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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE BANK OF AMERICA	)	
CALIFORNIA UNEMPLOYMENT	)	
BENEFITS LITIGATION	)	
	)	Case No.
-----	)	3:21-md-02992-GPC-MSB
This Document Relates	)	
to All Actions	)	

VIDEOTAPED DEPOSITION OF BRIAN T. MOYNIHAN,
a witness in the above-entitled cause, taken
before Susan Lozzi, Registered Professional Reporter
and Notary Public in and for the Commonwealth of
Massachusetts, pursuant to Federal Rules of Civil
Procedure 26 and 30, at Bank of Boston, 100 Federal
Street, Boston, Massachusetts, on Thursday,
October 2, 2025, commencing at 9:11 a.m.

A. Yes. Well, physically I live in Boston, yes.

Bar Index	Approximate Length (%)
1	95
2	100
3	90
4	95
5	40
6	98
7	90
8	15
9	92
10	55
11	95
12	35
13	60
14	60
15	25
16	30
17	95
18	98
19	15
20	80
21	95
22	90
23	95
24	85
25	95

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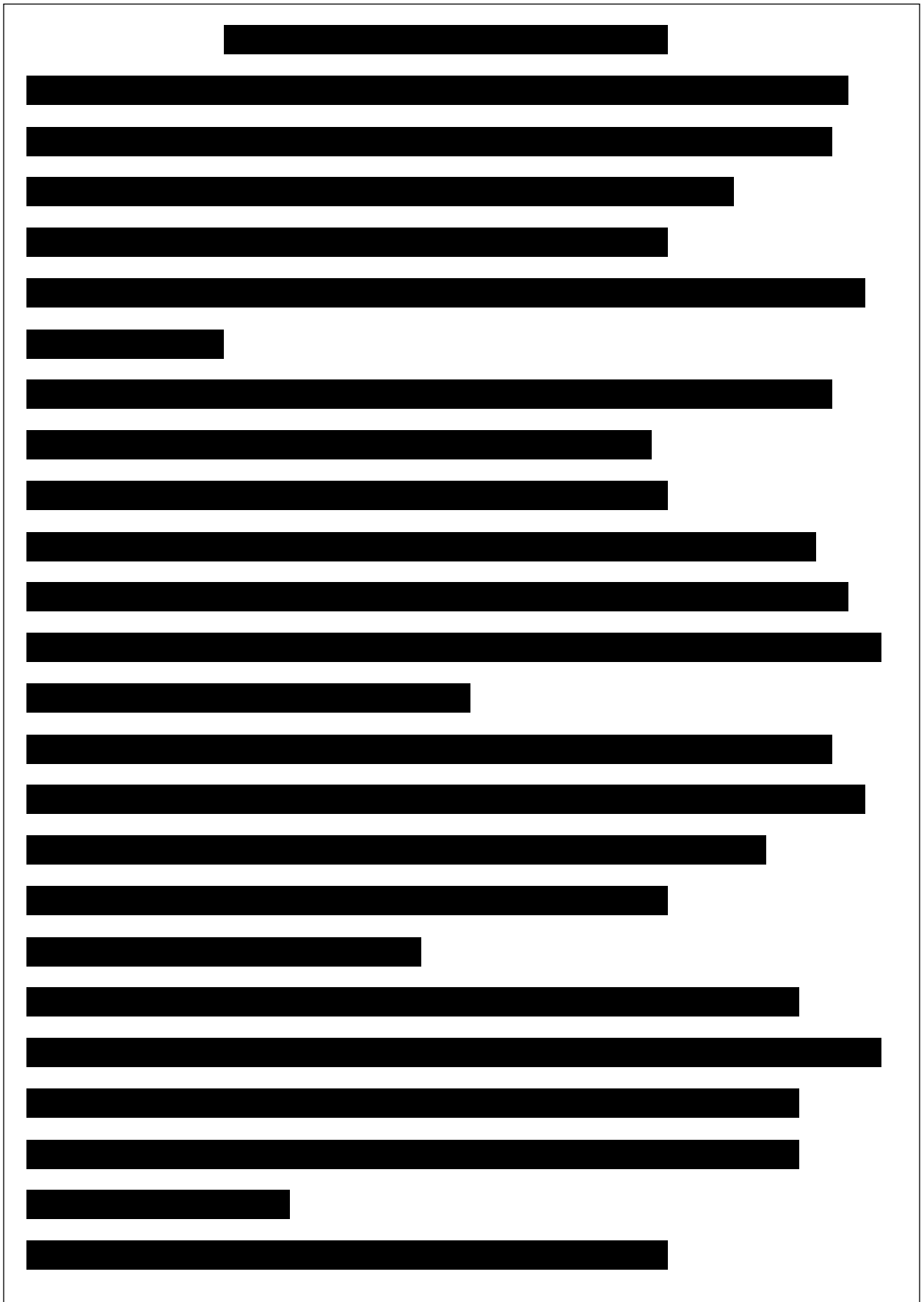
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A horizontal bar chart consisting of 20 solid black bars. The bars are arranged vertically, one above the other. Their lengths vary significantly, with the longest bars appearing in the middle of the sequence and the shortest bars at the top and bottom. The bars represent a distribution of data, with the longest bar being approximately 90% of the width of the chart area, and the shortest bars being around 5-10% of the width. The bars are evenly spaced, and there is no visible axis or grid.

