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STIPULATED
PROTECTIVE ORDER**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
Case No. 3:21-md-02992-LAB-MSB

IN RE: BANK OF AMERICA'S CALIFORNIA
UNEMPLOYMENT BENEFITS LITIGATION

This Document Relates to All Actions

*** CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED & VIDEOCONFERENCED DEPOSITION OF
WILLIAM MATTHEW MARTIN

Atlanta, Georgia

Wednesday, February 14, 2024

Court Reporter:

Michelle M. Boudreaux-Phillips, CCR

JOB No. 6459932

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1 employees.

2 Q What does "fraud servicing" mean?

3 A Fraud servicing is an inbound call center
4 whereby cardholders who have been blocked or declined
5 or have concerns around fraud on their prepaid card,
6 they can call an 800 number and speak to a fraud
7 servicing agent who can assist.

8 Q When you say "blocked or declined," can you
9 explain what those terms mean?

10 A When the bank -- the bank evaluates
11 transactions and cards for the possibility of fraud,
12 and where the bank has suspicion that fraud might be
13 occurring, the bank might suspend, decline, or block a
14 prepaid card.

15 Q What is the difference between suspend,
16 decline, or block?

17 A I'll start with the decline. A decline means
18 that a prepaid cardholder has attempted to make a
19 transaction, and the transaction was rejected.

20 A suspend means that a cardholder attempts to
21 make a transaction, and the card is suspended and the
22 cardholder cannot use the card for a similar
23 transaction without authenticating their identity and
24 verifying the legitimacy of the transaction.

25 A block is more restrictive in that a

1 cardholder cannot -- can only authenticate their
2 identity by speaking to a fraud servicing agent, and
3 the fraud servicing agent can then remove the block.

4 Q I see. So when you said that you assisted in
5 ramping up contractors for fraud servicing, you were
6 referring to the call center that handles cardholders
7 whose cards have been blocked; is that right?

8 A Suspended and blocked.

9 Q Suspended and blocked.

10 Are those two different call centers?

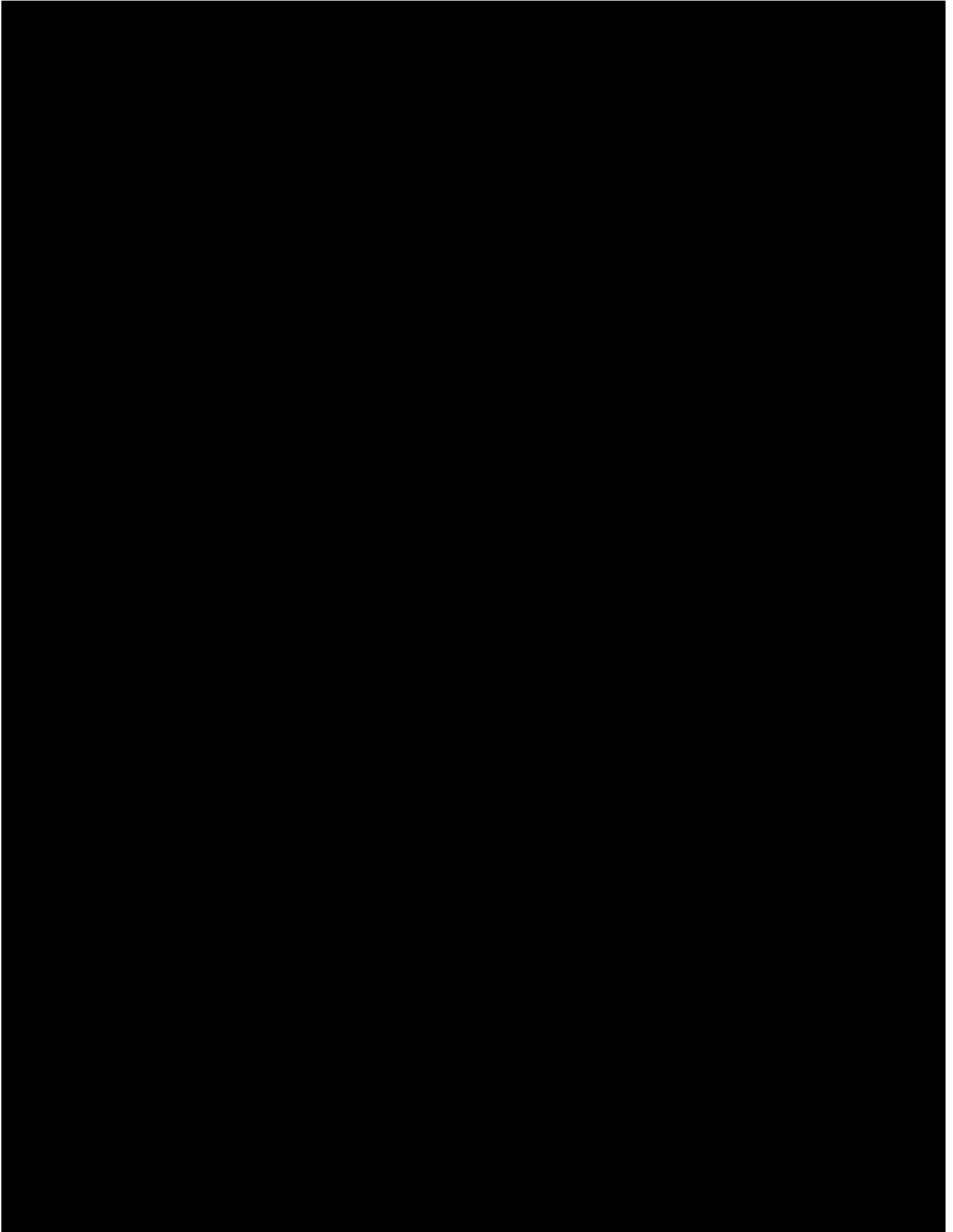
11 A No.

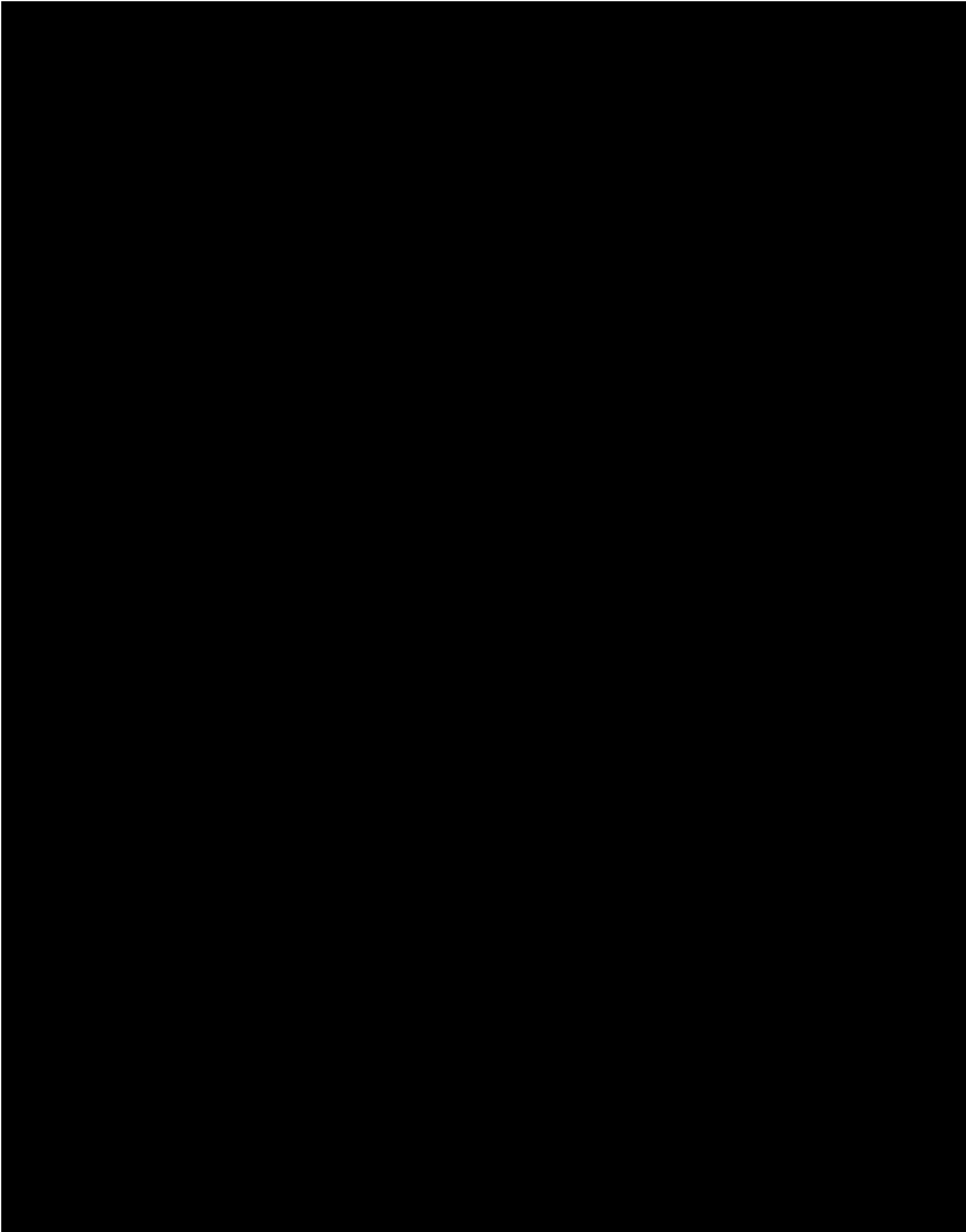
12 Q They're the same?

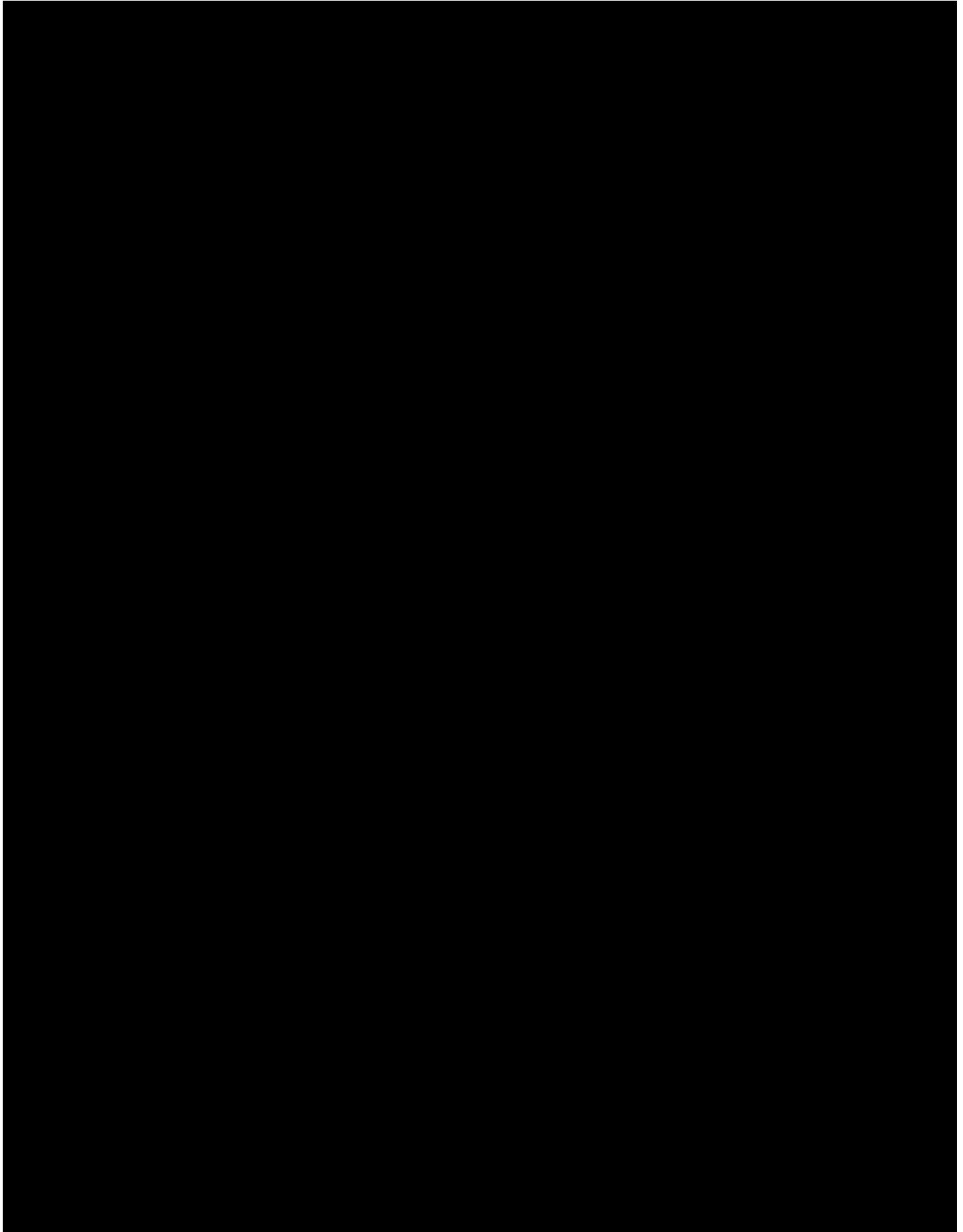
13 A They're the same.

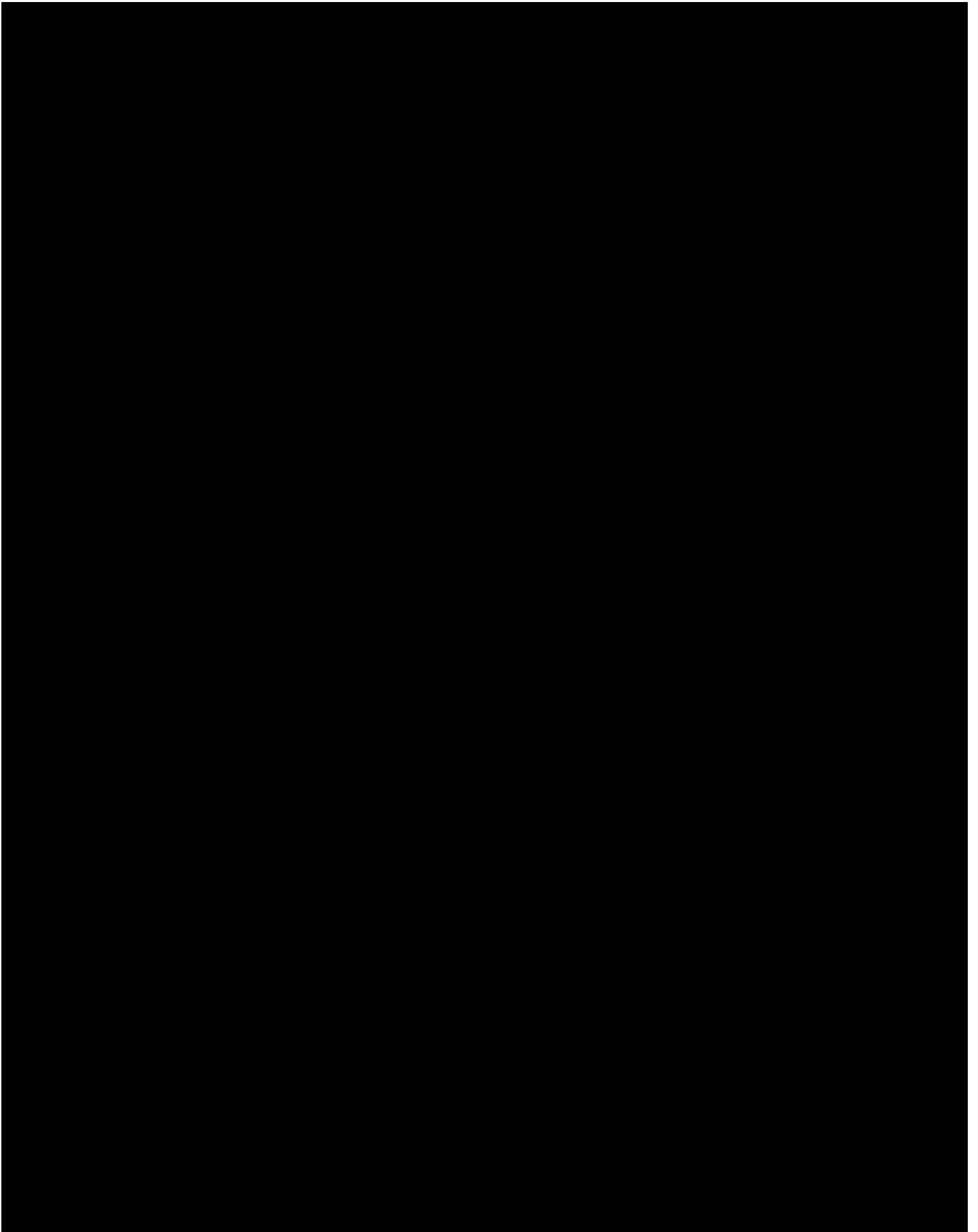
14 Q Is that referred to as the fraud Tier 2 call
15 center at the bank?

16 A It's 1-800 -- it's -- we have two phone
17 numbers that go to the same, I would say, group of
18 agents, that that group of agents is -- was divided at
19 certain times into a Tier 1 group and a Tier 2 group.

