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Videotaped Deposition of
Pamela Ann Joseph
May 12, 2025

In Re Bank of America CA Unemployment Benefits Litigation



Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA

3
4 IN RE: BANK OF AMERICA Case No.
5 CALIFORNIA UNEMPLOYMENT 3:21-md-02992-GPC-MSB
6 BENEFITS LITIGATION
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11 REMOTE VIDEOTAPED DEPOSITION OF
12 PAMELA ANN JOSEPH

13
14 May 12, 2025
15 11:11 a.m.

16
17
18 (All attendees appeared remotely via
19 teleconferencing and/or videoconferencing.)
20

21
22 Elizabeth R. Hollingsworth, CCR B-1319
23

24 Job No.: 10163119
25

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1 you recognize this document?

2 A Yes.

3 Q And this is a true and correct copy of
4 your rebuttal report in this case?

5 A Yes.

6 Q Okay. I'll be referring throughout the
7 day to this Exhibit 5, your rebuttal report as --
8 dated April 4th, 2025, as your rebuttal report.
9 So Exhibit 4 is your expert report. Exhibit 5 is
10 your rebuttal report.

11 Do the last three documents that we
12 just looked at, your class declaration, your
13 expert report, and your rebuttal report, do they
14 contain all the opinions that you are providing in
15 this case?

16 A Yes.

17 Q Are all of the opinions expressed in
18 your class certification declaration also
19 expressed in either your expert report or your
20 rebuttal report?

21 A That was very early in the process. So
22 I'd have to go back and look at all of those
23 again. But, again, I know that my expert report
24 and my rebuttal report are all my opinions.

25 Q Are there any opinions expressed in

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1 your class certification declaration that are not
2 expressed in either your expert report or your
3 rebuttal report?

4 A They would be my opinions, but I do not
5 know. I would have to go back and look through
6 line by line.

7 Q You don't recall intentionally omitting
8 any declar- -- any opinions that were in your
9 class certification declaration from your
10 subsequent expert report or rebuttal report?

11 A No.

12 Q Okay. Do you intend to offer any
13 opinions in this case beyond those expressed in
14 your expert report and rebuttal report?

15 A No.

16 Q Okay. So if you could turn your
17 attention to Exhibit 4, the expert report. Who
18 wrote this report?

19 A I wrote this report with support from
20 Ankura.

21 Q And when you say "Ankura," are you
22 referring to Ankura Consulting Group, LLC?

23 A Yes.

24 Q What is Ankura?

25 A They are the firm that hired me and

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1 Q I am not. We have put together some
2 excerpts. We do have a full copy of the contract
3 but in the interest of trying to save some paper
4 and some scrolling, we put together Exhibit 19,
5 which I will represent consists of excerpts from
6 the EDD bank contract. It's 11 pages of excerpts.

7 A Okay.

8 Q Do you see the first page of this
9 document that's 11 pages --

10 A Standard agreement, yeah.

11 Q Standard Agreement. And this is --
12 this is the EDD bank contract that you reviewed
13 portions of?

14 A Yes.

15 Q Great. And on the last page of this
16 excerpt, so if you scroll to page 11 of the .pdf,
17 requirement 323 states, "The debit card shall
18 contain no less than an ISO 7811-compliant high
19 coercivity magnetic strip."

