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THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE BANK OF AMERICA) Case No.
CALIFORNIA UNEMPLOYMENT) 3:21-md-02992-LAB-MSB
BENEFITS LITIGATION)
-----)

VIDEOTAPED ORAL DEPOSITION OF
BANK OF AMERICA, N.A.

BY AND THROUGH ITS DESIGNATED REPRESENTATIVE
SHANE DANIELS

FEBRUARY 6, 2024

On the 6th day of February, 2024, at 9:09 a.m.,
the videotaped oral deposition of the above-named
witness was taken at the instance of the Plaintiffs,
before Michelle L. Munroe, Certified Shorthand
Reporter in and for the State of Texas, at Jones Day,
2727 N. Harwood Street, Suite 500, Dallas, Texas,
pursuant to Notice and the agreement hereinafter set
forth.

A P P E A R A N C E S

FOR THE PLAINTIFFS AND THE PROPOSED CLASS:

Andrew F. Kirtley
Blair Kittle
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- AND -

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FOR BANK OF AMERICA, N.A. AND THE WITNESS:

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1 FOR THE INDIVIDUAL PLAINTIFFS:

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4 Suite 308

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6
7 ALSO PRESENT:

Phil Hall, Video Technician

8 Daniel Shay (via Zoom)

Colin Jones (via Zoom)

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good morning.

3 Today is Tuesday, February 6, 2024. The time is 09:09:05

4 9:09 a.m. We are on the record. Our court reporter 09:09:08

5 is Michelle Munroe. 09:09:12

6 Ms. Munroe, would you please swear in 09:09:12

7 the witness. 09:09:12

8 (Witness sworn in.) 09:09:29

9 THE VIDEOGRAPHER: Thank you. 09:09:29

10 Counsel, you may proceed. 09:09:30

11 MR. KIRTLEY: We are on the record? 09:09:33

12 THE REPORTER: Yes, sir. 09:09:36

13 THE VIDEOGRAPHER: We are. 09:09:36

14 SHANE DANIELS, 09:09:36

15 having been first duly sworn, testified as follows: 09:09:36

16 EXAMINATION 09:09:36

17 BY MR. KIRTLEY: 09:09:36

18 Q. Good morning, Mr. Daniels. My name is 09:09:38

19 Andrew Kirtley. I'm one of the attorneys that are 09:09:43

20 representing the class plaintiffs in this case and 09:09:47

21 I'll be the person taking your deposition today. 09:09:51

22 If you could just state your name for the 09:09:56

23 record? 09:10:00

24 A. Sure. Shane Daniels. 09:10:00

25 Q. You have a middle name? 09:10:02

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1 A. I do. Shane Michael Daniels. 09:10:07

2 Q. Okay. So I want to thank you for being 09:10:10

3 here. I'll start -- I'll sort of -- I'll give you 09:10:15

4 an intro of some things to expect and some ground 09:10:20

5 rules. And then that will take 5 or 10 minutes. 09:10:23

6 A. Sure. 09:10:32

7 Q. So you can relax for the first 5 or 10 09:10:32

8 here. 09:10:35

9 A. Okay. Thank you. 09:10:36

10 Q. So since you're just sworn in, you 09:10:37

11 understand that you are testifying under oath here 09:10:40

12 today? 09:10:47

13 A. I do. 09:10:47

14 Q. Okay. And that means that you're legally 09:10:48

15 required to say the truth in all of your answers. 09:10:51

16 A. Yes, sir. 09:10:55

17 Q. Same as if you were in a court of law? 09:10:56

18 A. Yes, sir. 09:10:58

19 Q. Okay. Is there any reason why you can't 09:11:00

20 be fully present or testify truthfully today? 09:11:06

21 A. No. 09:11:09

22 Q. You are not sick? 09:11:10

23 A. No. 09:11:13

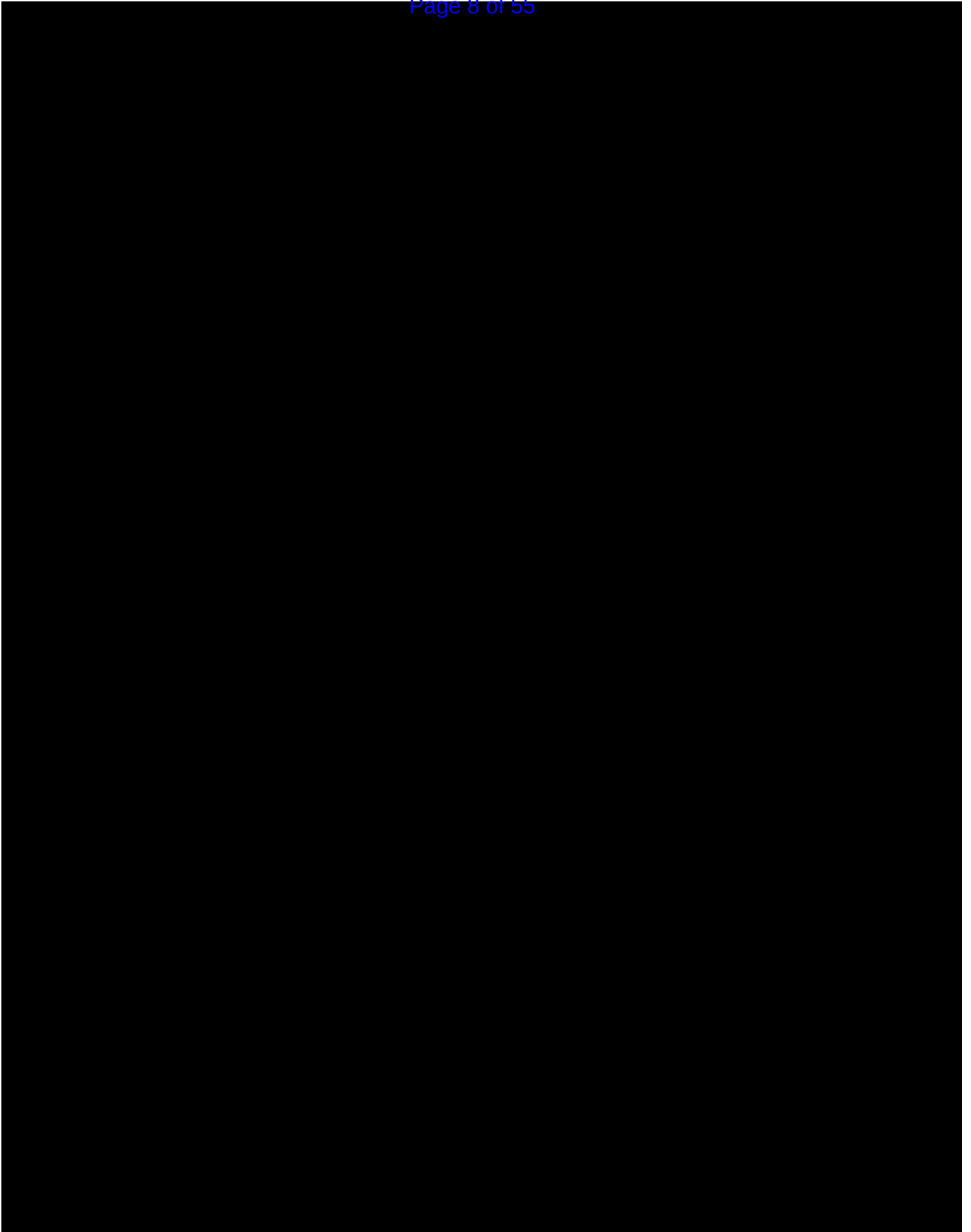
24 Q. You aren't on any medication? 09:11:15

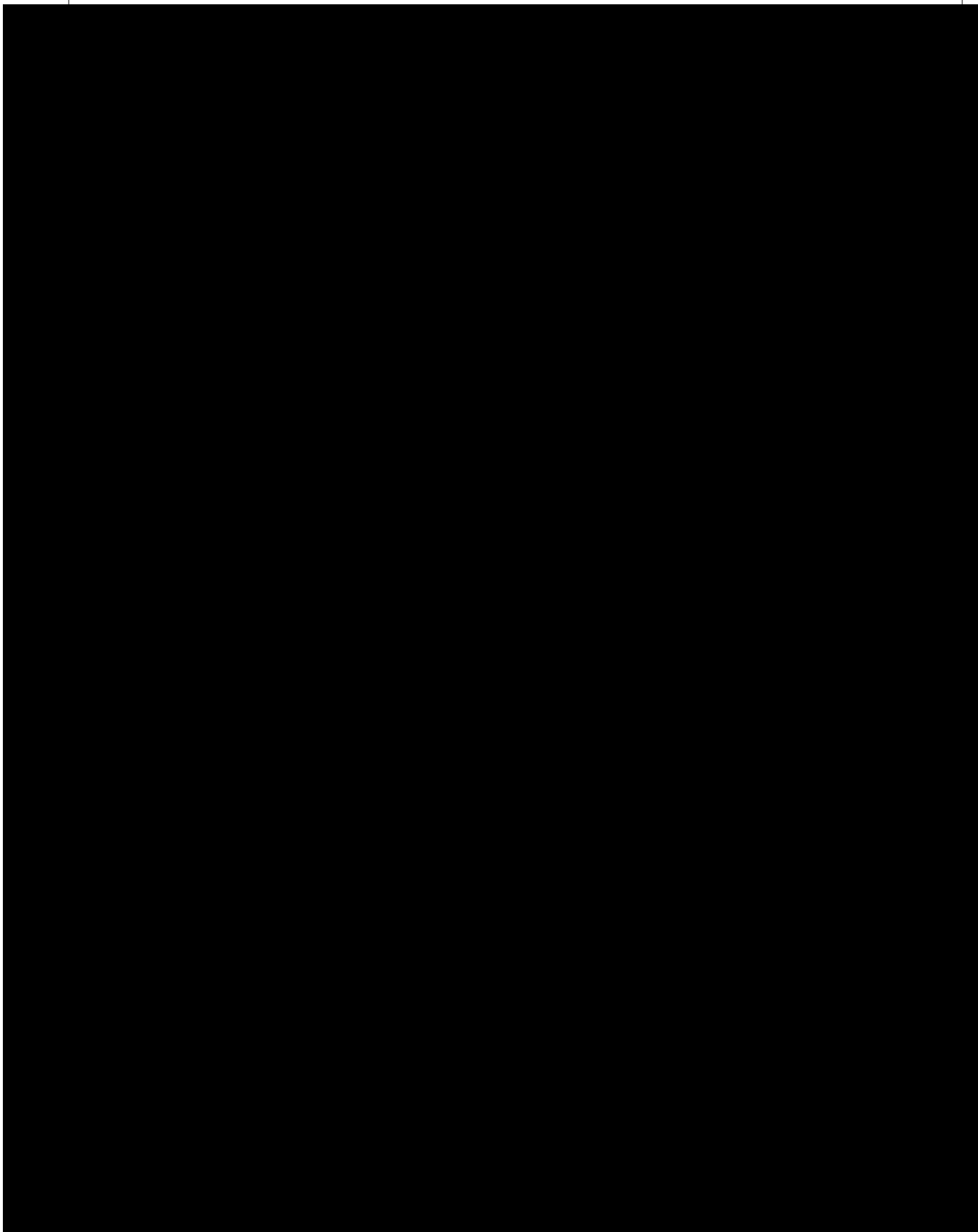
25 A. No. 09:11:16

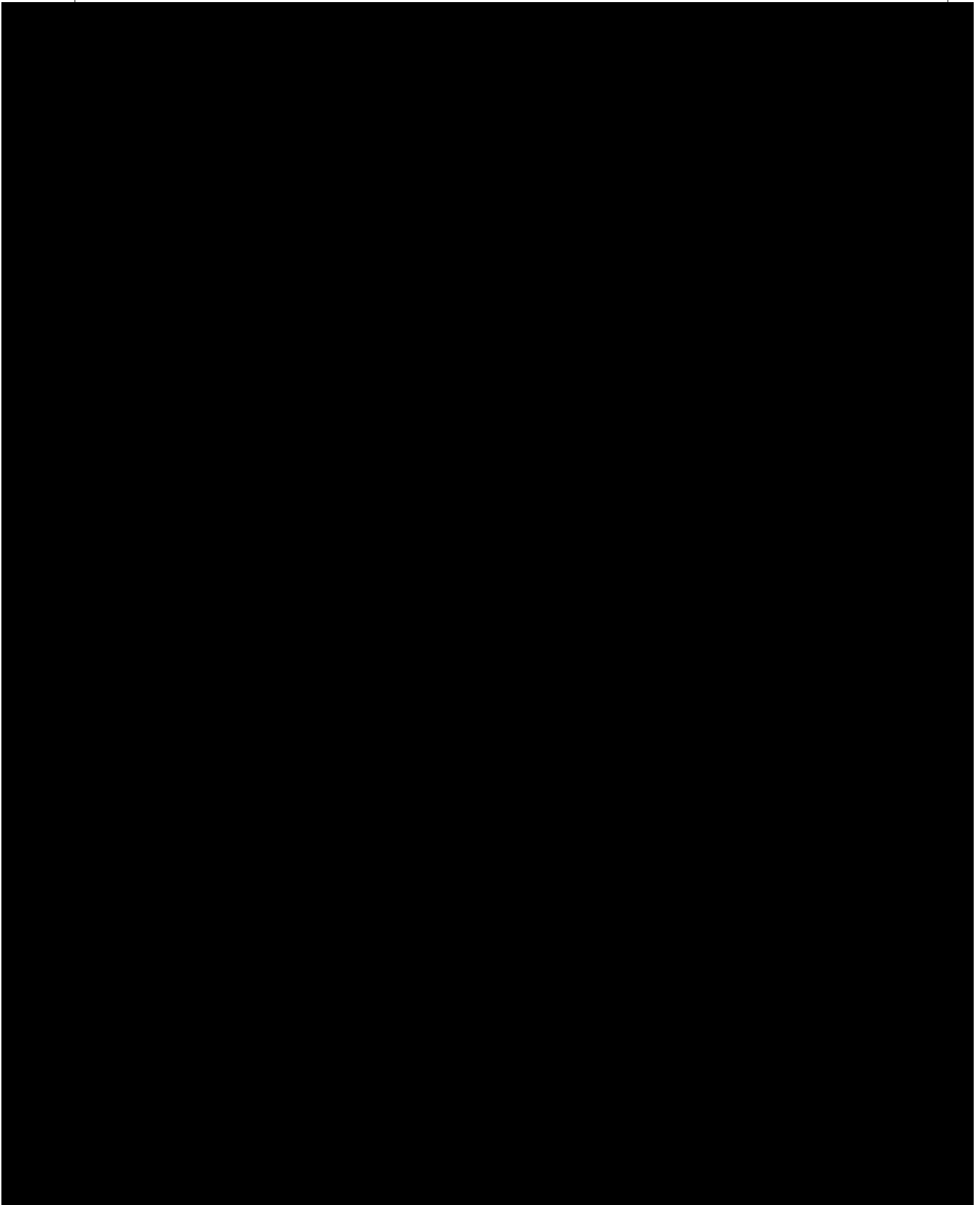
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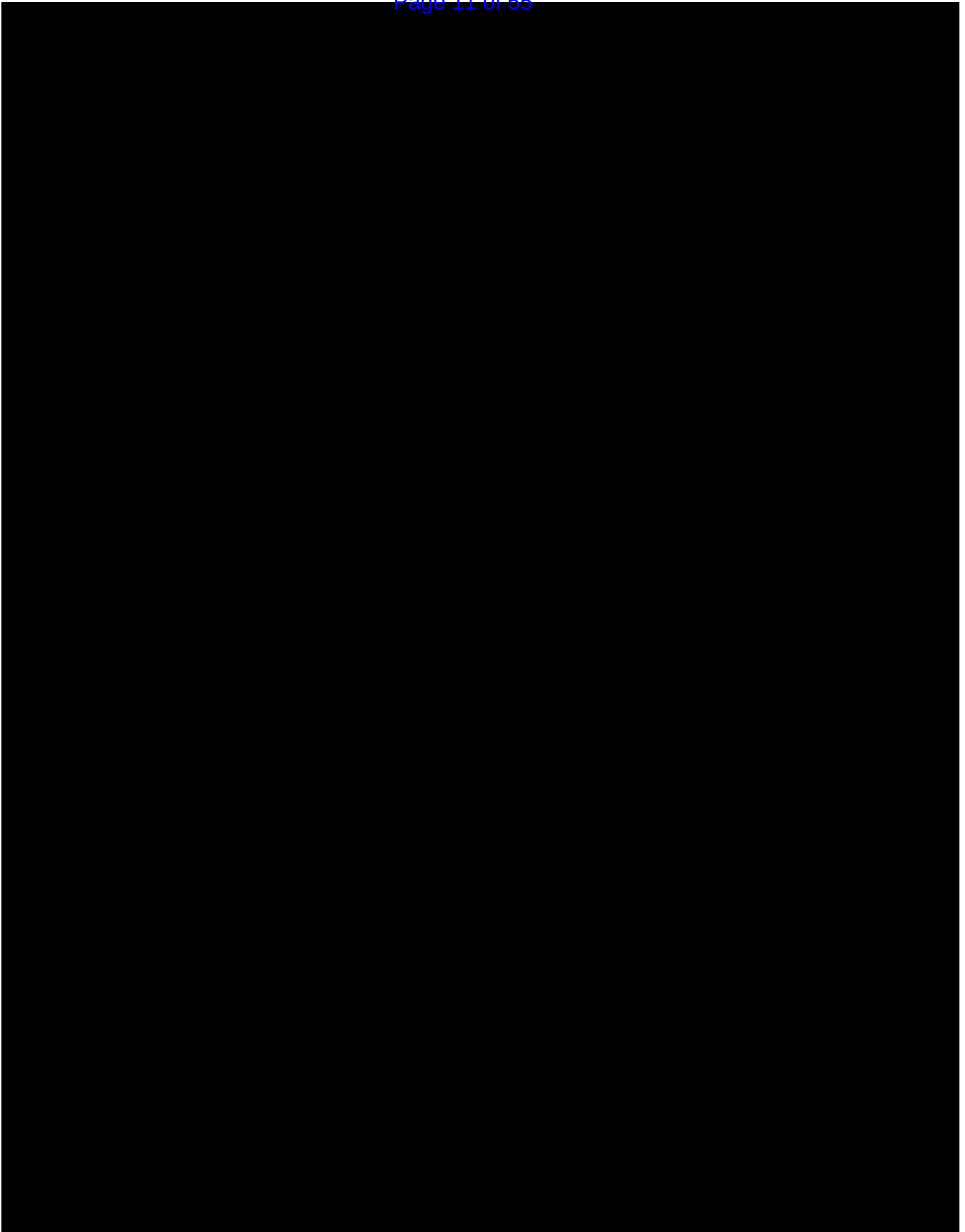
1 Q. Okay. You don't have any medical 09:11:18
2 condition that affects sort of clear thinking or 09:11:22
3 recall? 09:11:25
4 A. No. 09:11:26
5 Q. Okay. Have you ever testified before 09:11:27
6 either in a deposition or in court? 09:11:34
7 A. I have. 09:11:36
8 Q. Why don't we start with depositions. 09:11:41
9 Could you tell me about the number of depositions 09:11:44
10 that you have done and what the circumstances were? 09:11:47
11 A. Sure. I have given one deposition on an 09:11:49
12 individual claim case for a credit card dispute. 09:11:52
13 Q. And you were testifying in your capacity 09:12:00
14 as an employee of the bank or some other financial 09:12:03
15 services company? 09:12:05
16 A. Yes, sir, that's correct, for Bank of 09:12:06
17 America. 09:12:12
18 Q. Okay. And how long ago was that? 09:12:12
19 A. It was somewhere around the beginning of 09:12:14
20 the summer of last year. 09:12:16
21 Q. Okay. Of 2023? 09:12:18
22 A. Yes, sir. 09:12:21
23 Q. Okay. And have you ever testified in 09:12:22
24 court? 09:12:25
25 A. No. 09:12:25

