

DX 14.E

**REDACTED VERSION OF
DOCUMENT SOUGHT TO
BE SEALED PURSUANT TO
STIPULATED
PROTECTIVE ORDER**

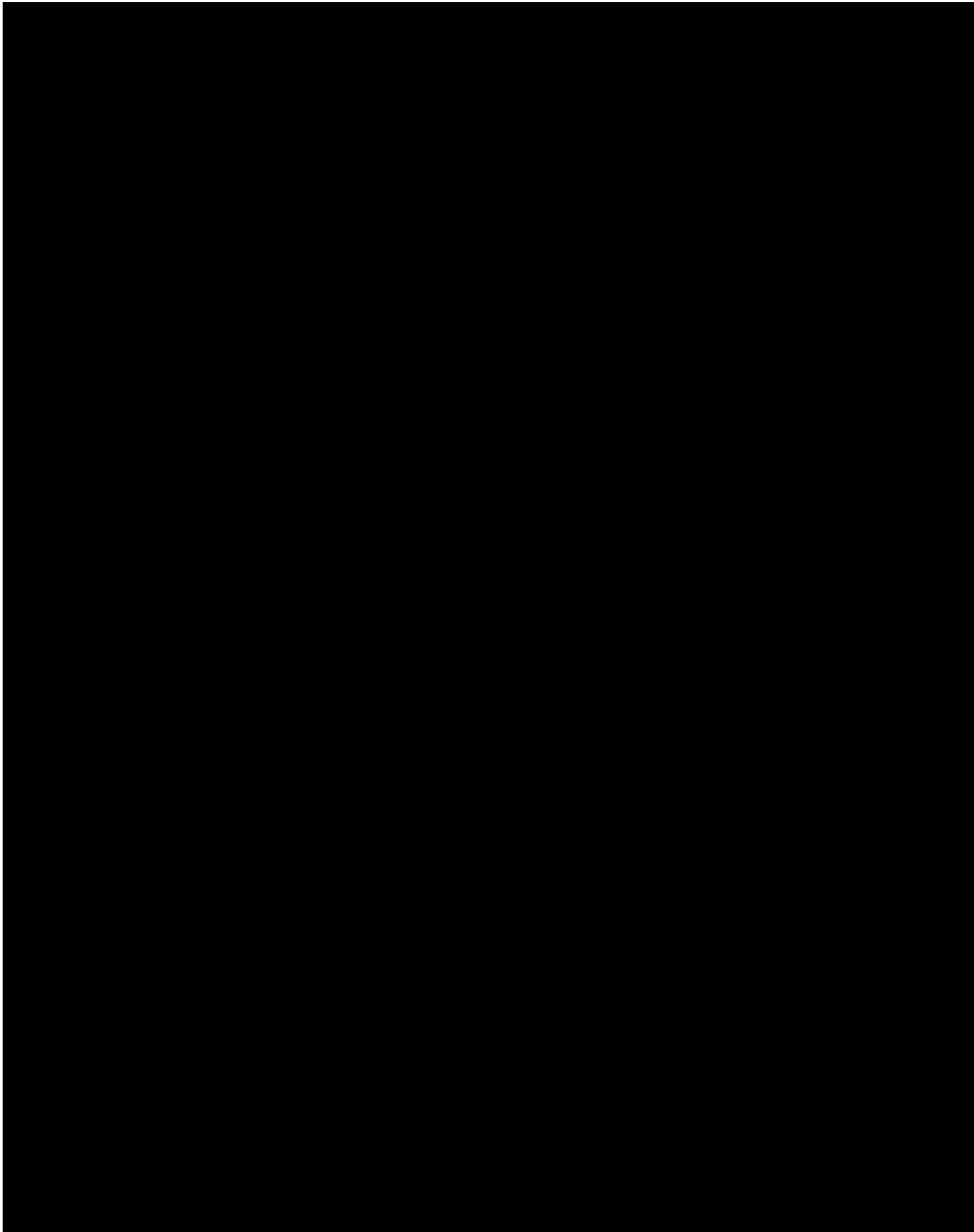
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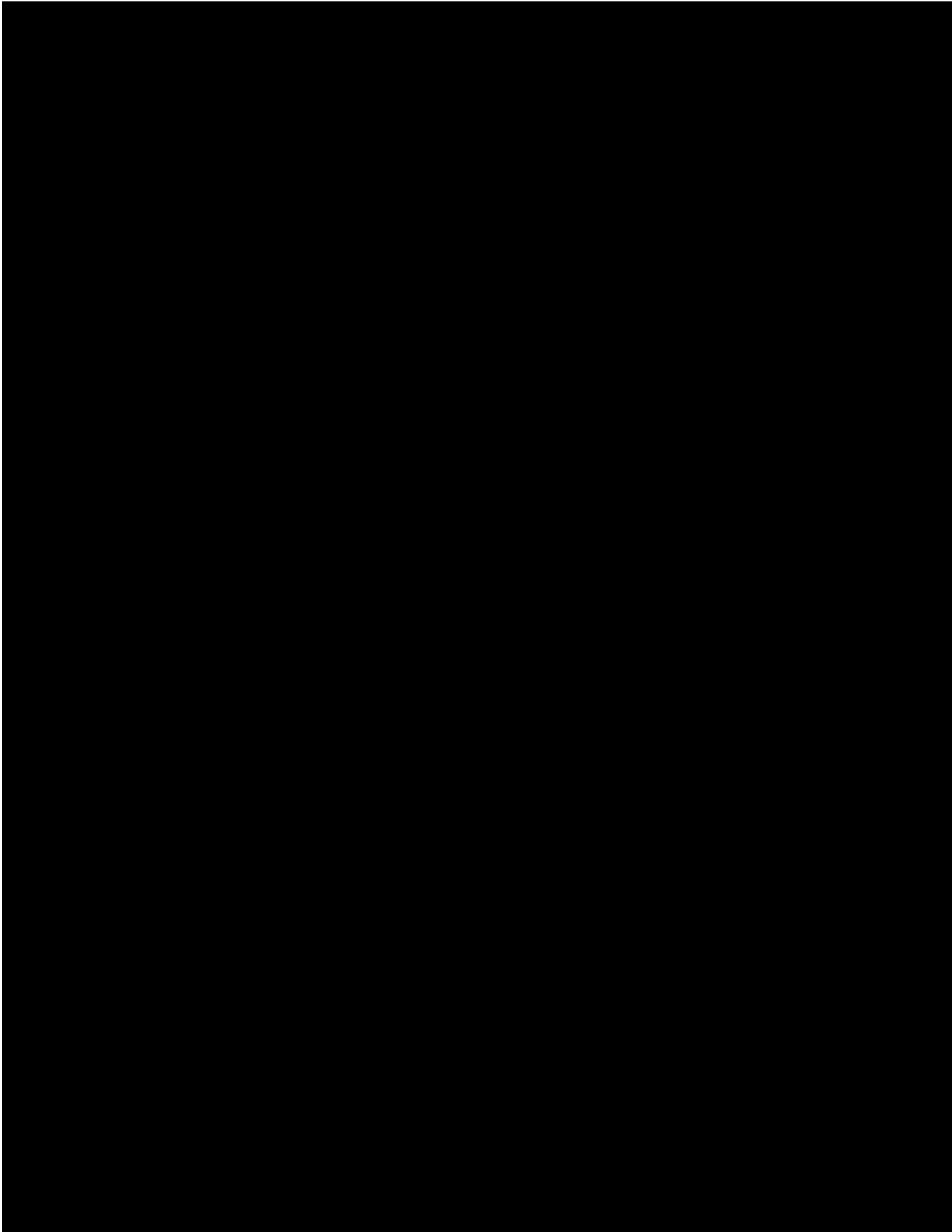
THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
IN RE BANK OF AMERICA) Case No.
CALIFORNIA UNEMPLOYMENT) 3:21-md-02992-LAB-MSB
BENEFITS LITIGATION)
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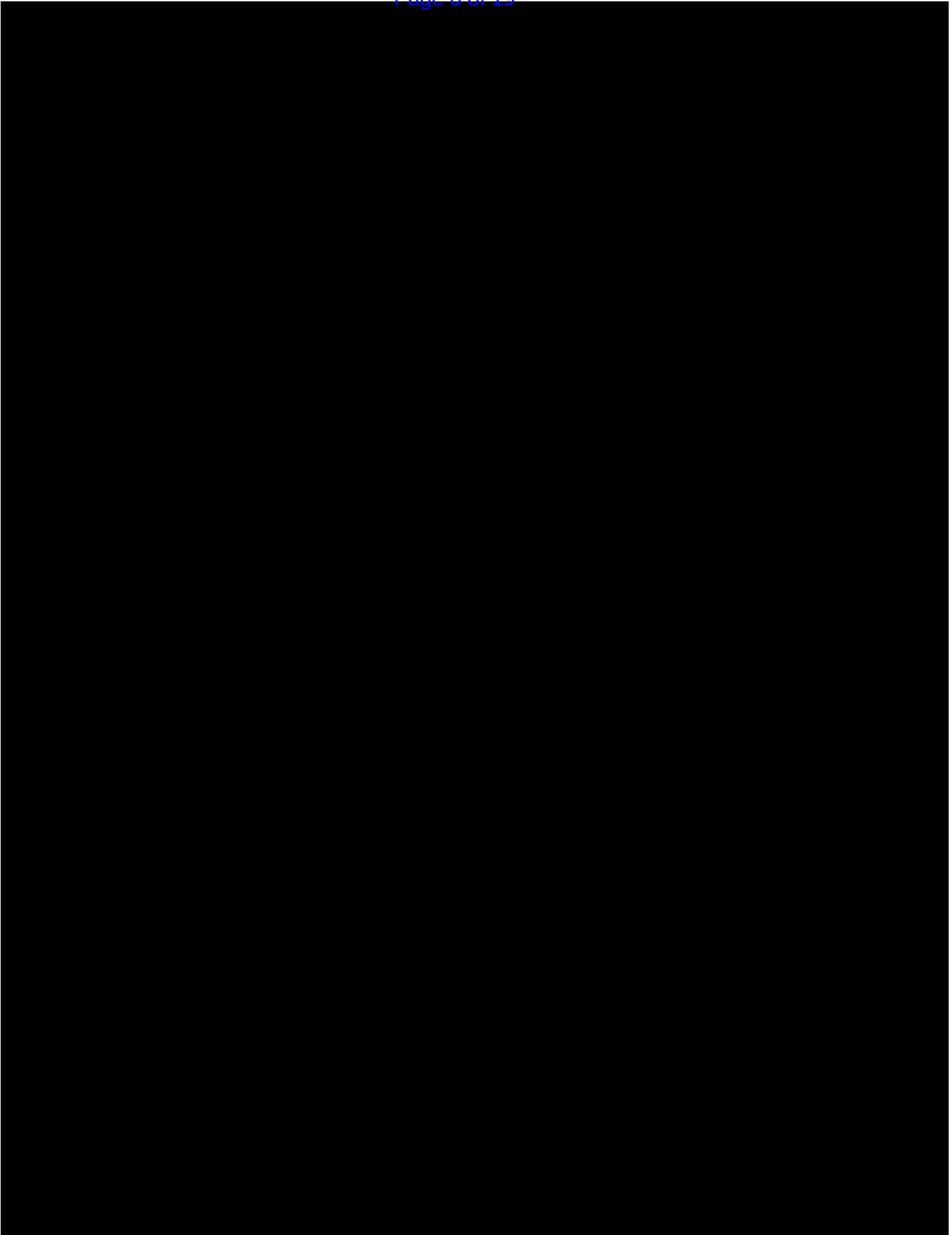
VIDEOTAPED ORAL DEPOSITION OF
BANK OF AMERICA, N.A.
BY AND THROUGH ITS DESIGNATED REPRESENTATIVE
SHANE DANIELS
FEBRUARY 6, 2024