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A horizontal bar chart consisting of 20 solid black bars. The bars are arranged vertically, one above the other. Their lengths vary significantly, representing a distribution of values. The longest bar is the 11th from the top, extending nearly to the right edge of the image. Other bars of varying lengths are scattered throughout the list, with some being very short and others being quite long. The bars are not sorted in any particular order.

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column. The lengths of the bars vary significantly, with the longest bar being the 10th bar from the top, and the shortest bars being the 1st and 19th bars. The bars are all solid black and have a uniform height. The chart is set against a white background.

Bar Index	Approximate Length (%)
1	75
2	85
3	60
4	95
5	100
6	88
7	20
8	78
9	98
10	18
11	92
12	98
13	90
14	82
15	40
16	75
17	95
18	100
19	100
20	45
21	95
22	15
23	98
24	100
25	25

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column, with the longest bar in the middle and the shortest bars at the top and bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being very short. The bars are arranged in a single column, with the longest bar in the middle and the shortest bars at the top and bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being very short. The bars are arranged in a single column, with the longest bar in the middle and the shortest bars at the top and bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being very short.

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged vertically, with the longest bar at the top and the shortest bar at the bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being much shorter. The bars are arranged in a single column, with the longest bar at the top and the shortest bar at the bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being much shorter.

[illegible]

A horizontal bar chart with 20 bars of varying lengths, representing percentages. The bars are arranged in a single column. The lengths of the bars correspond to the following approximate percentages: 15%, 90%, 10%, 85%, 95%, 88%, 78%, 72%, 60%, 92%, 100%, 20%, 85%, 90%, 10%, 95%, 40%, 35%, 85%, 20%, 95%, 40%, 95%, 15%.

Category	Percentage
1	15%
2	90%
3	10%
4	85%
5	95%
6	88%
7	78%
8	72%
9	60%
10	92%
11	100%
12	20%
13	85%
14	90%
15	10%
16	95%
17	40%
18	35%
19	85%
20	20%
21	95%
22	40%
23	95%
24	15%

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A horizontal bar chart consisting of 20 solid black bars. The bars are arranged vertically, one above the other. Their lengths vary significantly, with the longest bars appearing in the middle of the set and the shortest bars at the top and bottom. The bars represent a distribution of data, with the longest bars reaching approximately 95% of the width and the shortest bars reaching approximately 15% of the width.

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A horizontal bar chart consisting of 20 solid black bars. The bars are arranged vertically, one above the other. Their lengths vary significantly, representing a distribution of data. The longest bar is the second one from the top, extending almost to the right edge of the image. The shortest bar is the ninth one from the top, which is very narrow. The bars are set against a plain white background.

████████████████████

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column, with the longest bar in the middle and the shortest at the top and bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being very short. The bars are arranged in a single column, with the longest bar in the middle and the shortest at the top and bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being very short. The bars are arranged in a single column, with the longest bar in the middle and the shortest at the top and bottom. The lengths of the bars vary significantly, with some being nearly full-width and others being very short.

Bar Index (from top)	Relative Length (approximate percentage of the longest bar)
1	25%
2	55%
3	95%
4	30%
5	85%
6	15%
7	95%
8	88%
9	60%
10	100%
11	90%
12	65%
13	95%
14	95%
15	95%
16	95%
17	15%
18	90%
19	5%
20	95%

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A horizontal bar chart consisting of 20 solid black bars. The bars are arranged vertically, with their lengths varying significantly. The longest bars are located in the middle of the chart, while the shortest bars are at the top and bottom. The bars represent a distribution of data, with the majority of the values falling between the 10th and 15th positions from the top.

[illegible]

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column. The lengths of the bars vary significantly, with the longest bar being the 10th bar from the top, and the shortest bars being the 1st and 19th bars. The bars are all solid black and have no text labels or numerical values associated with them.

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COMMONWEALTH OF MASSACHUSETTS

I, SUSAN LOZZI, Registered Professional Reporter and Notary Public duly and qualified in and for the State of Massachusetts do hereby certify that the foregoing statement is a true and correct transcript of my original stenographic notes.

I further certify that I am neither attorney or counsel for, nor related to or employed by any of the parties to the action in which this deposition is taken; and furthermore, that I am not a relative or employee of any attorney or counsel employed by the parties hereto or financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Notarial Seal this 6th day of October, 2025.


SUSAN LOZZI
NOTARY PUBLIC

My Commission Expires: March 20, 2031.