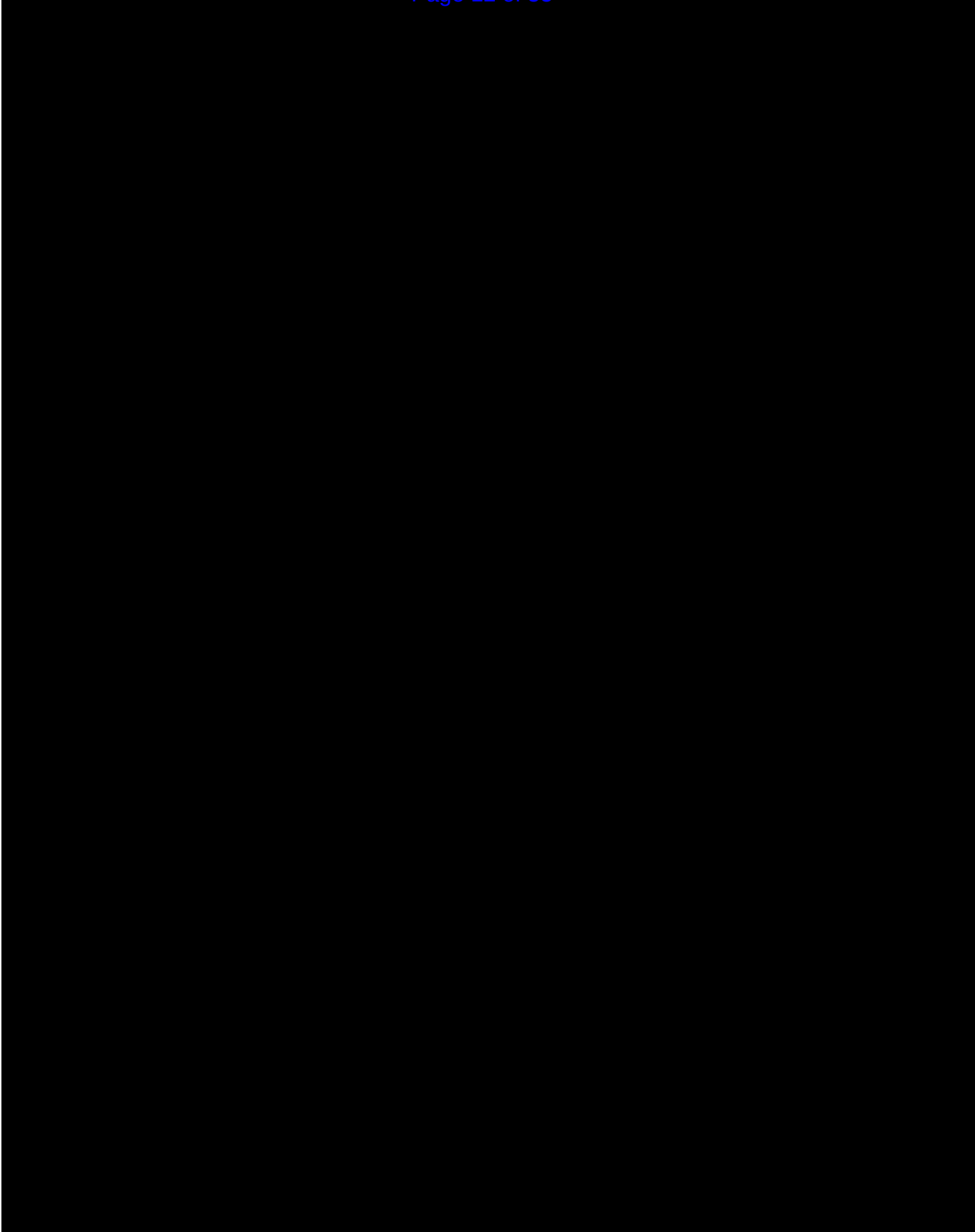
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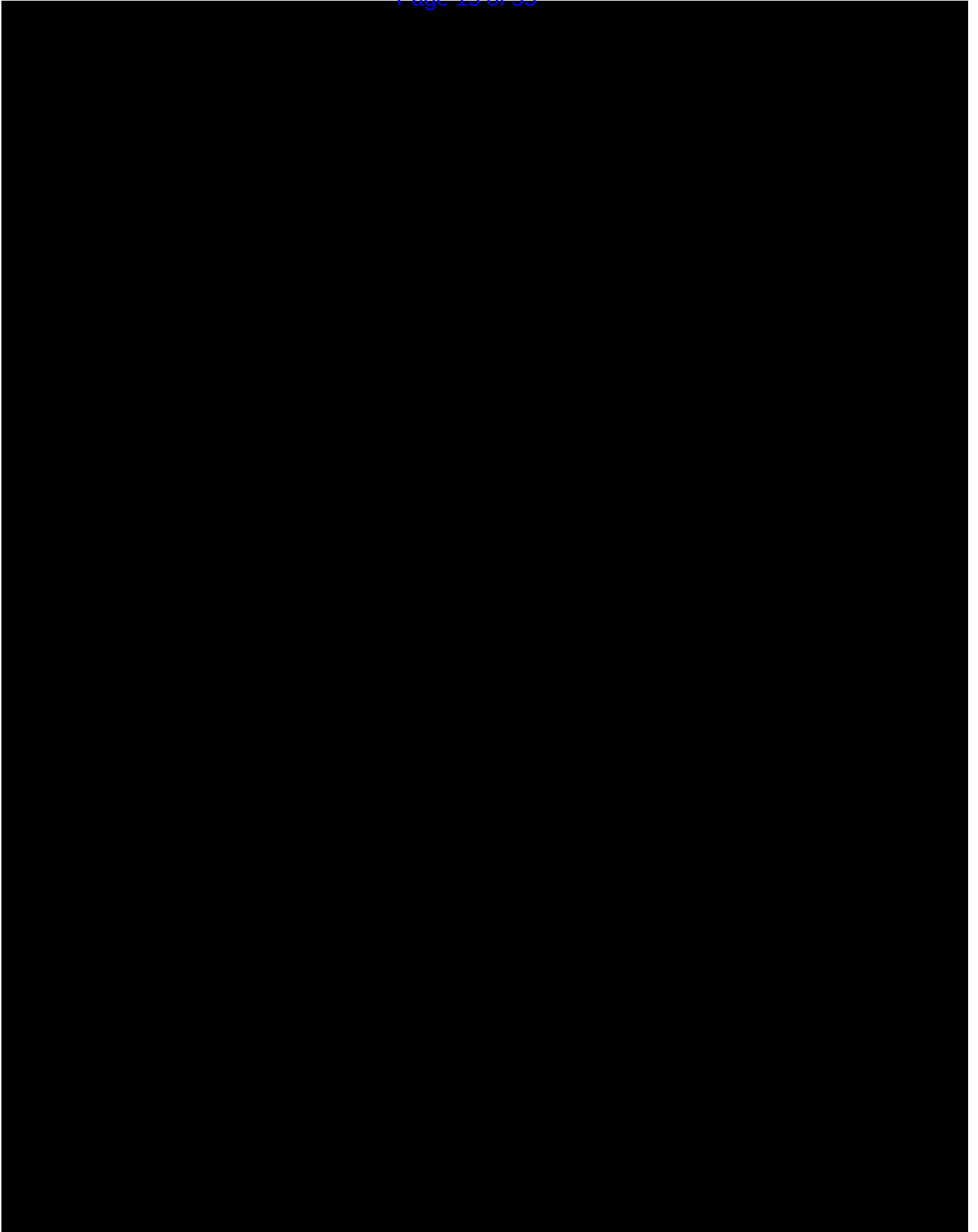