20 And the contractor agrees to that
21 requirement; correct?

22 A Correct.

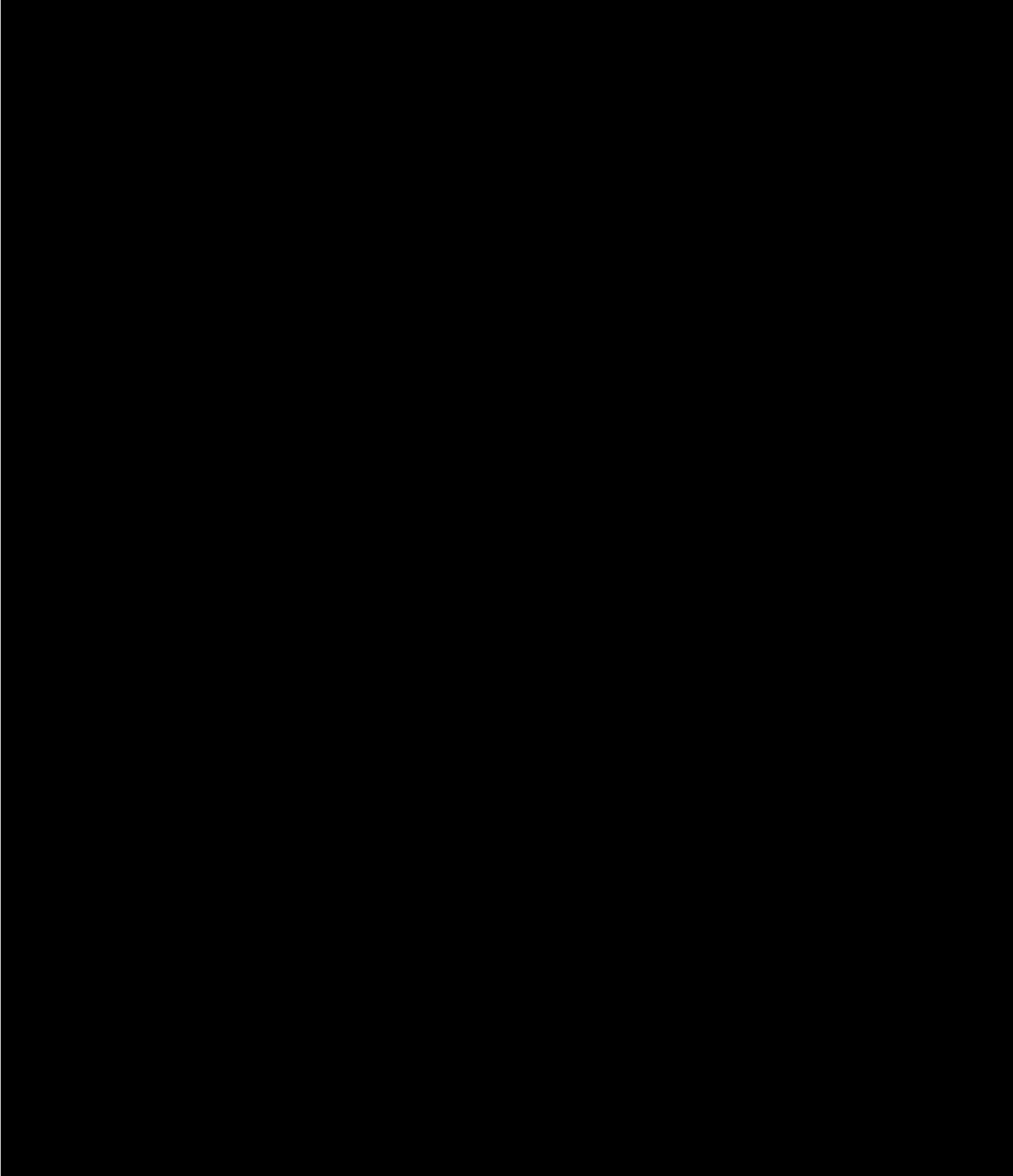
23 Q It is possible for a card to have both
24 an ISO 7811-compliant high coercivity magnetic
25 strip and also an EMV chip; correct?

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1

A That is correct.



11 Q If you could scroll to the sixth page
12 of this excerpt. This is the page at the top of
13 it, it says "Continued support of the EDD s
14 central mission." Are we on the same page?

15 A What does it say at the top?

16 Q "Continued support of the EDD's central
17 mission."

18 MS. YVONNE CHAN: Click on the left.
19 Page 6. (Inaudible.)

20 Q (By Ms. Connie Chan) No. No. Thank
21 you. I know. Unfortunately, the page also does
22 not have -- this document does not have internal
23 page numbers.

24 A Okay. I'm there.

25 Q And if you could look at the very

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COURT REPORTER CERTIFICATE

STATE OF GEORGIA:

COUNTY OF DEKALB:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the proceedings were reduced to typewriting under my direction and control; that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said deposition; and I further certify that I am not of kin or counsel to the parties in the case; am not in the employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This, the 28th day of May, 2025.



Elizabeth R. Hollingsworth, CCR B-1319

Pamela Ann Joseph

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DISCLOSURE OF NO CONTRACT

I, Elizabeth R. Hollingsworth, CCR, do hereby disclose, pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, that Gallo Legal Services, was contacted by the party taking the deposition to provide court reporting services for this deposition and there is no contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board for the taking of this deposition.

There is no contract to provide court reporting services between Gallo Legal Services, or any person with whom Gallo Legal Services, has a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond our usual and customary rates have been disclosed and offered to all parties.

This 28th day of May, 2025.



Elizabeth R. Hollingsworth, B-1319