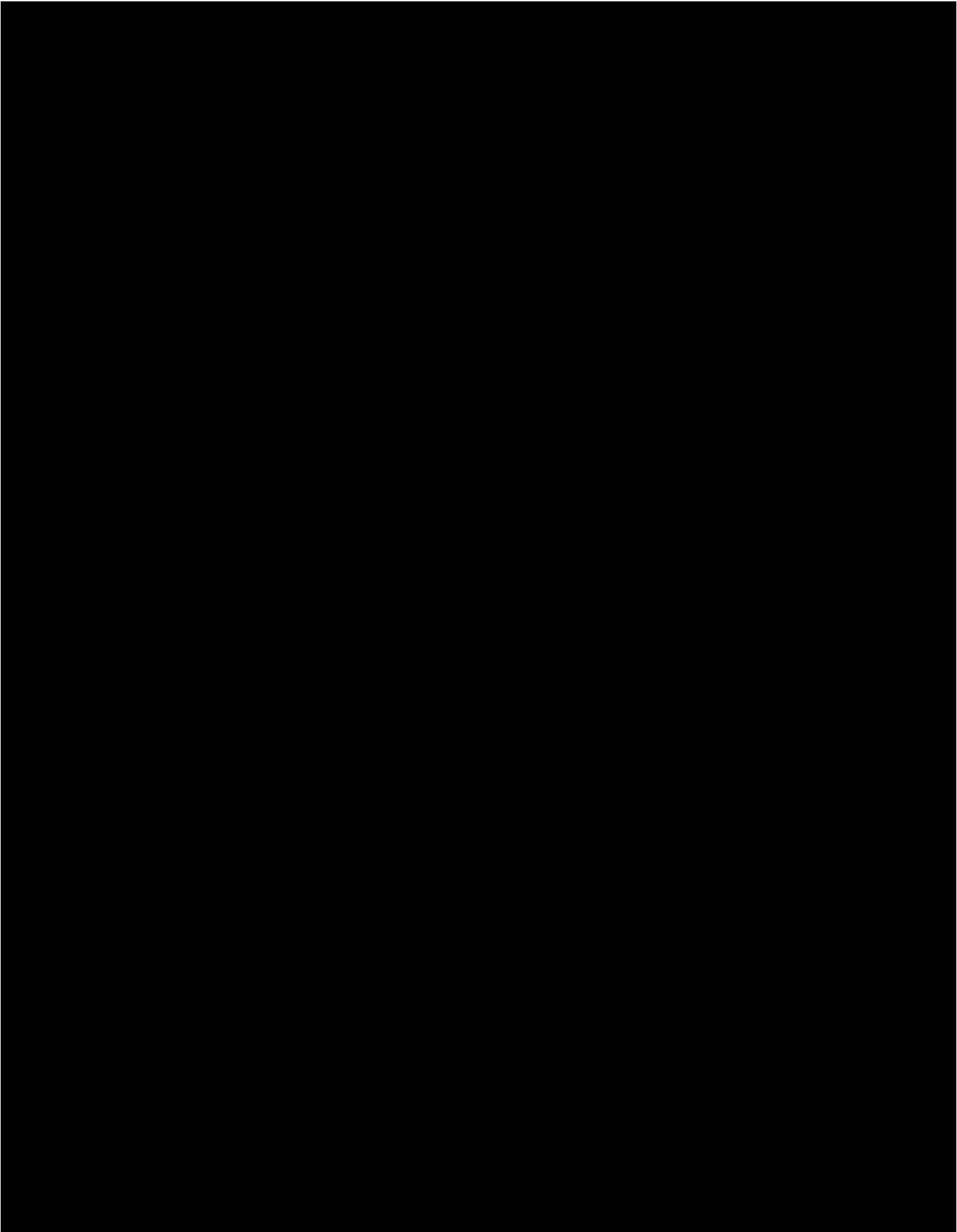


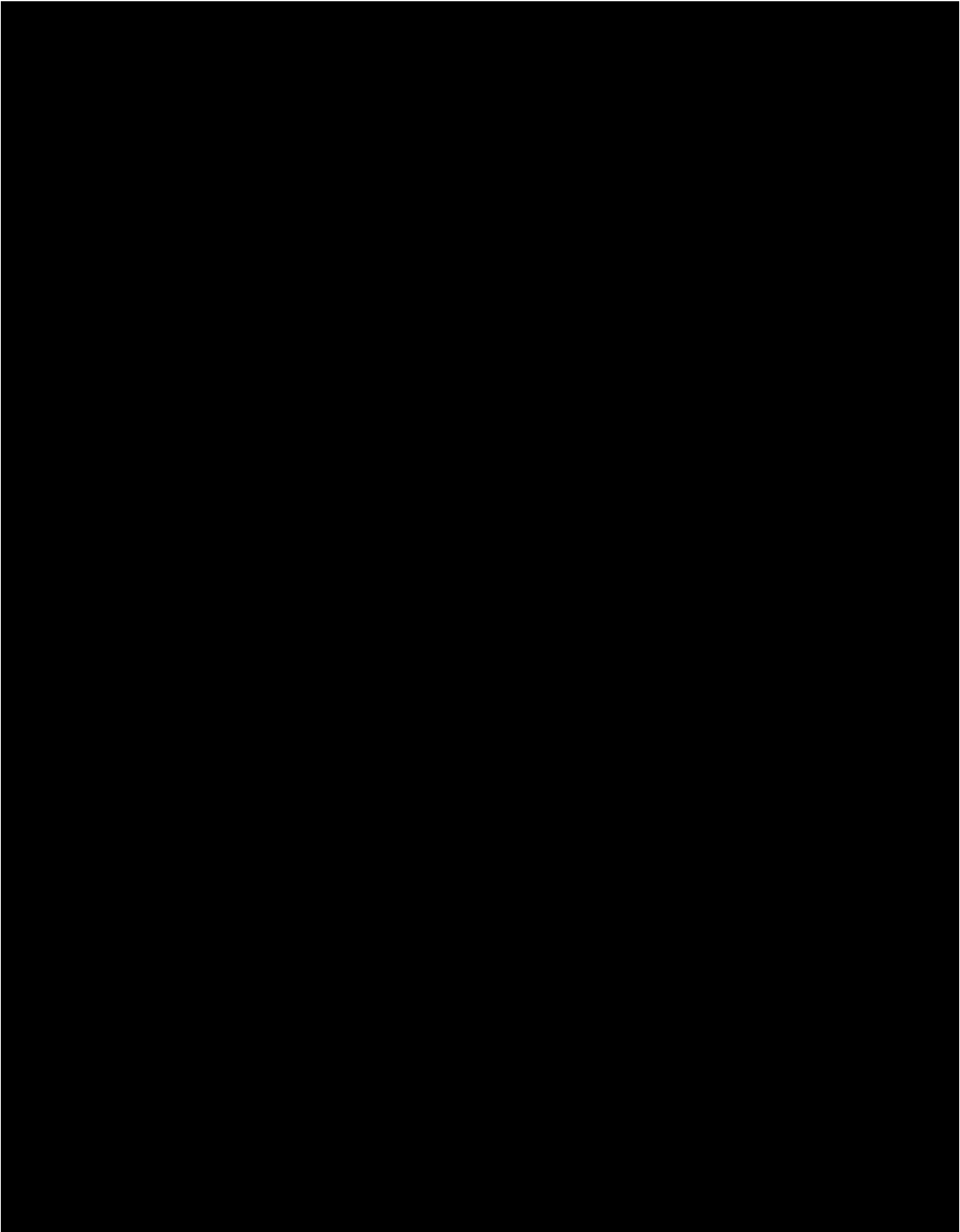


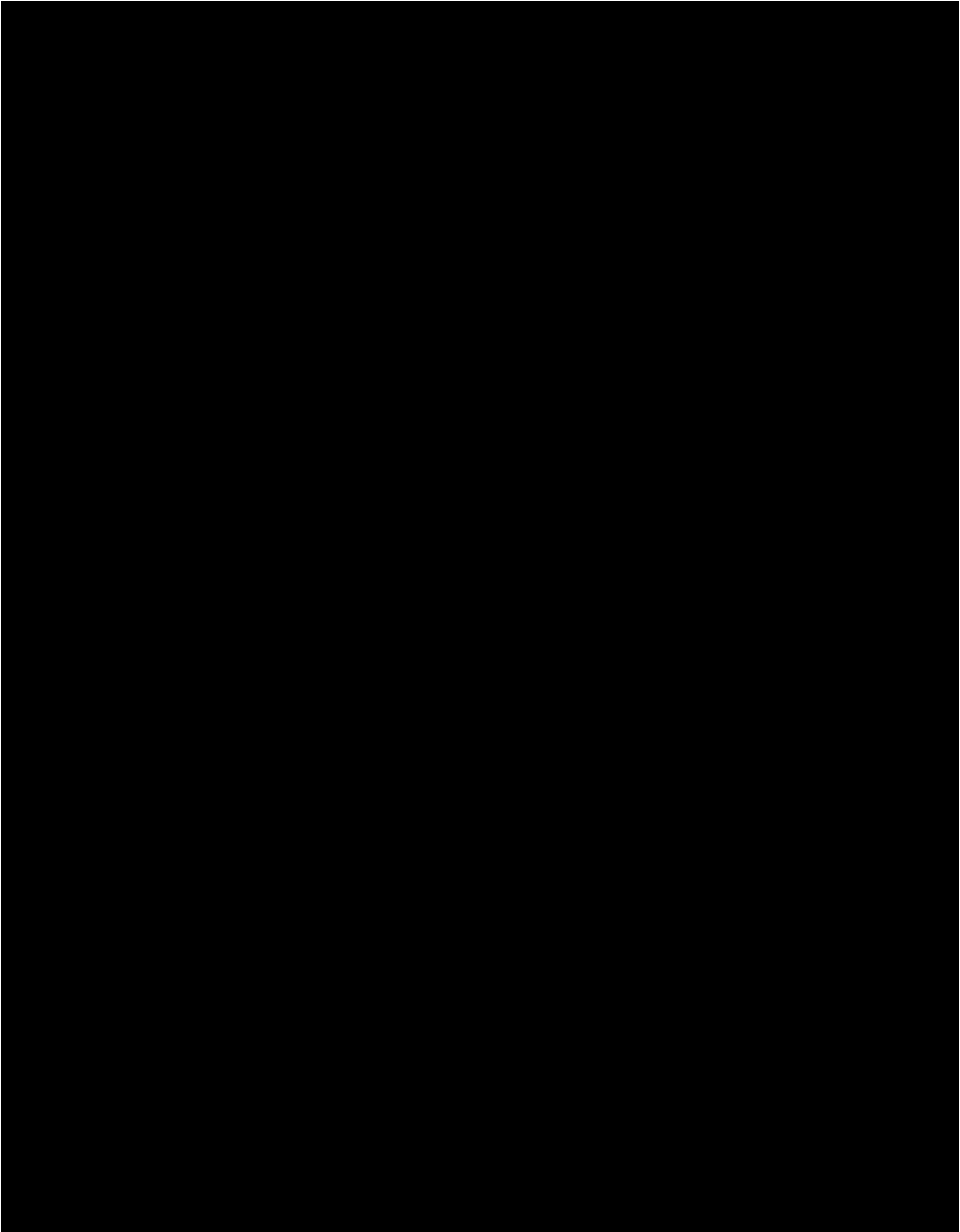


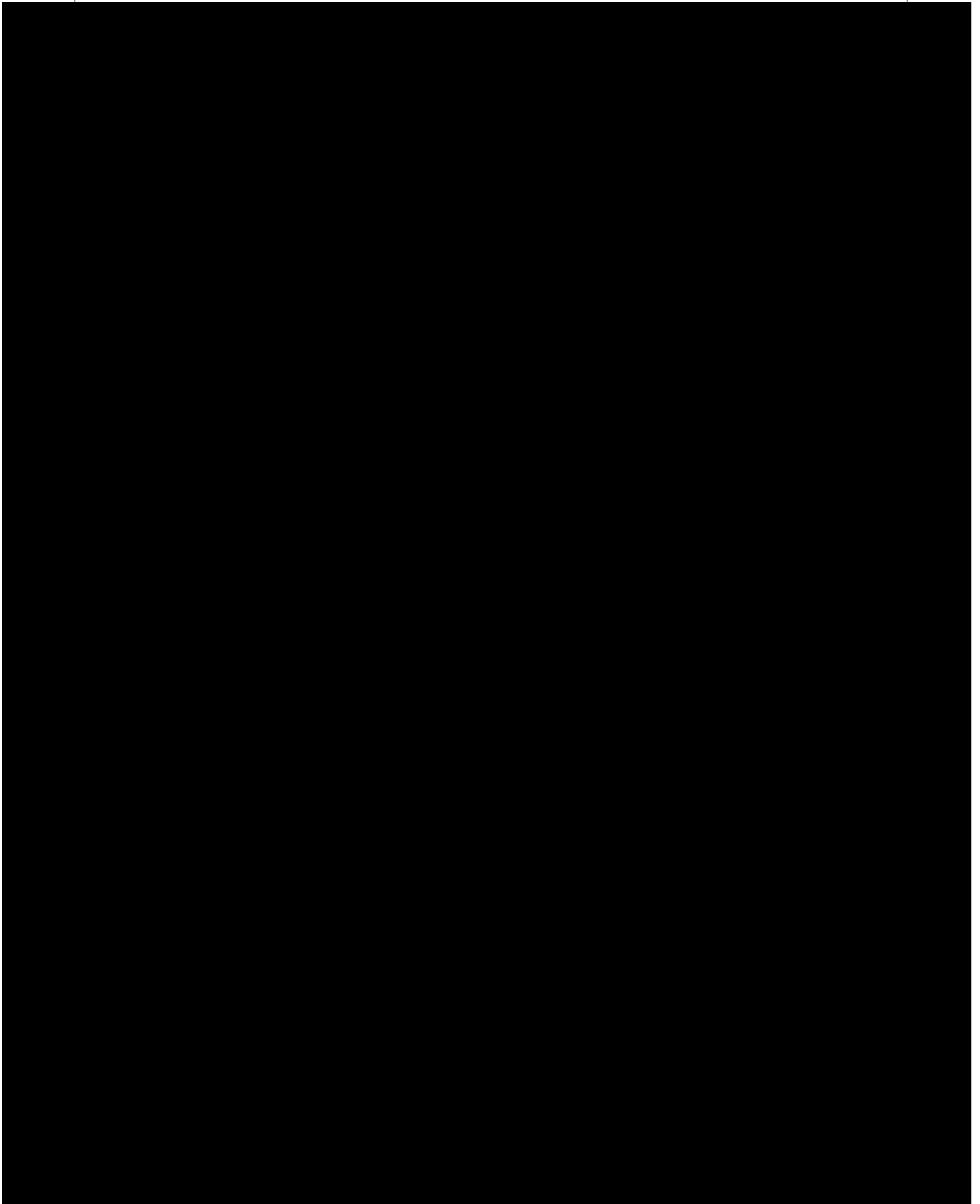


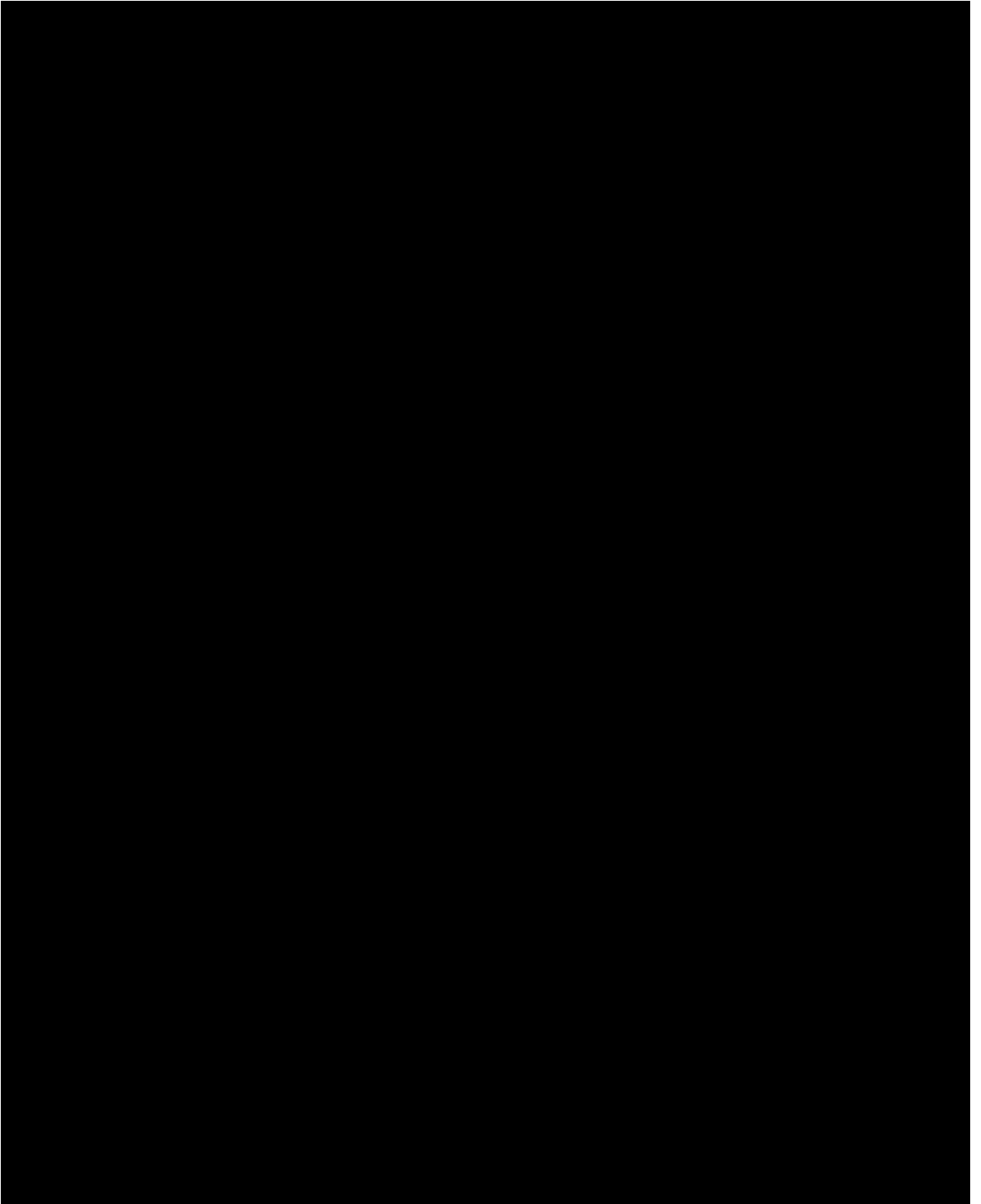
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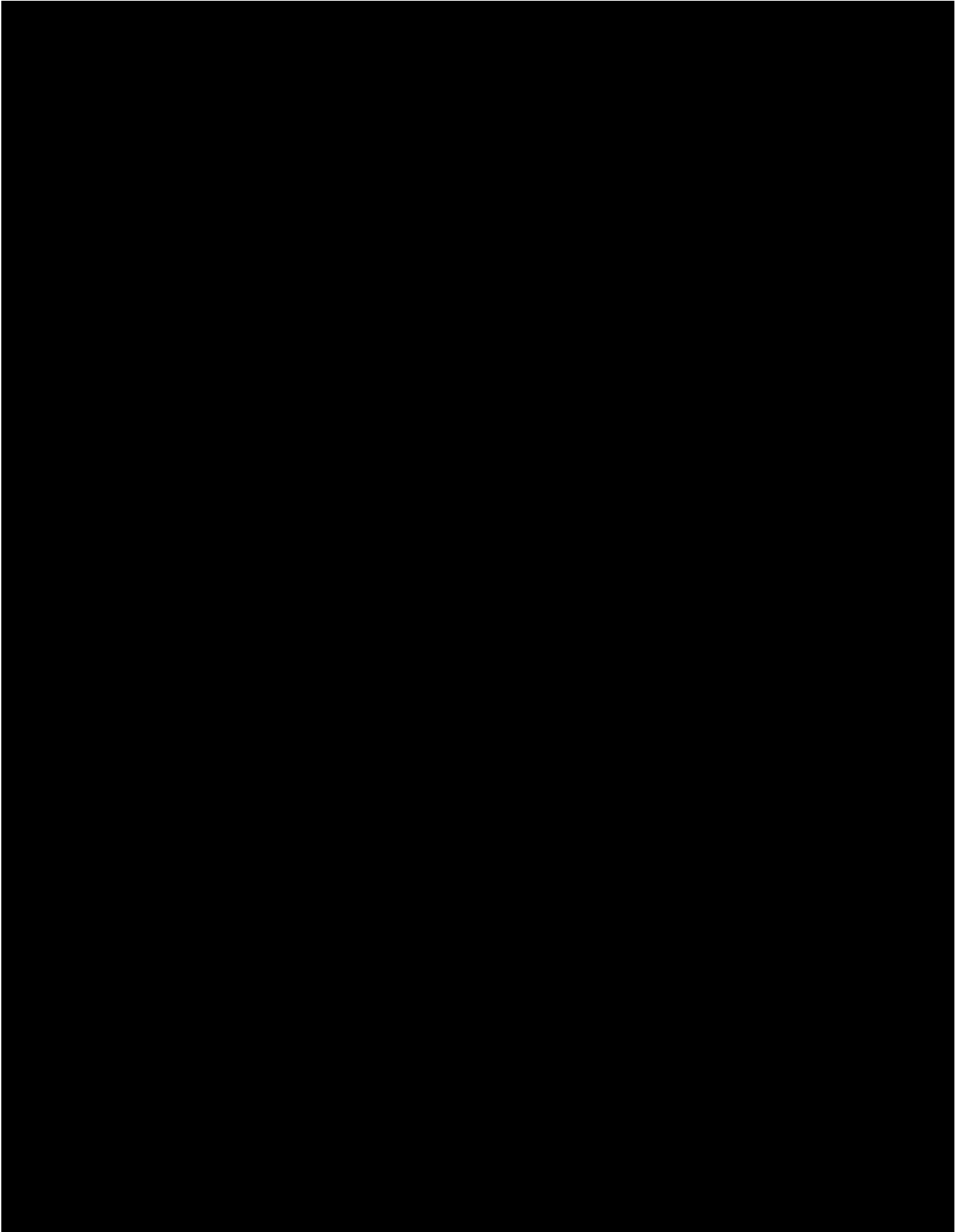