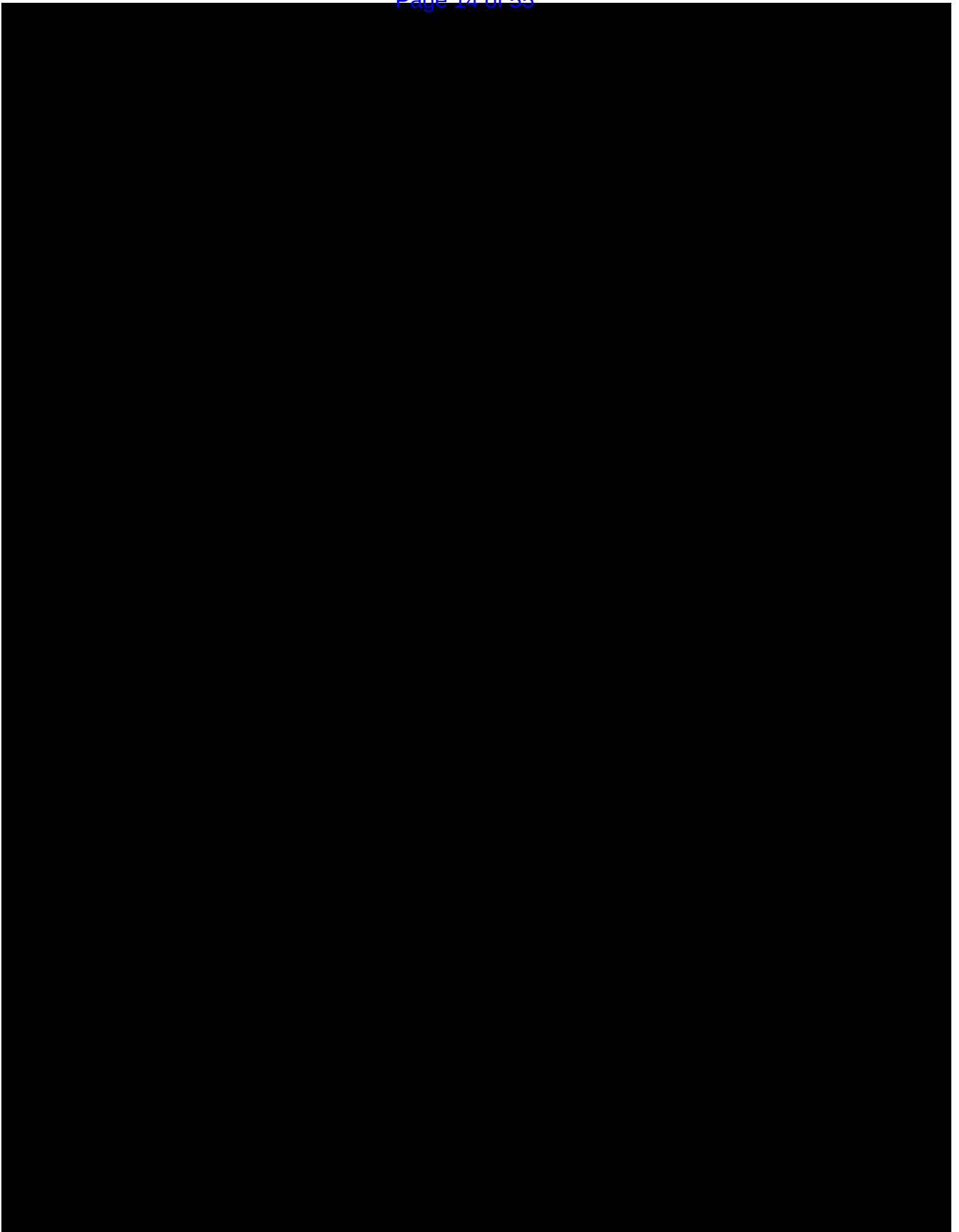


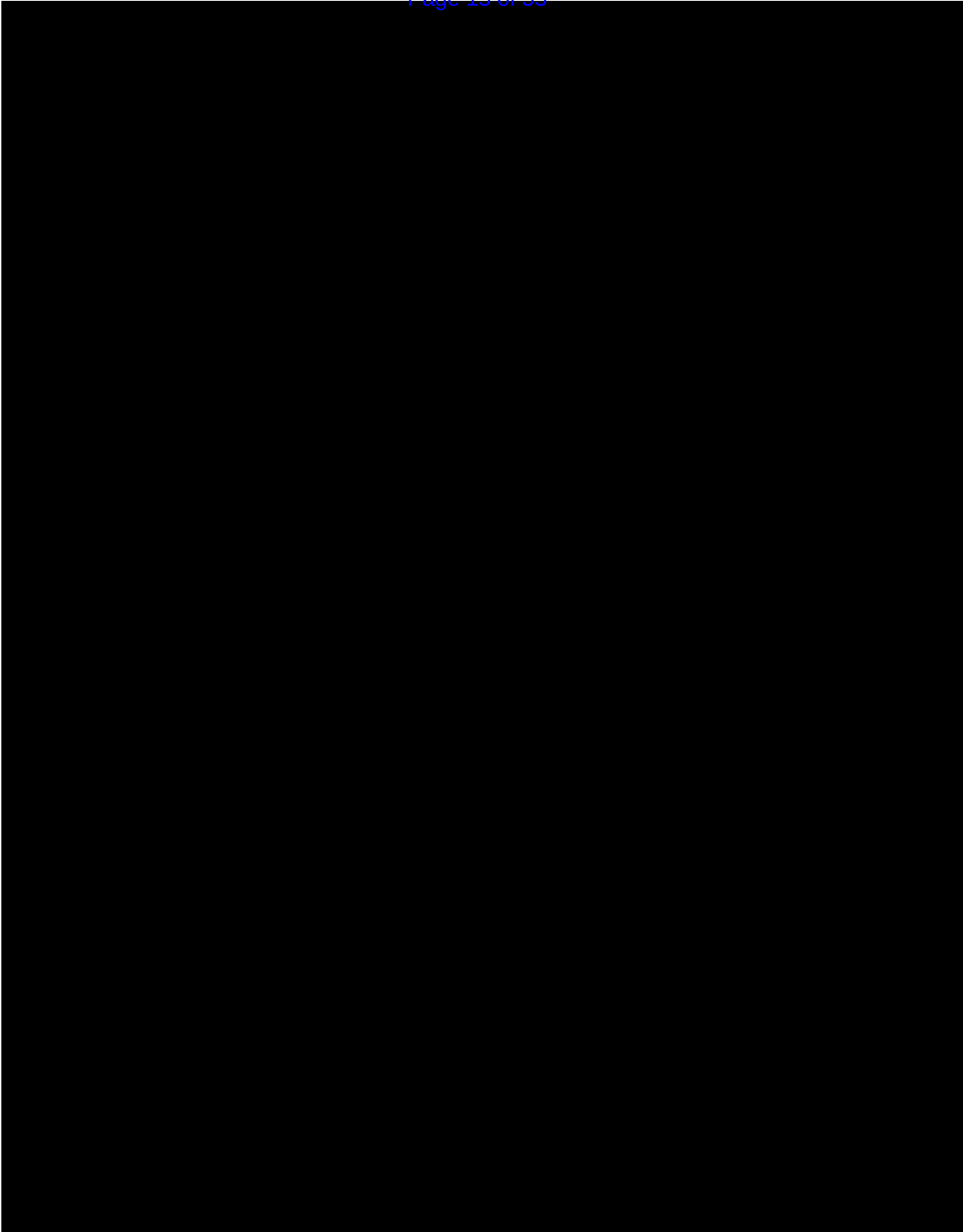


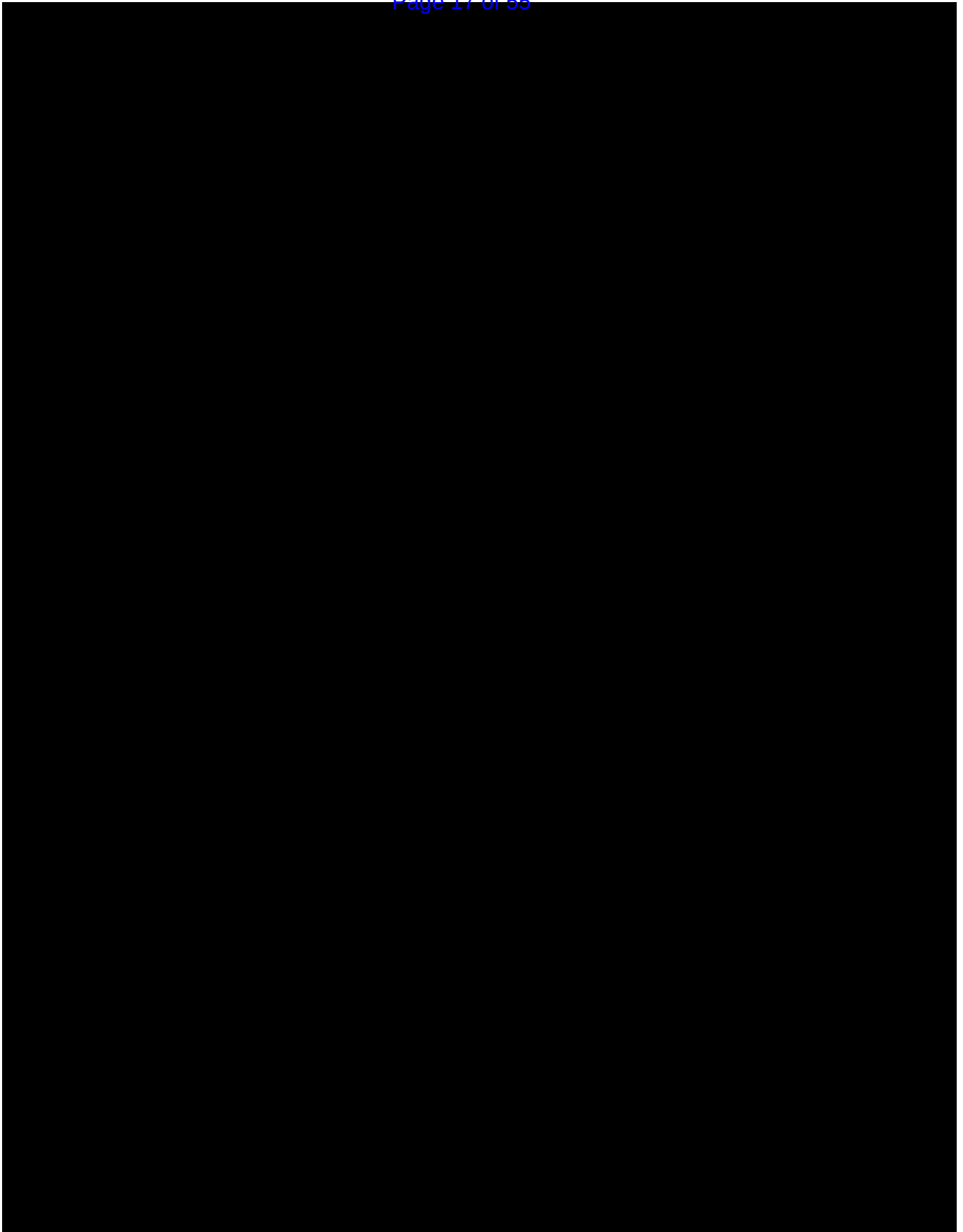


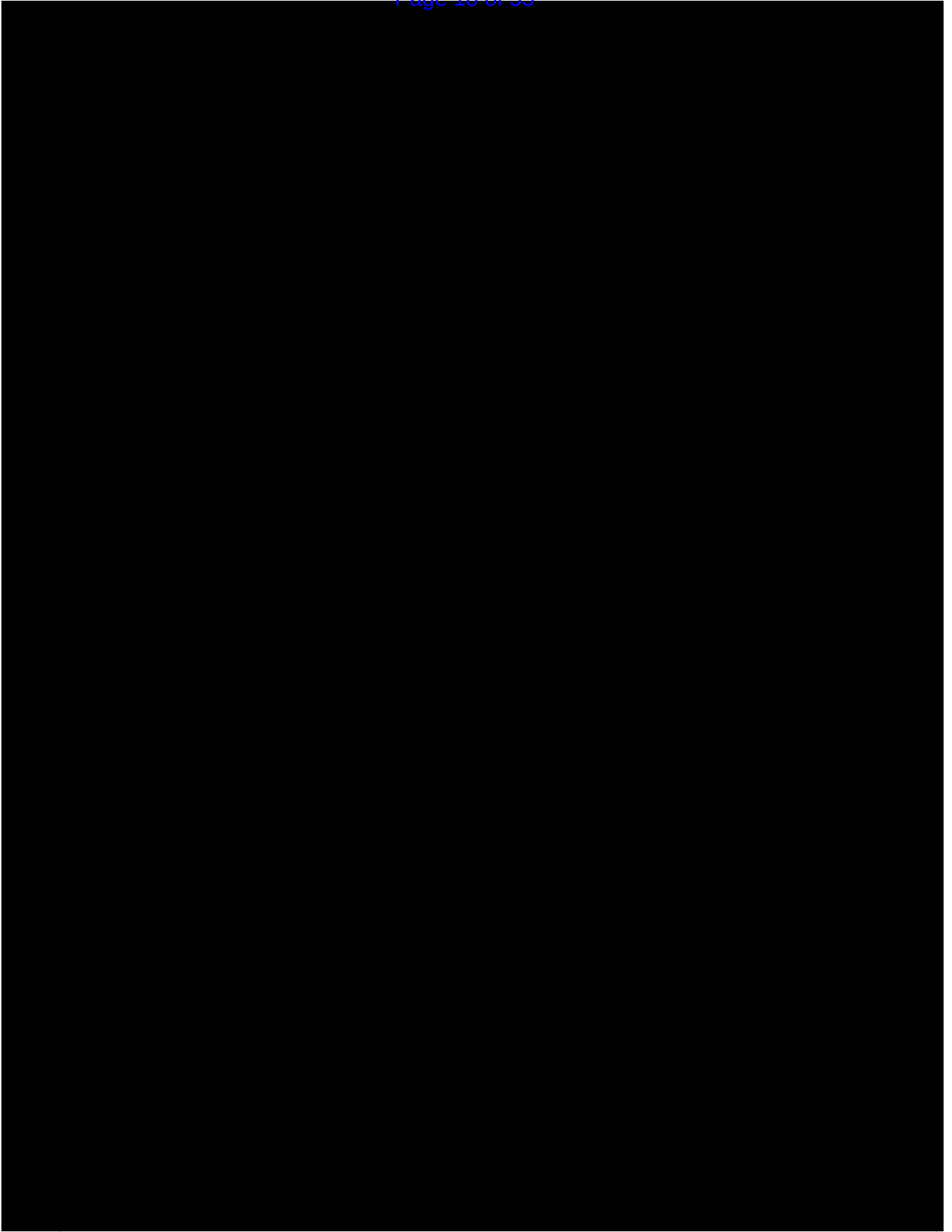


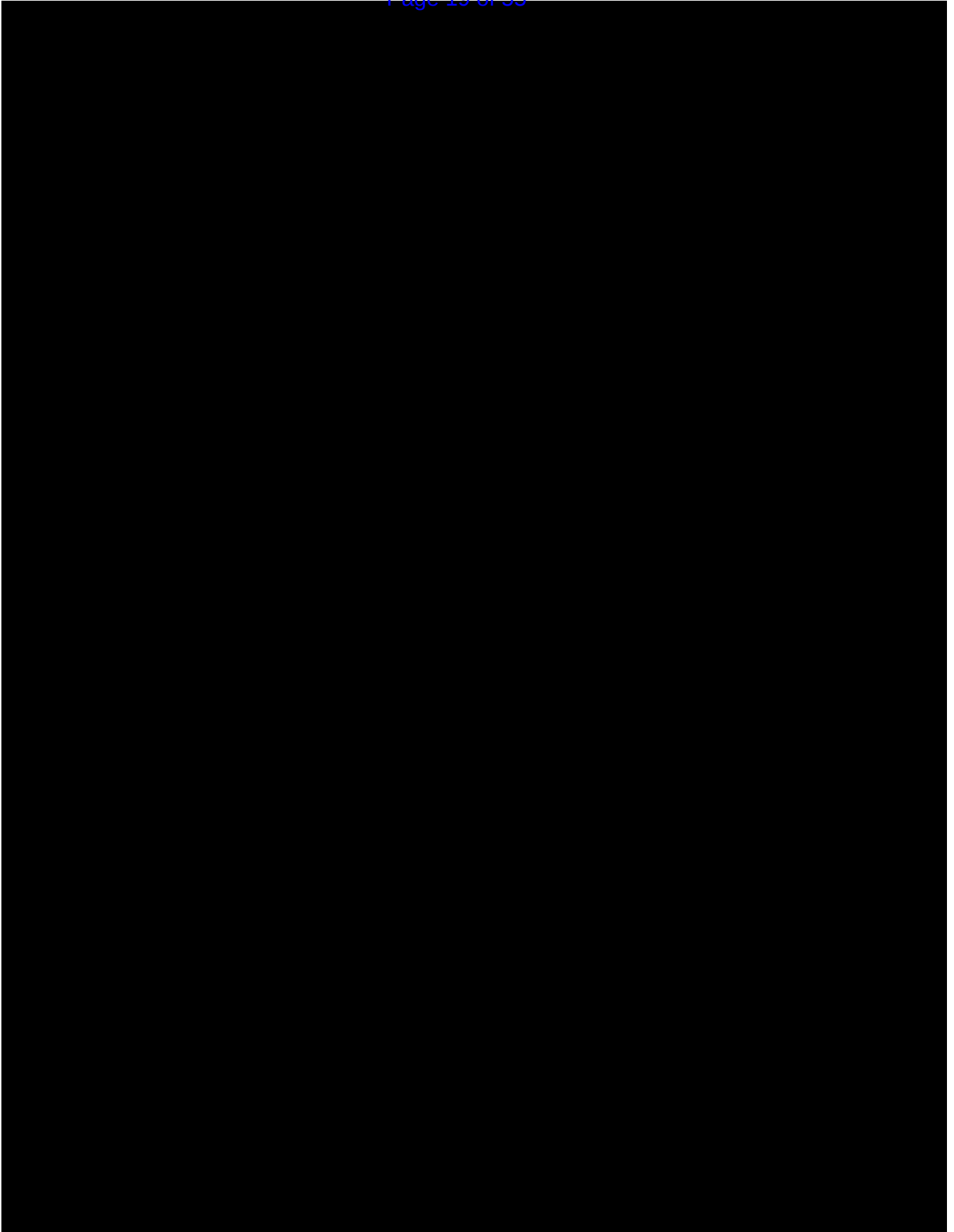


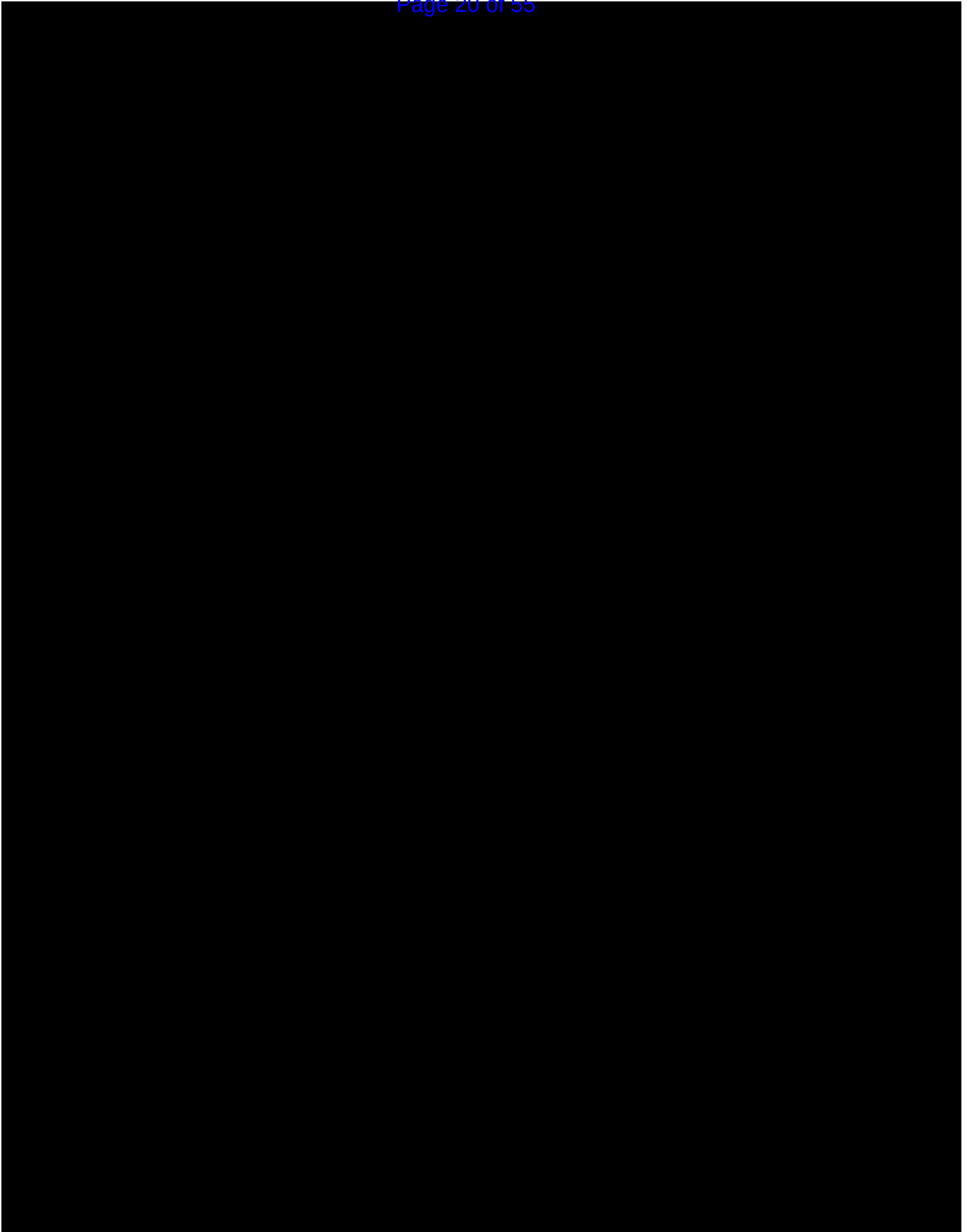