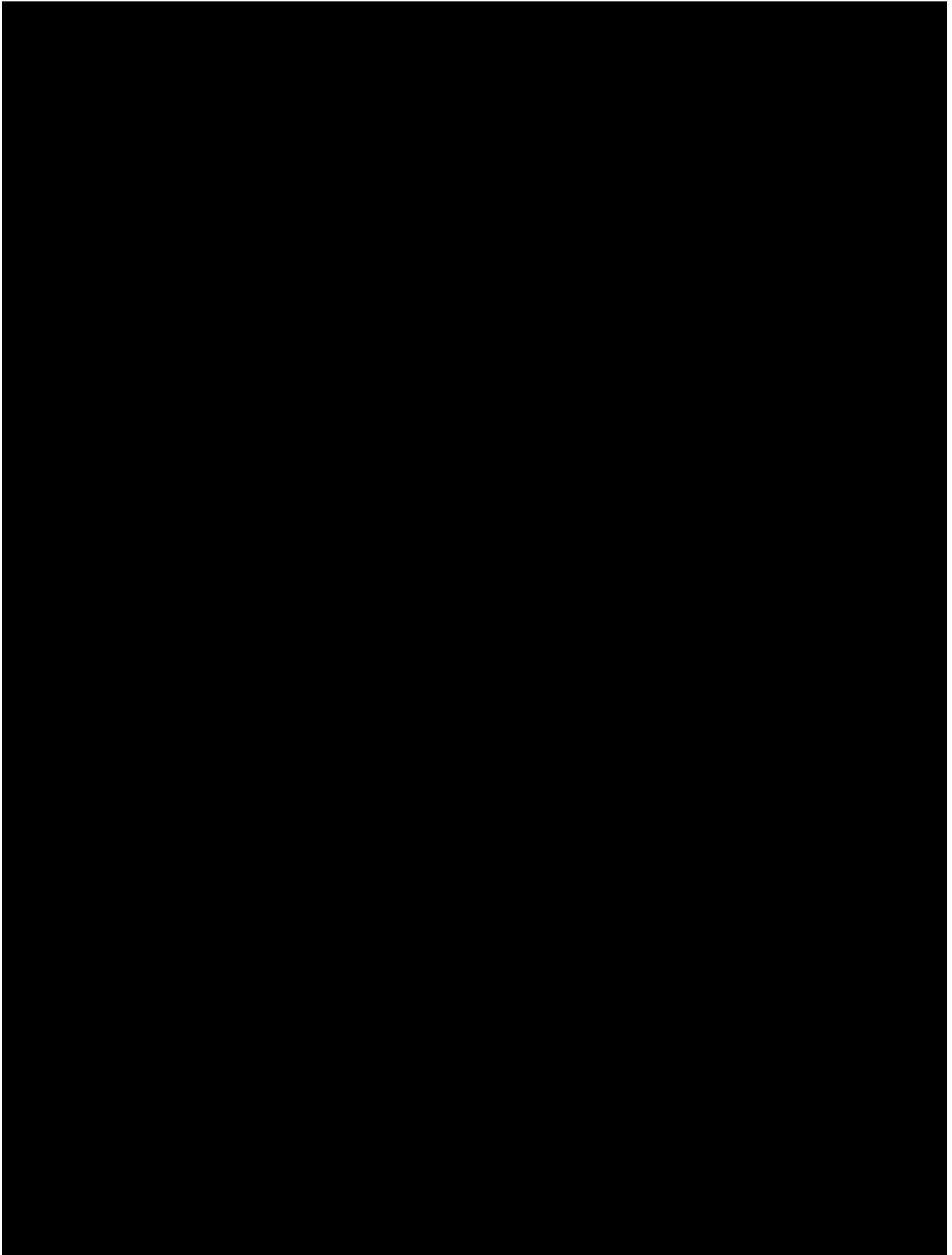
On the 6th day of February, 2024, at 9:09 a.m.,
the videotaped oral deposition of the above-named
witness was taken at the instance of the Plaintiffs,
before Michelle L. Munroe, Certified Shorthand
Reporter in and for the State of Texas, at Jones Day,
2727 N. Harwood Street, Suite 500, Dallas, Texas,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