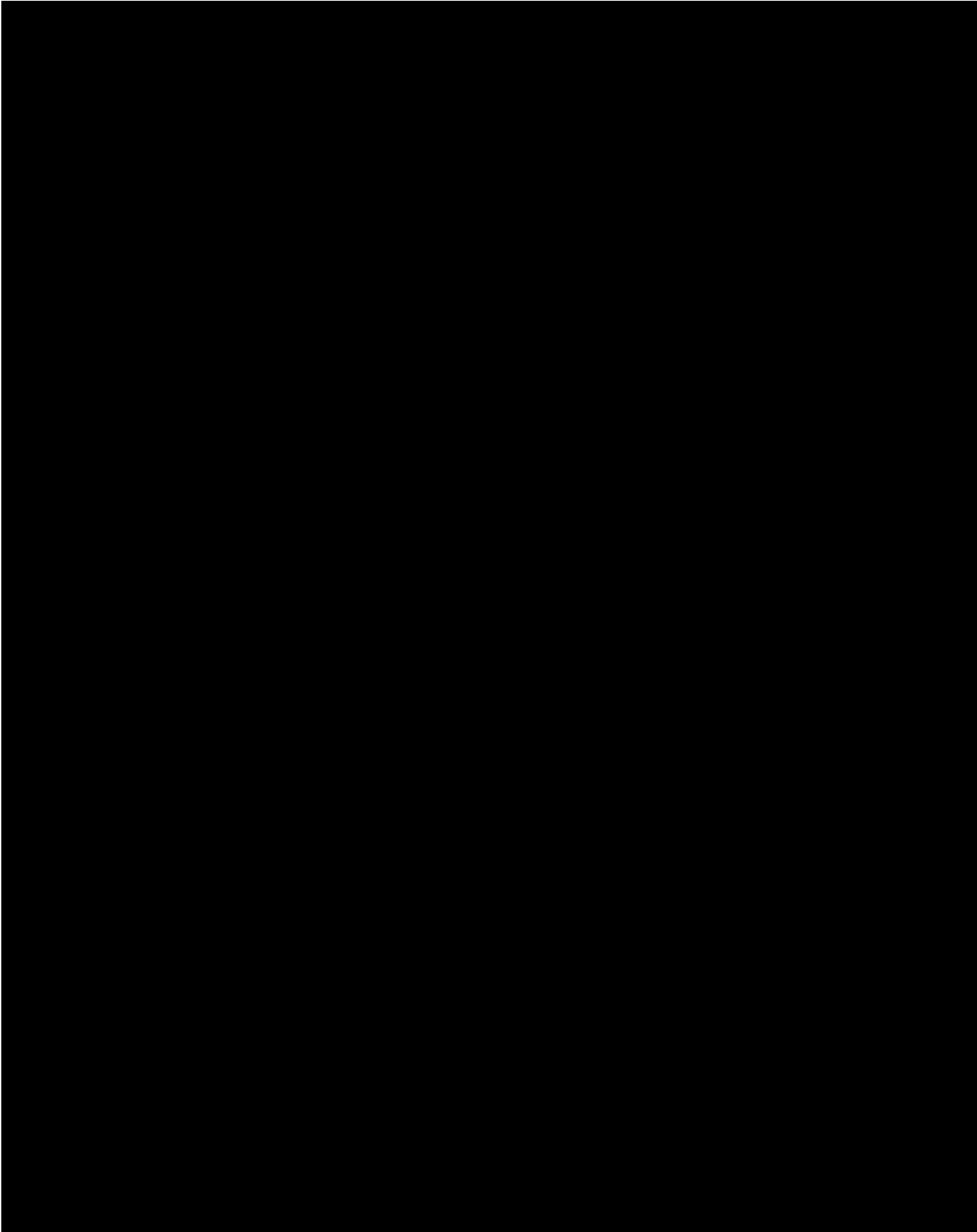


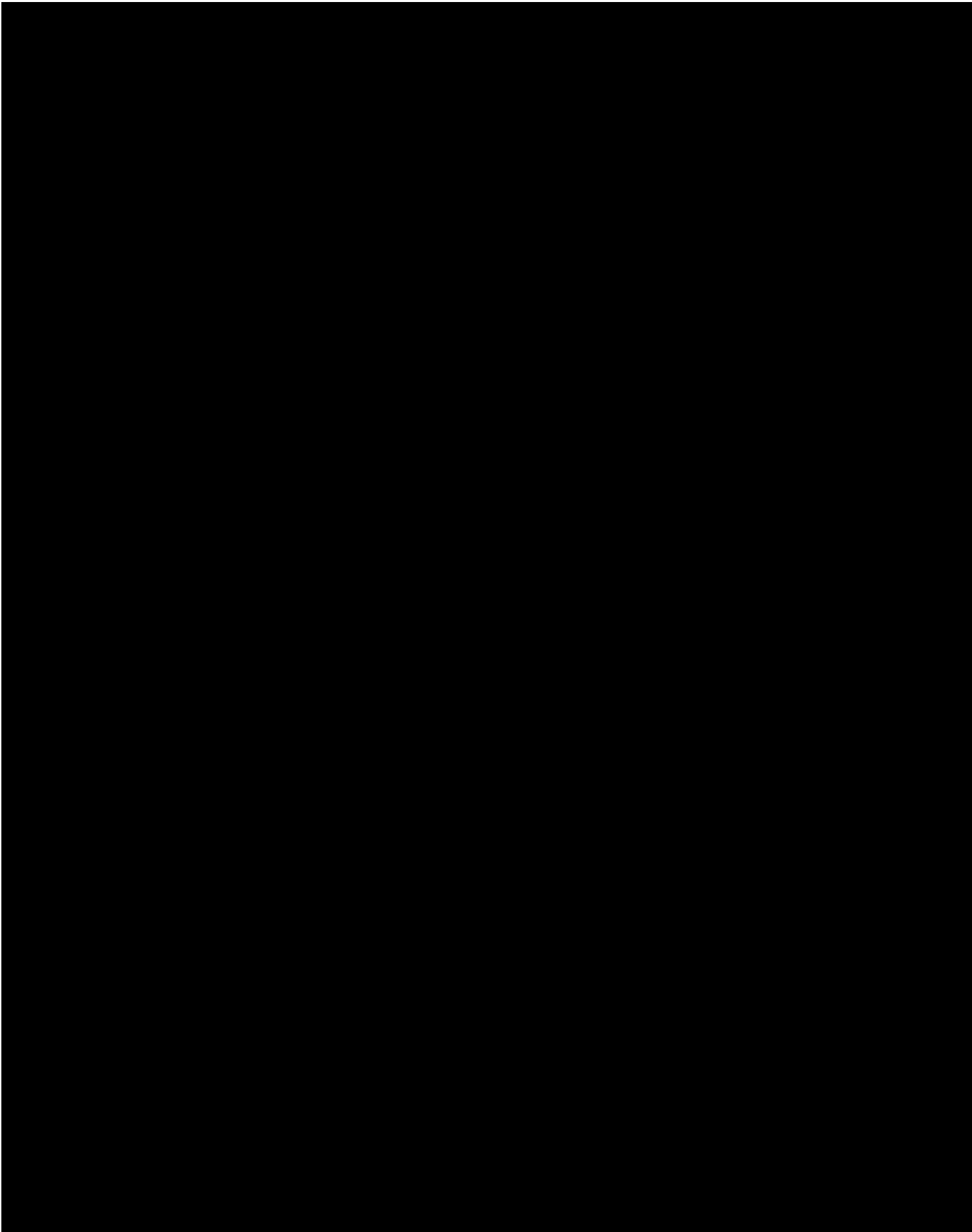


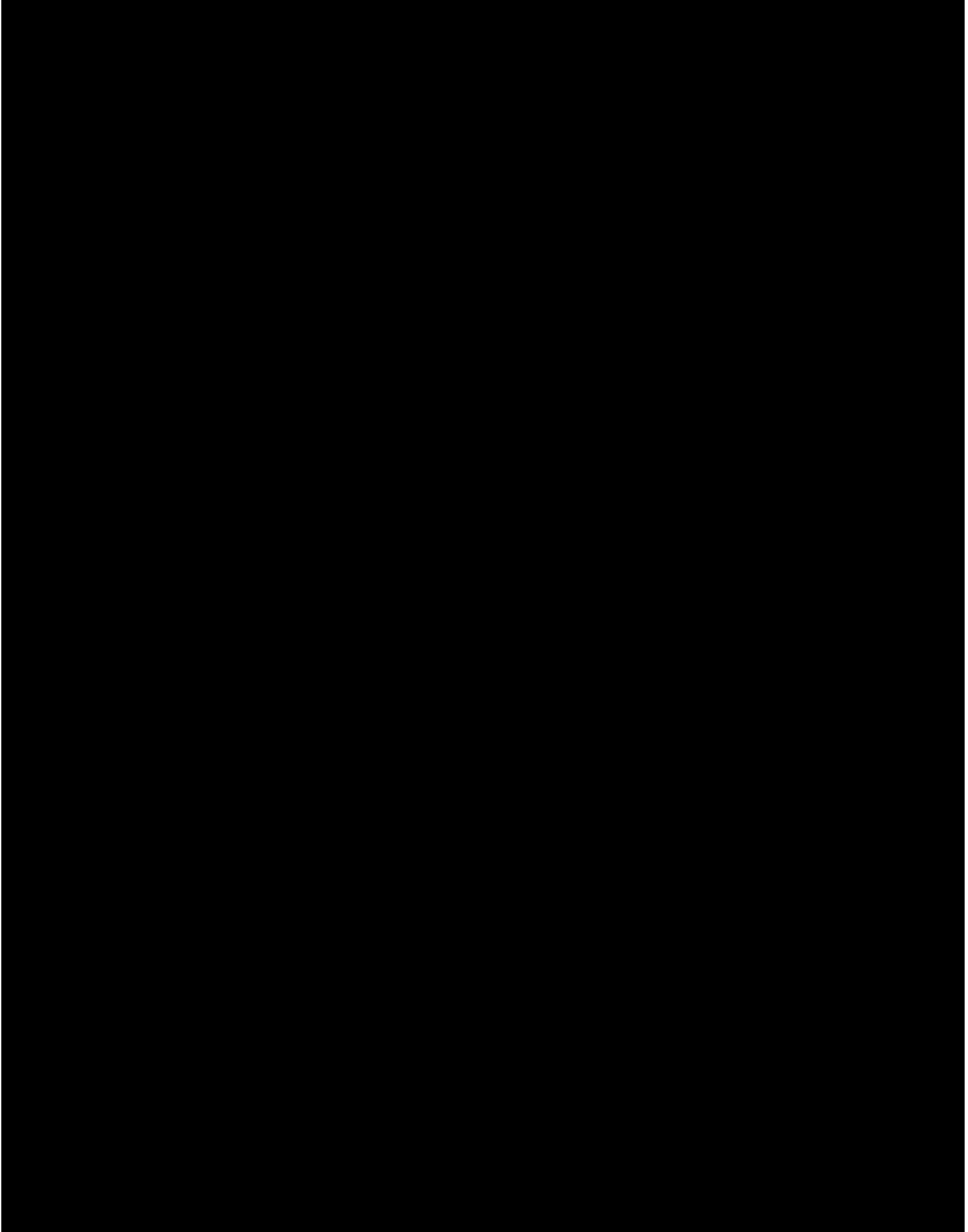


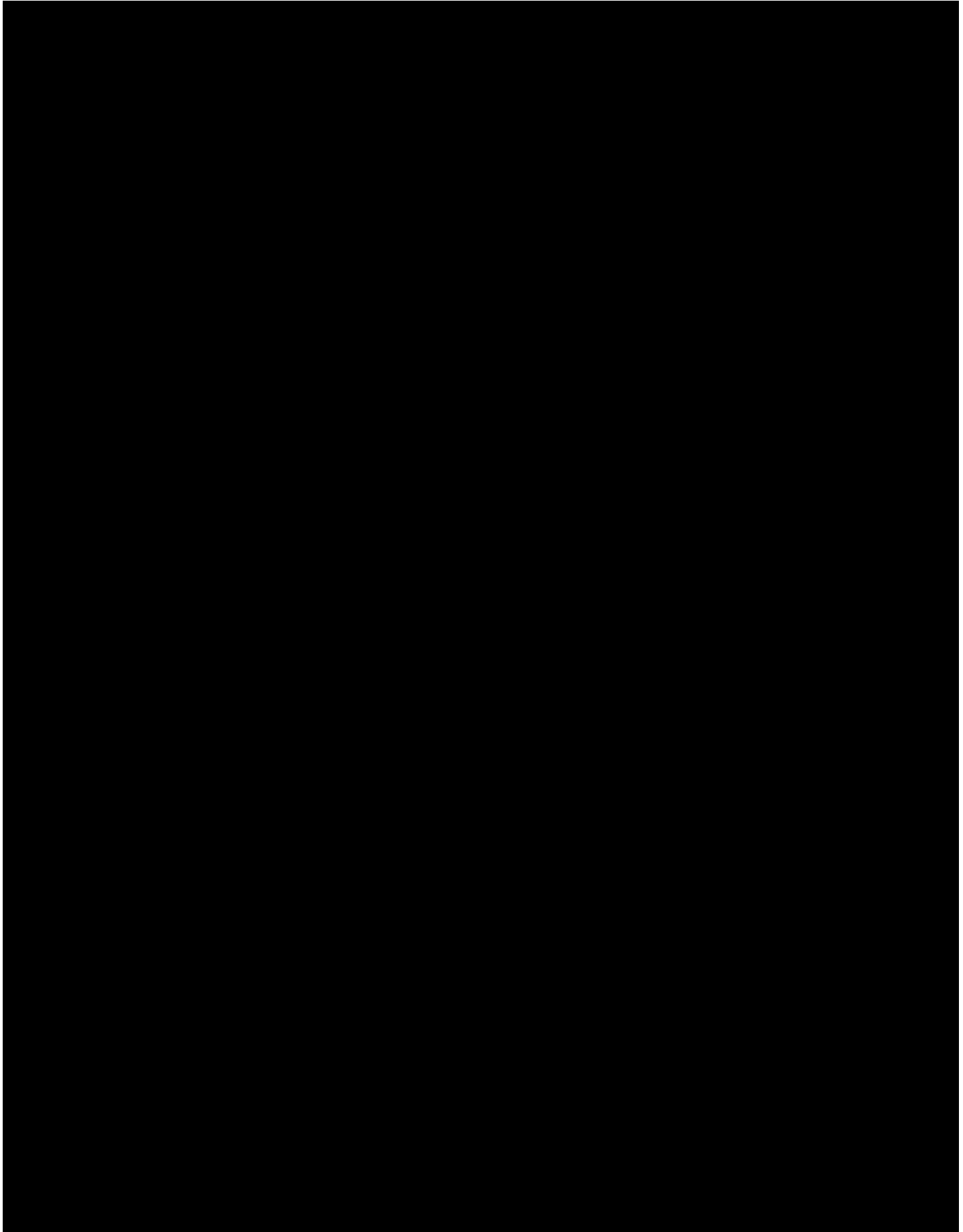


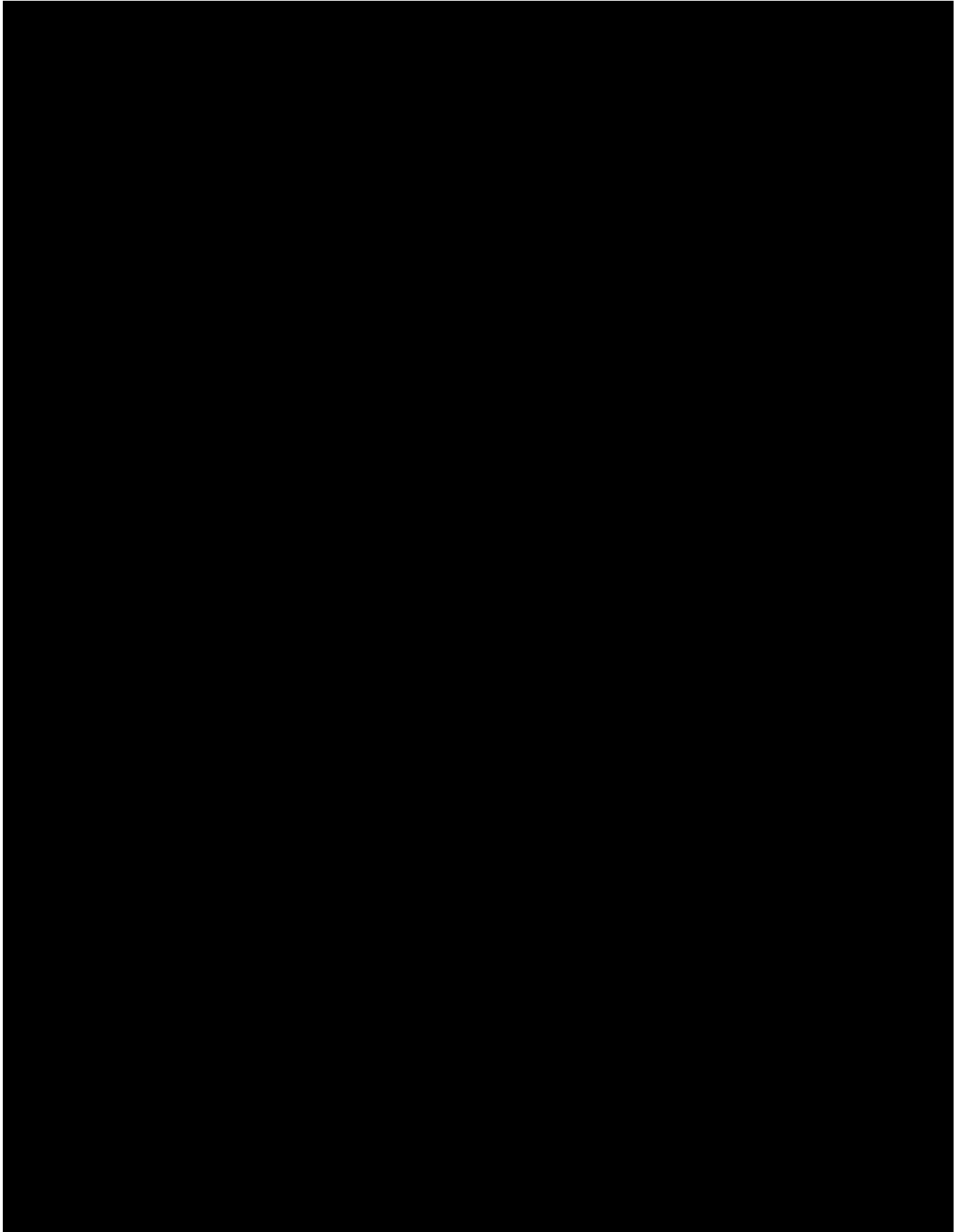


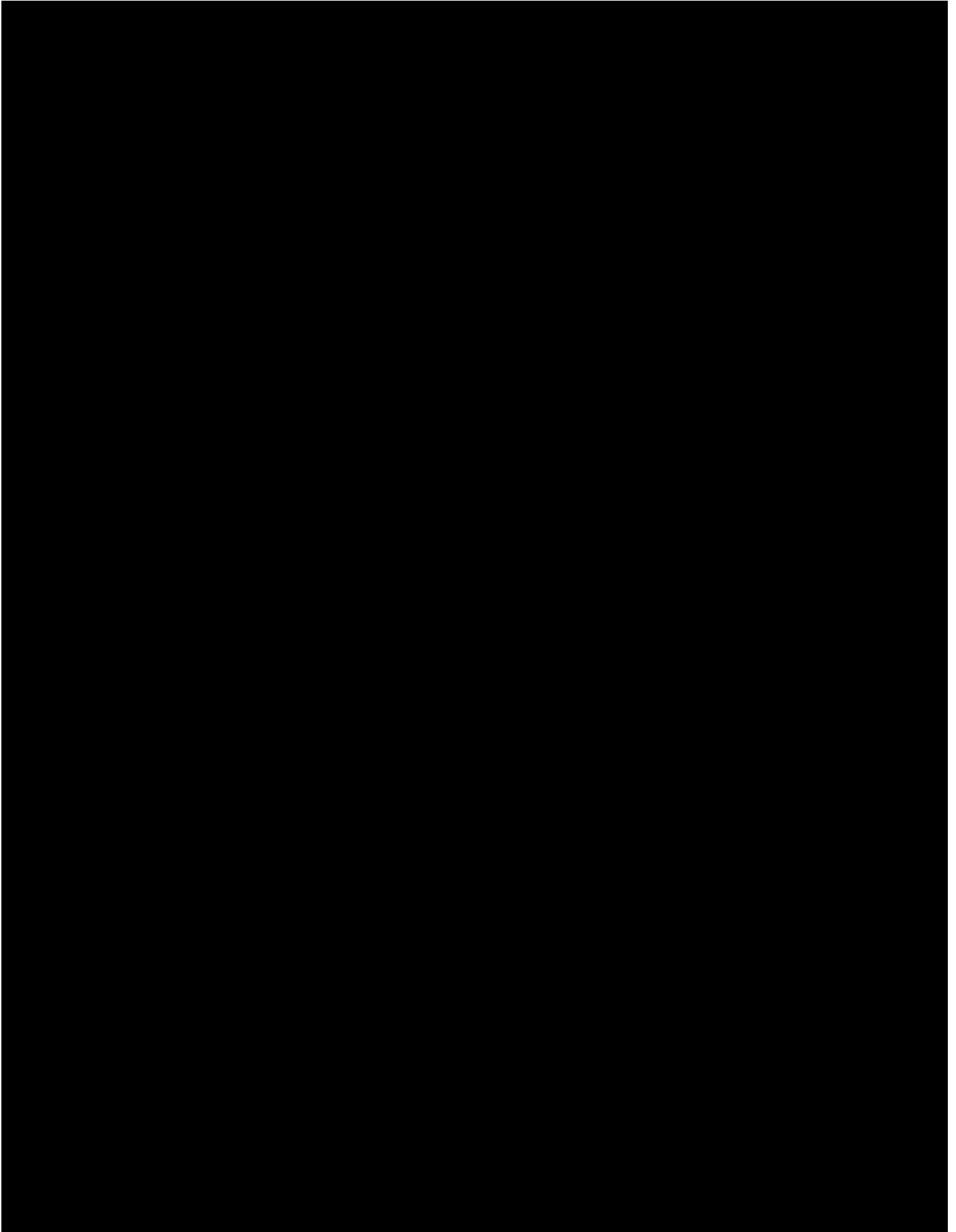


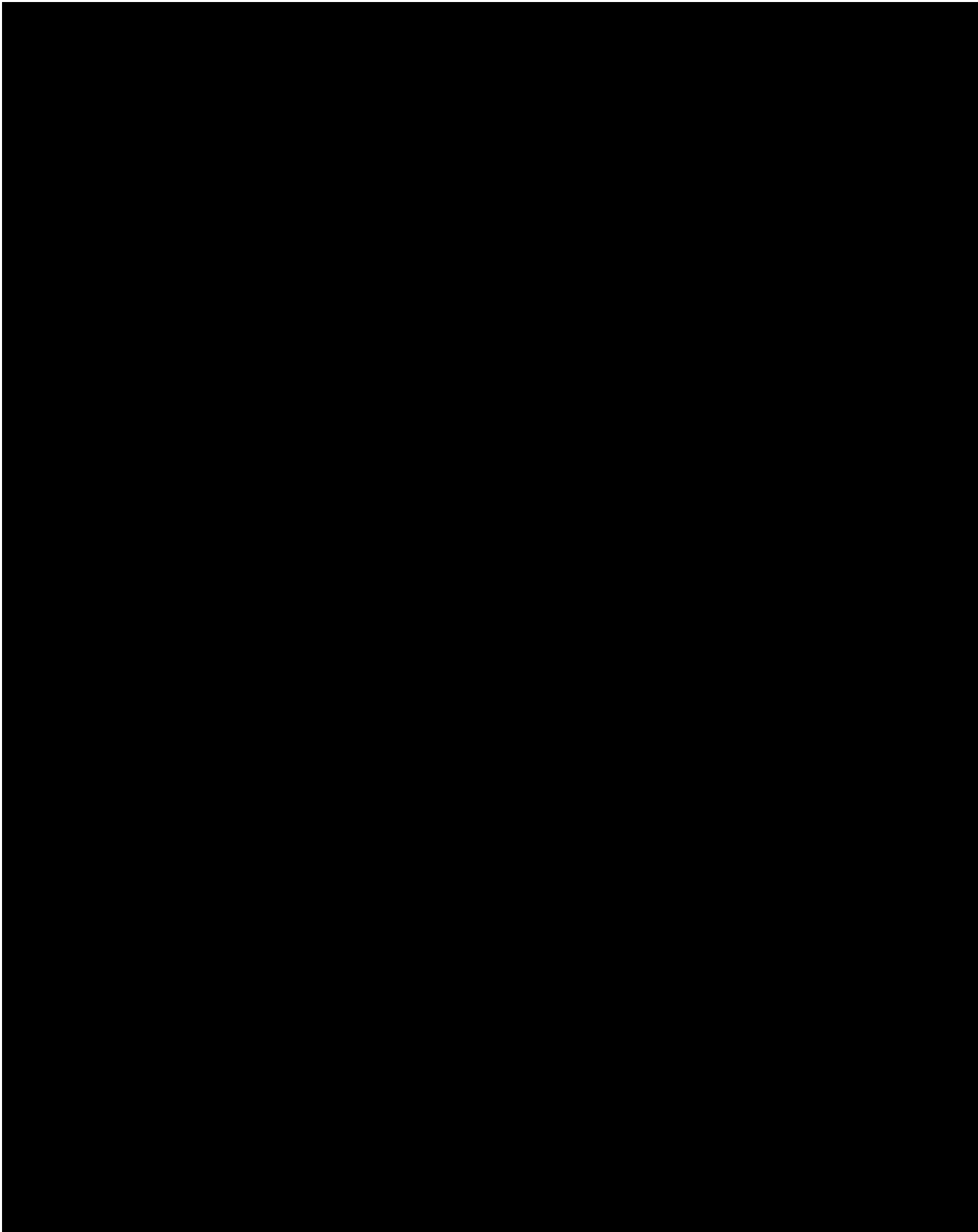


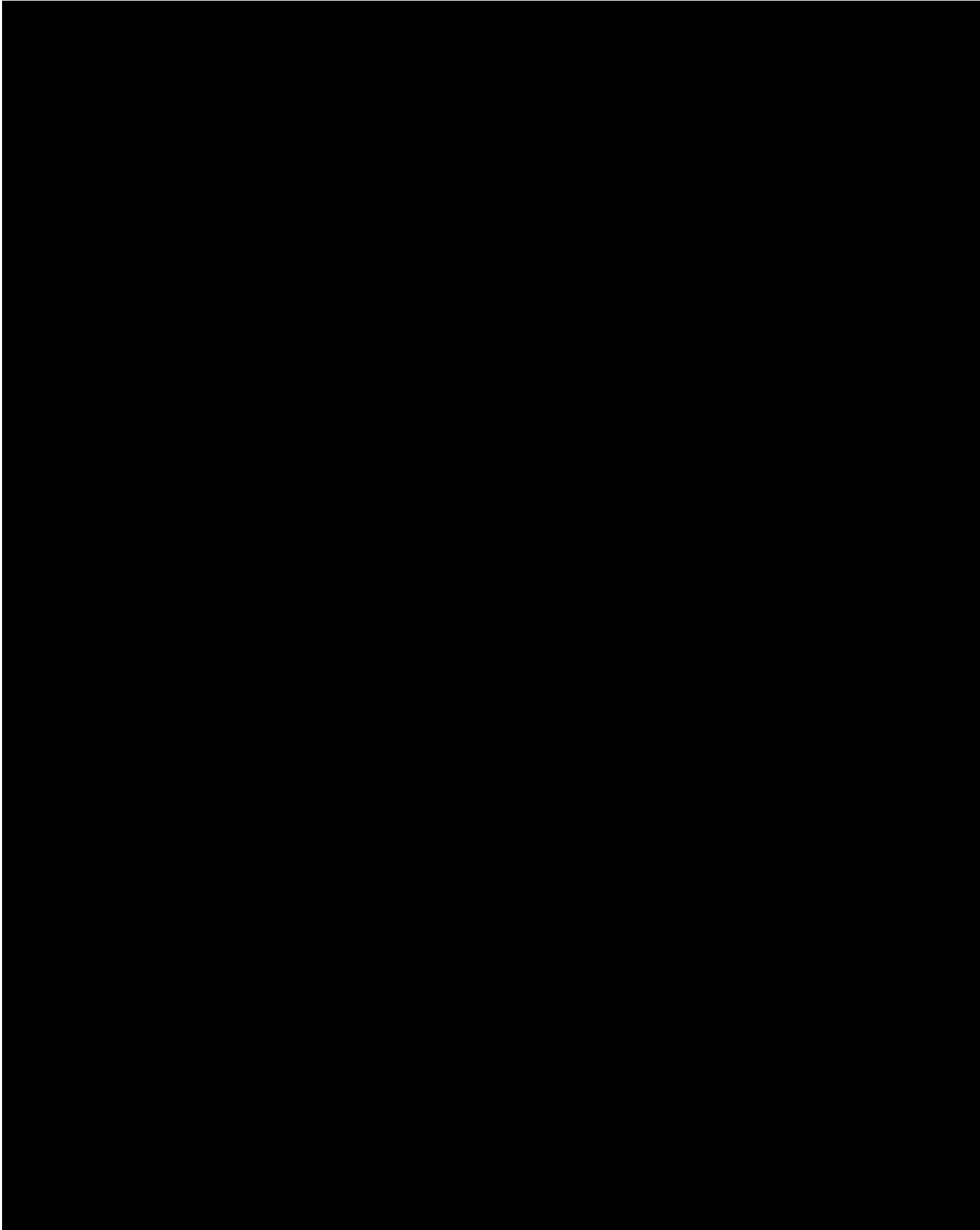