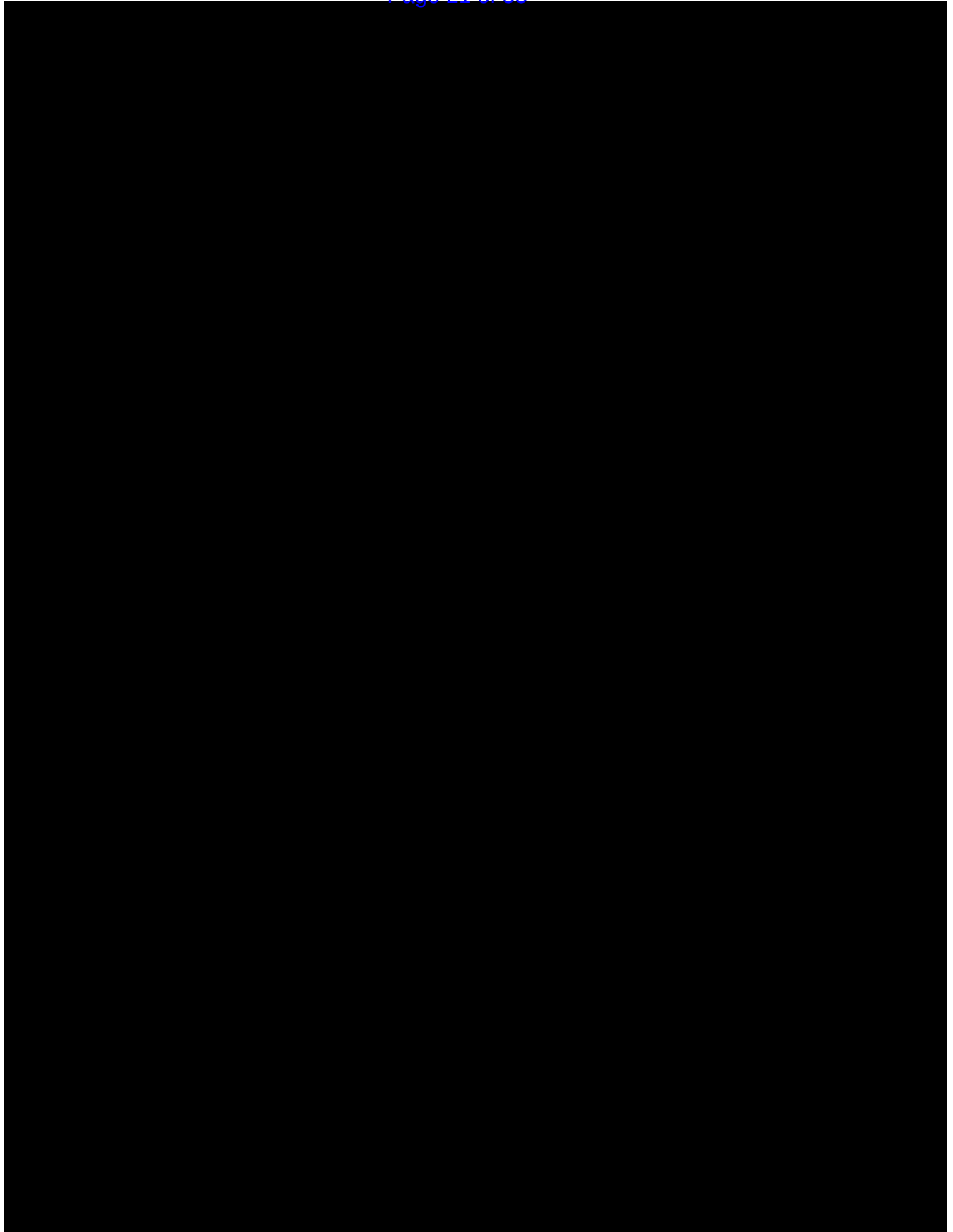


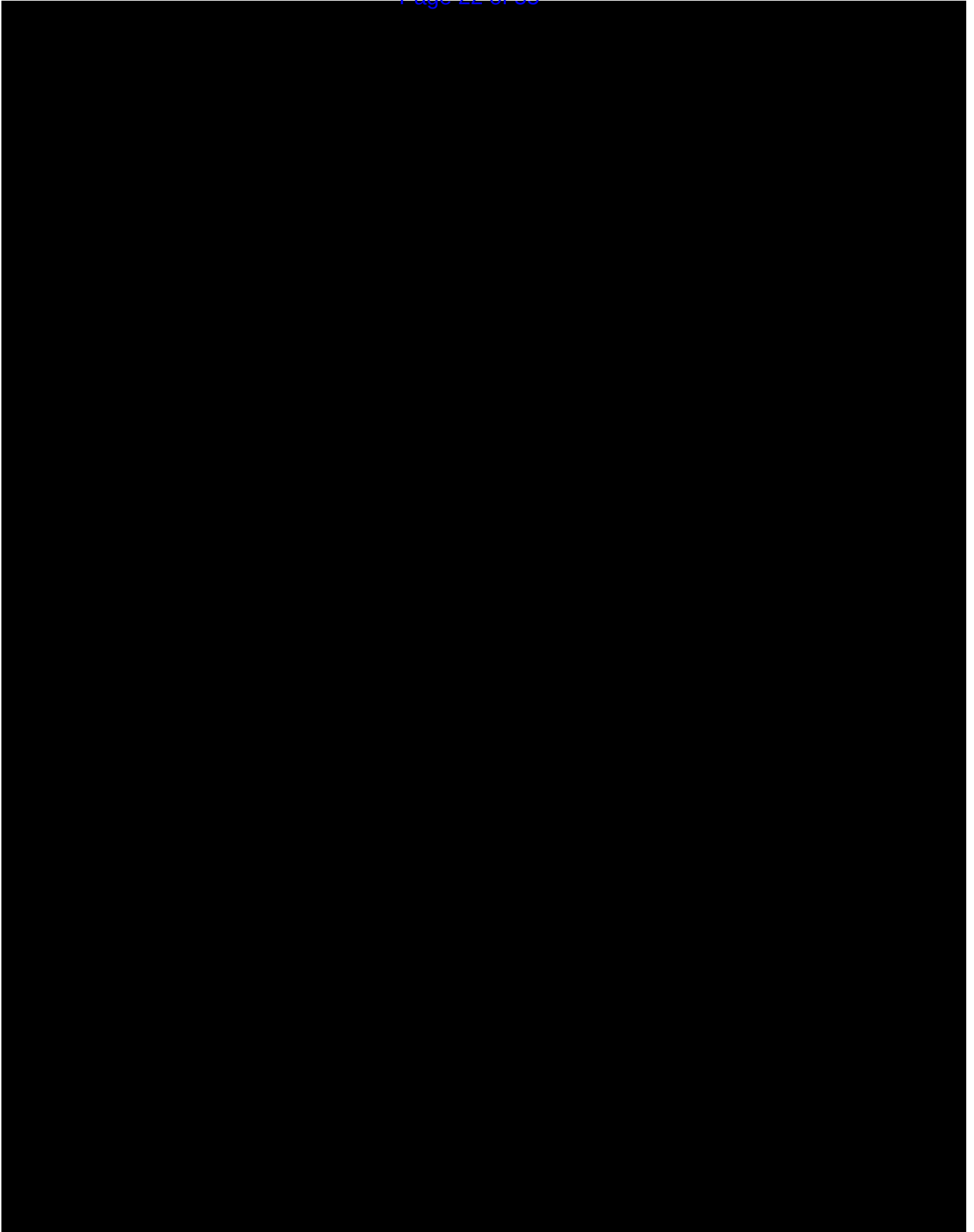


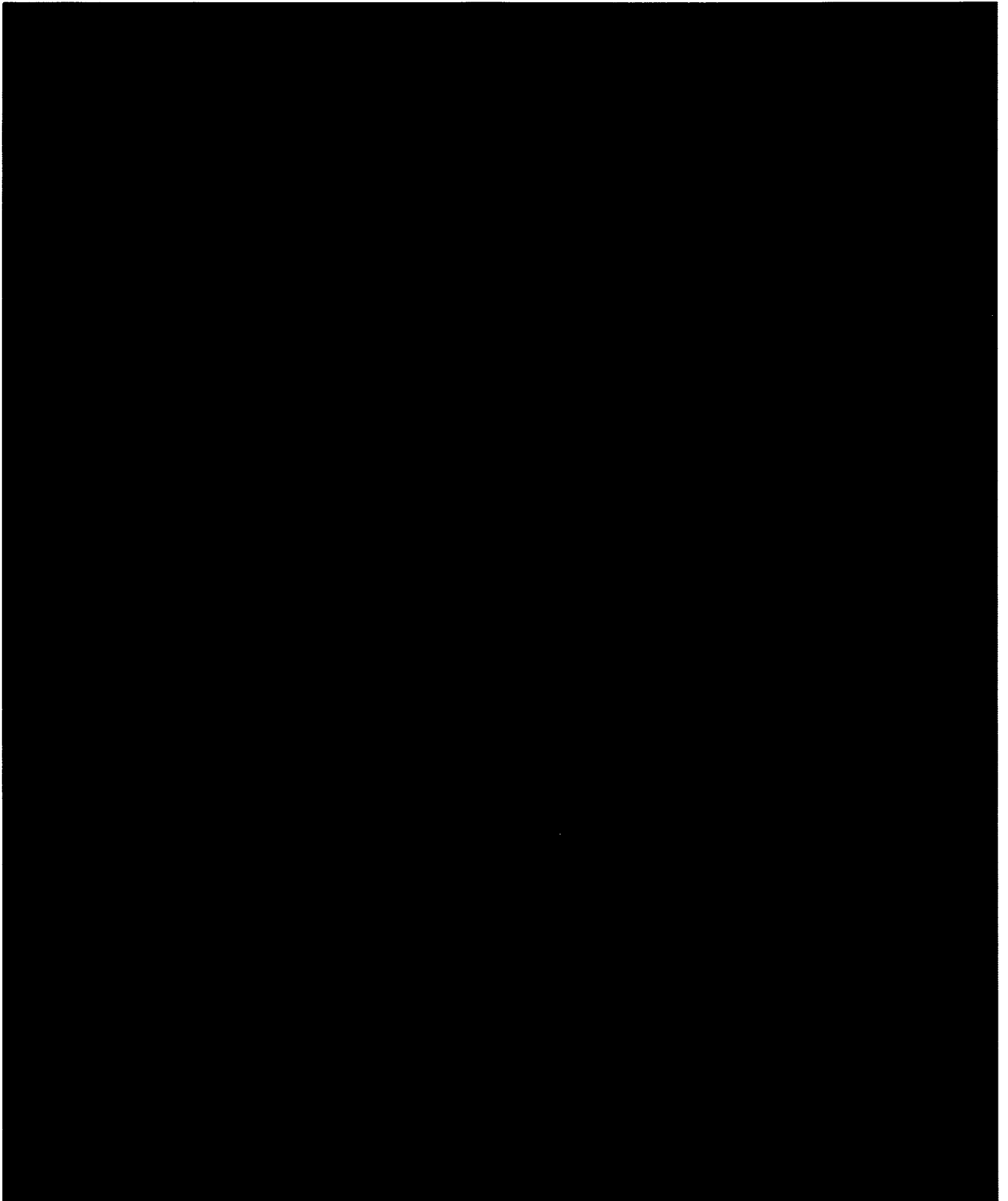


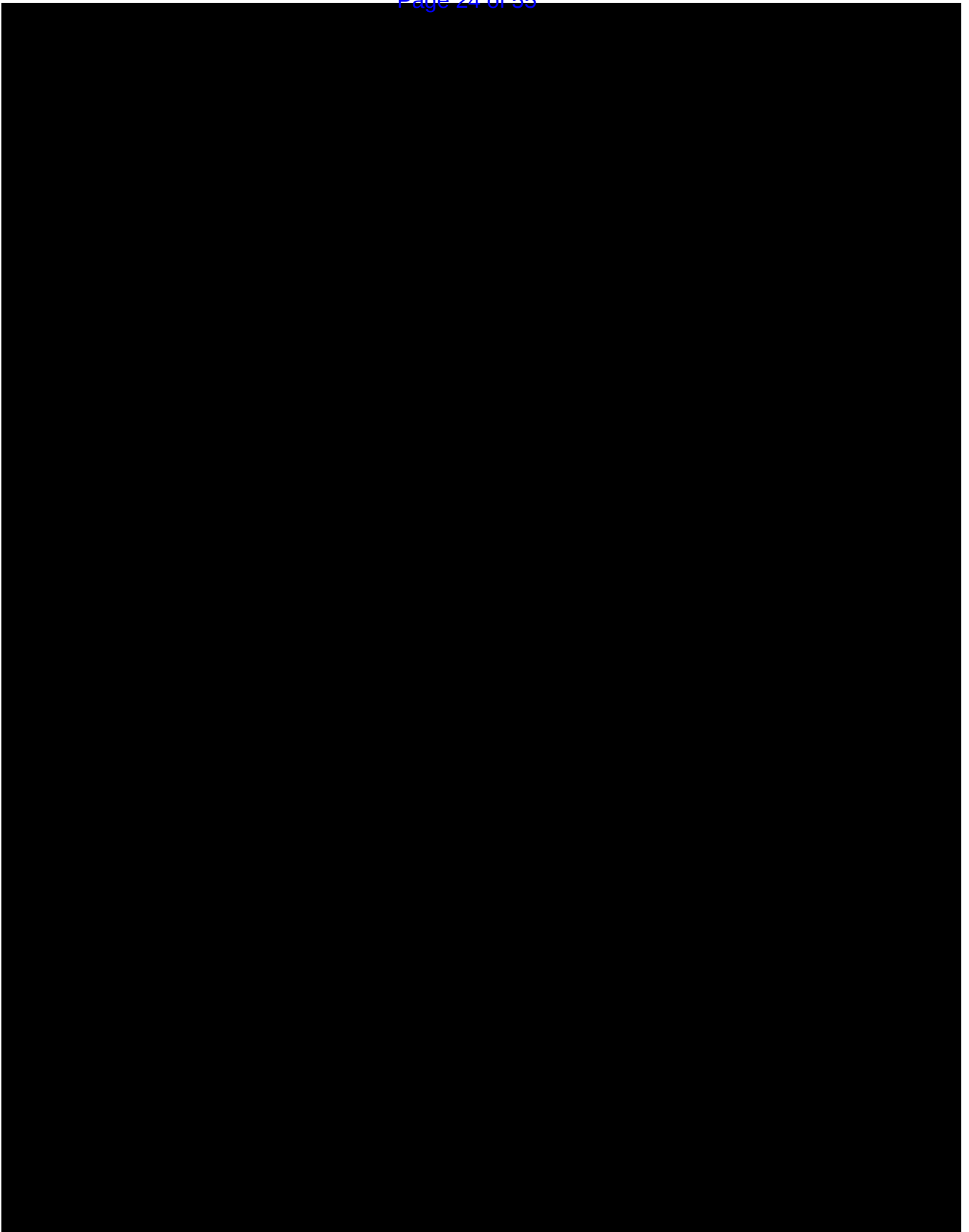


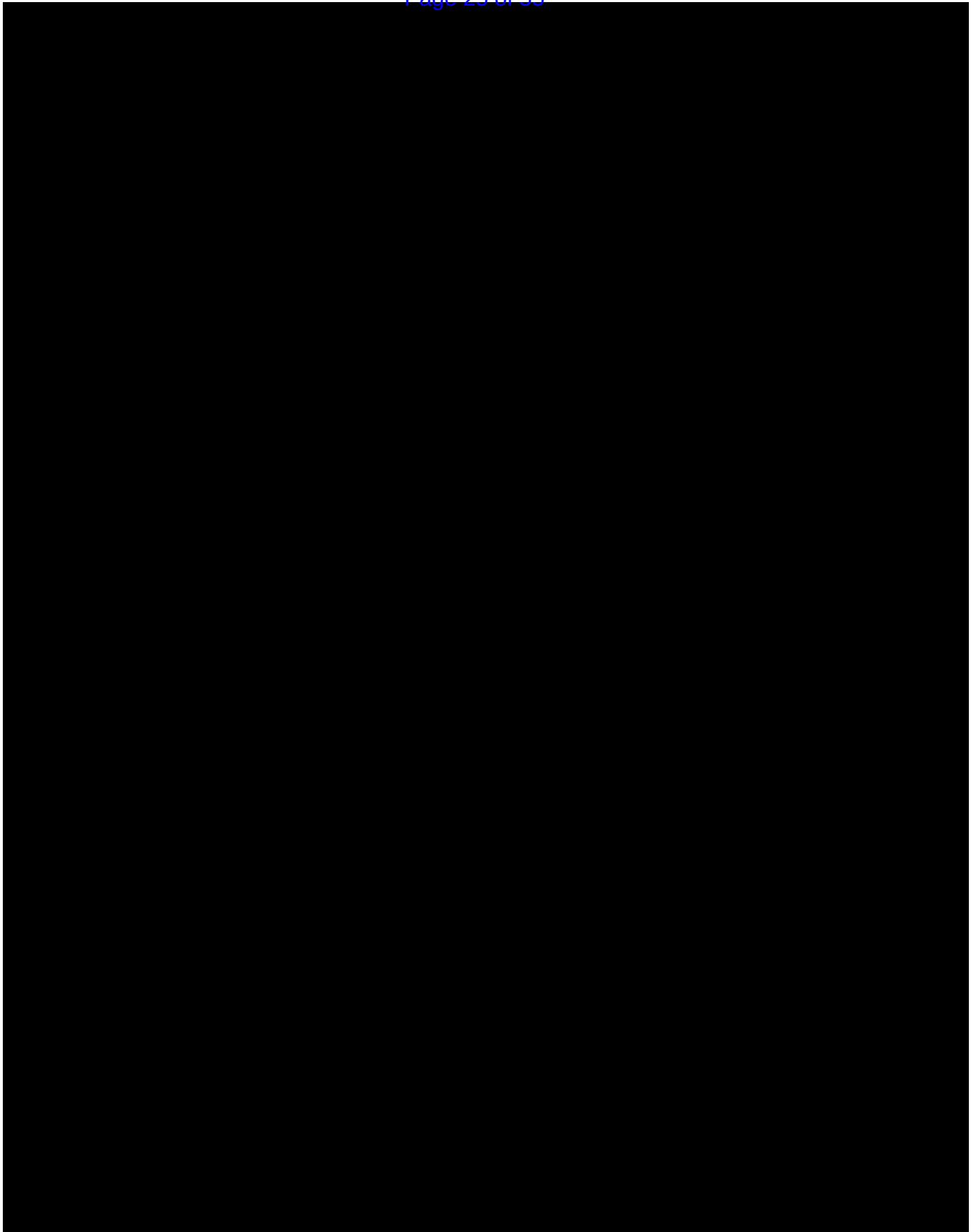