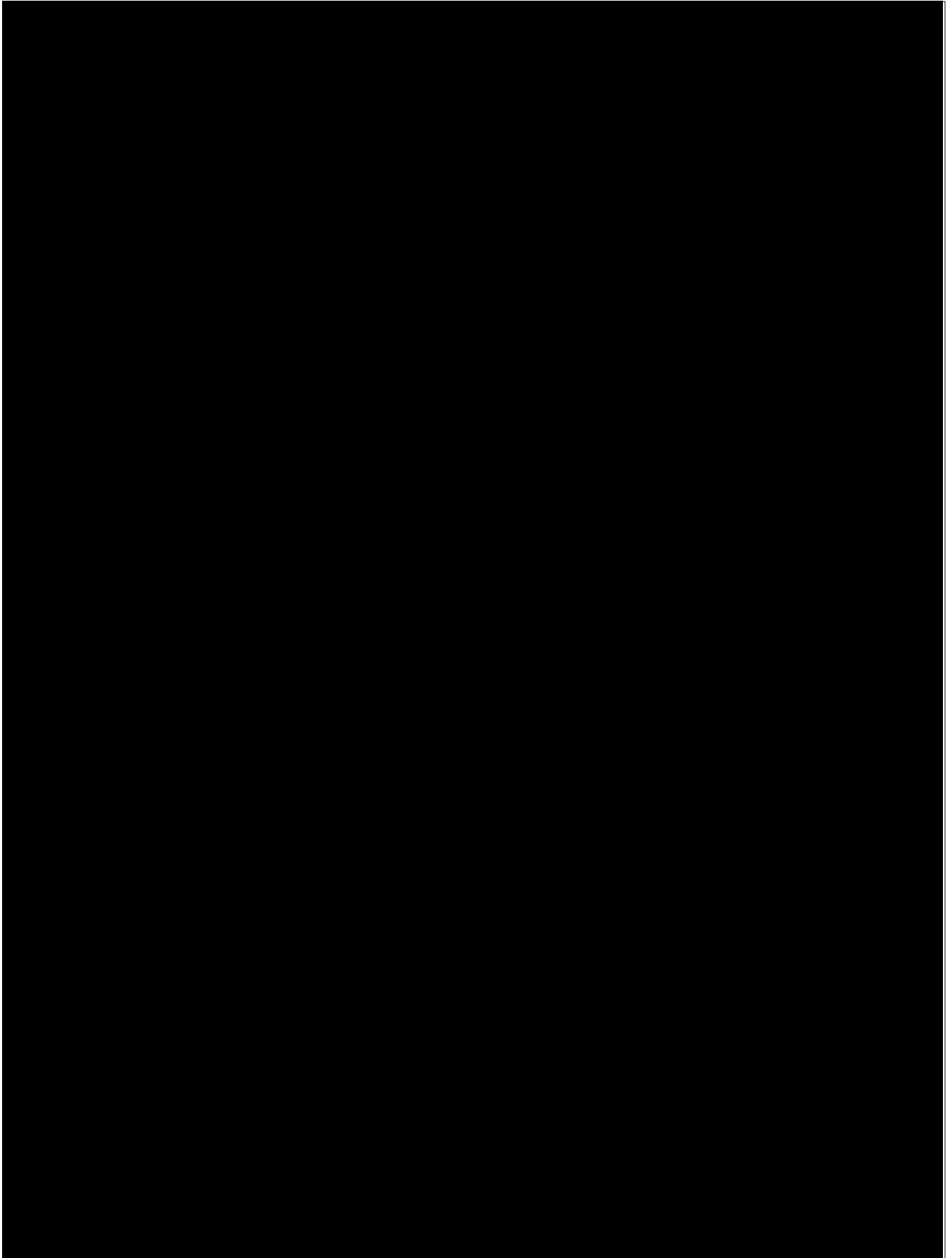
1	claims have been denied and BofA accounts frozen	09:24:12
2	based on BofA's application of the claim fraud	09:24:15
3	filter.	09:24:25
4	Do you understand that?	09:24:21
5	A. I do.	09:24:21
6	Q. Okay. And is that a subject with which	09:24:21
7	you are familiar?	09:24:24
8	A. I am.	09:24:24
9	Q. Okay. So I know you have said that you	09:24:26
10	understand it, but I just want to follow up on a few	09:24:30
11	terms in there to make sure that we're on the same	09:24:33
12	page in terms of our understanding.	09:24:36
13	So one of the phrases or terms that's used	09:24:38
14	in topic 20 is the term "claim fraud filter."	09:24:41
15	Do you know what that refers to?	09:24:46
16	A. I do.	09:24:47