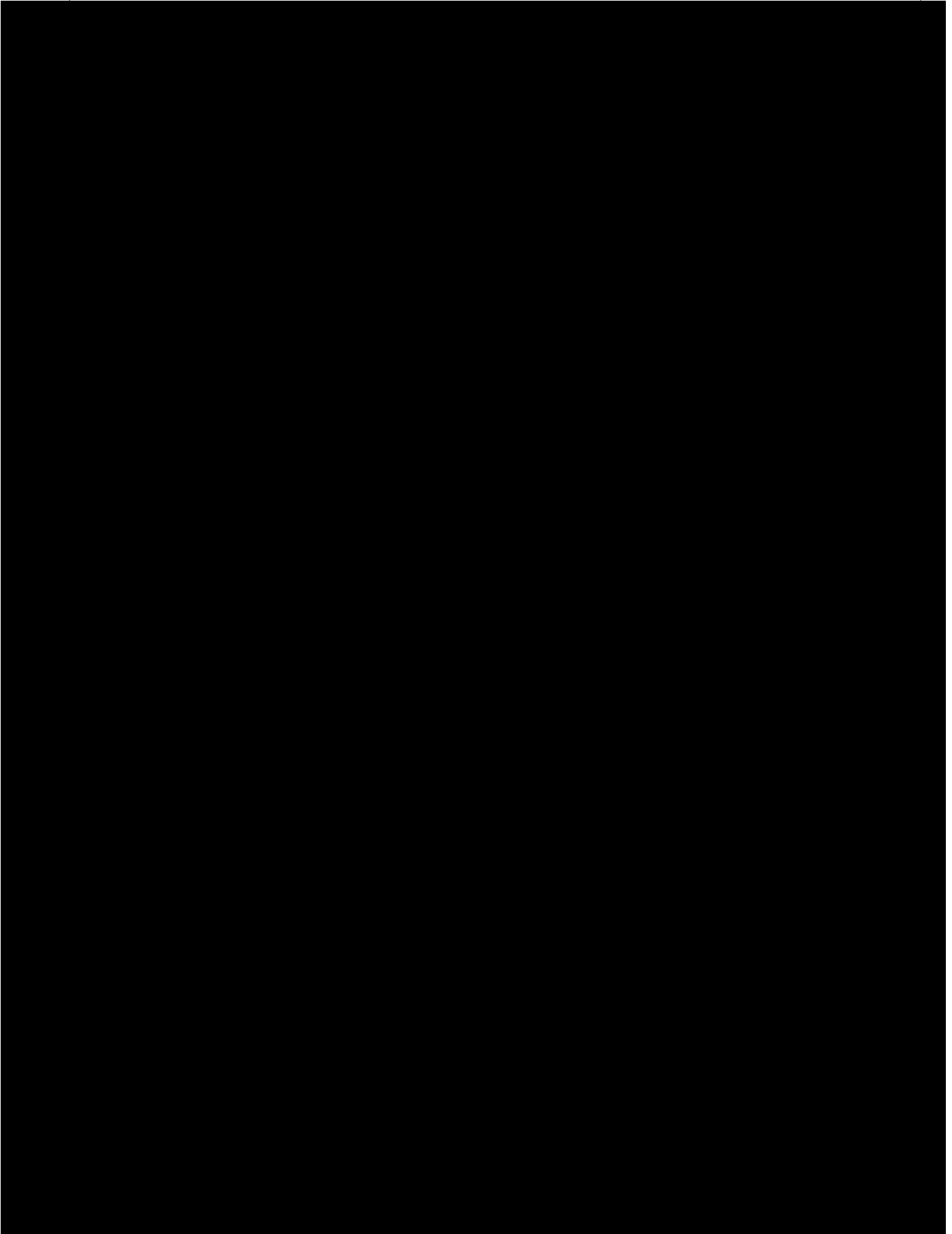


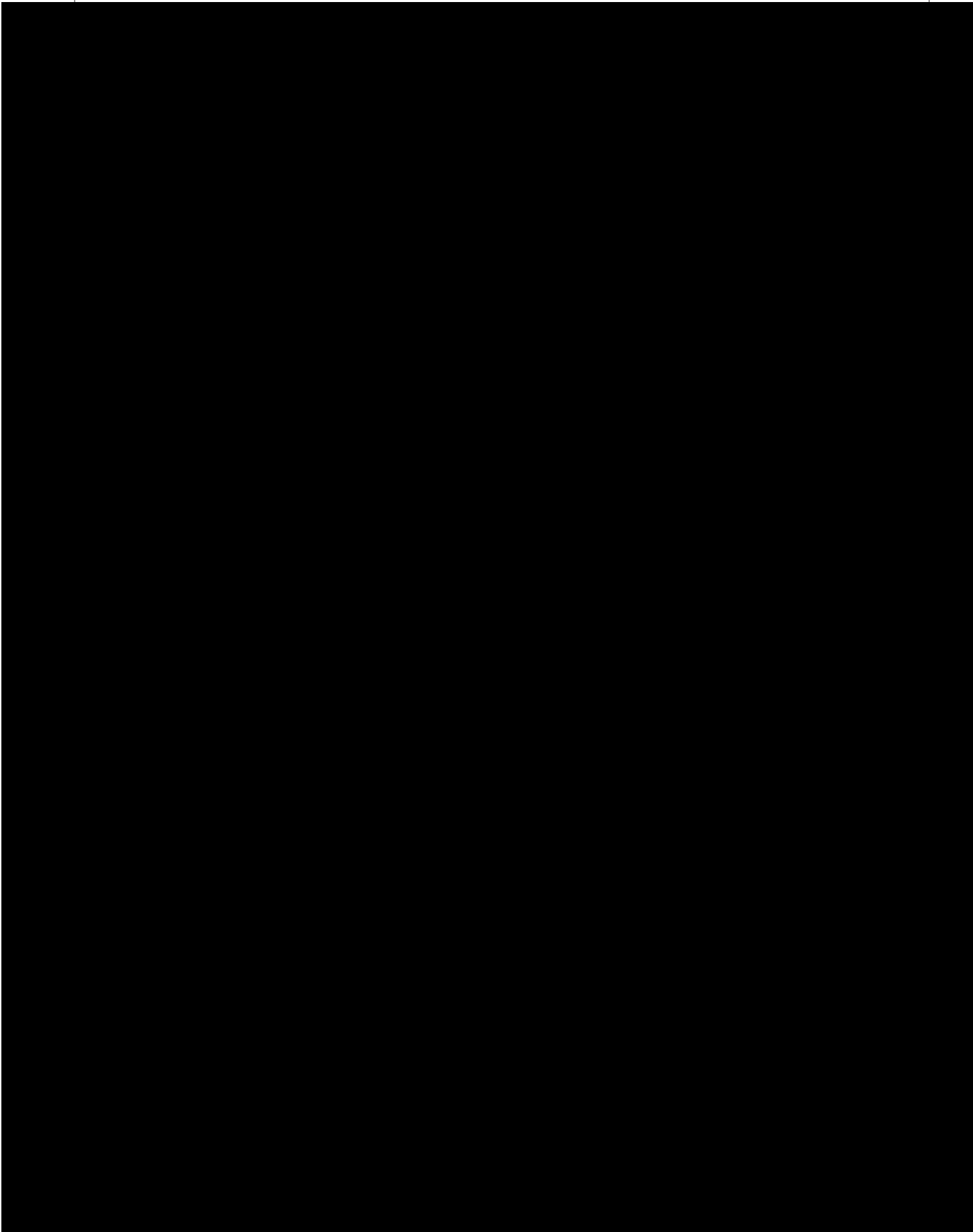


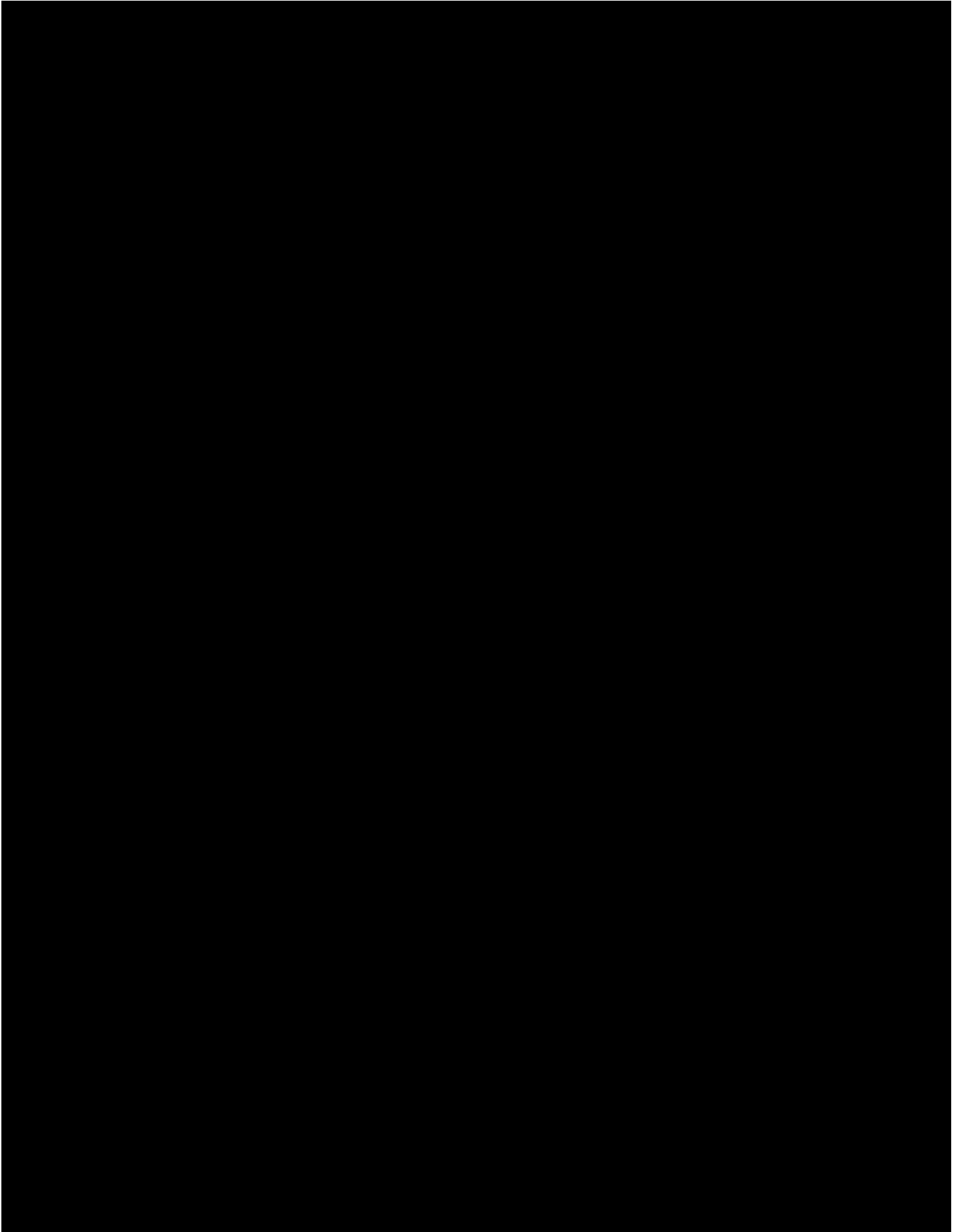


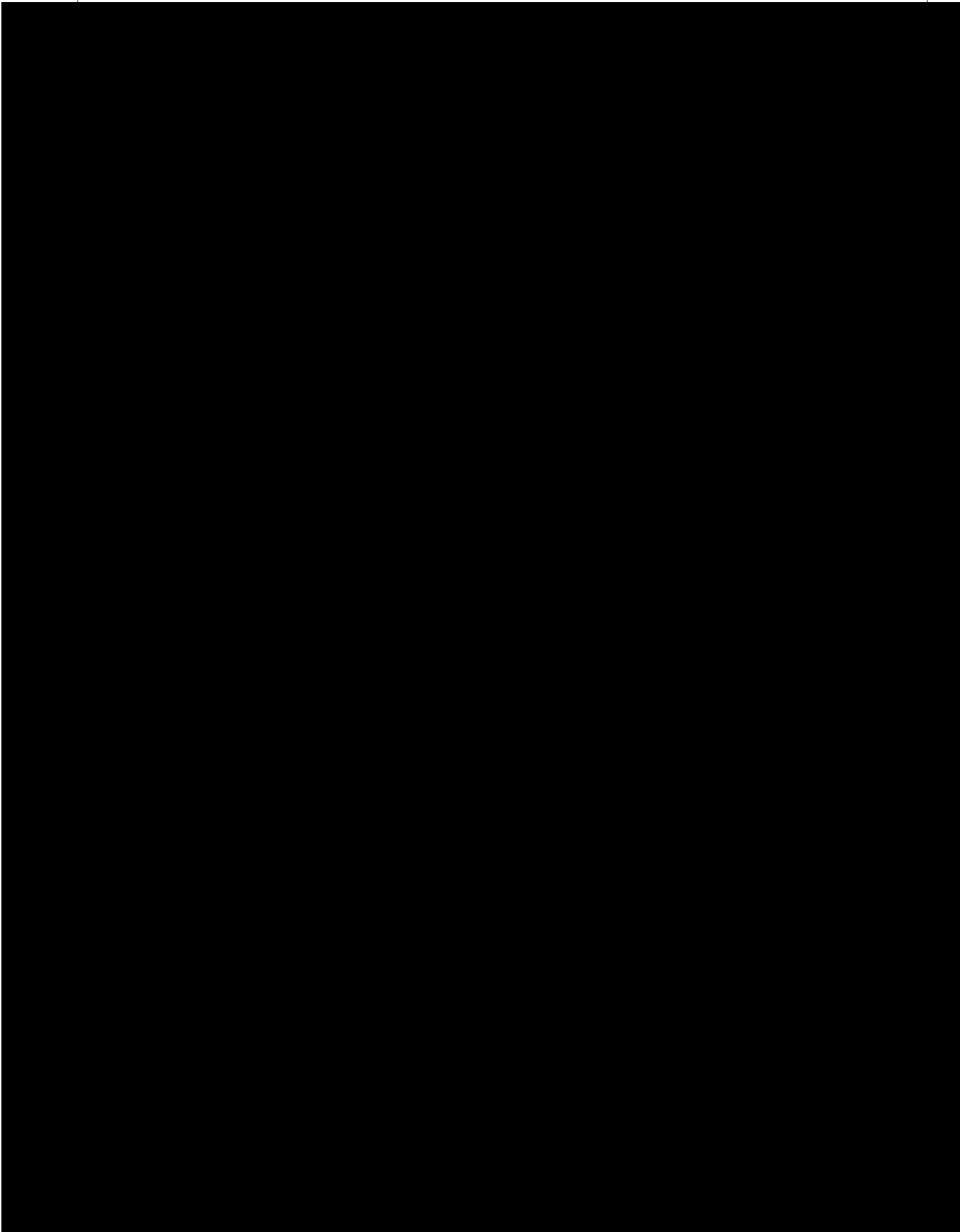


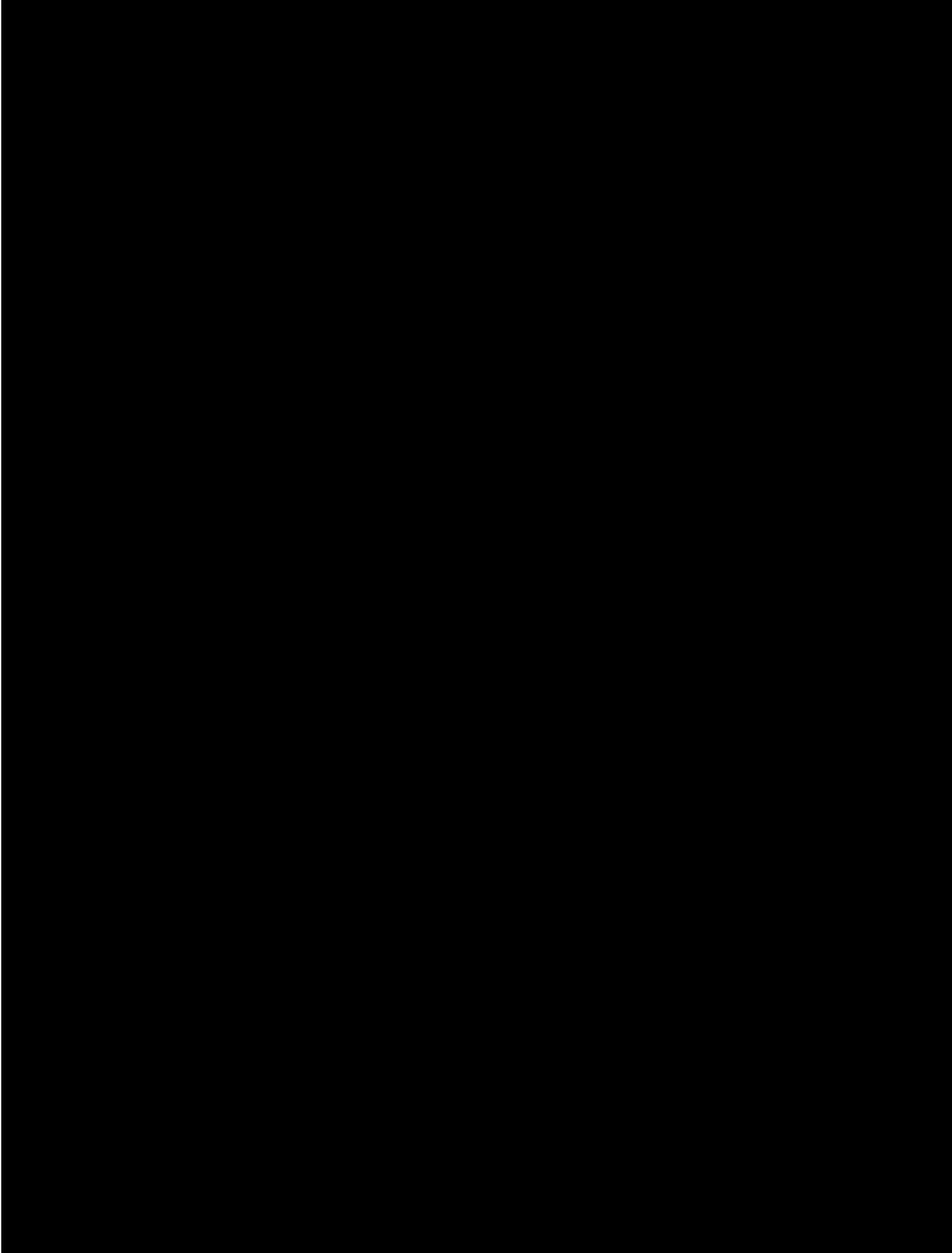


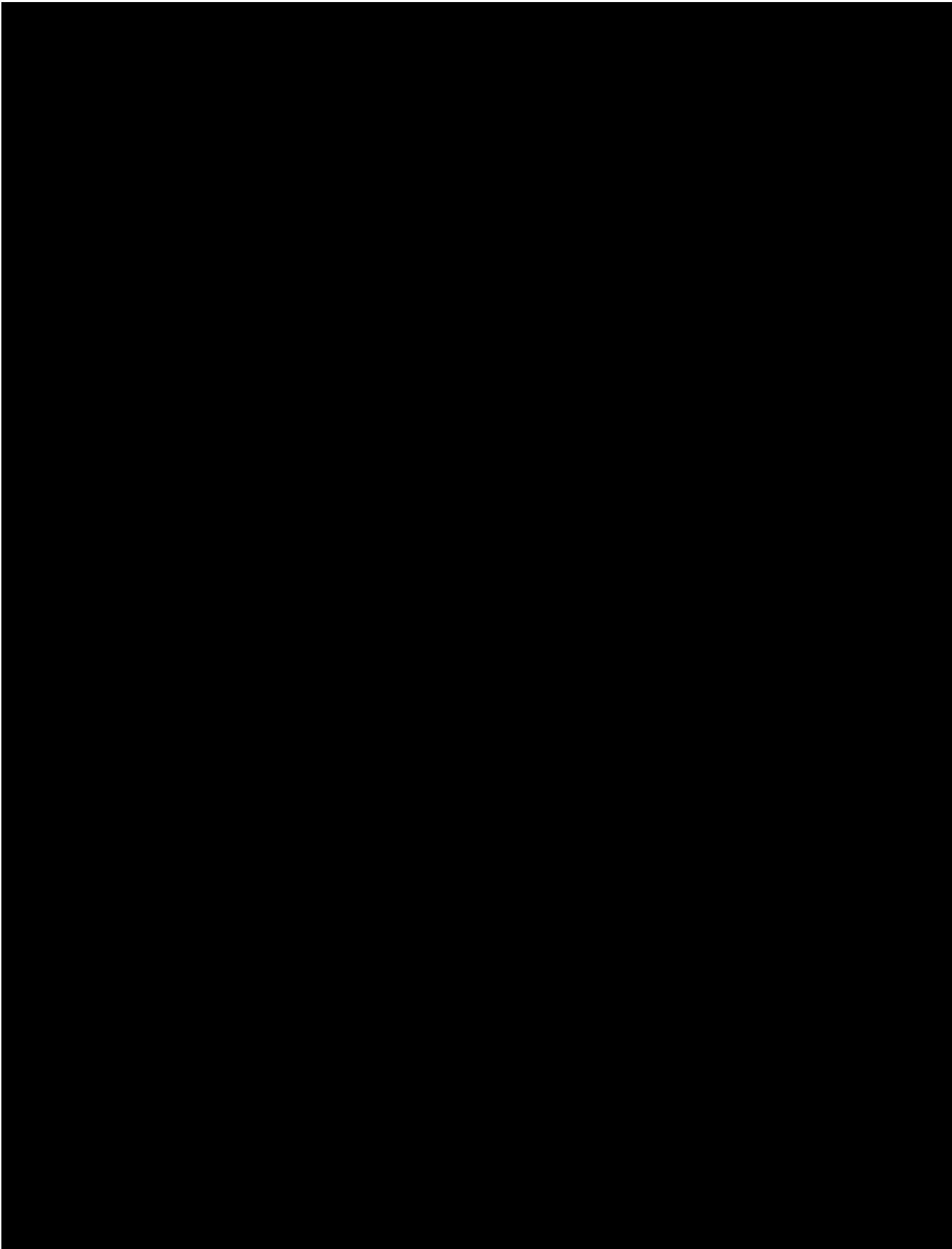


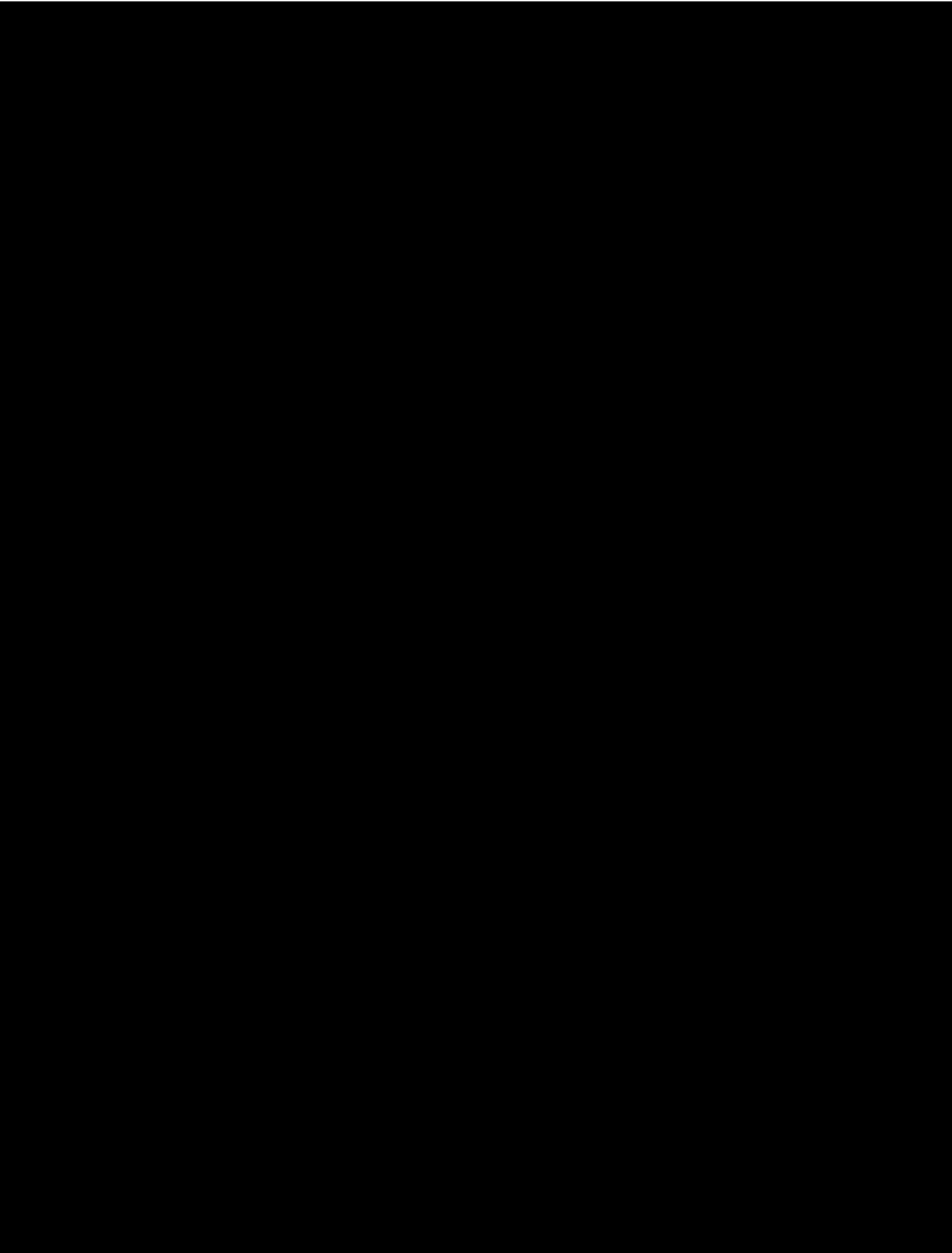


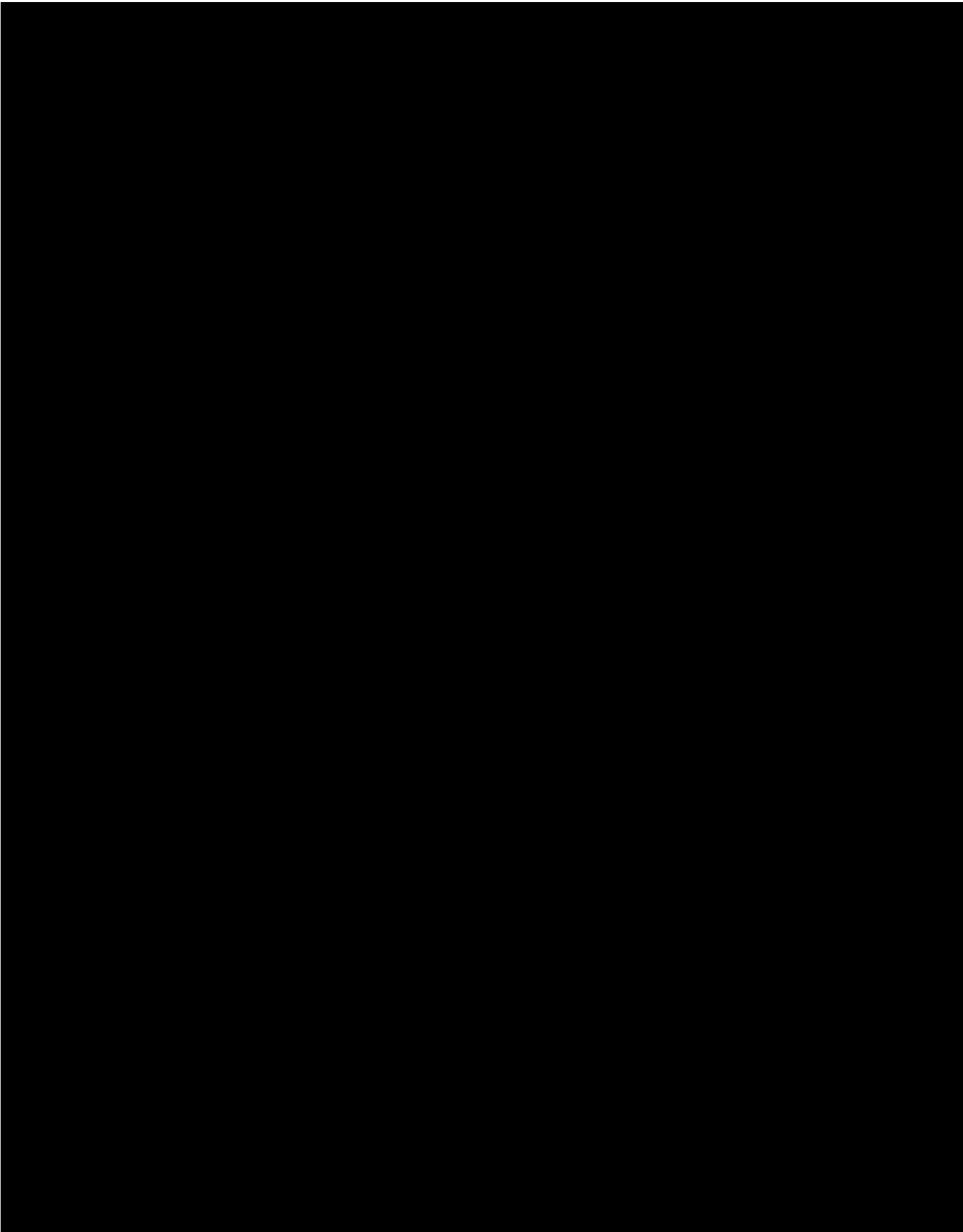