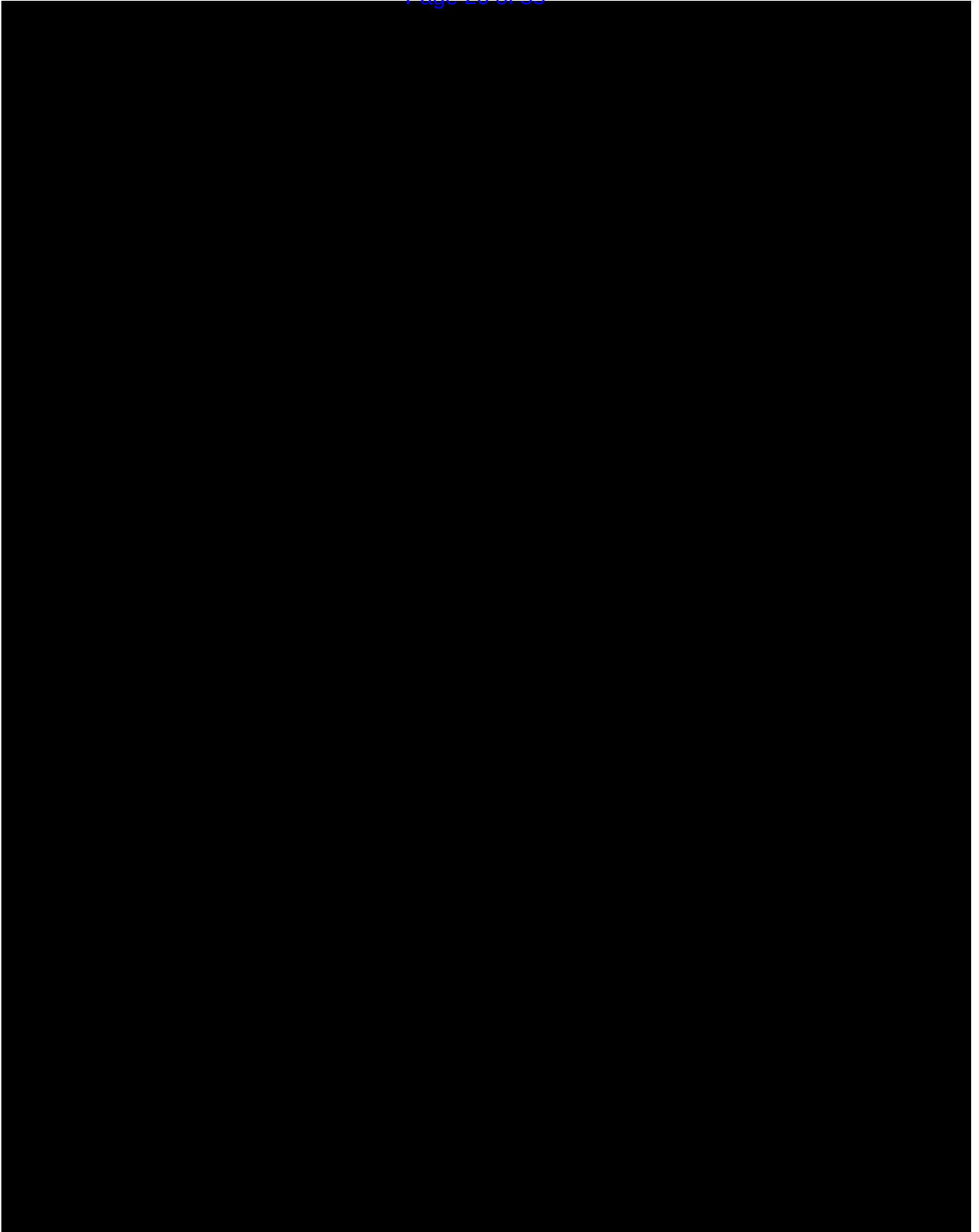


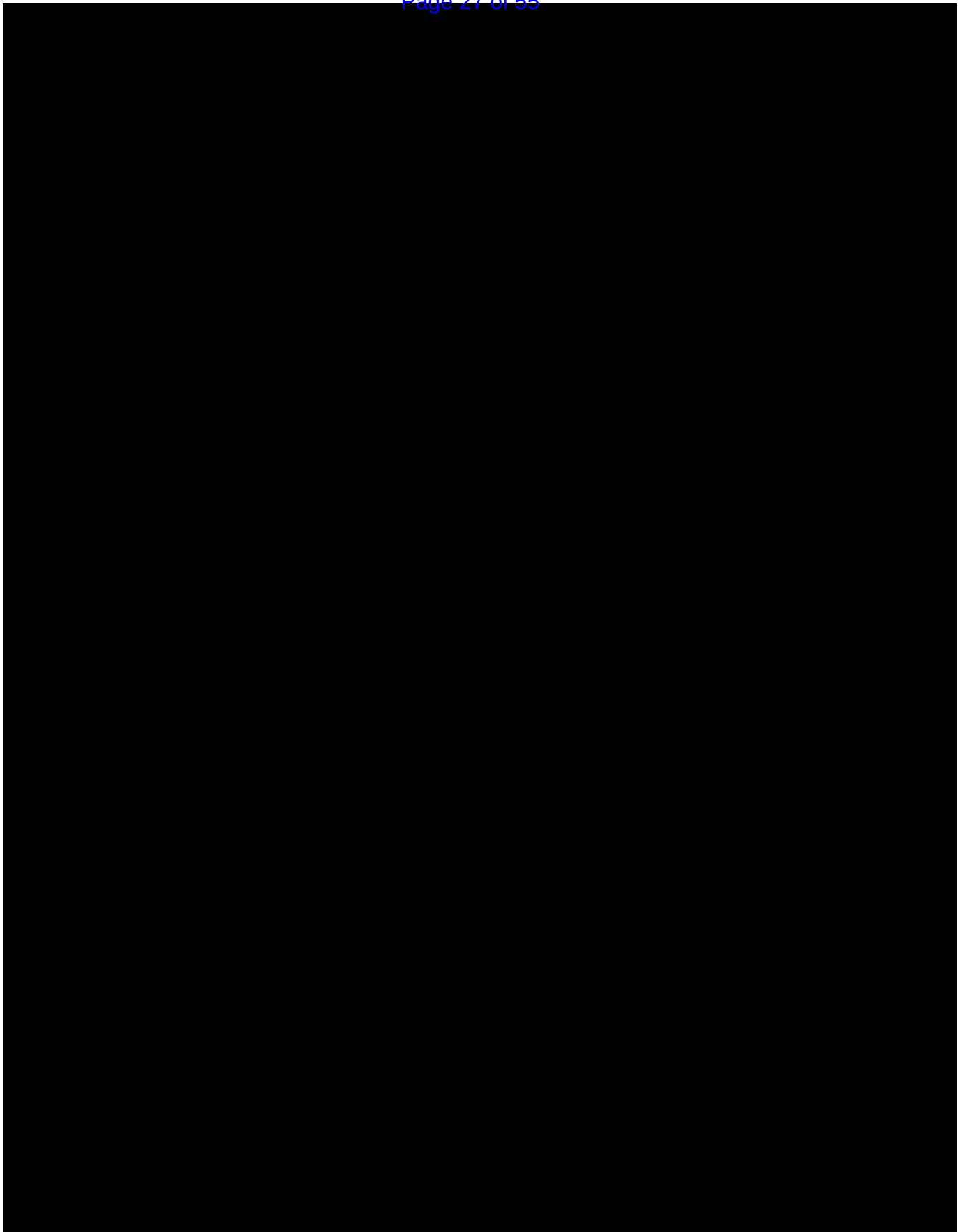


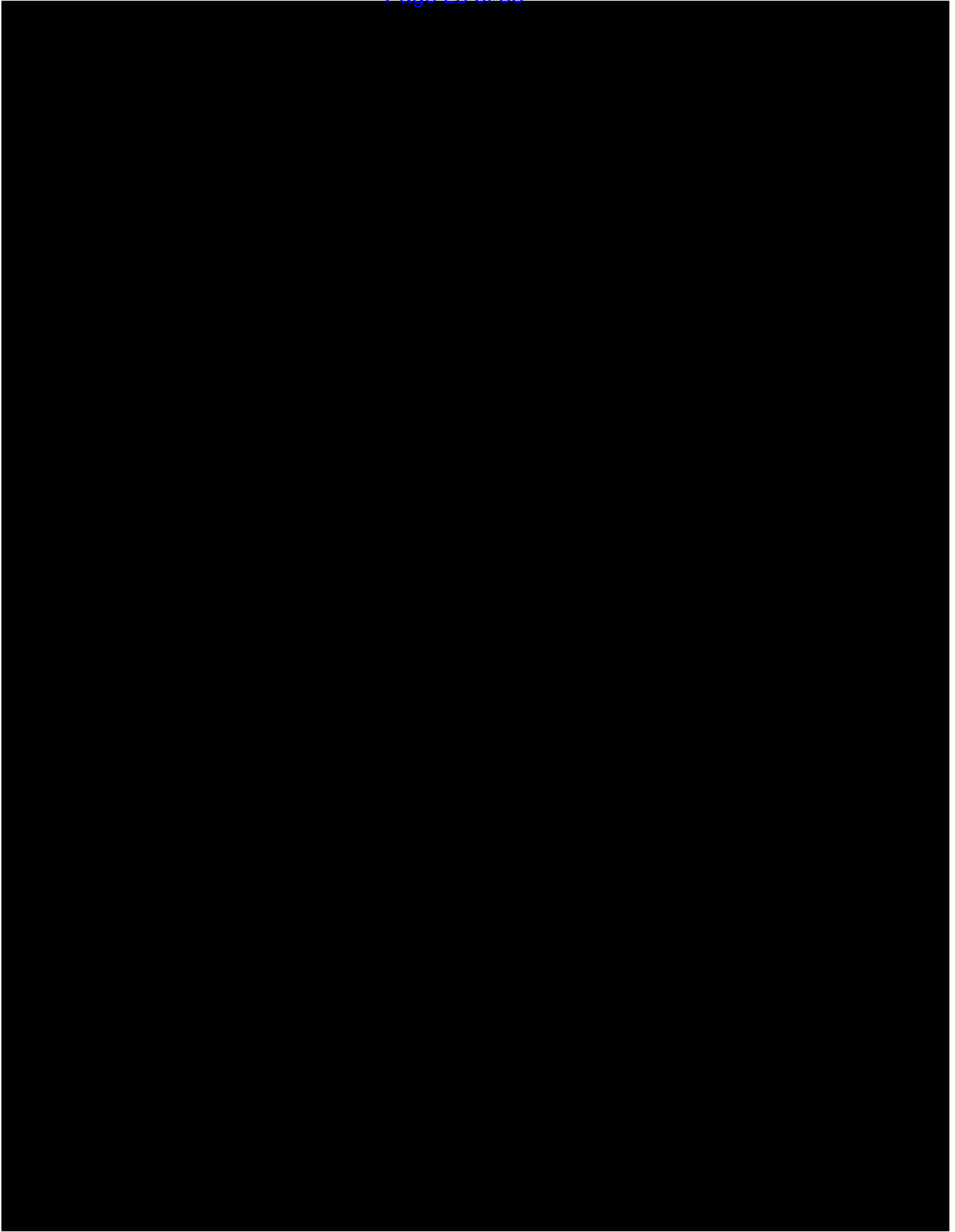


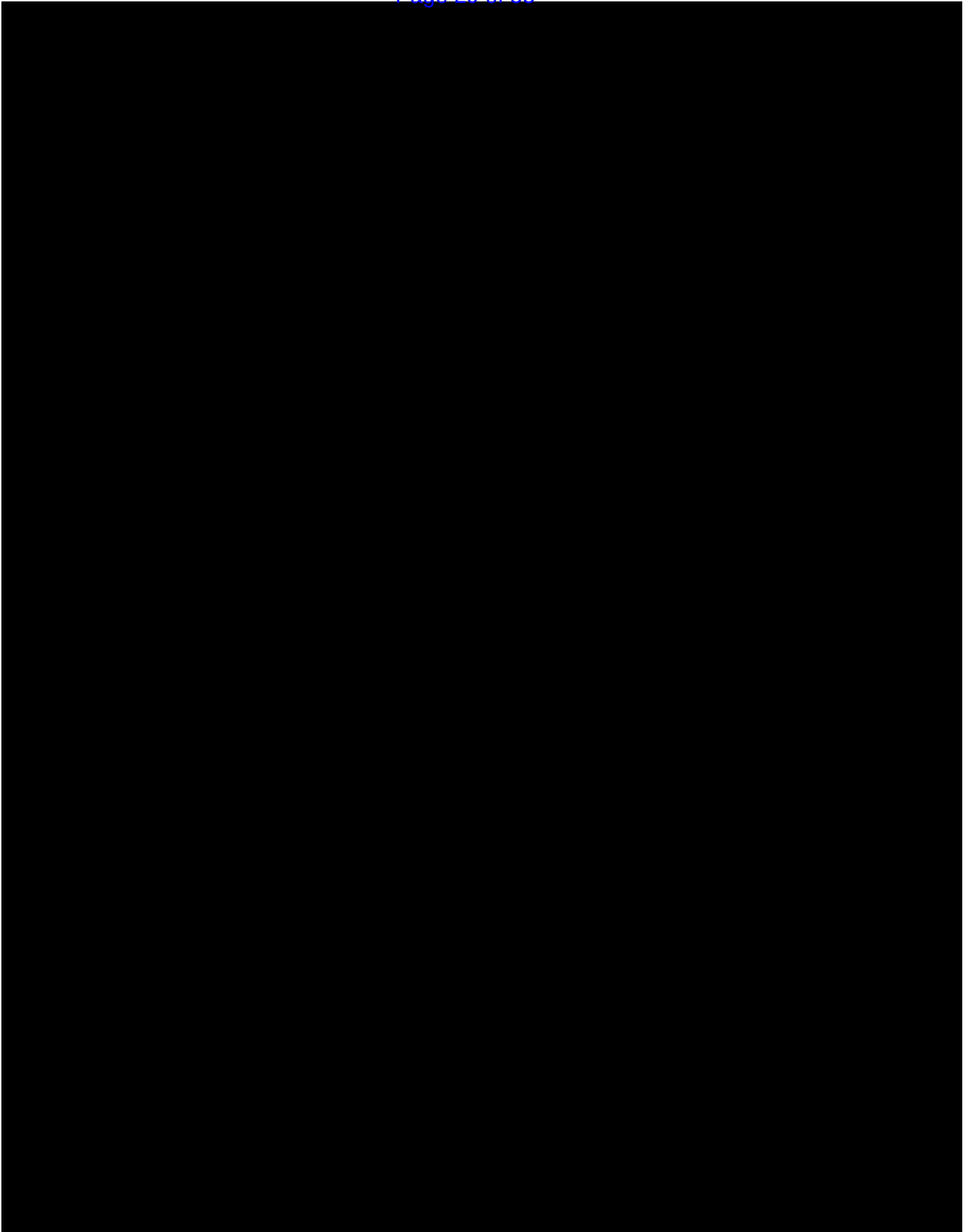


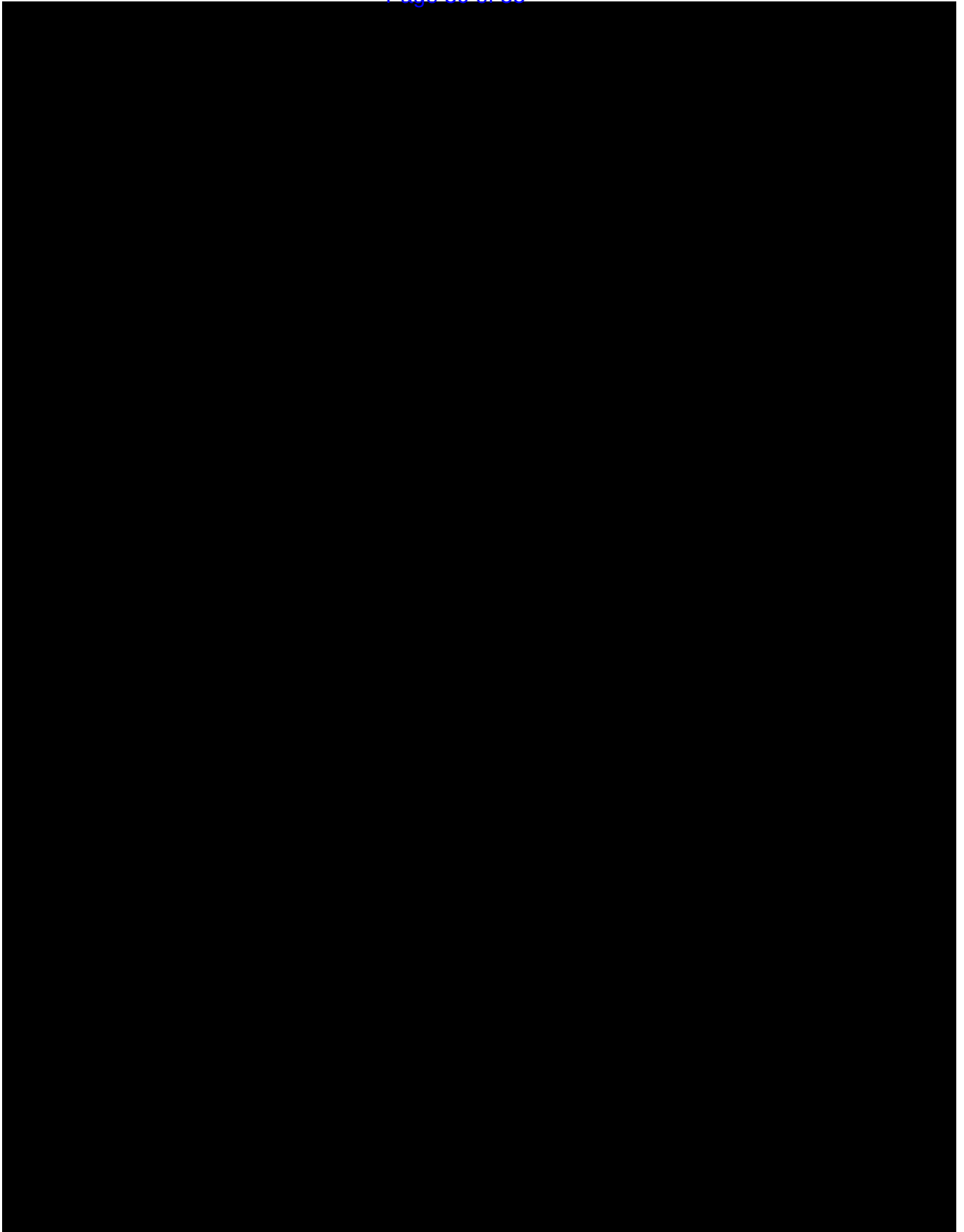


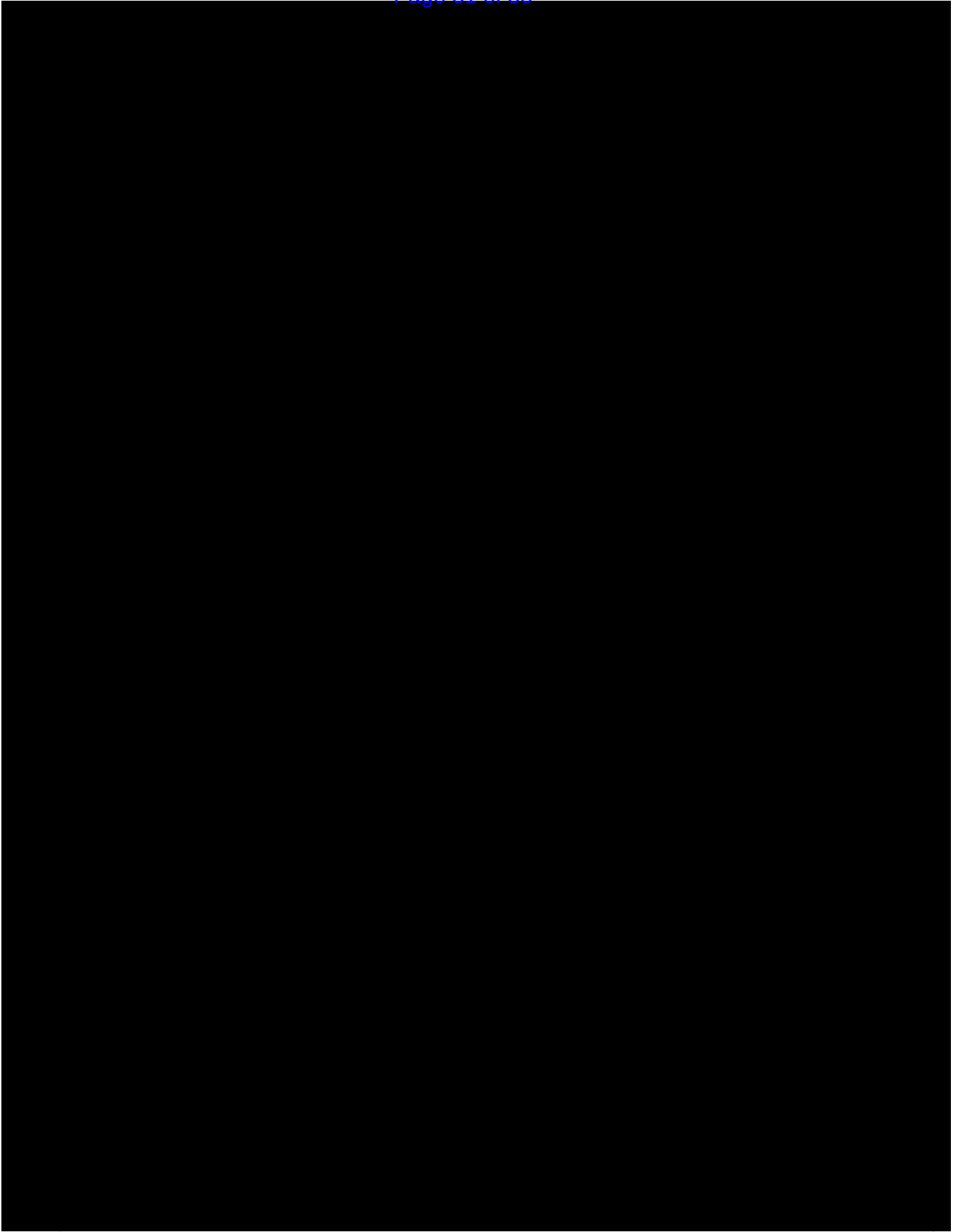