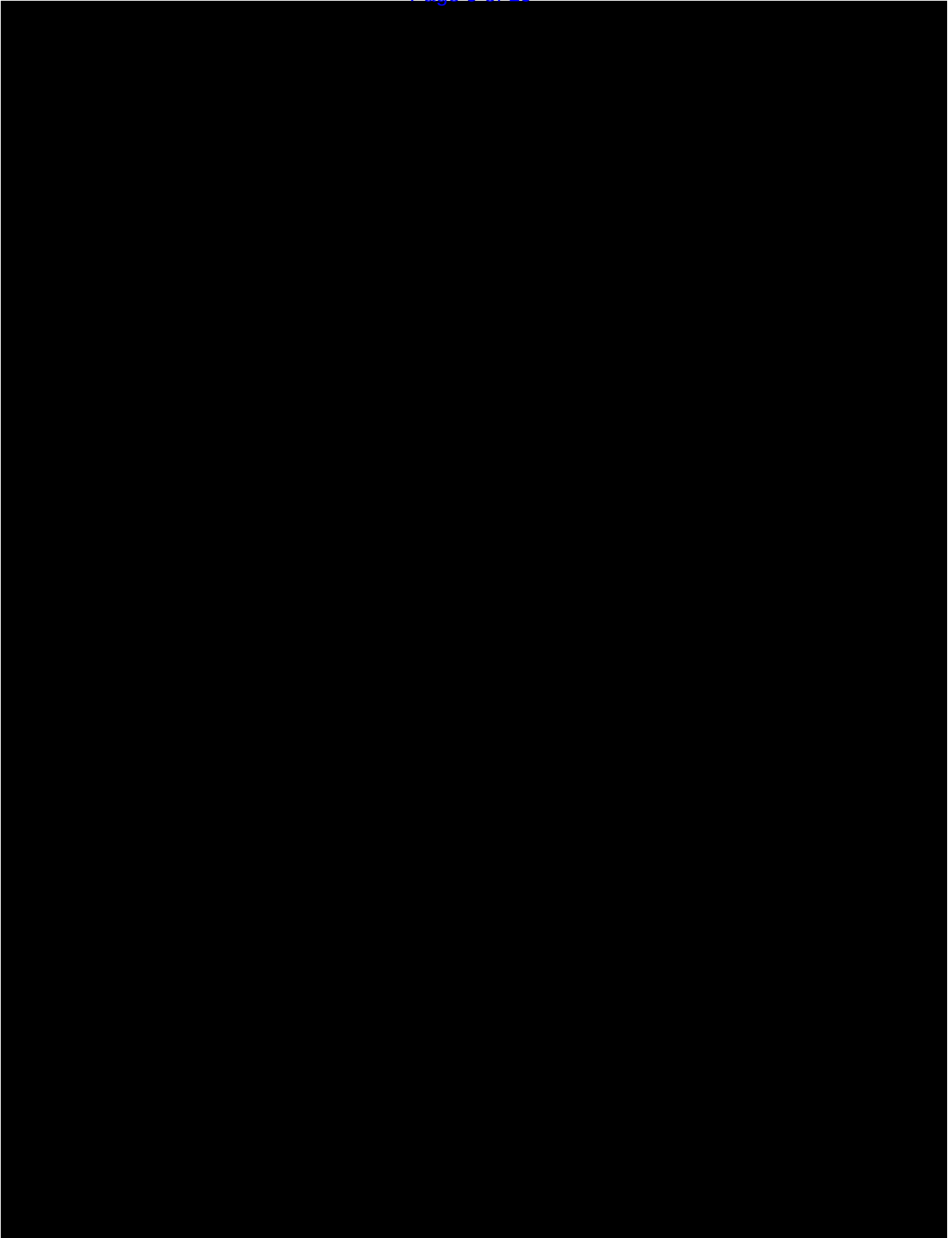


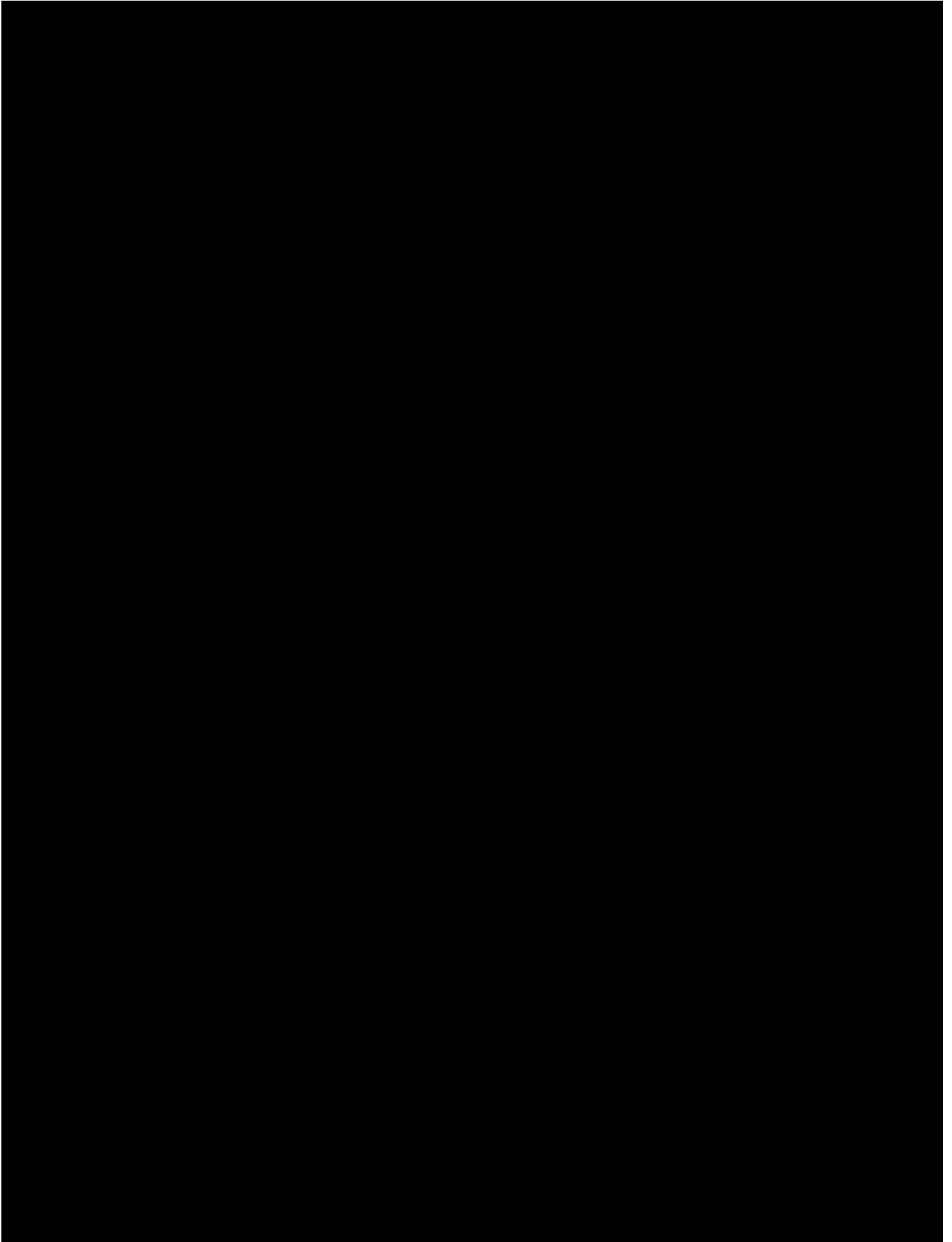


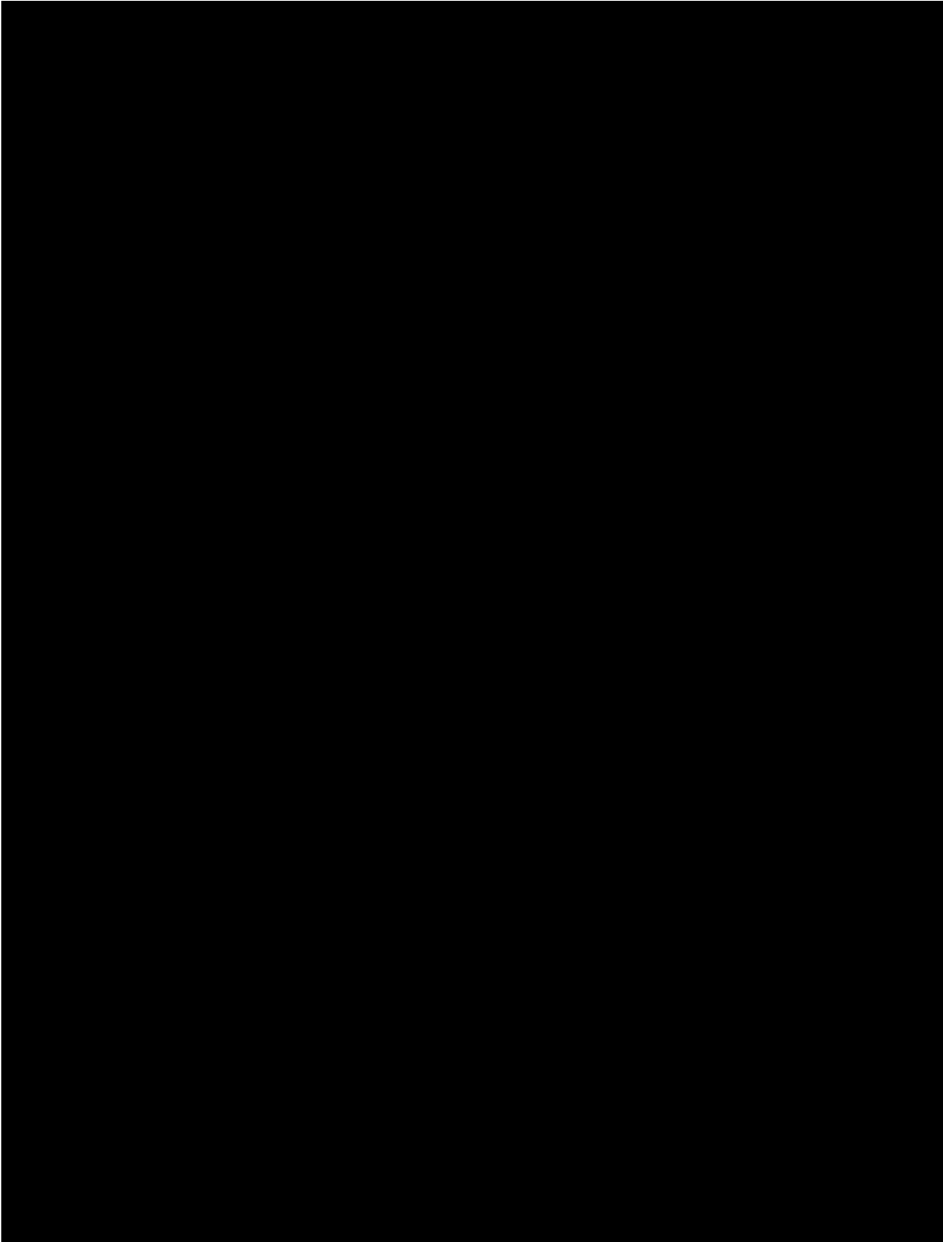


