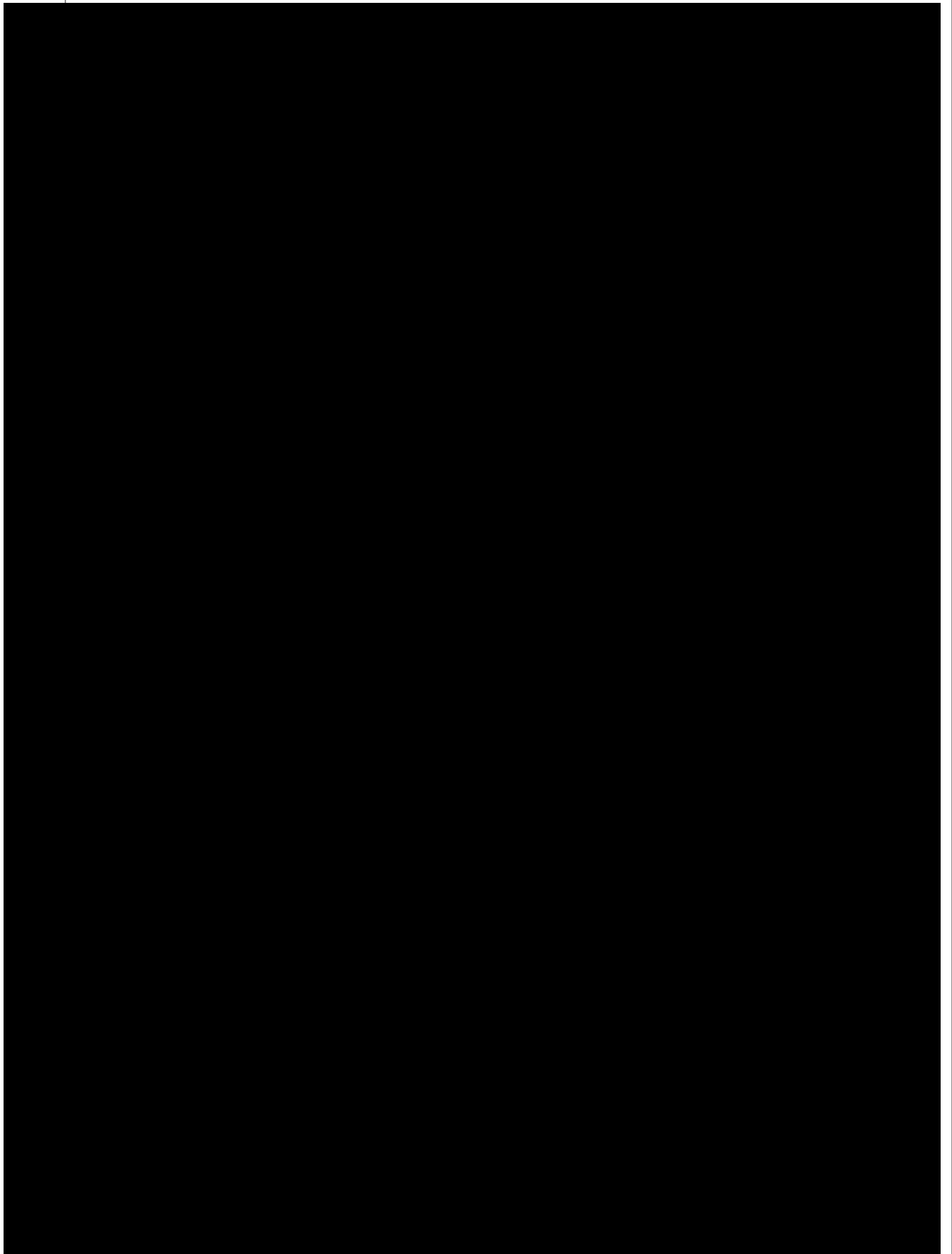
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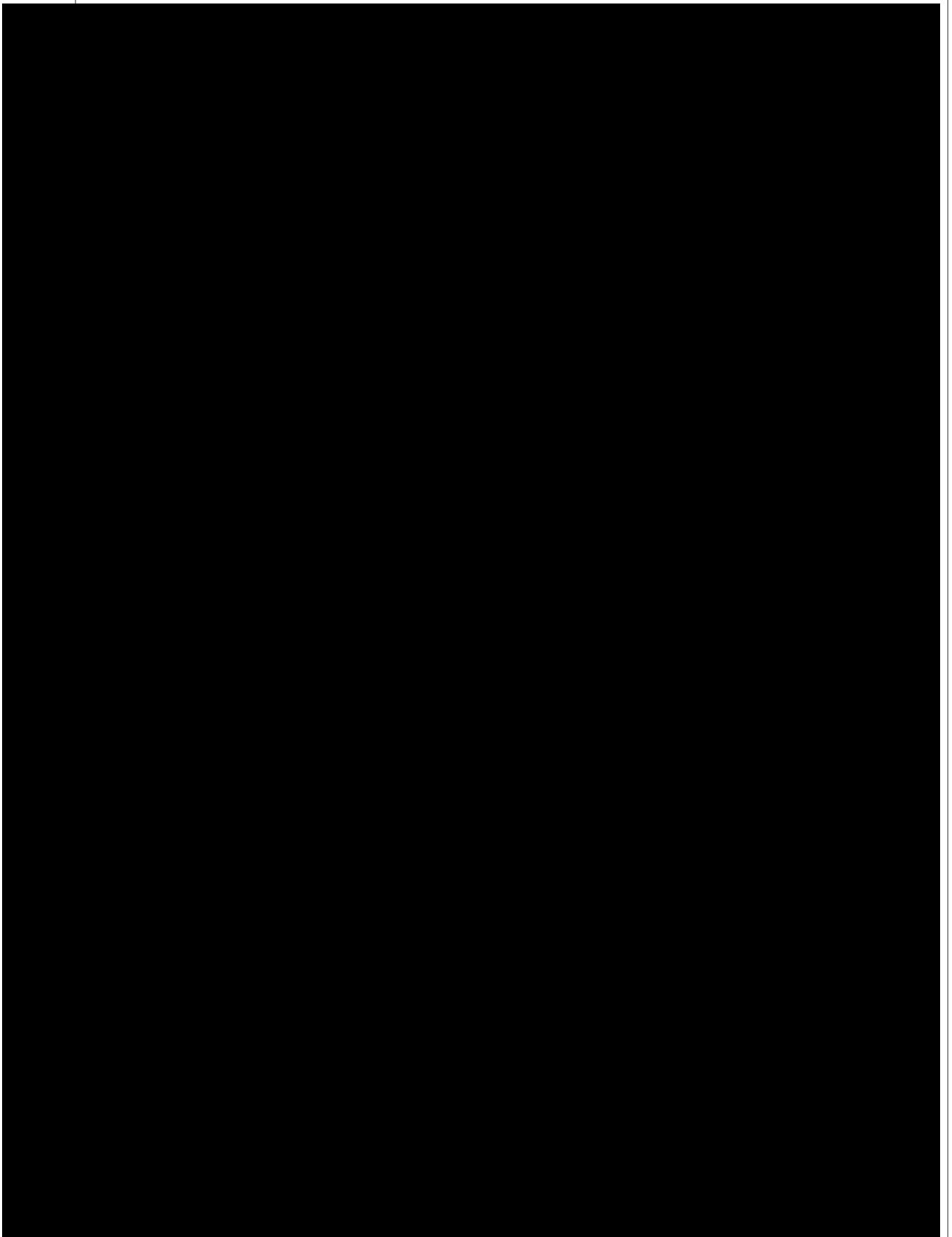
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CERTIFICATE

I, Okeemah S. Henderson, RPR, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 23rd day of June, 2025.

My commission expires:

September 30, 2029



Okeemah S. Henderson, RPR
Official Court Reporter