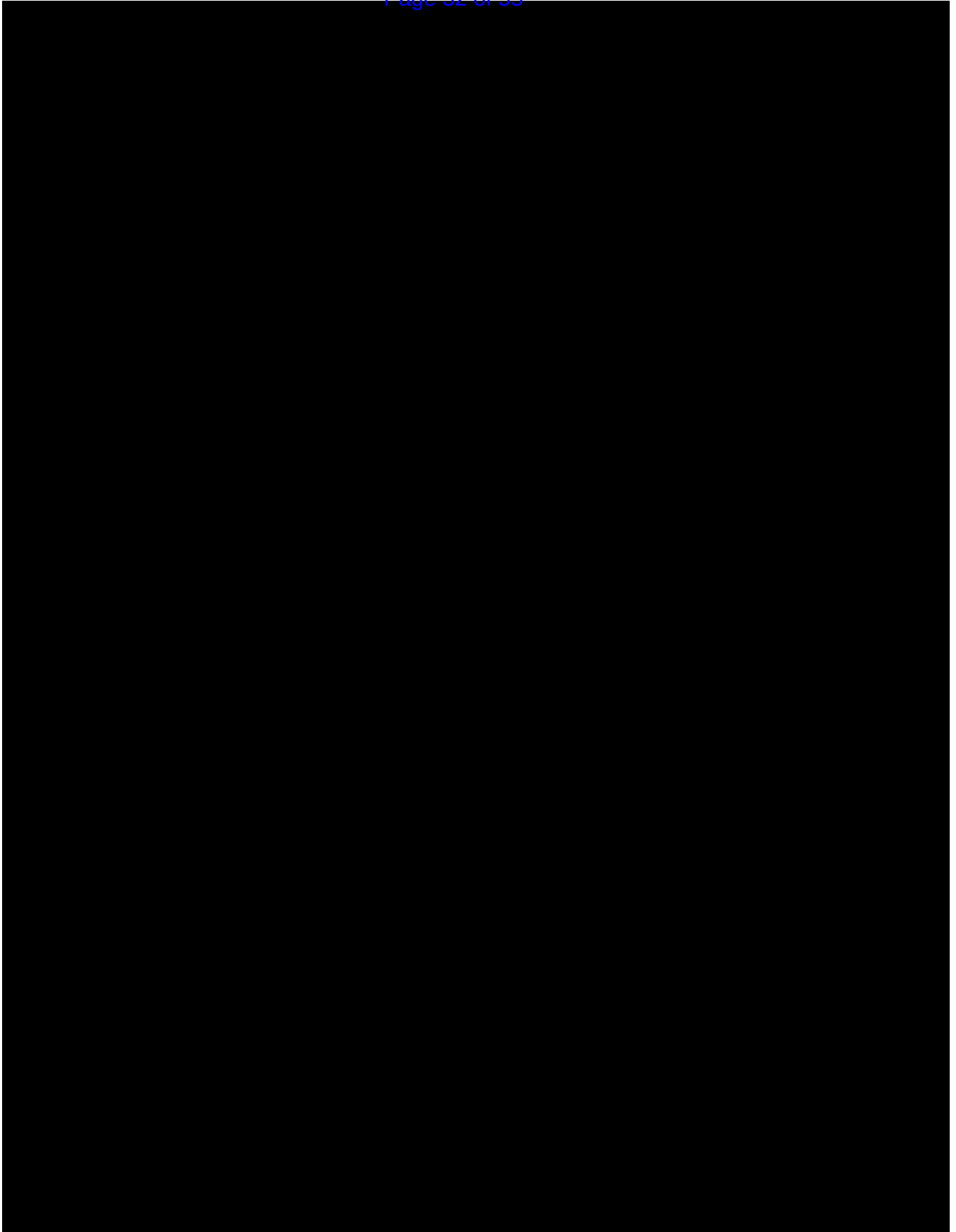


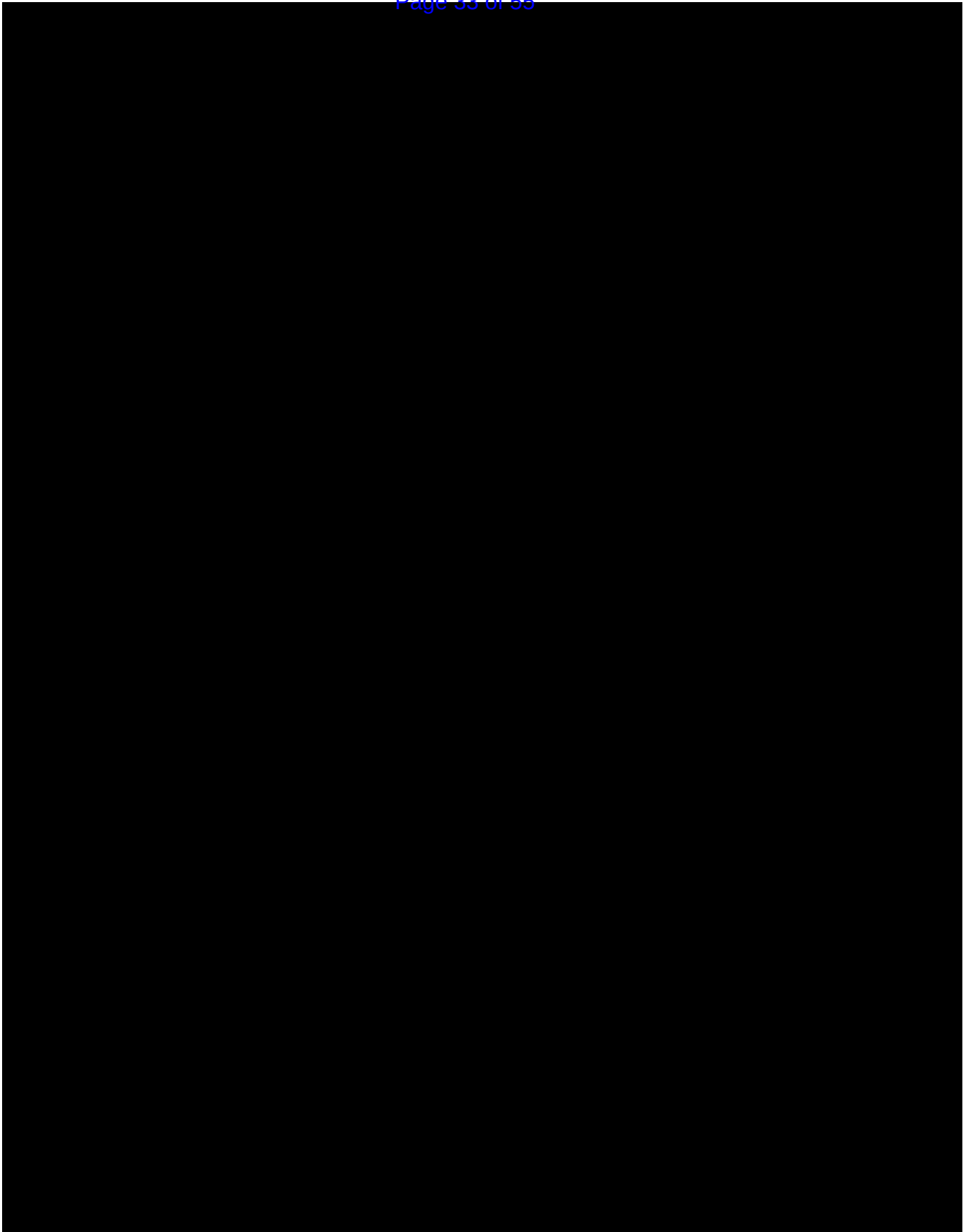


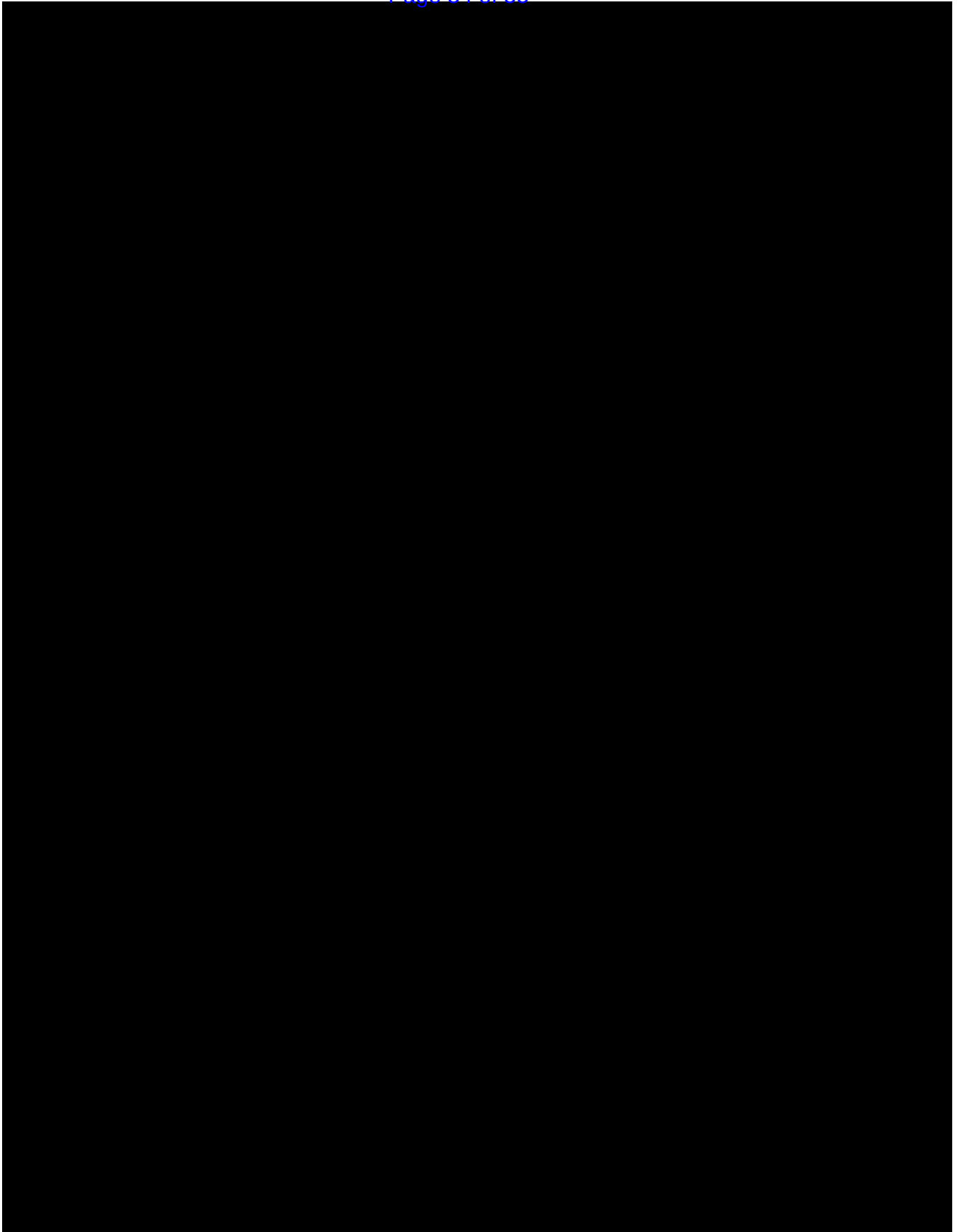


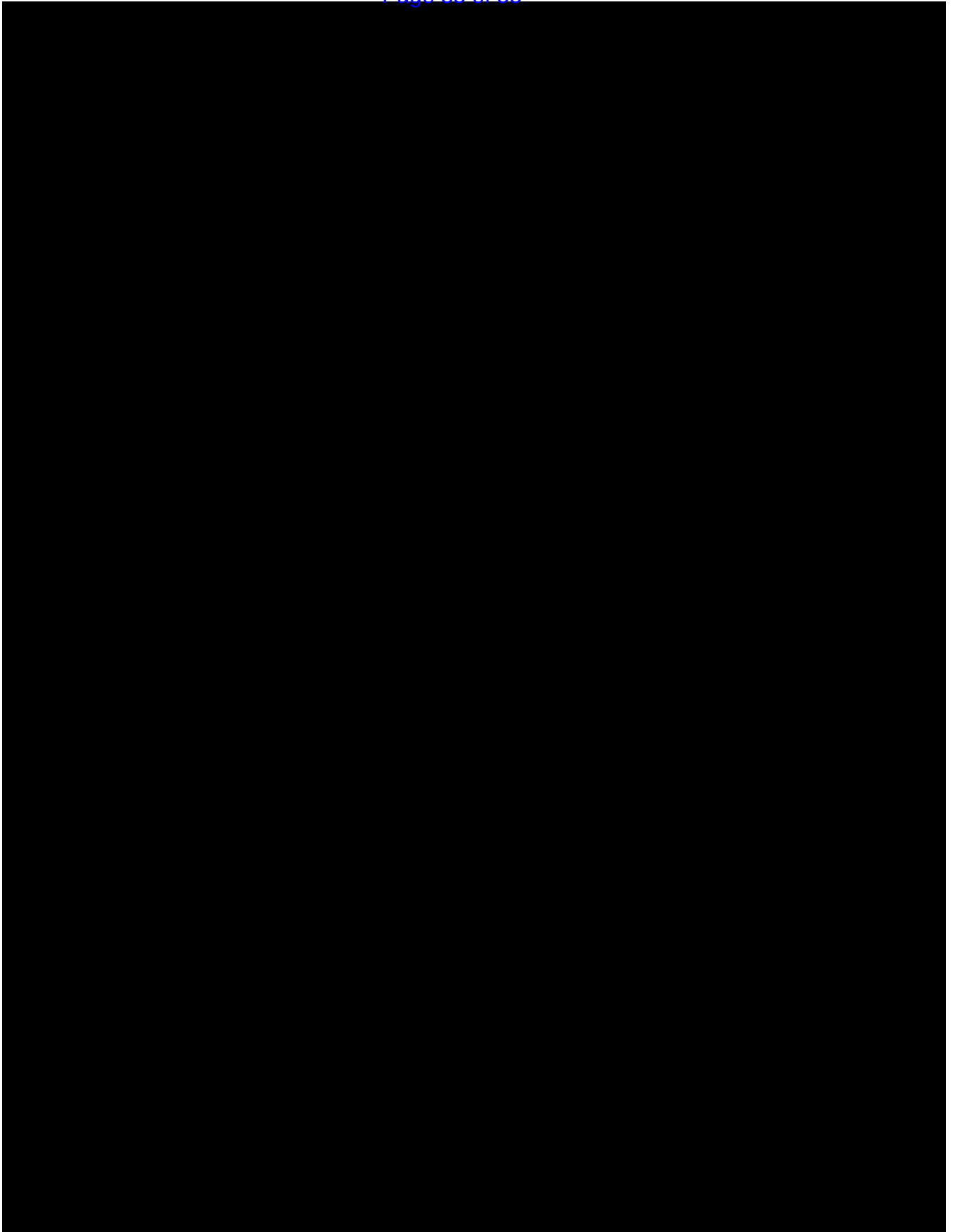


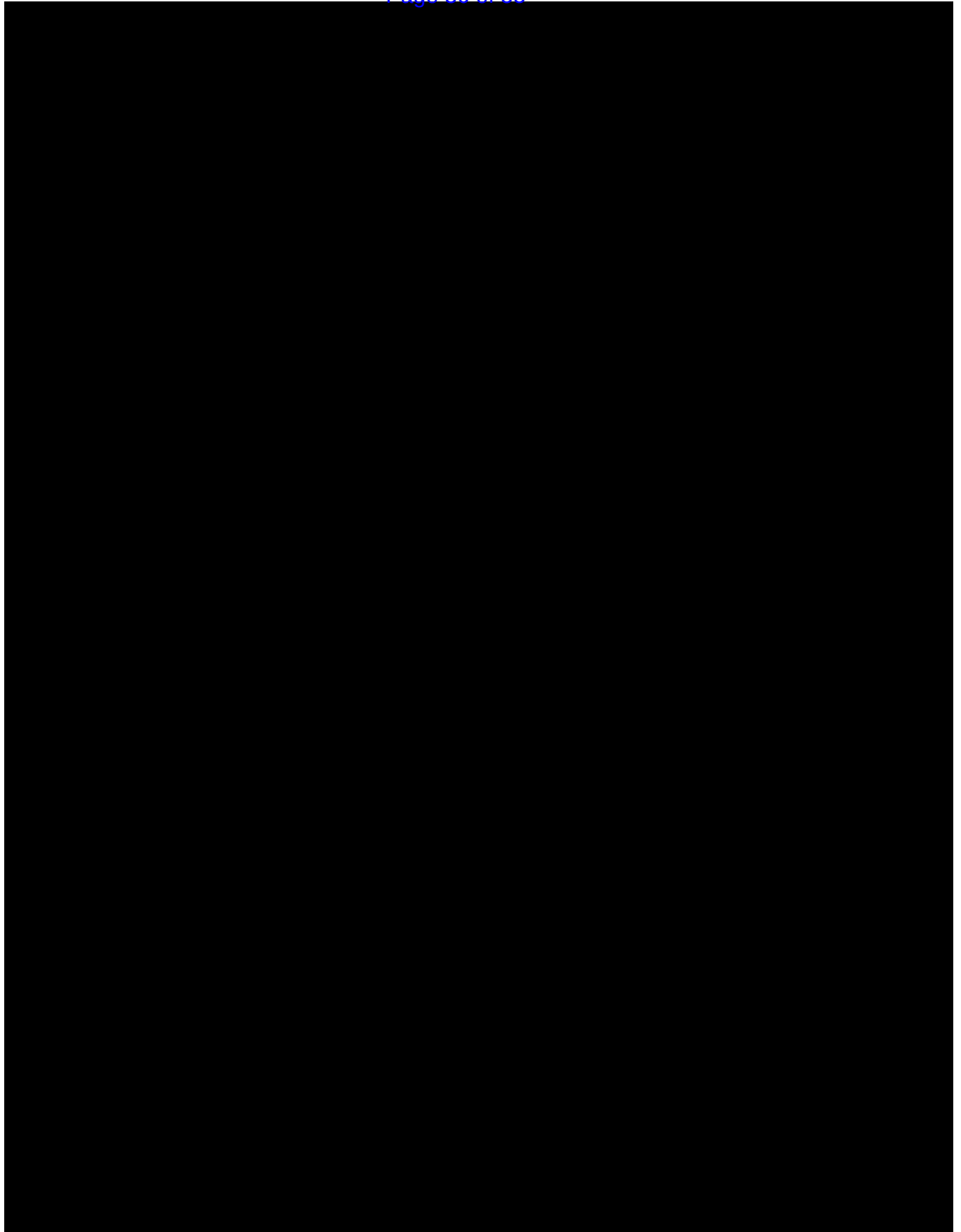


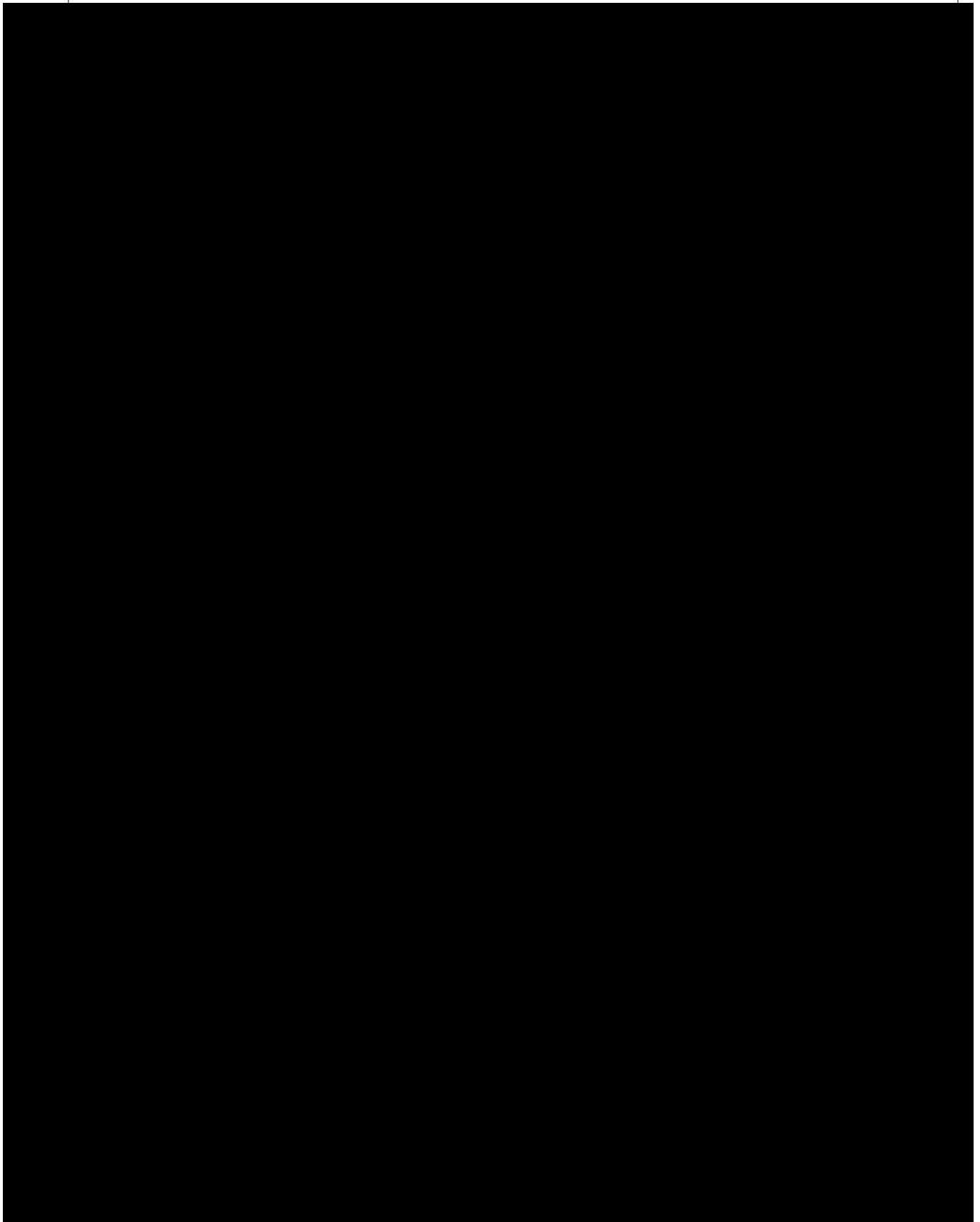