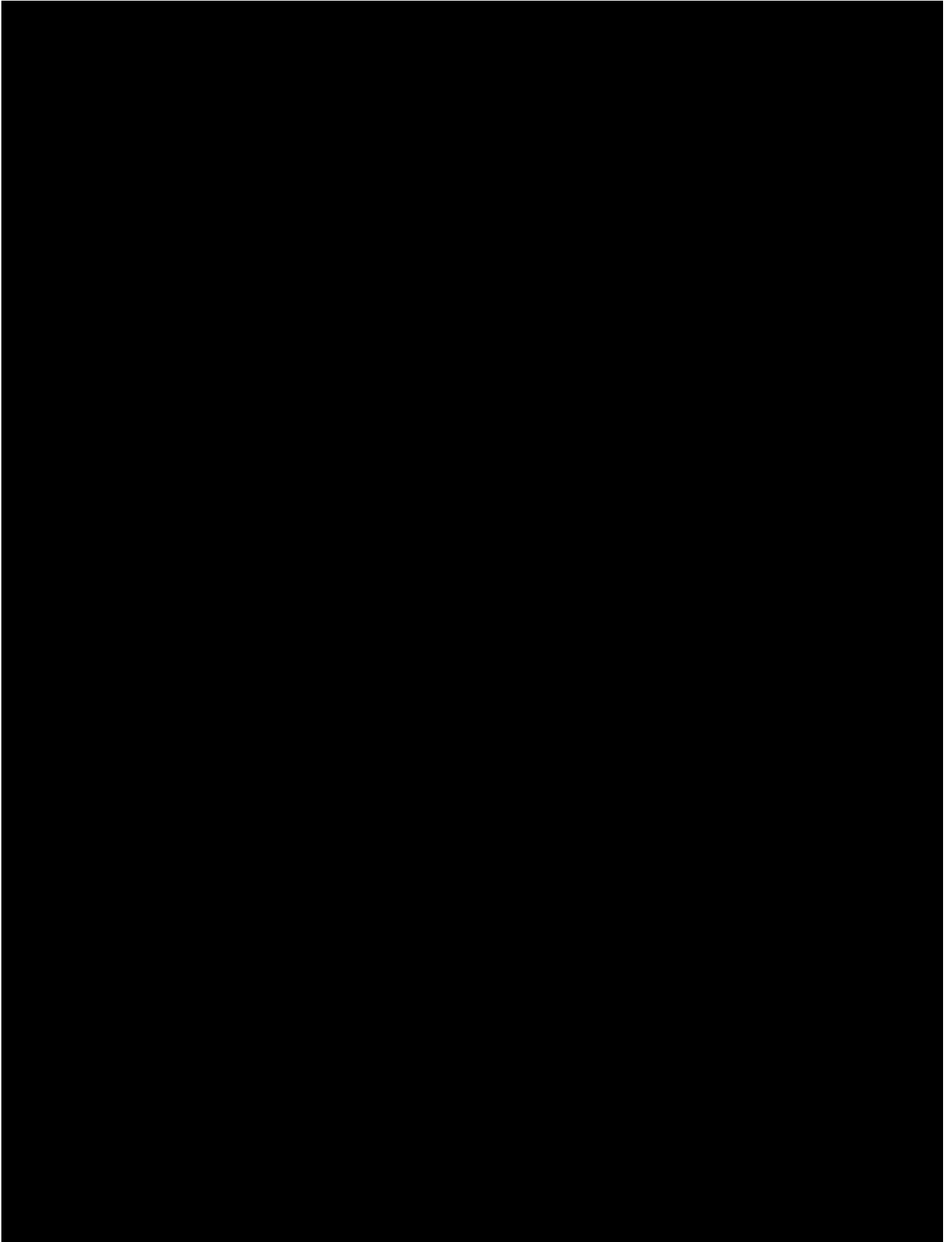


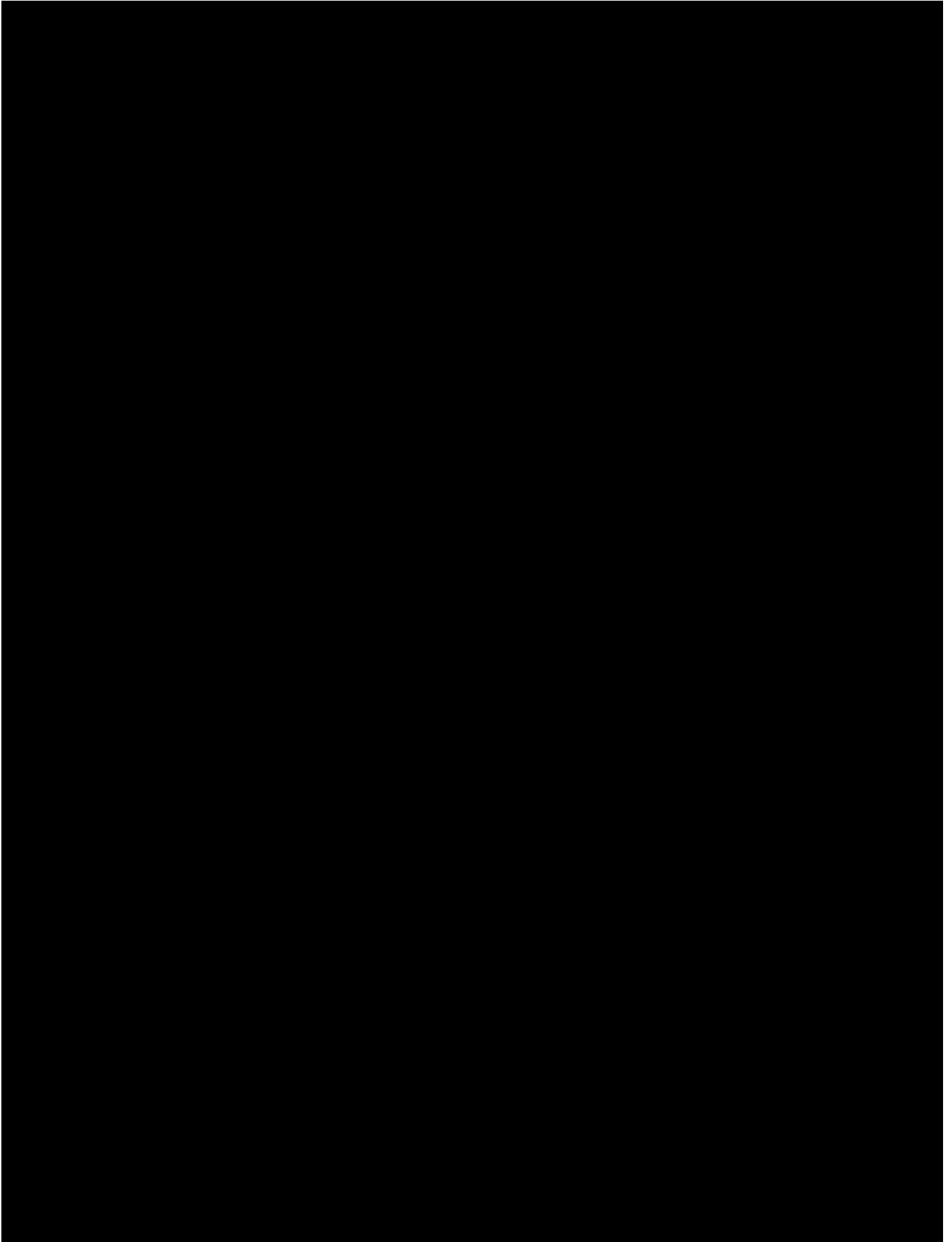


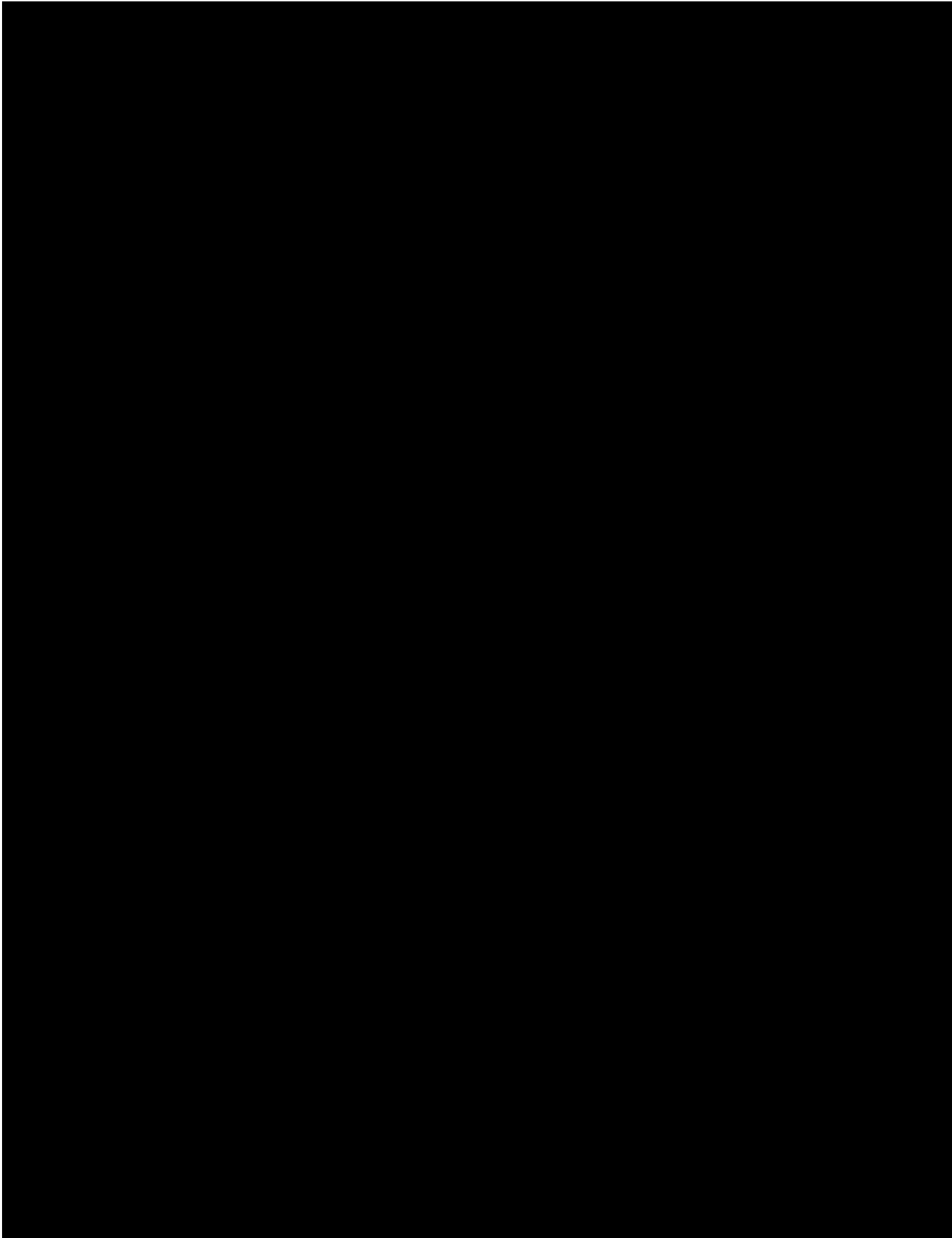


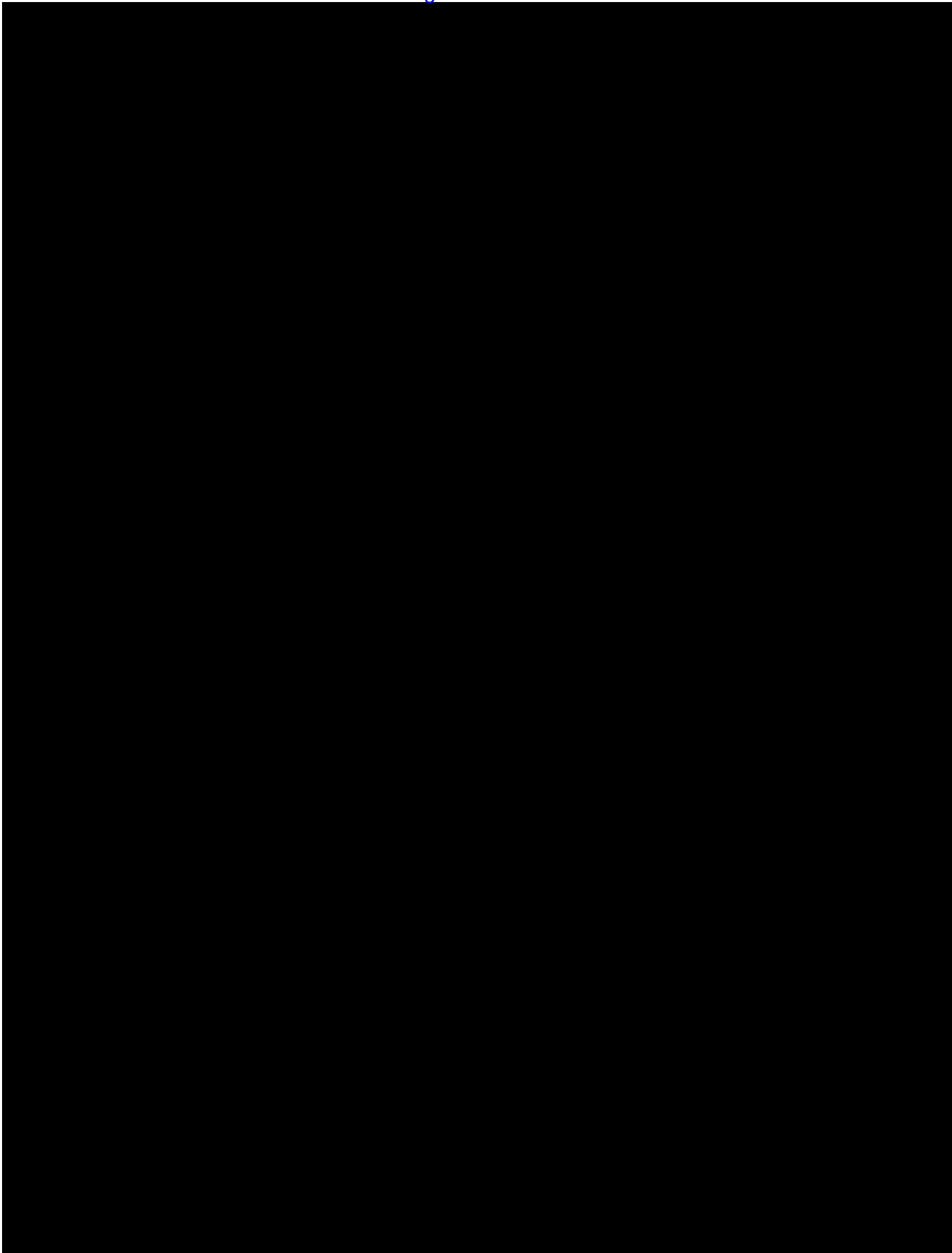