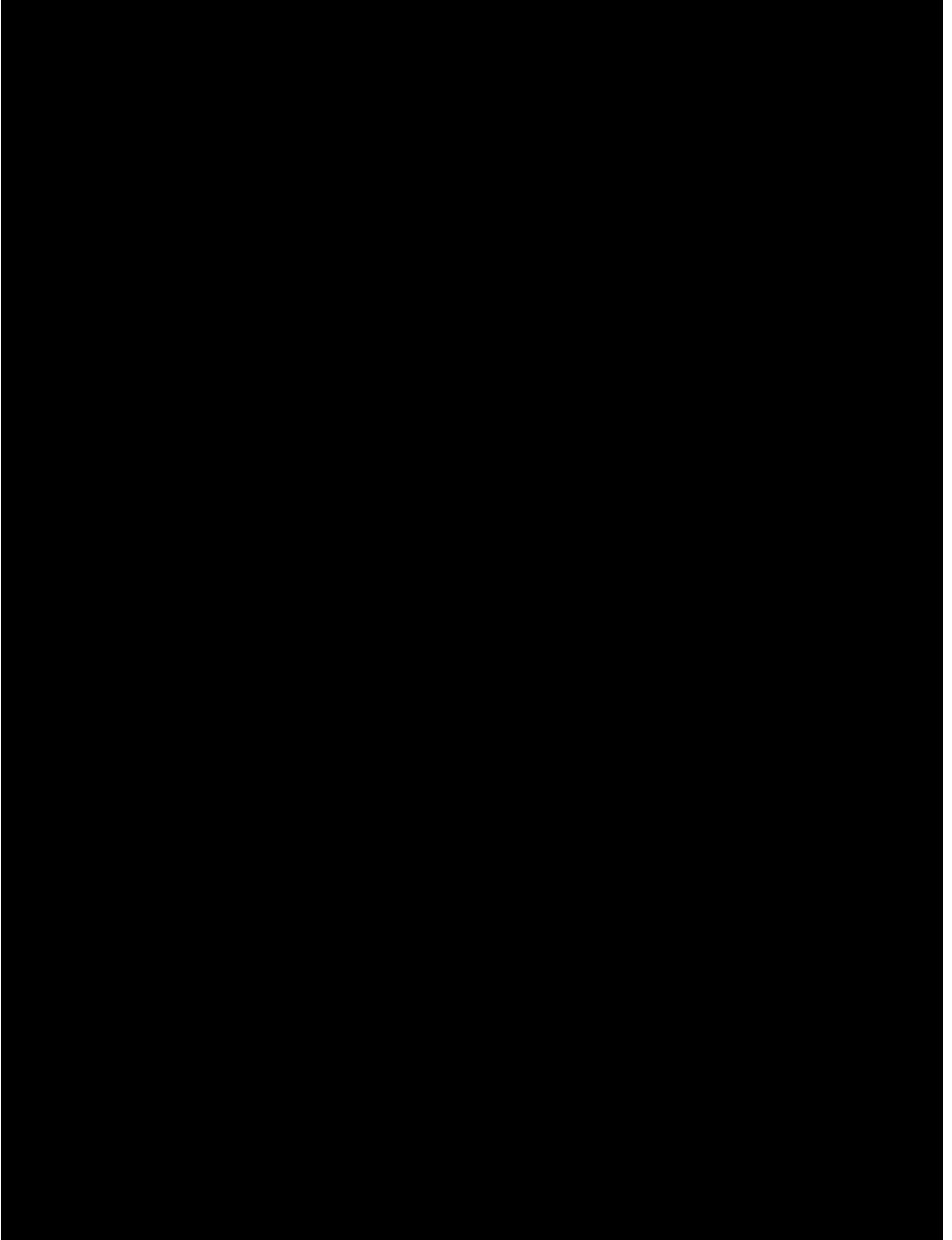


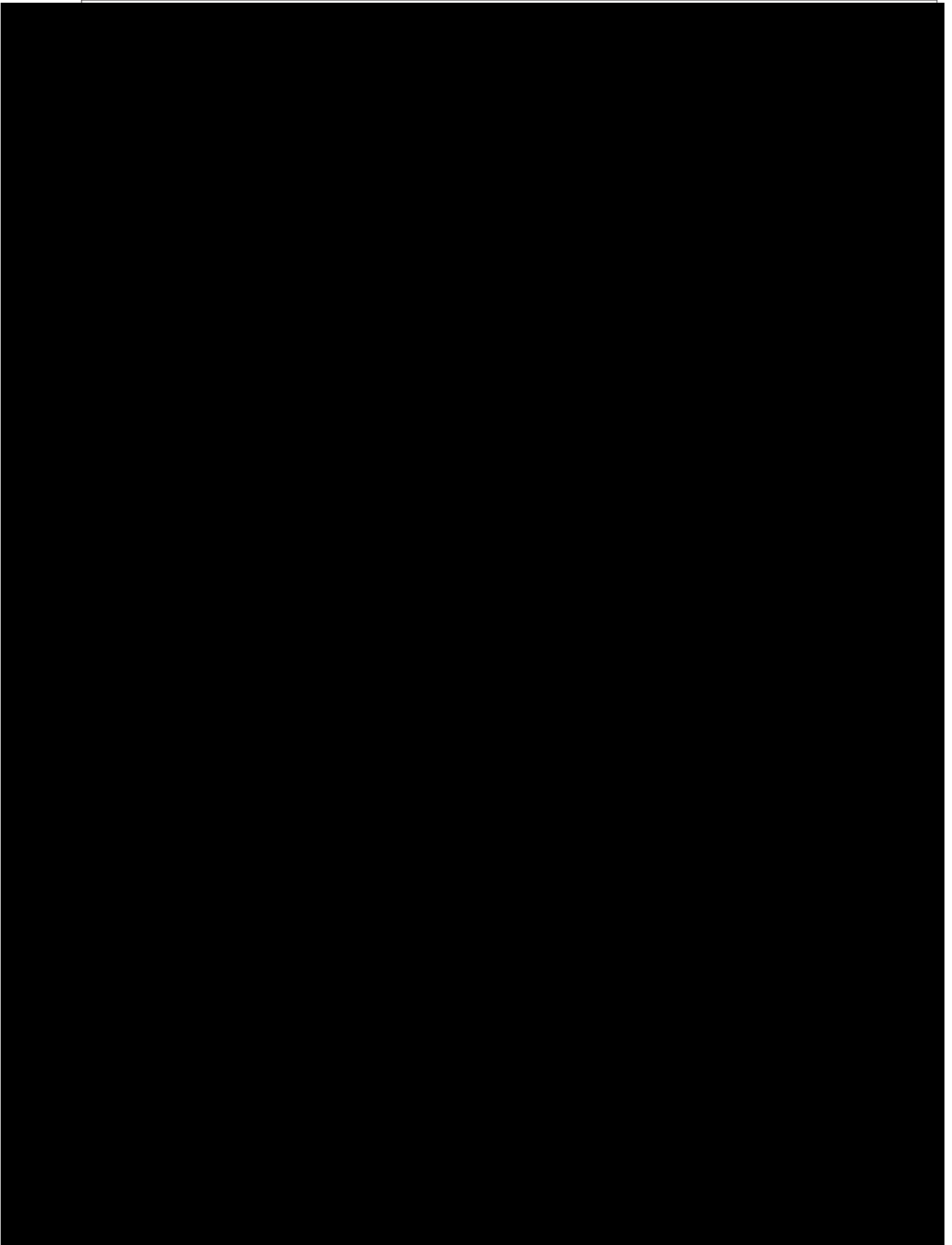


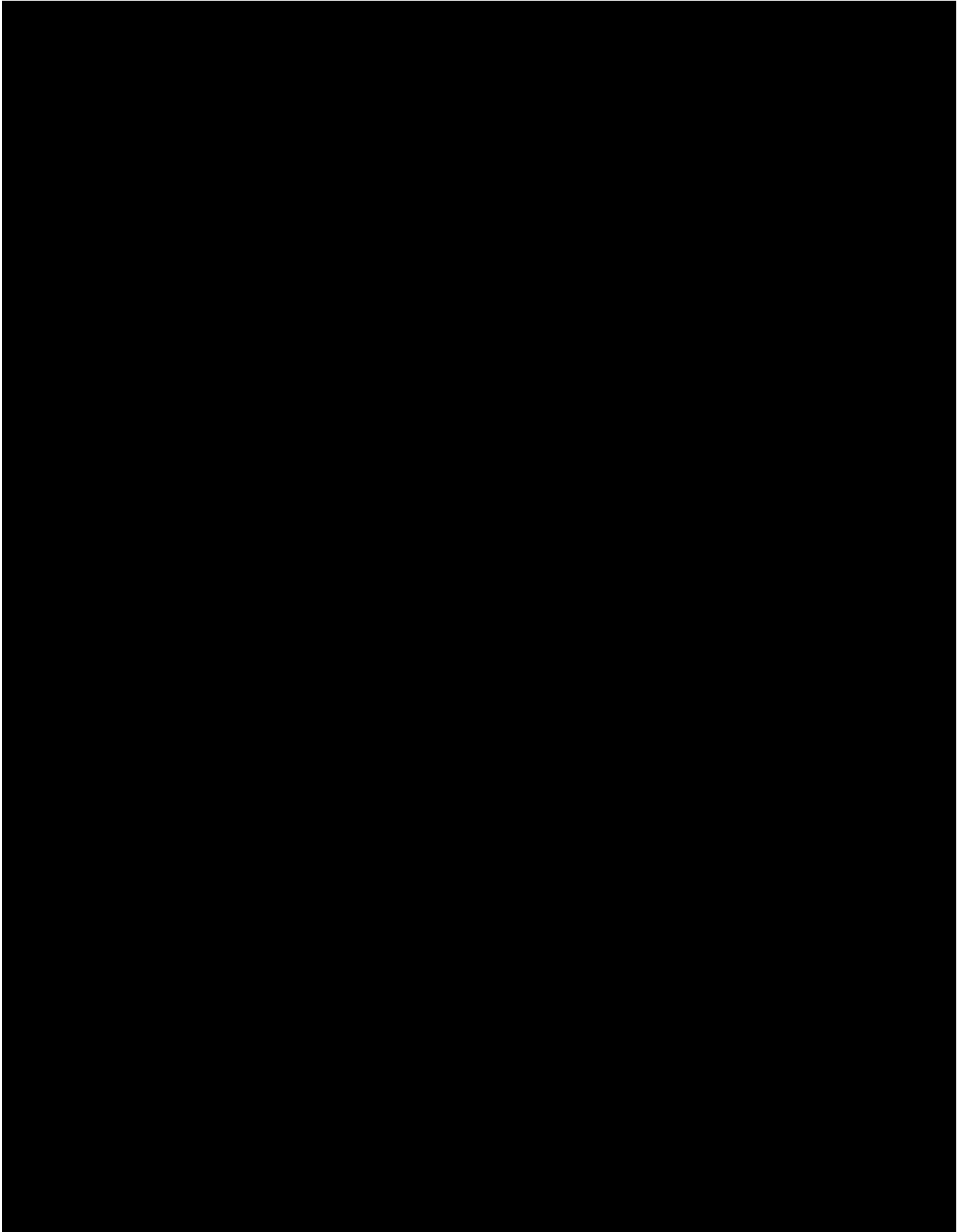


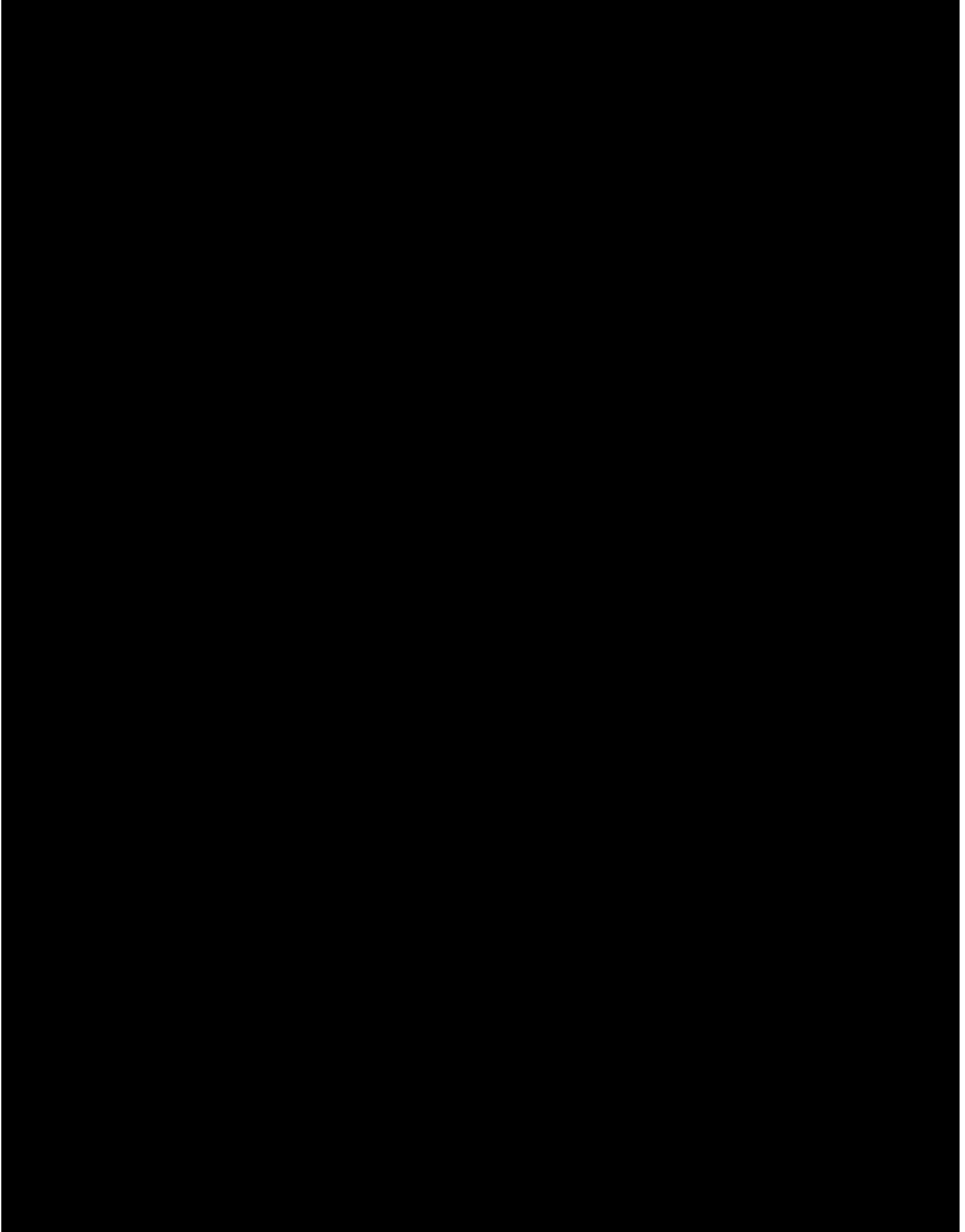


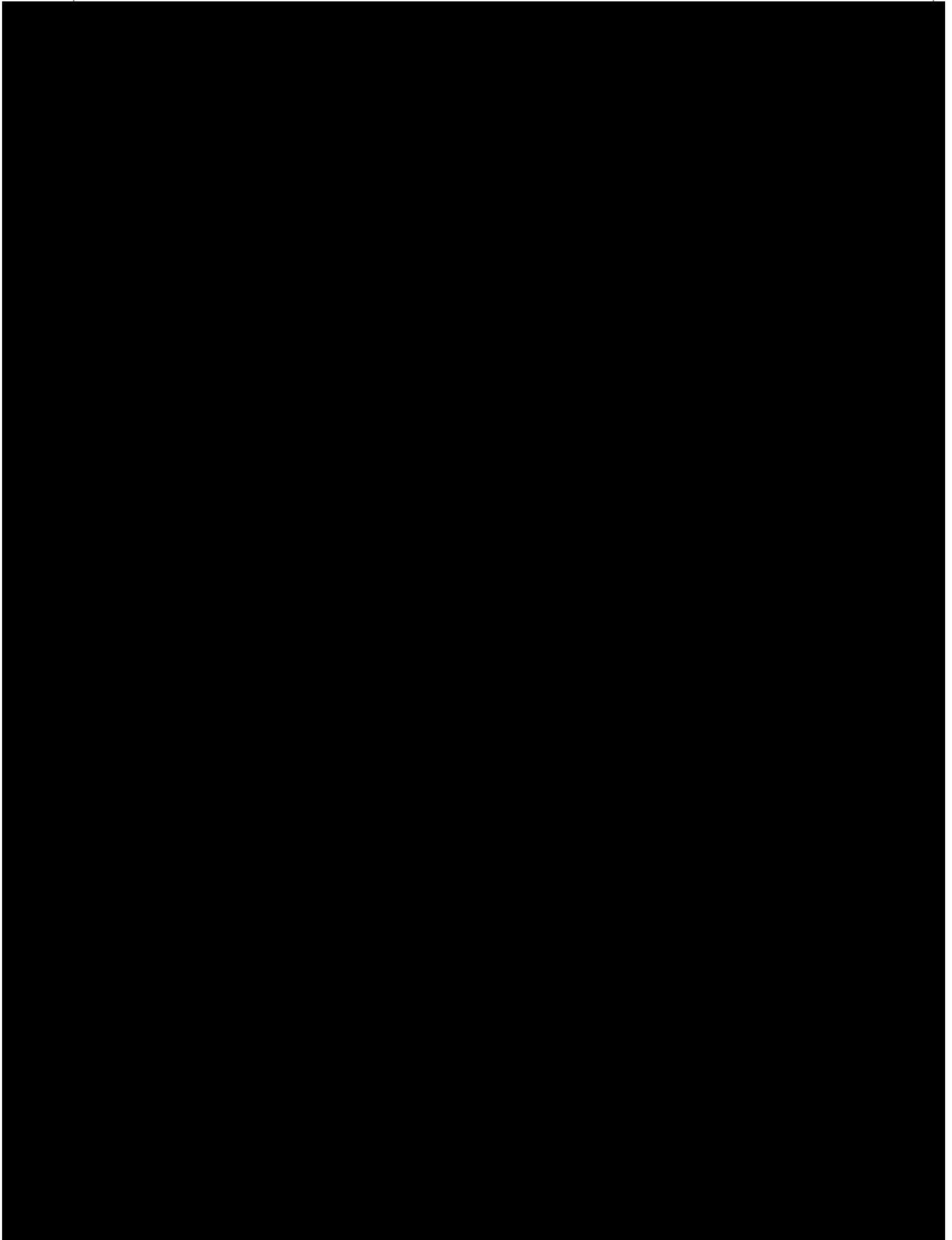


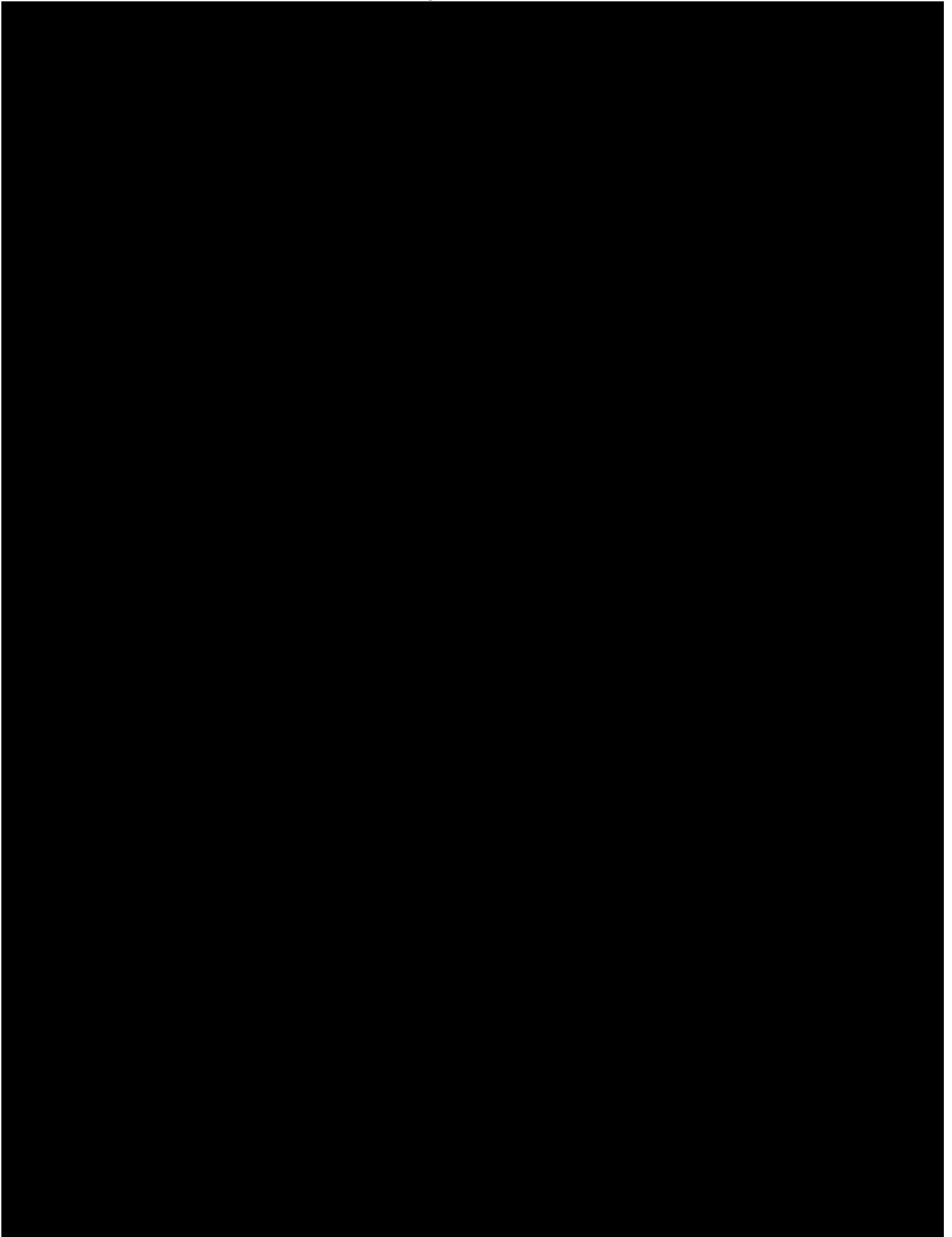


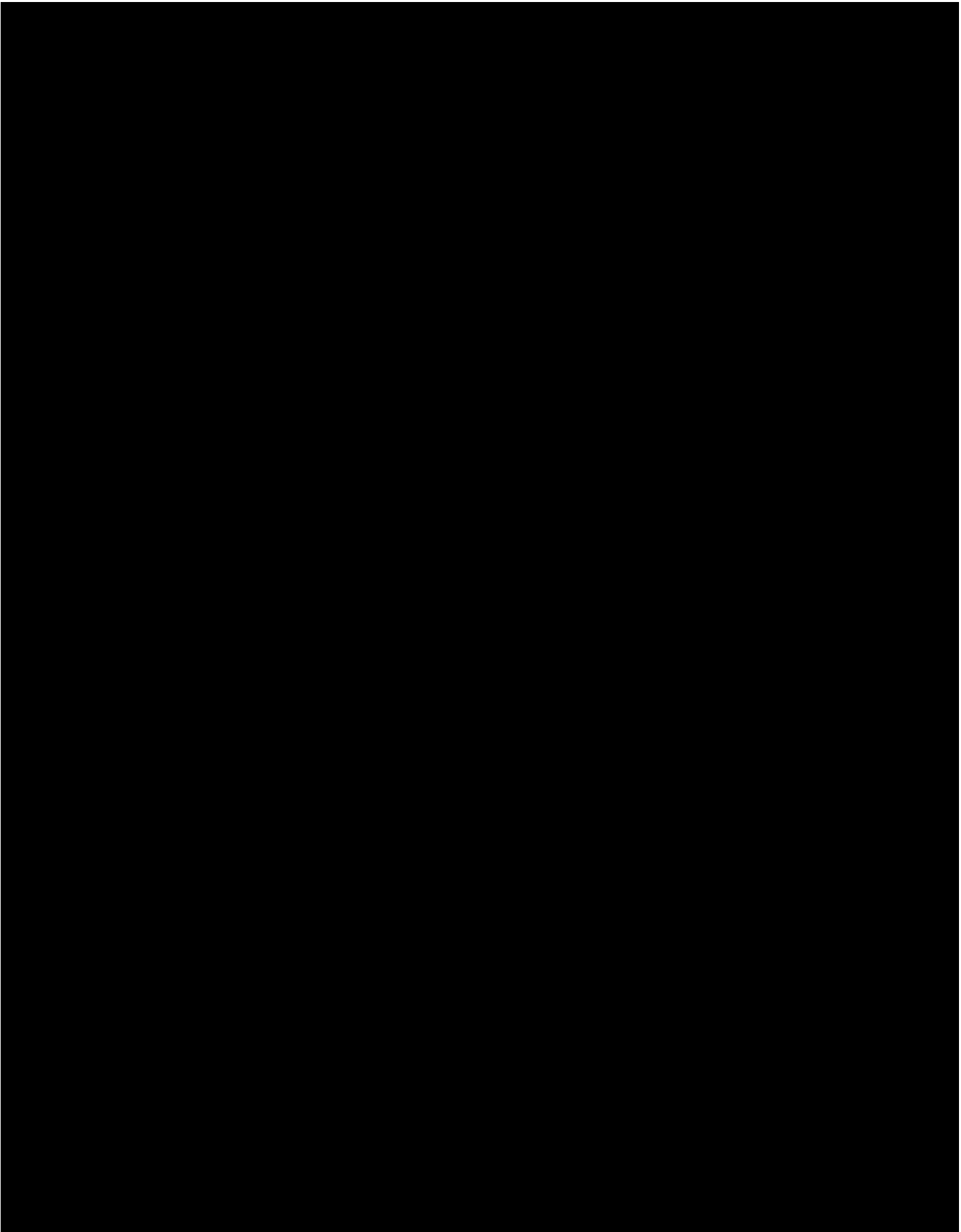


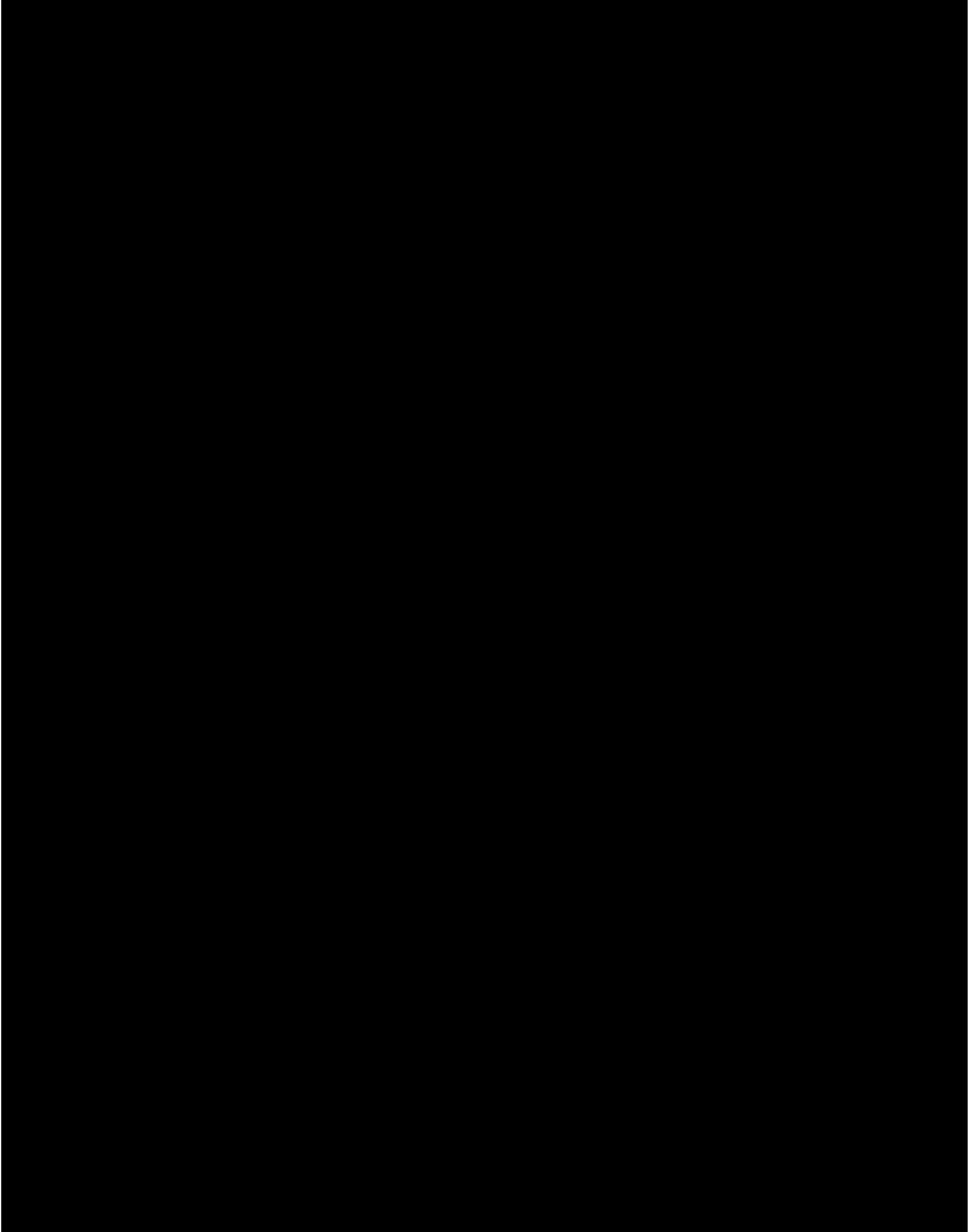


