

DX 14.0

CONFIDENTIAL

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

- - - - -

IN RE: BANK OF AMERICA

CALIFORNIA UNEMPLOYMENT

BENEFITS LITIGATION

Case Number:

21-MD-02992-GPC-MSB

This document relates
to All Actions

- - - - -

CORRECTED TRANSCRIPT

CONFIDENTIAL

Video Deposition of

J. DANIEL KREIS

in Washington, D.C.

Monday, May 5, 2025

9:31 a.m.

Veritext 7304174

Reported by: Laurie Donovan, RPR, CRR, CLR

1 MS. HAGGANS: And this will be Kreis Exhibit

2 3.

3 (Exhibit 3 was marked for
4 identification.)

5 BY MS. HAGGANS:

6 Q So Mr. Kreis, I'm just going to hand these
7 to you -- both to you at once, and we'll do a little
8 housekeeping that will hopefully make this more
9 organized going forward.

10 A Okay.

11 Q So looking first at the document that's
12 marked Kreis Exhibit 2, do you recognize it?

13 A Yes, I do.

14 Q Okay. What is it?

15 A This is my expert report that I provided on
16 March 4.

17 Q Okay, and what about Kreis Exhibit 3; do you
18 recognize that document?

19 A Yes, I do.

20 Q What is it?

21 A It is my rebuttal report on April 4.

22 Q When were you first contacted about this
23 case?

24 A It was either October or November of 2023.

25 Q Who contacted you?

1 Q Yes.

2 A That's, that's the only thing that I would
3 say.

4 Q Okay.

5 Were there any people that you wanted to
6 talk to in connection with this case that you weren't
7 able to speak with?

8 A No.

9 Q Okay. If we can look at tab -- Exhibit 2,
10 which is the opening report.

11 A Mm-hmm.

12 Q And we can go to paragraph 7, which is on
13 page 4.

14 A Okay.

15 Q You there?

16 A I am.

17 Q Okay. So you note in paragraph 7 that your
18 work is "ongoing," and you "reserve the right to
19 supplement, amend, and revise."

20 My question is whether -- other than the
21 materials reflected in your rebuttal report, have you
22 reviewed additional materials in connection with this
23 case?

24 A Say that again.

25 Q Sure.

1 So this paragraph 7 that's in your, in your
2 opening report where you --

3 A Yeah.

4 Q -- reserve your, your right to, you know,
5 review additional materials or conduct further
6 analysis -- and, and I understand that since you wrote
7 this, you've provided the rebuttal report --

8 A Right.

9 Q -- that, that we just looked at, and so I'm
10 just trying to understand that. Other than the
11 rebuttal report, have you done -- have you reviewed
12 any additional materials?

13 A No, not other than the rebuttal report.

14 Q Okay. Other than as reflected in the
15 rebuttal report, have you conducted any further
16 analyses in connection with this case?

17 A No, I have not.

18 Q Okay. Other than the work in the rebuttal
19 report, have you supplemented your opinions in this
20 case in any way?

21 A I'm not sure -- you mean have I written
22 something else? Supplemented how?

23 Q Or, or do you intend to supplement the
24 opinions that you've offered in this case other than
25 as, as detailed in the rebuttal?

1 A No, I haven't done anything other than
2 what's in the rebuttal, but obviously retain the right
3 to further add to my report should new information
4 come about.

5 Q Okay. That's fair.

6 I'm, I'm just trying to understand, as we
7 sit here today, do you intend to offer any opinions in
8 this case beyond the opinions that are articulated in
9 the reports that you have submitted so far?

10 A As of this moment, I have not been asked to
11 offer any other opinions.

12 Q Okay. Mr. Kreis, where are you employed?

13 A I am the head and founder of First Camden
14 Consulting.

15 Q Well, that's -- so I apologize.

16 So you're not -- are maybe not technically
17 employed. So you, you work for your own consulting
18 business?

19 A Correct.

20 Q Okay. How long have you been working for
21 yourself?

22 A About three years.

23 Q Okay. How many years were you doing
24 consulting before you started your own company?

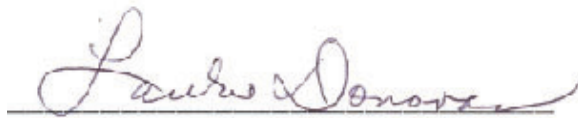
25 A My time at Fair Isaac was mostly consulting.

1
2
3
4
5 CERTIFICATE OF SHORTHAND REPORTER -- NOTARY PUBLIC

6 I, Laurie Donovan, Registered Professional
7 Reporter, Certified Realtime Reporter, and notary
8 public for the District of Columbia, the officer
9 before whom the foregoing deposition was taken,
10 do hereby certify that the foregoing transcript
11 is a true and correct record of the testimony
12 given; that said testimony was taken by me
stenographically and thereafter reduced to
typewriting under my supervision; 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.

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my notarial seal this 24th day
15 of JUNE 2025.

16 My commission expires: July 14, 2027

17
18 

19 LAURIE DONOVAN
20 NOTARY PUBLIC IN AND FOR
21 THE DISTRICT OF COLUMBIA
22
23
24
25