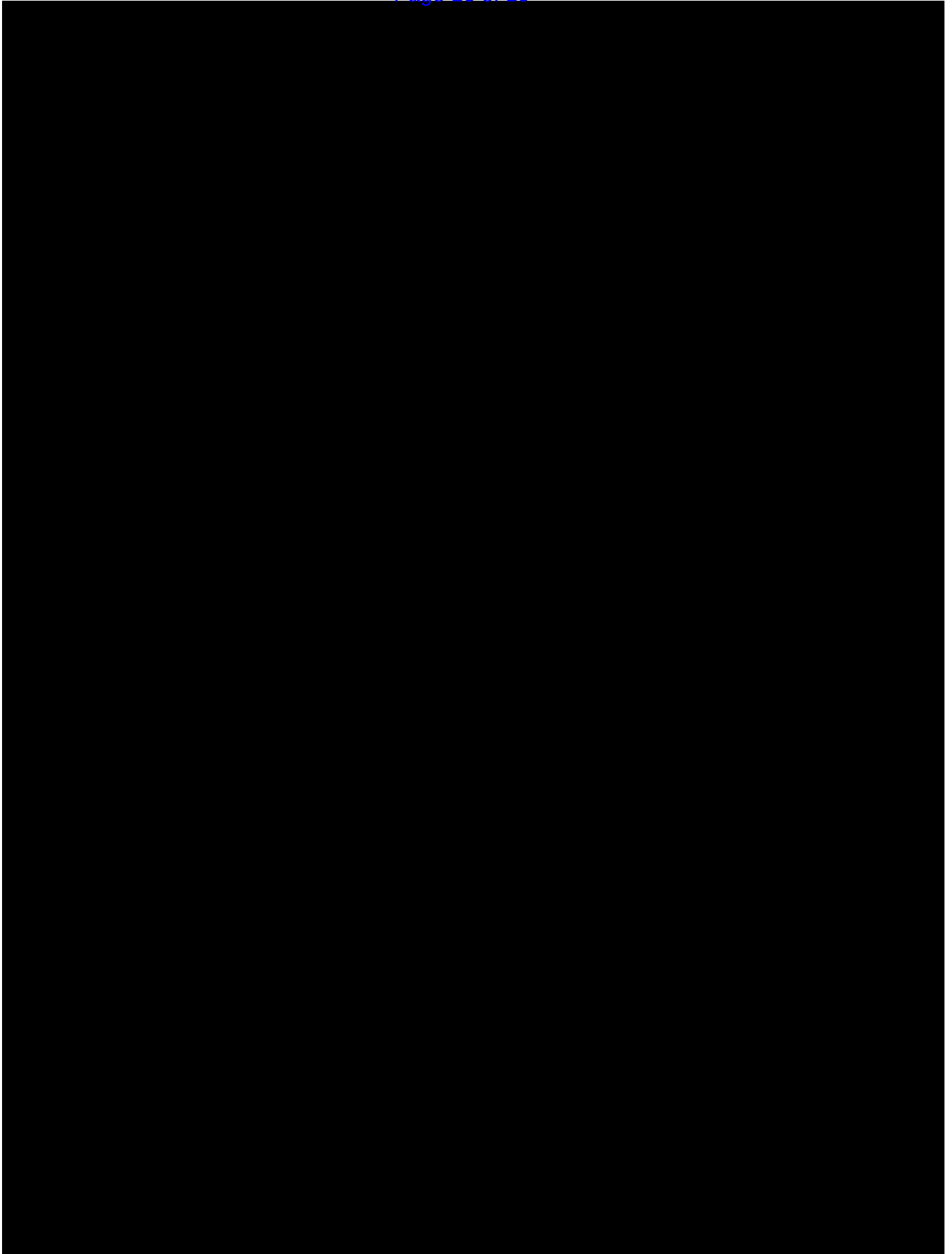


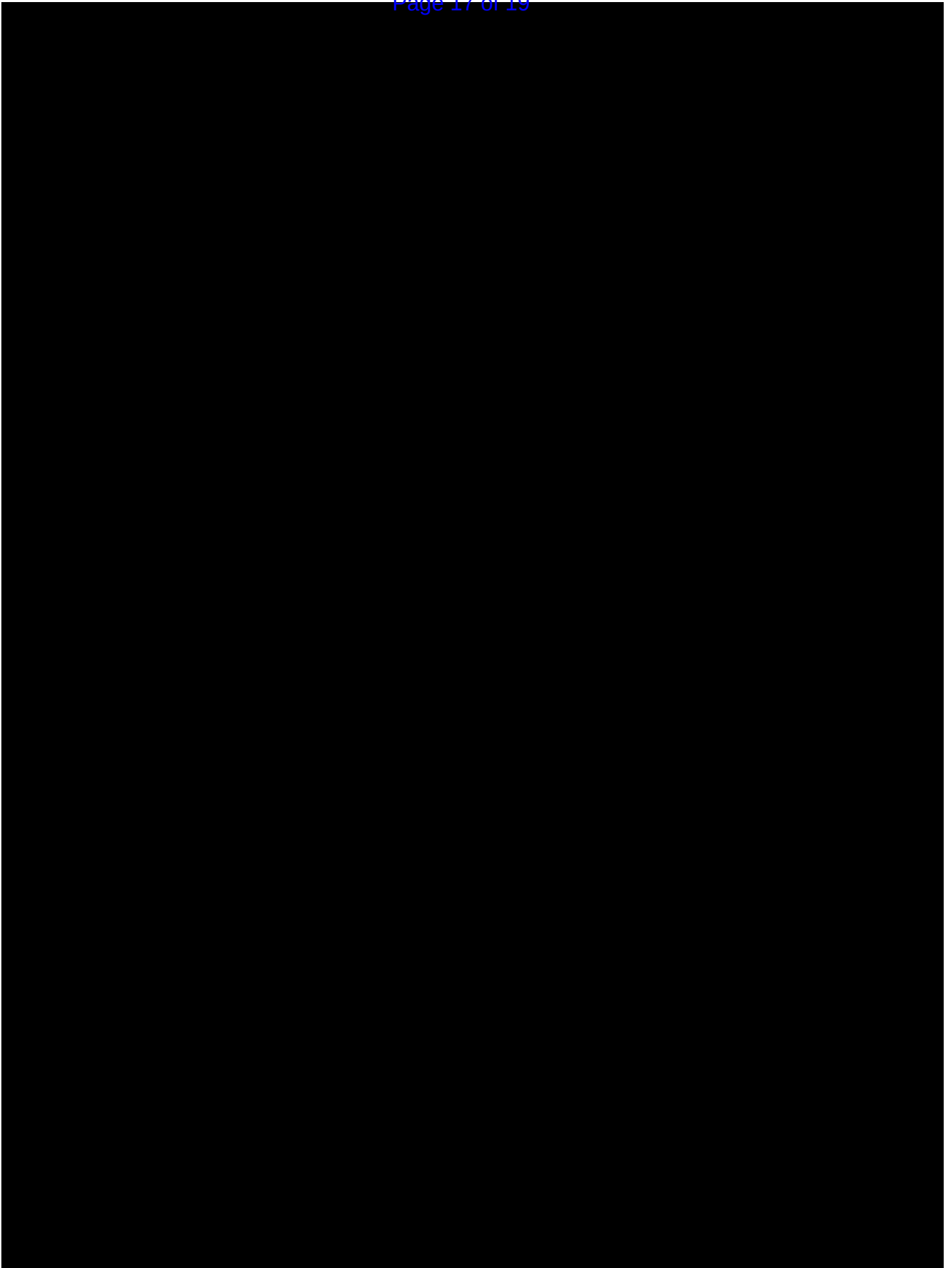


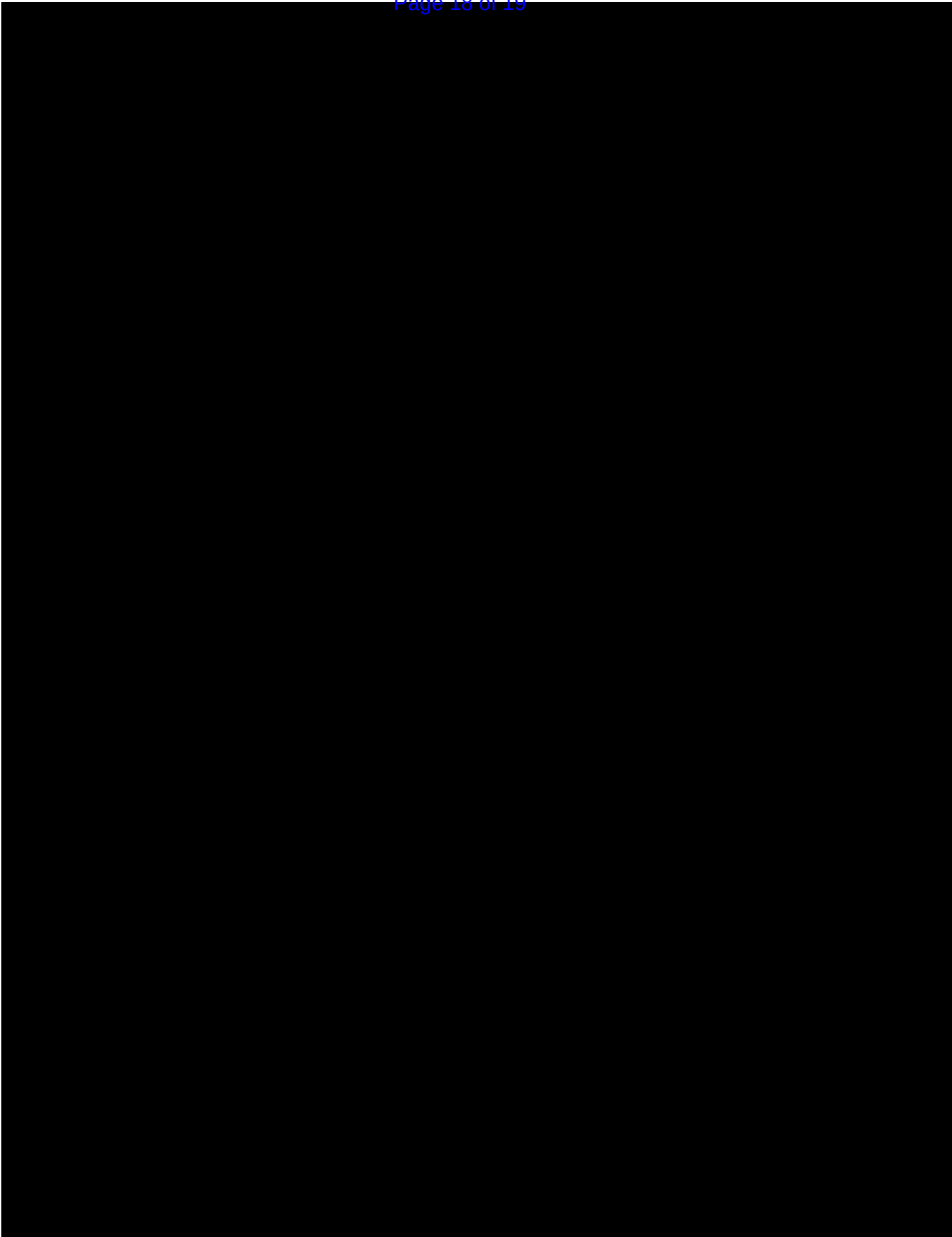












1 STATE OF TEXAS)

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.

18
19
20 
21

Michelle L. Munroe, CSR No. 6011

Commission expires 1-31-26

Firm Registration #571

22 VERITEXT LEGAL SOLUTIONS

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24 Fort Worth, Texas 76102

817.336.3042 telephone