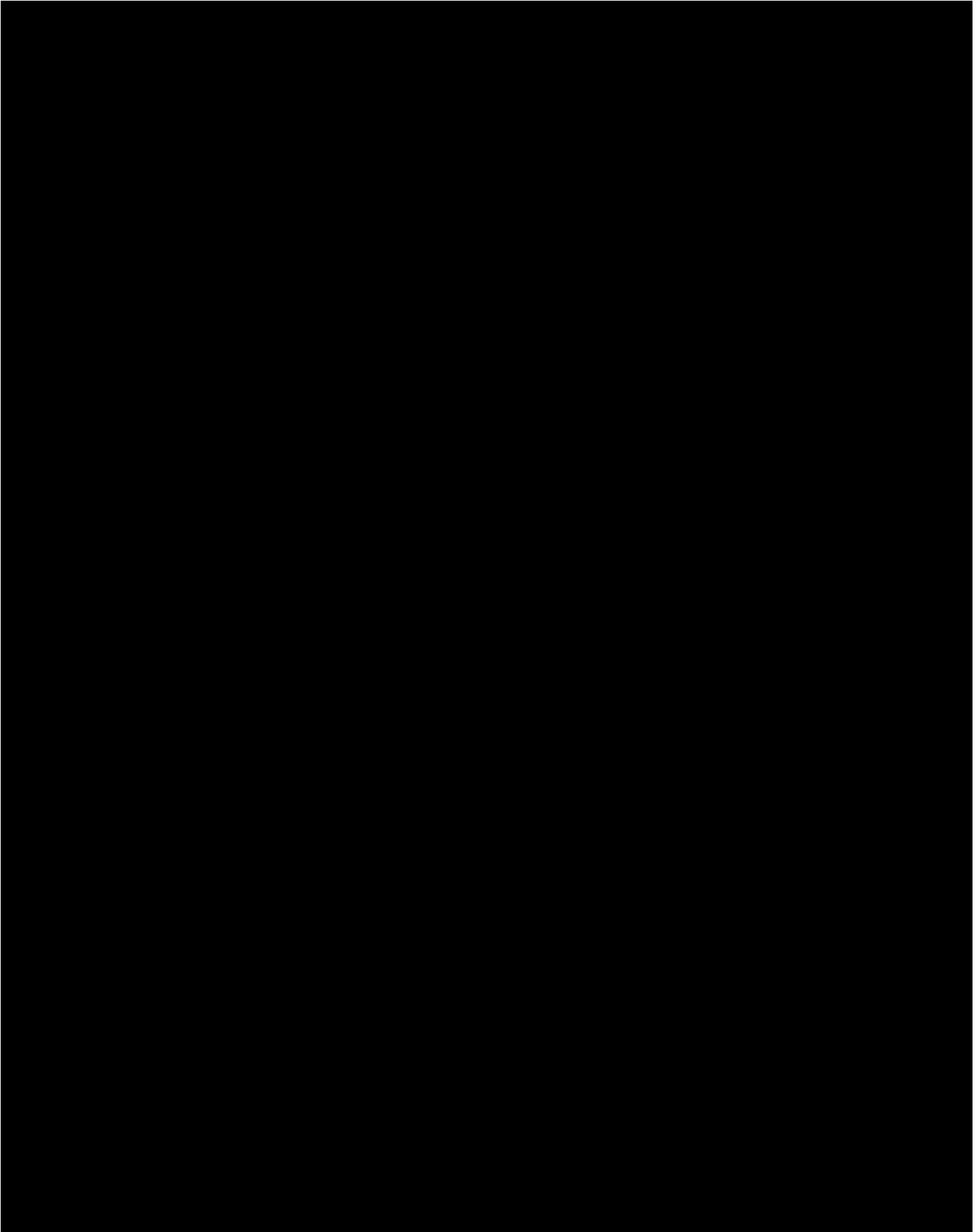


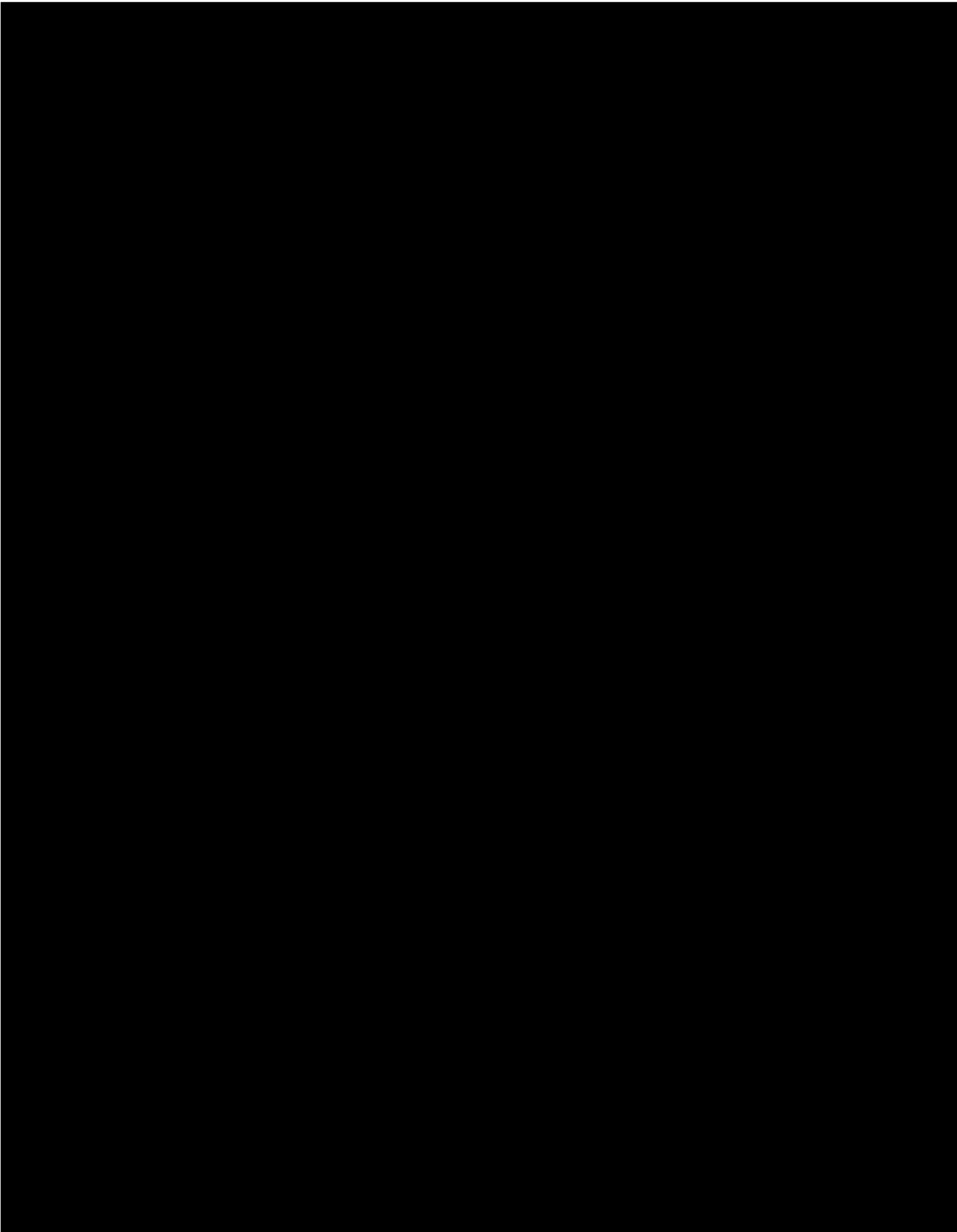


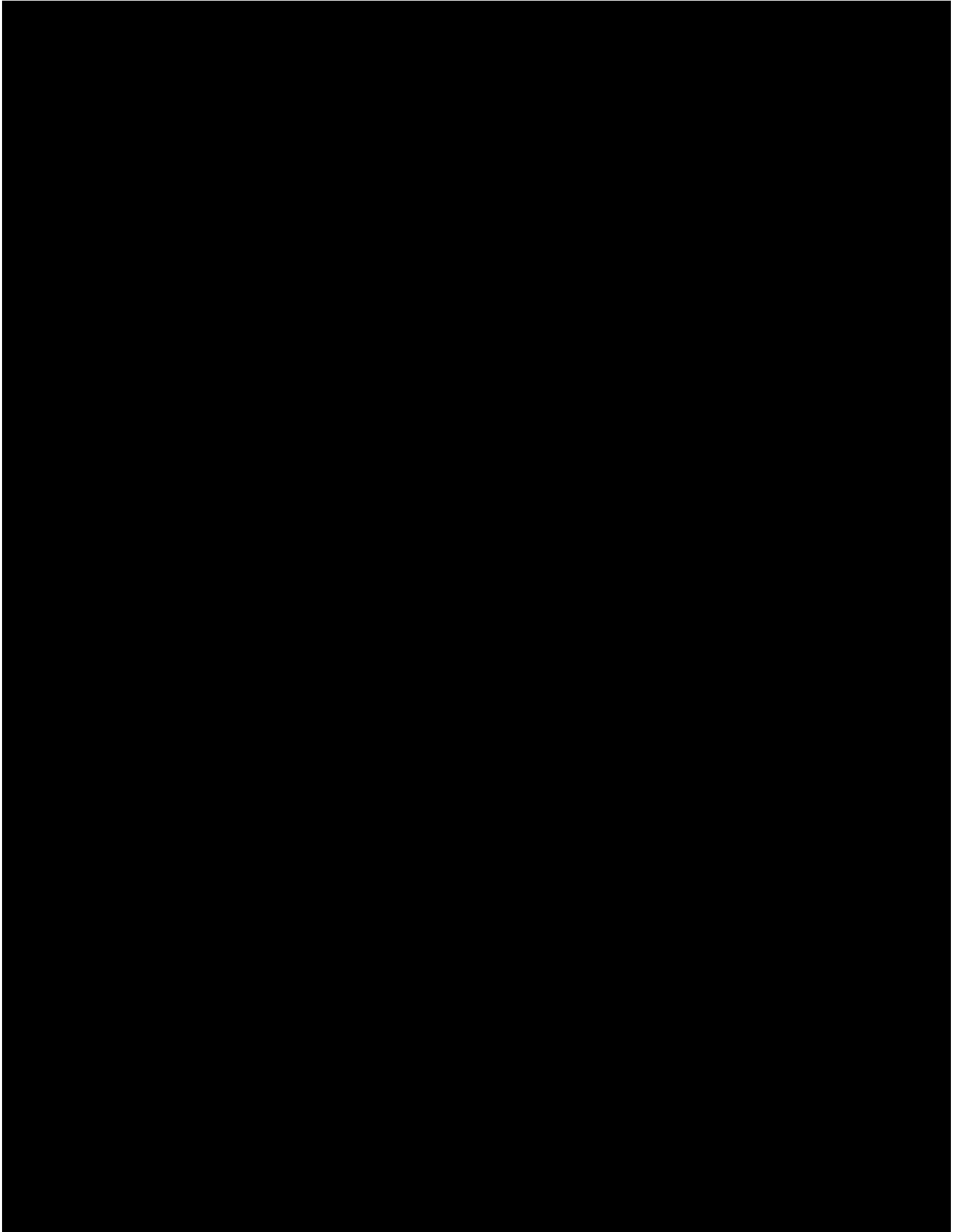


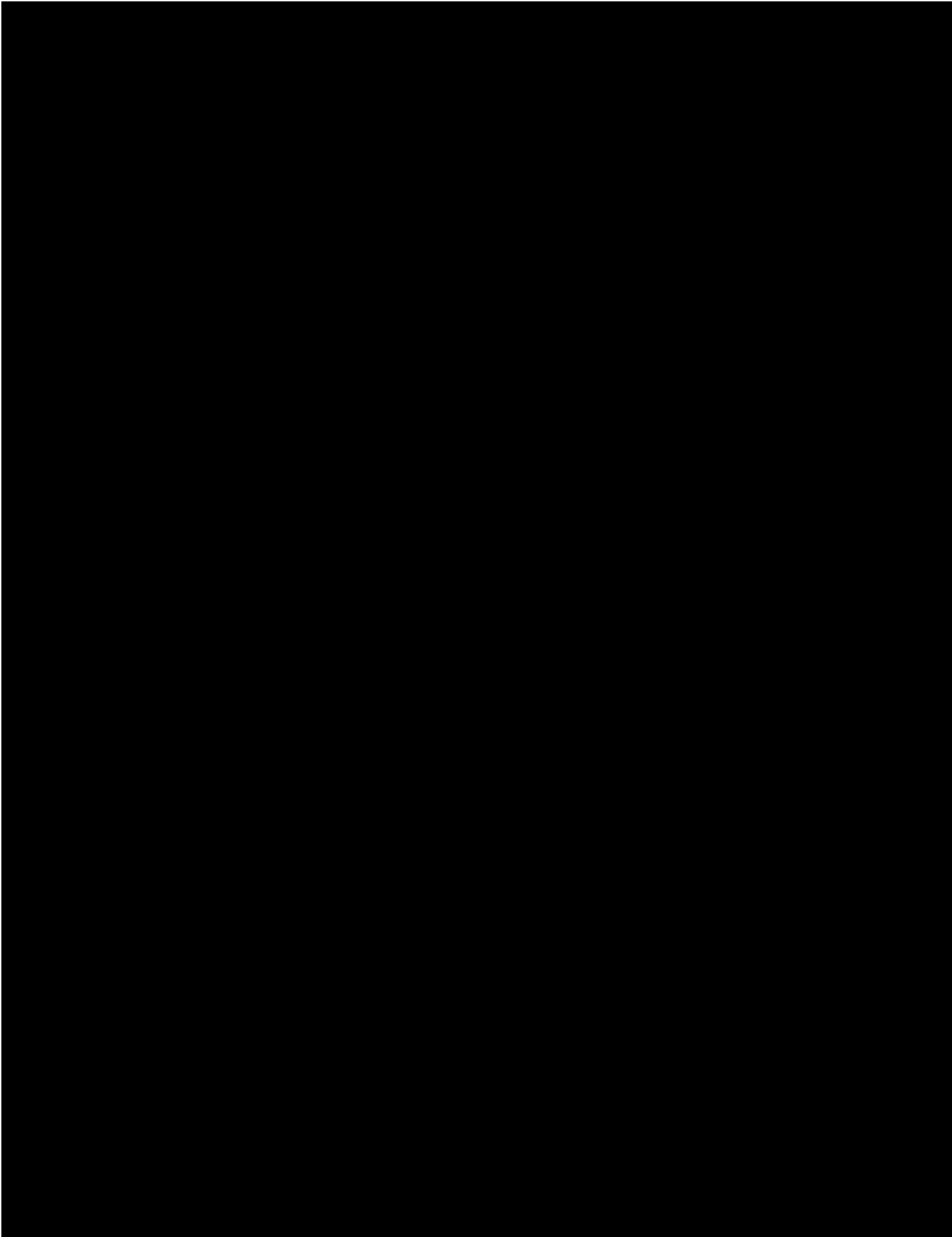


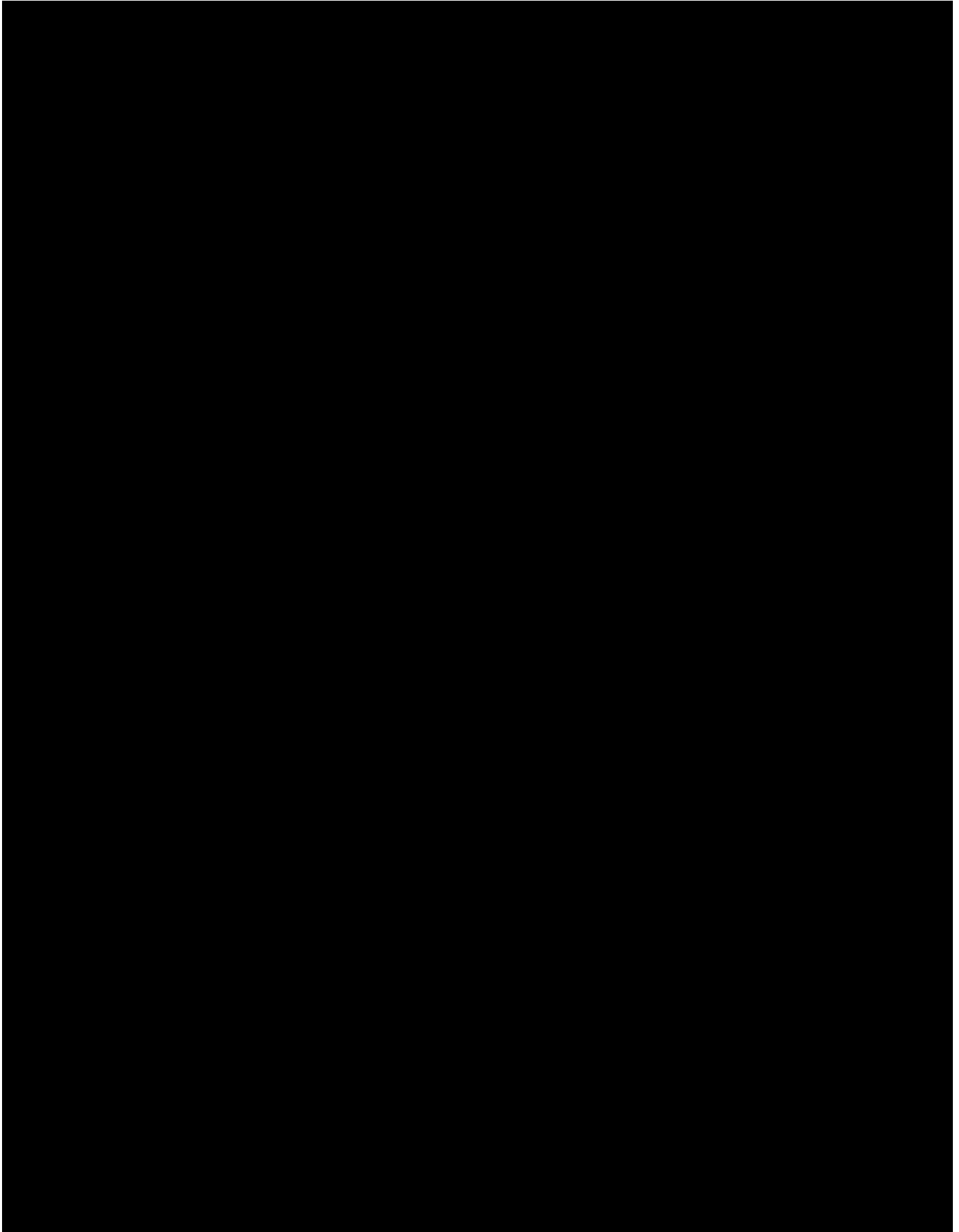


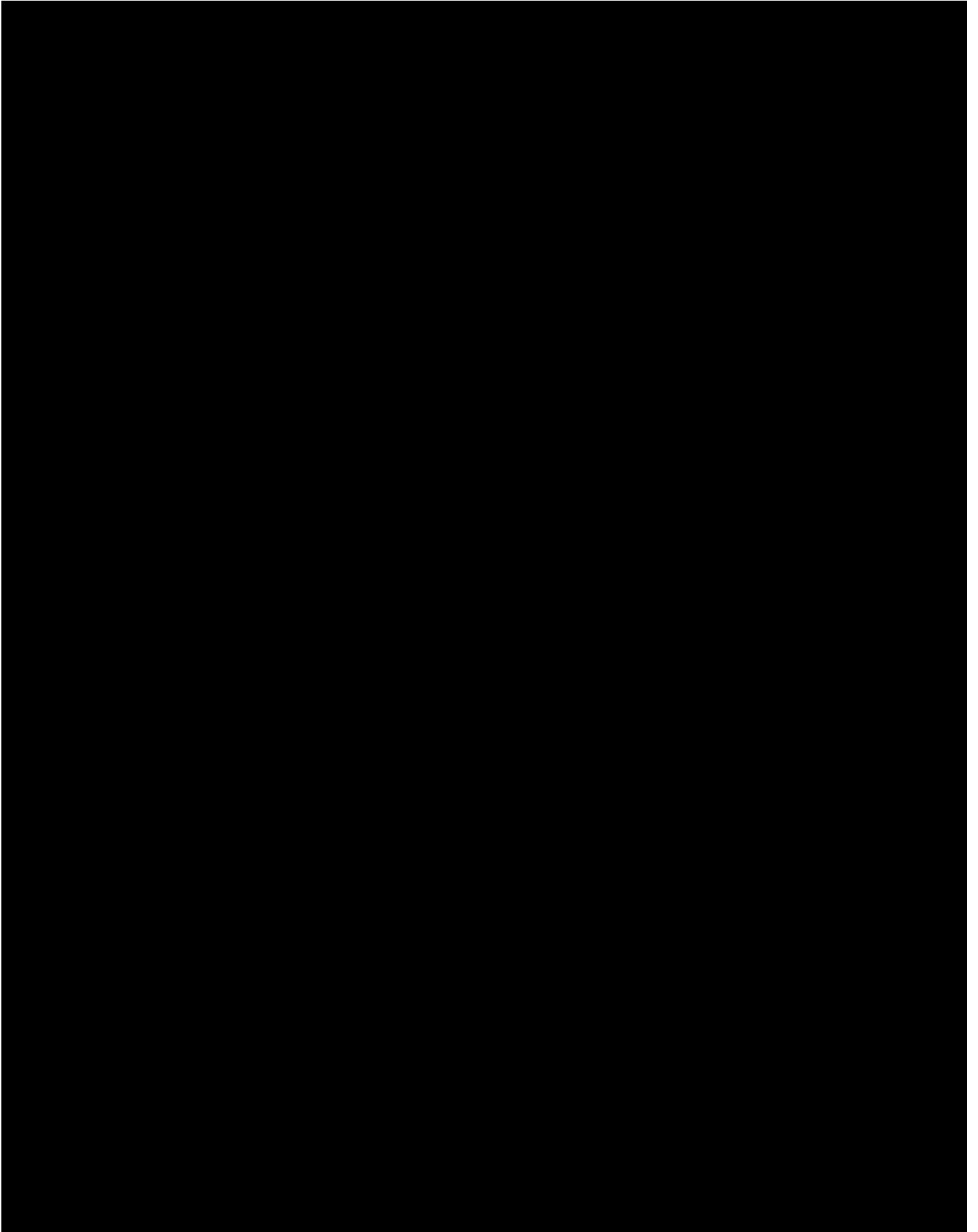


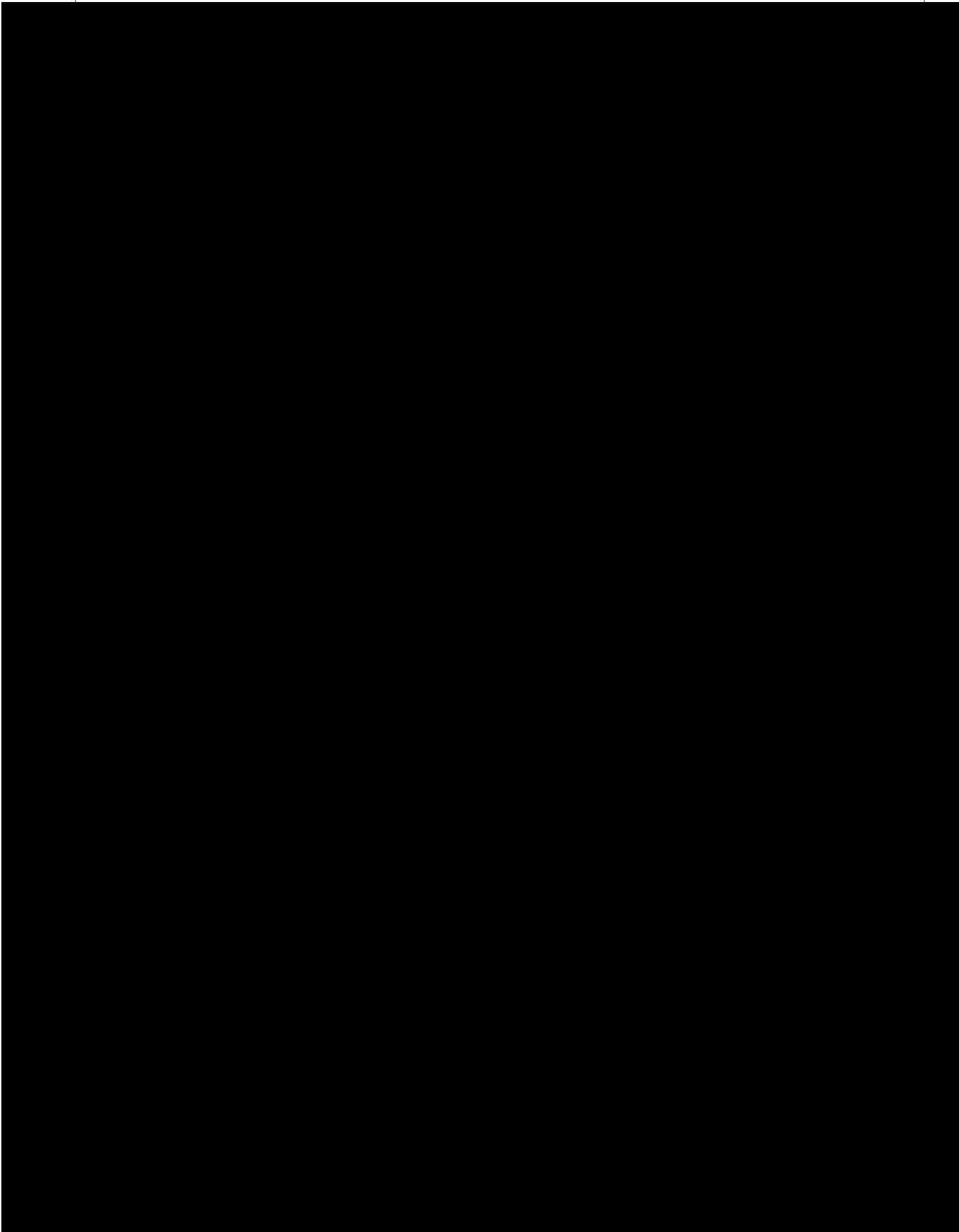


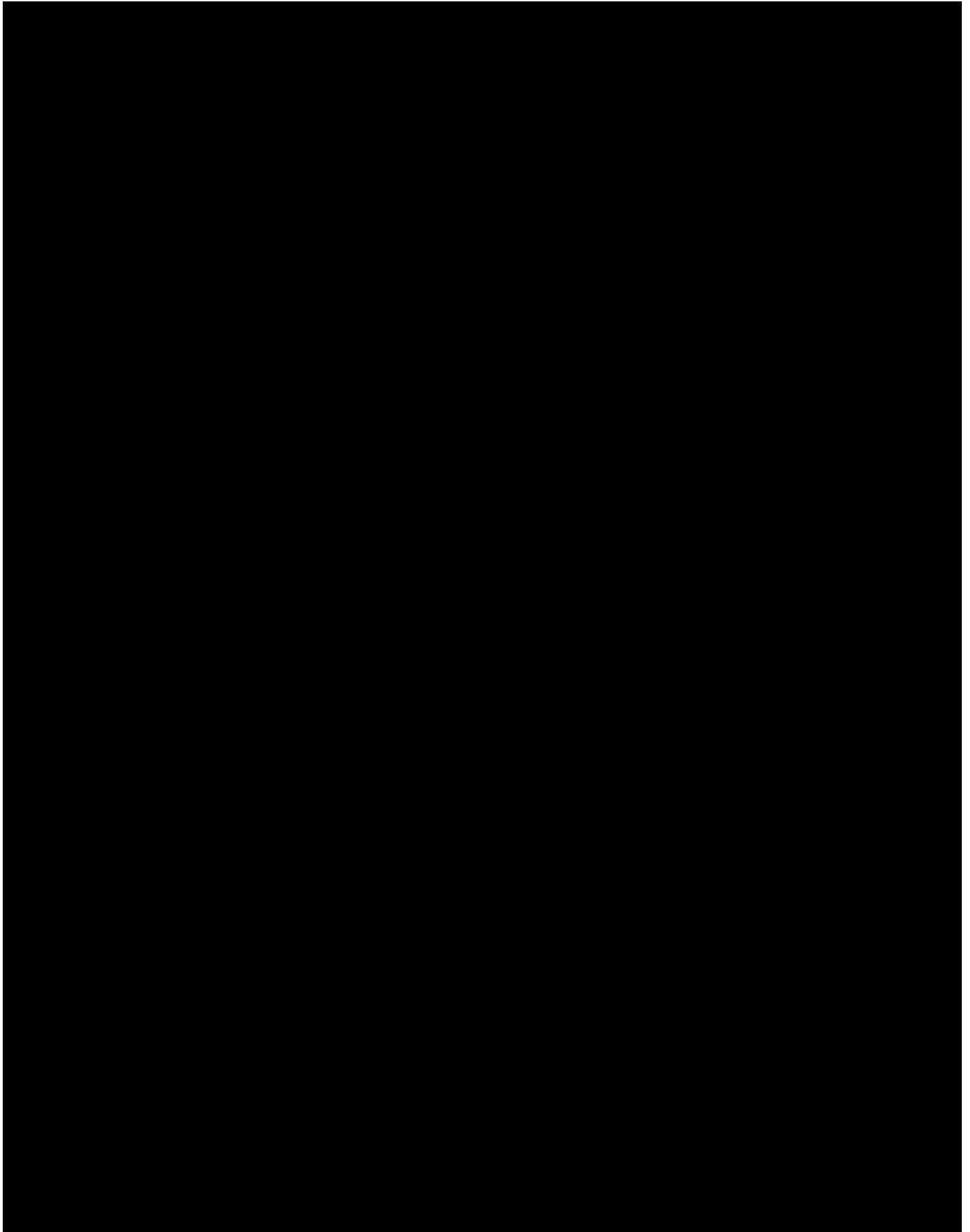