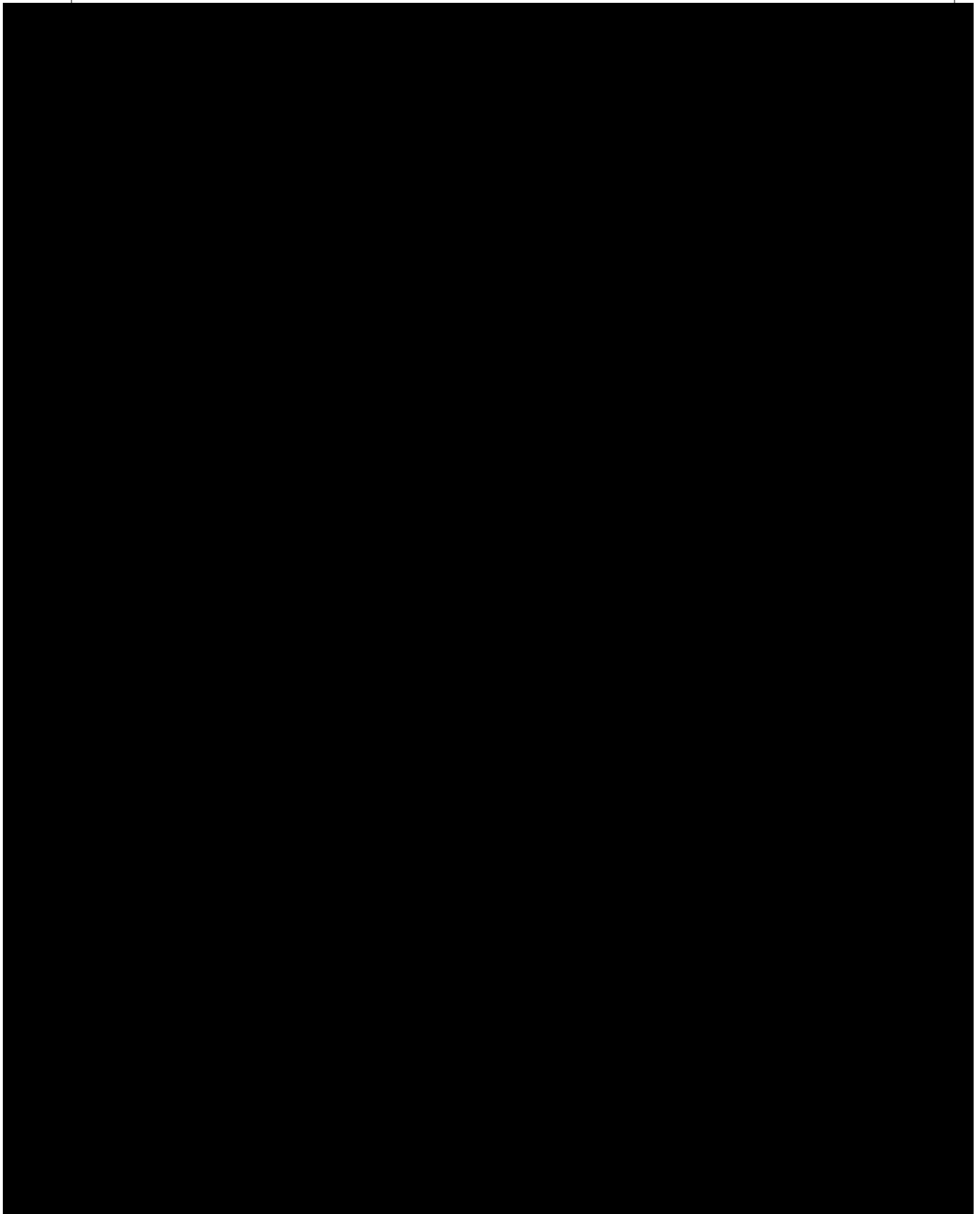


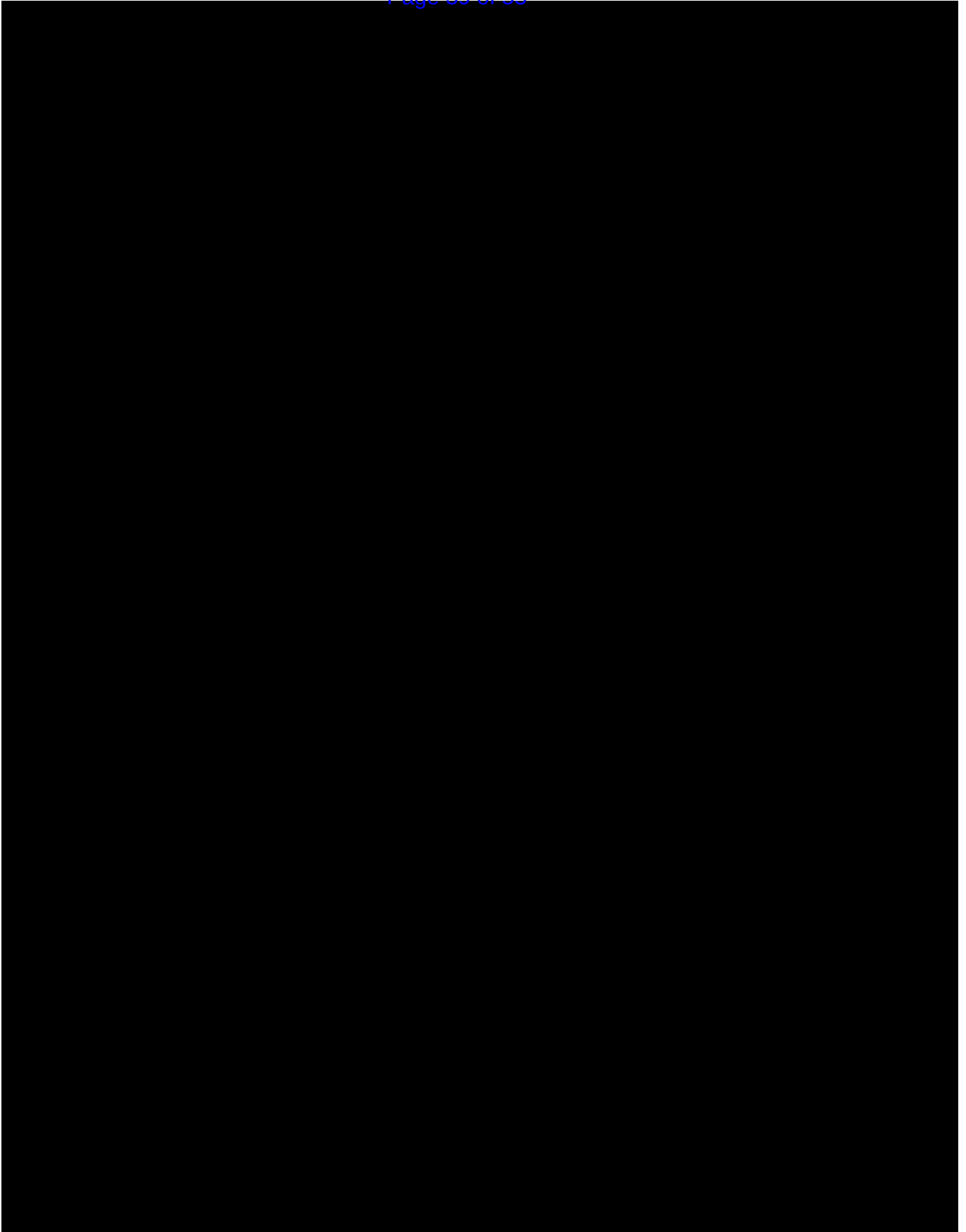


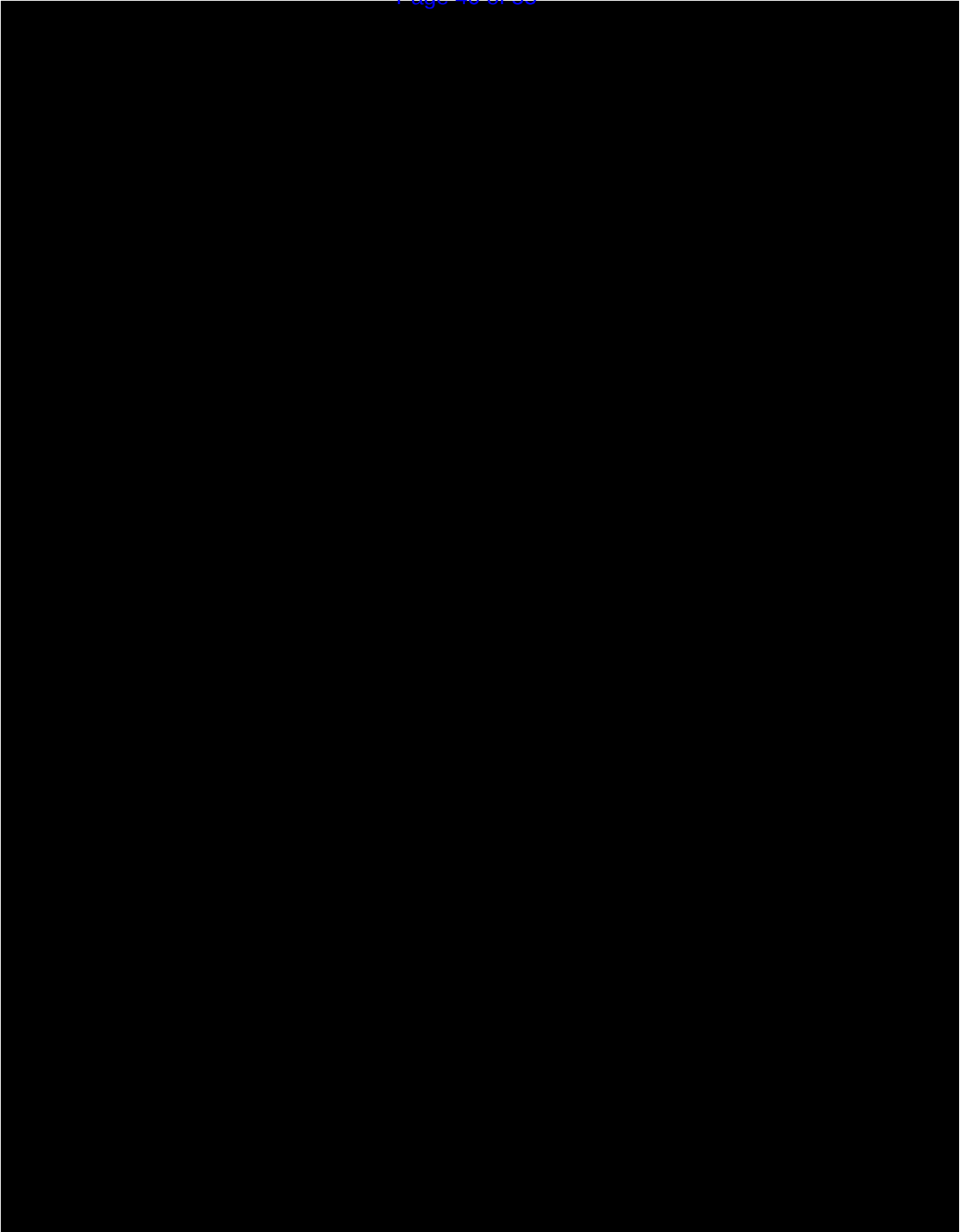


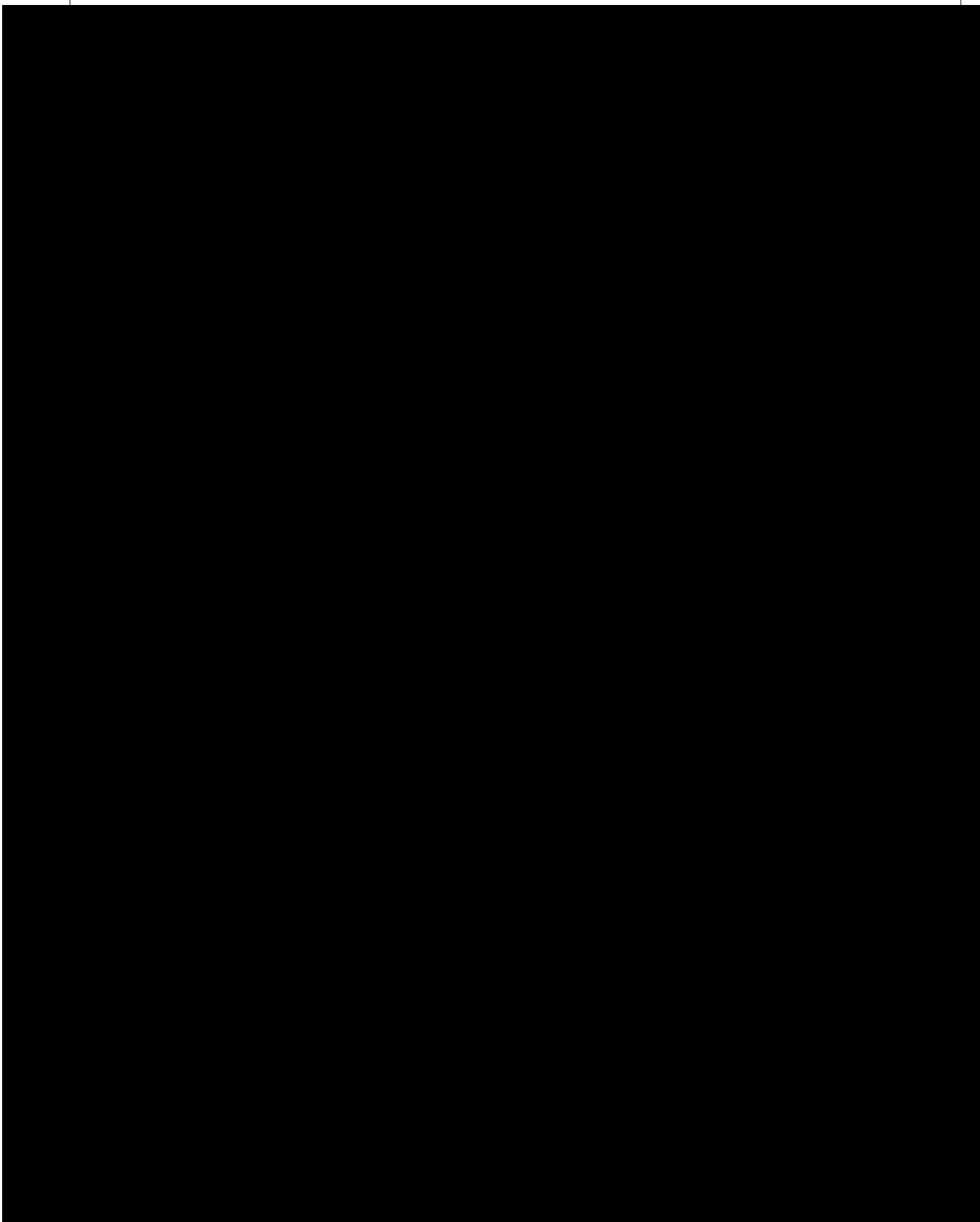


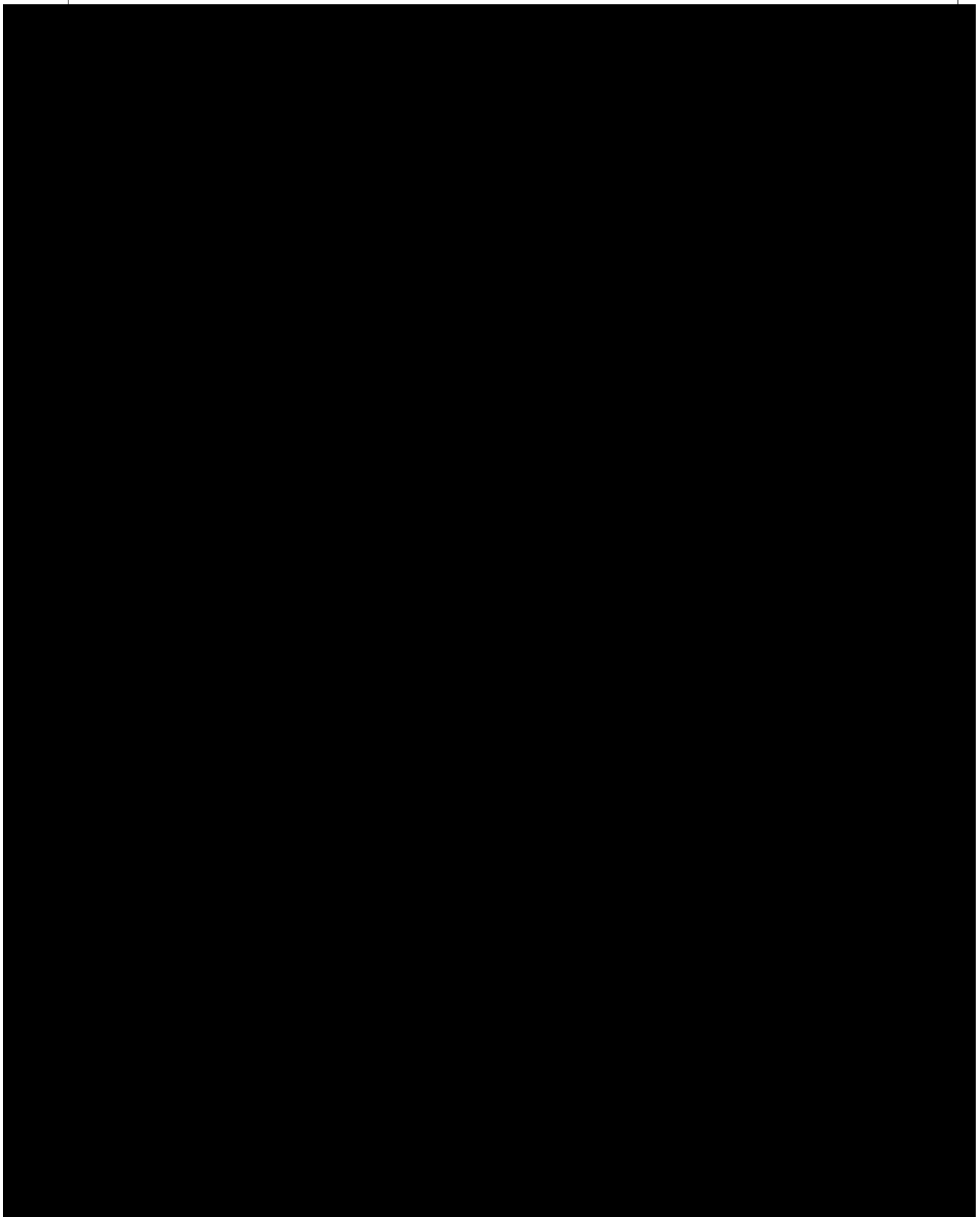


