

**DX 14.Z**

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

Videotaped Deposition of  
**Carl Pry**  
May 16, 2025

In Re Bank of America CA Unemployment Benefits Litigation  
**Confidential**



**Confidential**  
**Carl Pry** **In Re Bank of America CA Unemployment Benefits Litigation**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF CALIFORNIA  
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4 IN RE BANK OF AMERICA CALIFORNIA  
5 UNEMPLOYMENT BENEFITS LITIGATION  
6  
7 Case No:  
8 3:21-md-02992-GPC-MSB  
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11 VIDEOTAPED DEPOSITION of CARL PRY, taken by  
12 the Plaintiff, pursuant to Notice, held via ZOOM, on May  
13 16, 2025, at 11:03 a.m., before a Notary Public of the  
14 State of New York.  
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Carl Pry

In Re Bank of America CA Unemployment Benefits Litigation

1 Q. Was there a point in your work on this case  
2 where your role was anything other than serving as a  
3 rebuttal expert witness?

4 A. In this case, no. That's been my only role.

5 Q. You haven't provided any sort of litigation  
6 support? You make reference to that in your rebuttal  
7 report.

8 A. No, no. I -- my only role within this  
9 particular case is what we are talking about here, to  
10 author and provide this rebuttal report.

11 Q. Understood.

12 All right. So if you turn to page 3 of you  
13 report at paragraph 10, you indicate that you reserve  
14 the right to revise your opinions, as stated in your  
15 report.

16 Have you updated your opinions in any way, not  
17 already reflected in Exhibit 2, this report?

18 A. No, I've not.

19 Q. Have you been provided any additional data  
20 regarding potential fraudster or uninjured class  
21 members?

22 A. No, I've not been provided any additional data.

23 Q. Sir, does Exhibit 2 contain all of the opinions  
24 you intend to offer at trial in this case?

25 A. Oh, Exhibit 2 is the report. Yes, they do.

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**In Re Bank of America CA Unemployment Benefits Litigation**

1 Q. Sorry. If I confuse Exhibit 2 in the report --  
2 Exhibit 2 is the report?

3 A. No. My -- that's my confusion. I was thinking  
4 appendix 2, which has all the documents that I reviewed  
5 to prepare my report. That's my confusion.

6 Q. We will talk about appendix 2.

7 MR. HOLLENBERG: Now we're going to  
8 mark another document as Exhibit 3, and that  
9 will pop up in the chat as well. So let me  
10 know when you've had a chance to review that.

11 (Whereupon, Defendant's Rebuttal Expert  
12 Designations was marked as Plaintiffs' Exhibit  
13 3, for identification, as of this date.)

14 THE WITNESS: I see: "Defendant's  
15 Rebuttal Expert Designations."

16 BY MR. HOLLENBERG:

17 Q. Sir, have you ever seen this document before?

18 A. Yes.

19 Q. All right. Direct your attention to the bottom  
20 of page 4 and top of page 5 of Exhibit No. 3. You see  
21 the heading A, "Mr. Pry is expected to testify regarding  
22 the following rebuttal topics"?

23 A. I do.

24 Q. Now, is the description of your anticipated  
25 opinion or opinions previewed here on pages 4 and 5 of

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**Carl Pry** **In Re Bank of America CA Unemployment Benefits Litigation**

1 C E R T I F I C A T E

2 STATE OF NEW YORK )

3 ) ss.:

4 COUNTY OF QUEENS )

5

6 I, BROOKE E. PERRY, a Notary Public  
7 within and for the State of New York, do hereby  
8 certify:

9 That CARL PRY, the witness whose  
10 deposition is hereinbefore set forth, was duly  
11 sworn by me and that such deposition is a true  
12 record of the testimony given by such witness.

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

17 IN WITNESS WHEREOF, I have hereunto set  
18 my hand this 16th day of May, 2025.

19

20 *Brooke E. Perry*

21 -----  
BROOKE E. PERRY

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