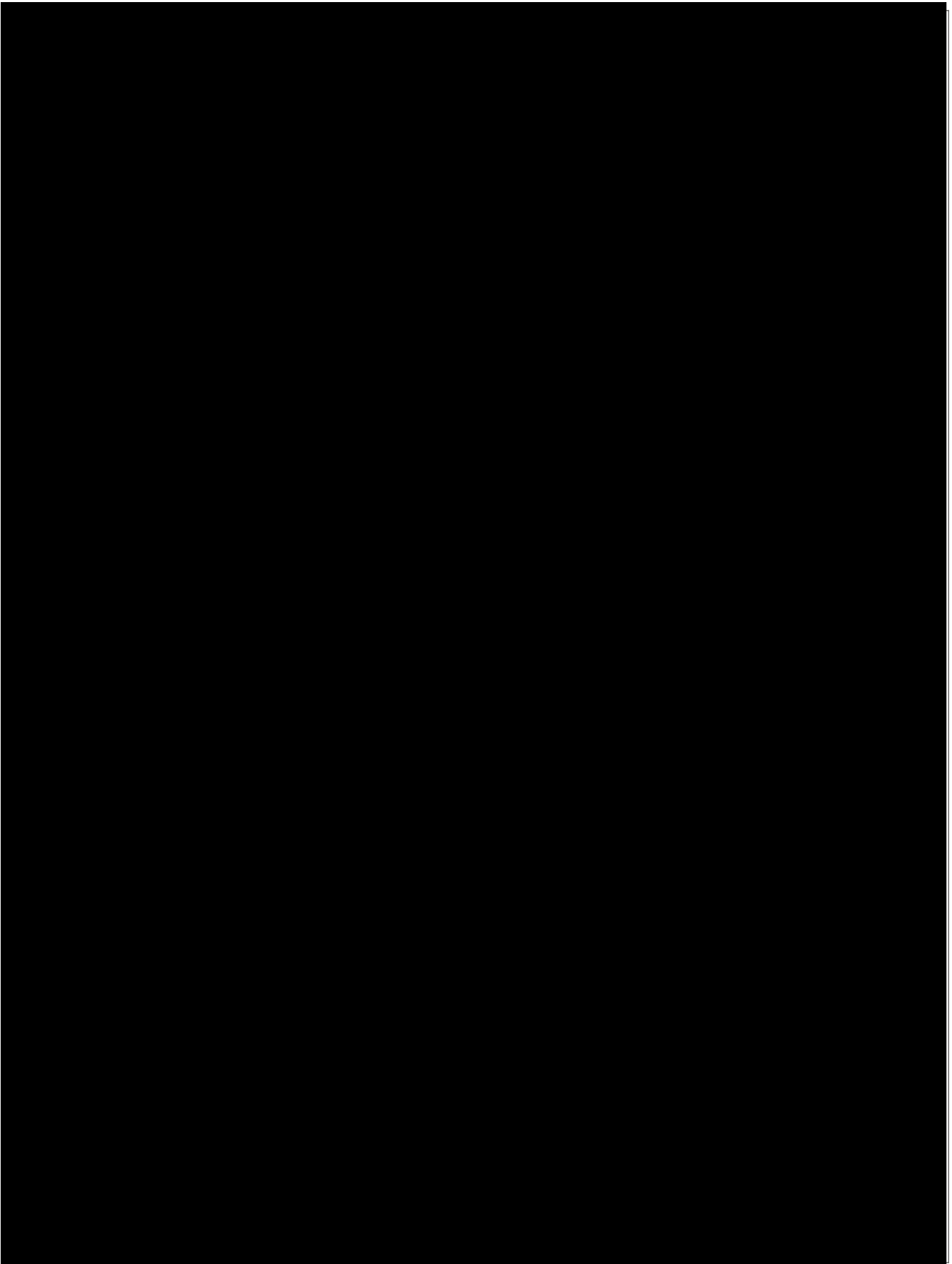


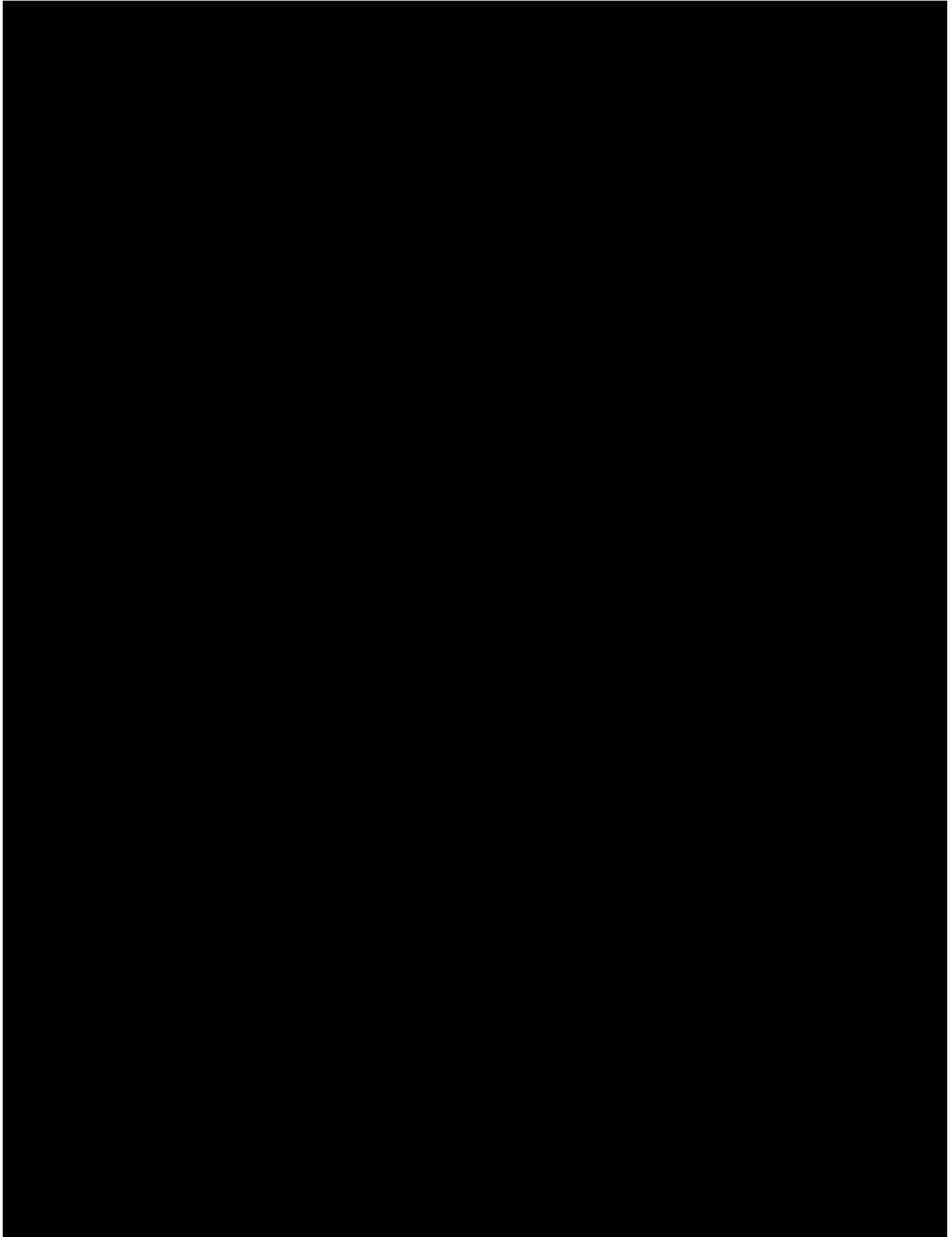


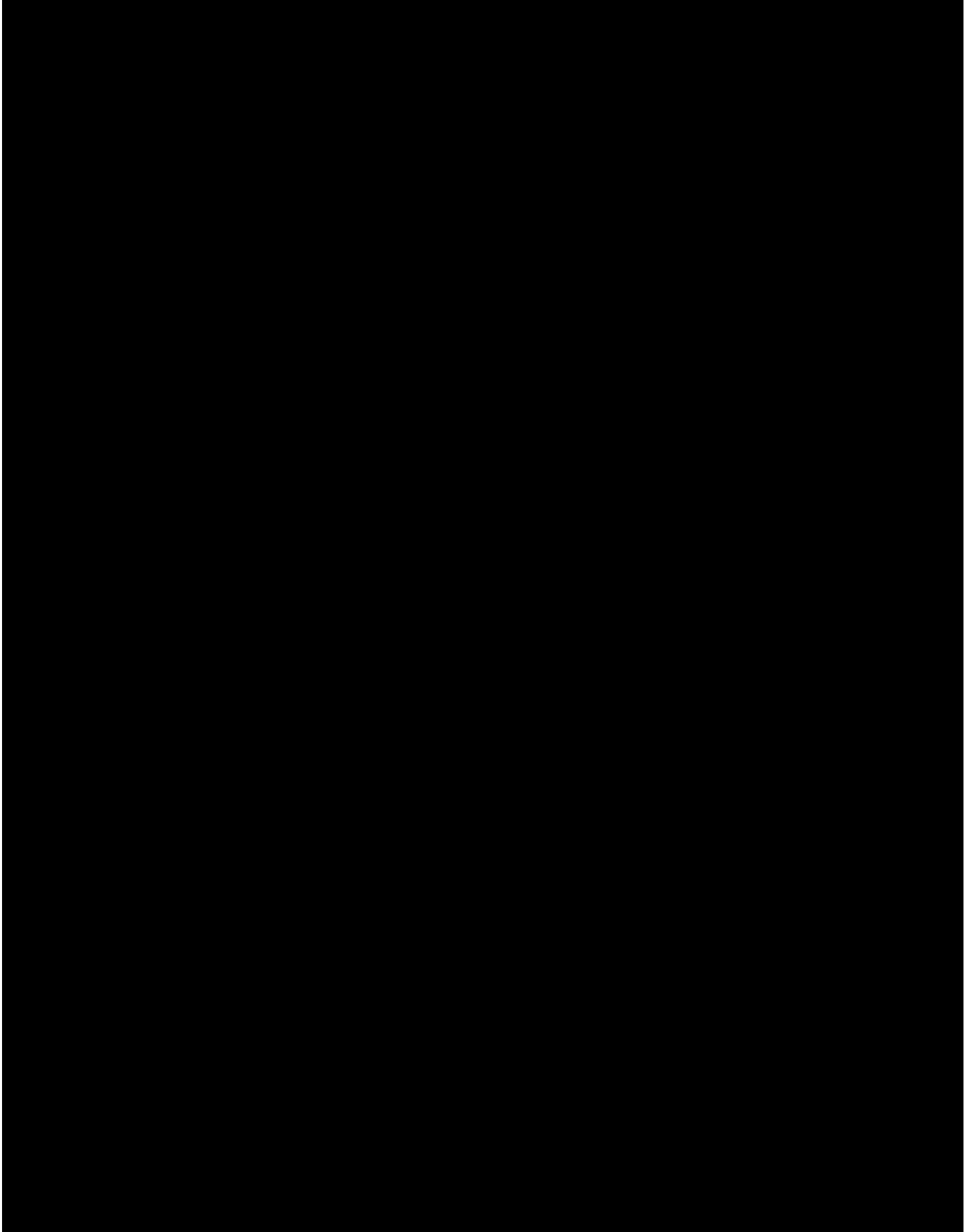


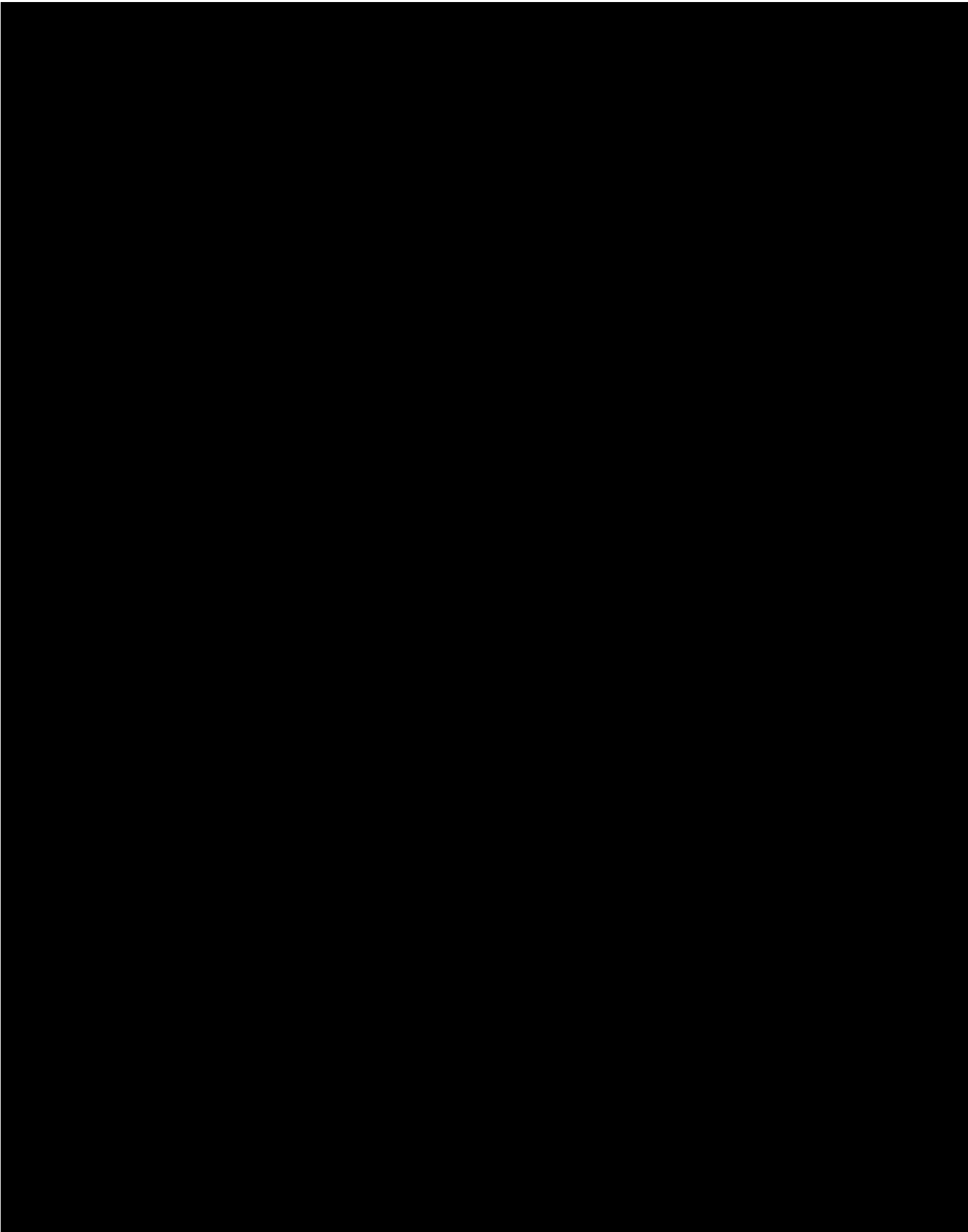


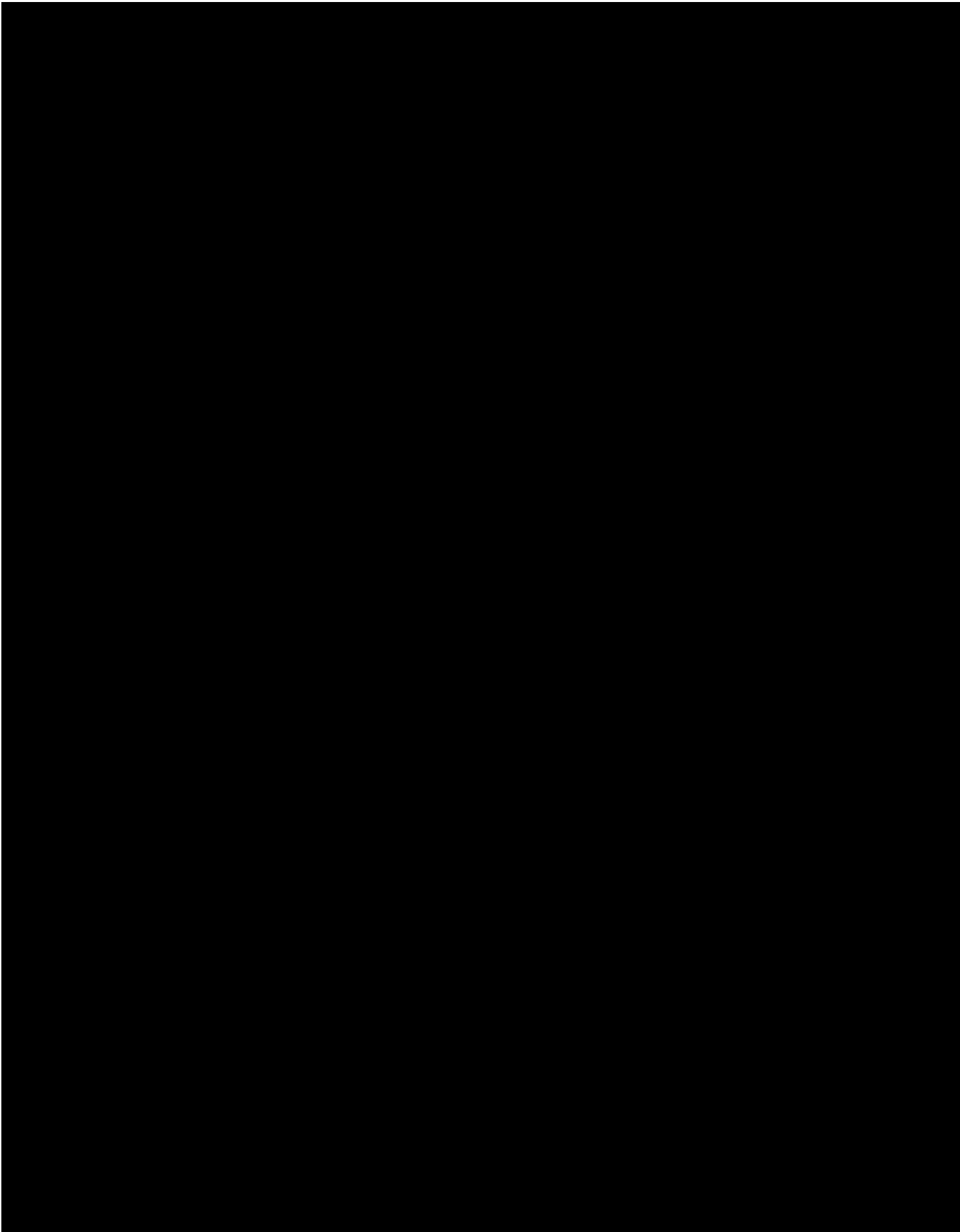












C E R T I F I C A T E

I, MICHELLE M. BOUDREAUX-PHILLIPS, do hereby
certify that WILLIAM MATTHEW MARTIN, the witness whose
deposition is hereinbefore set forth, was duly sworn by
me and that such deposition is a true record of the
testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or marriage
and that I am in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 28th day of February 2024.



MICHELLE M. BOUDREAUX-PHILLIPS, CCR