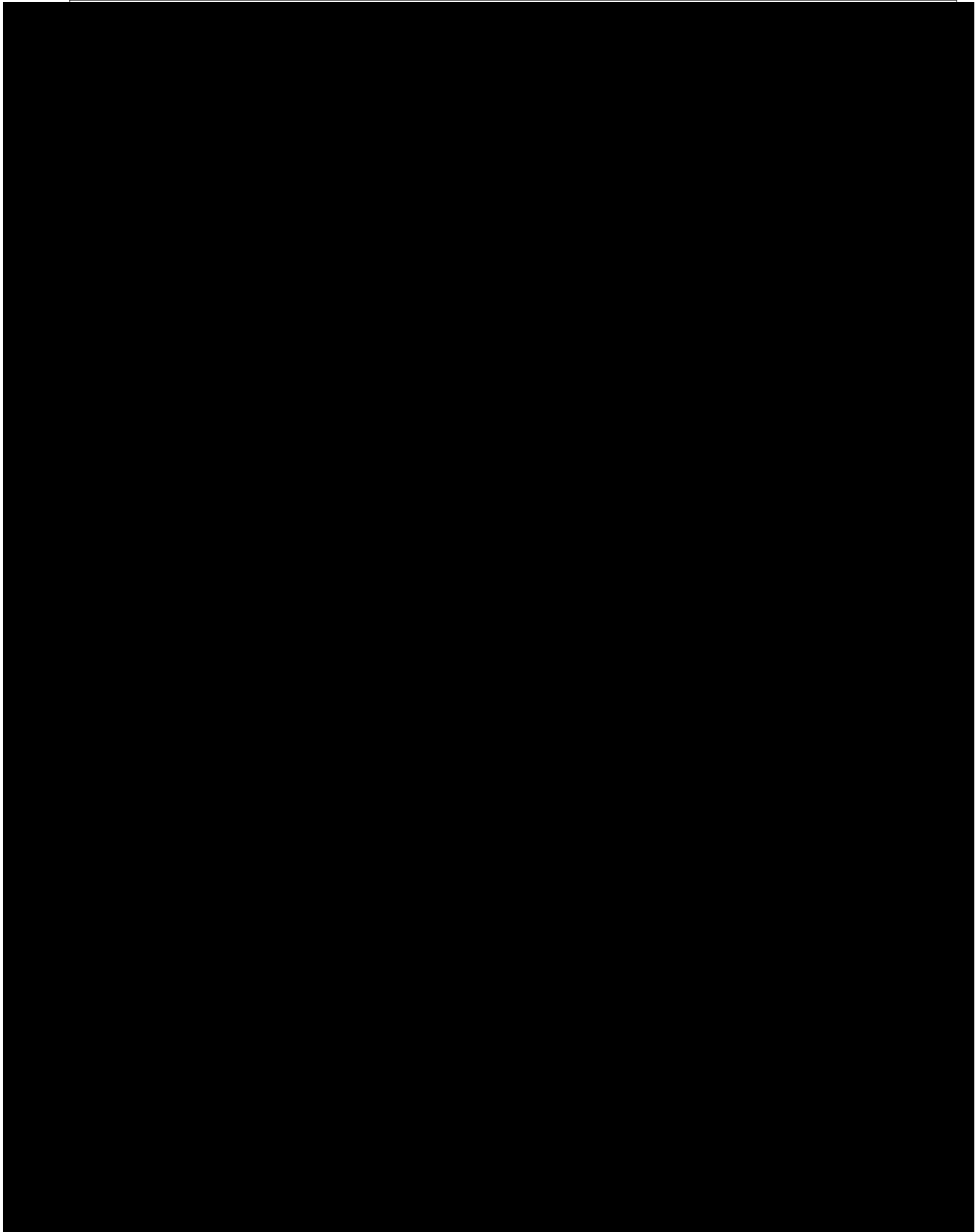


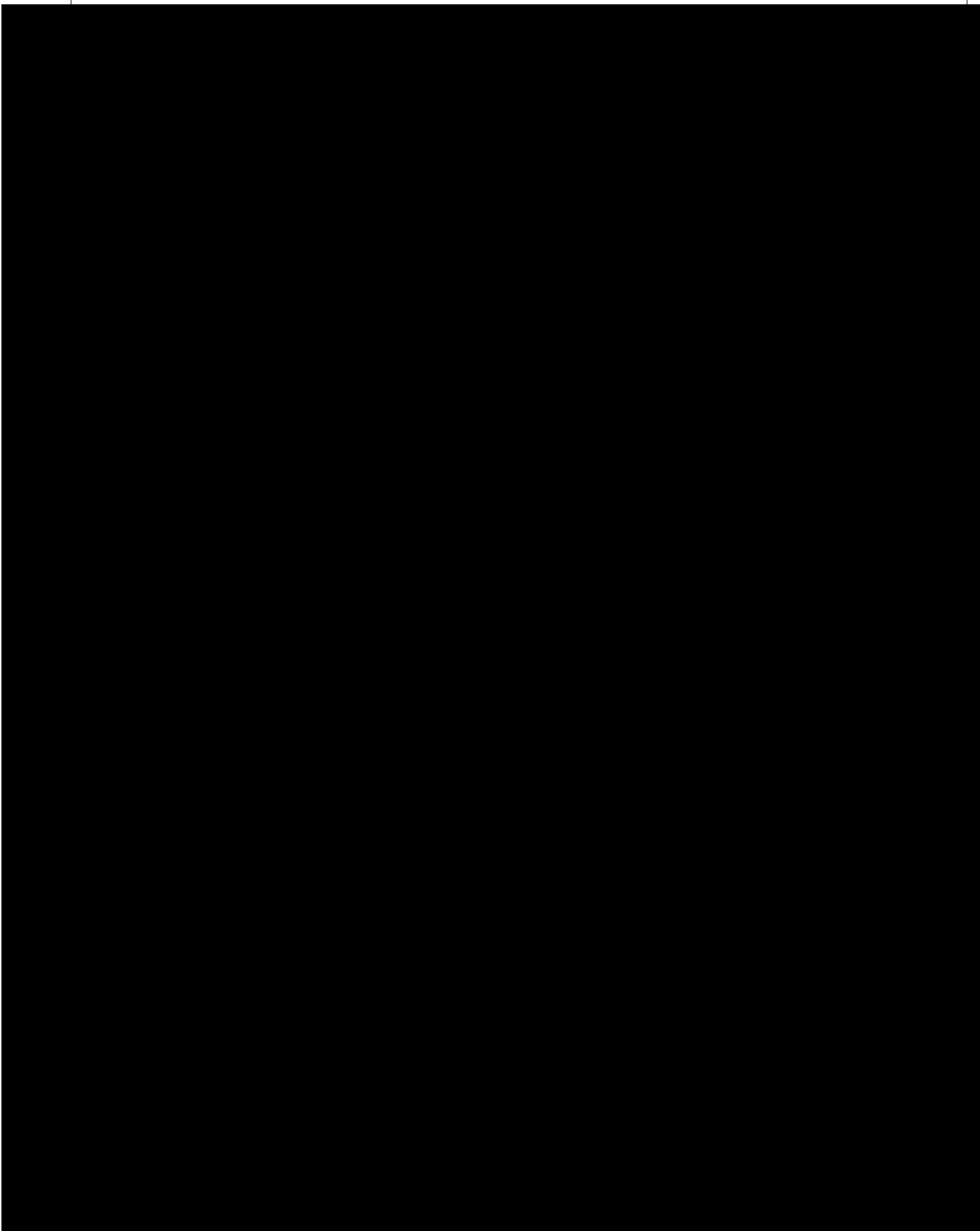


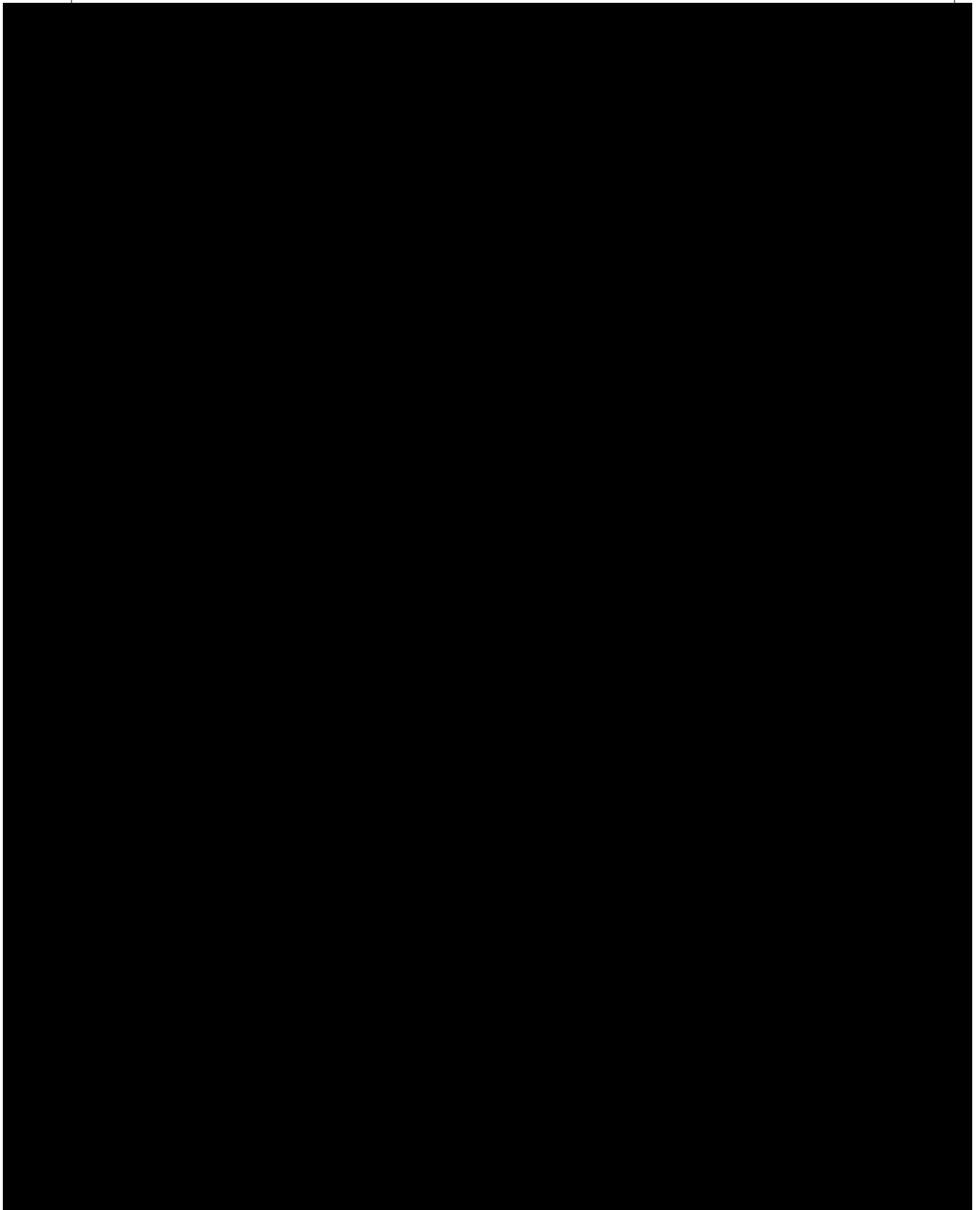


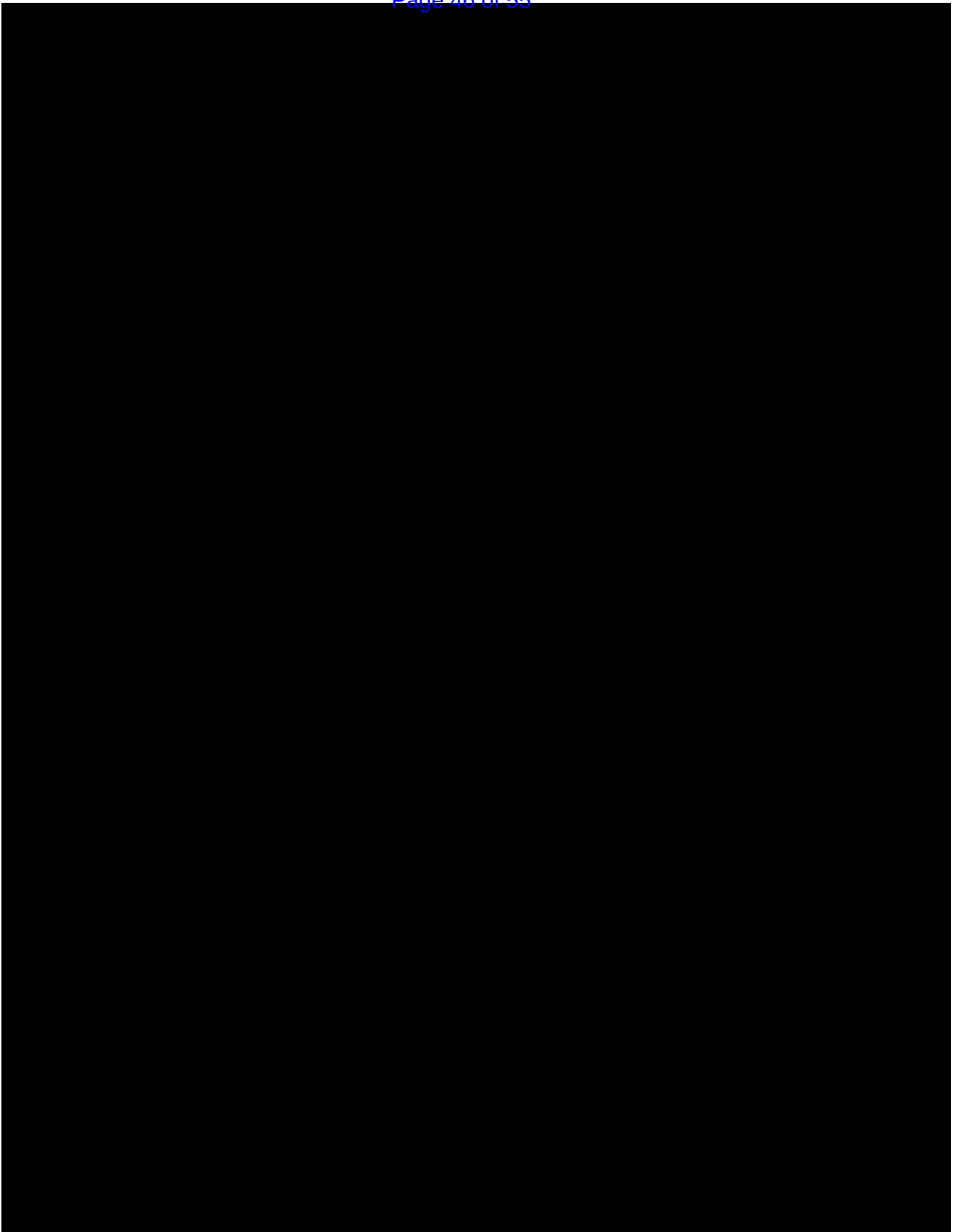


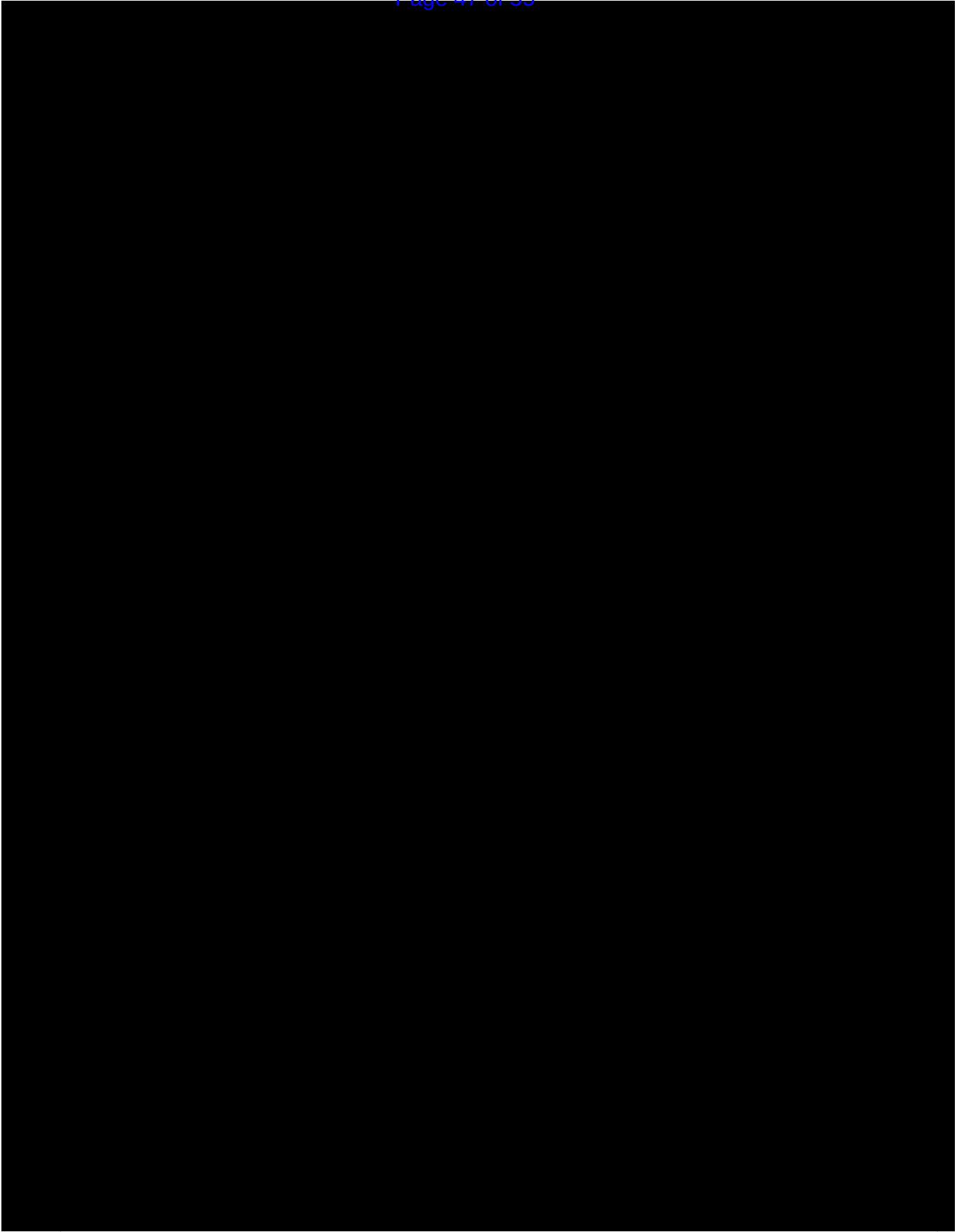


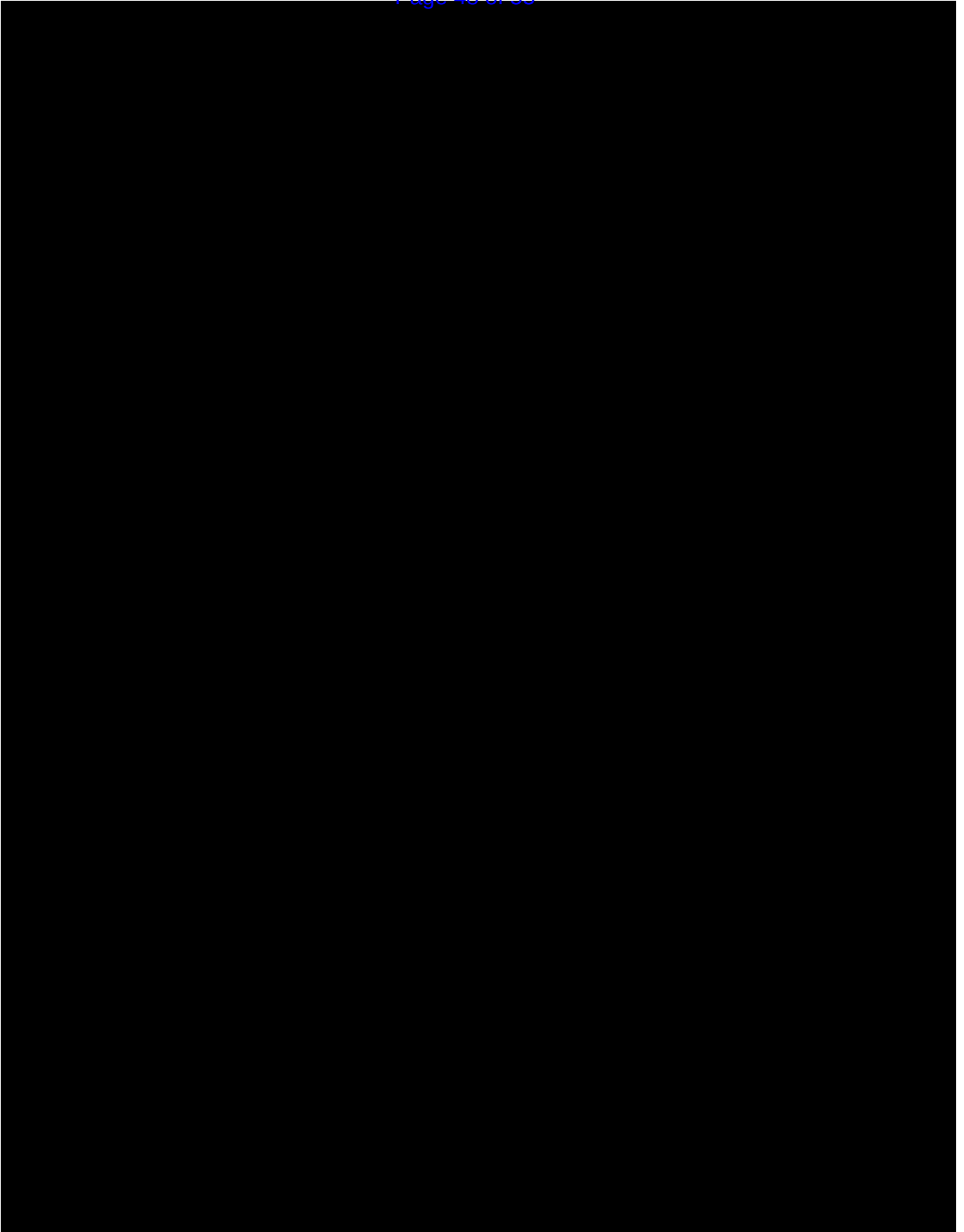


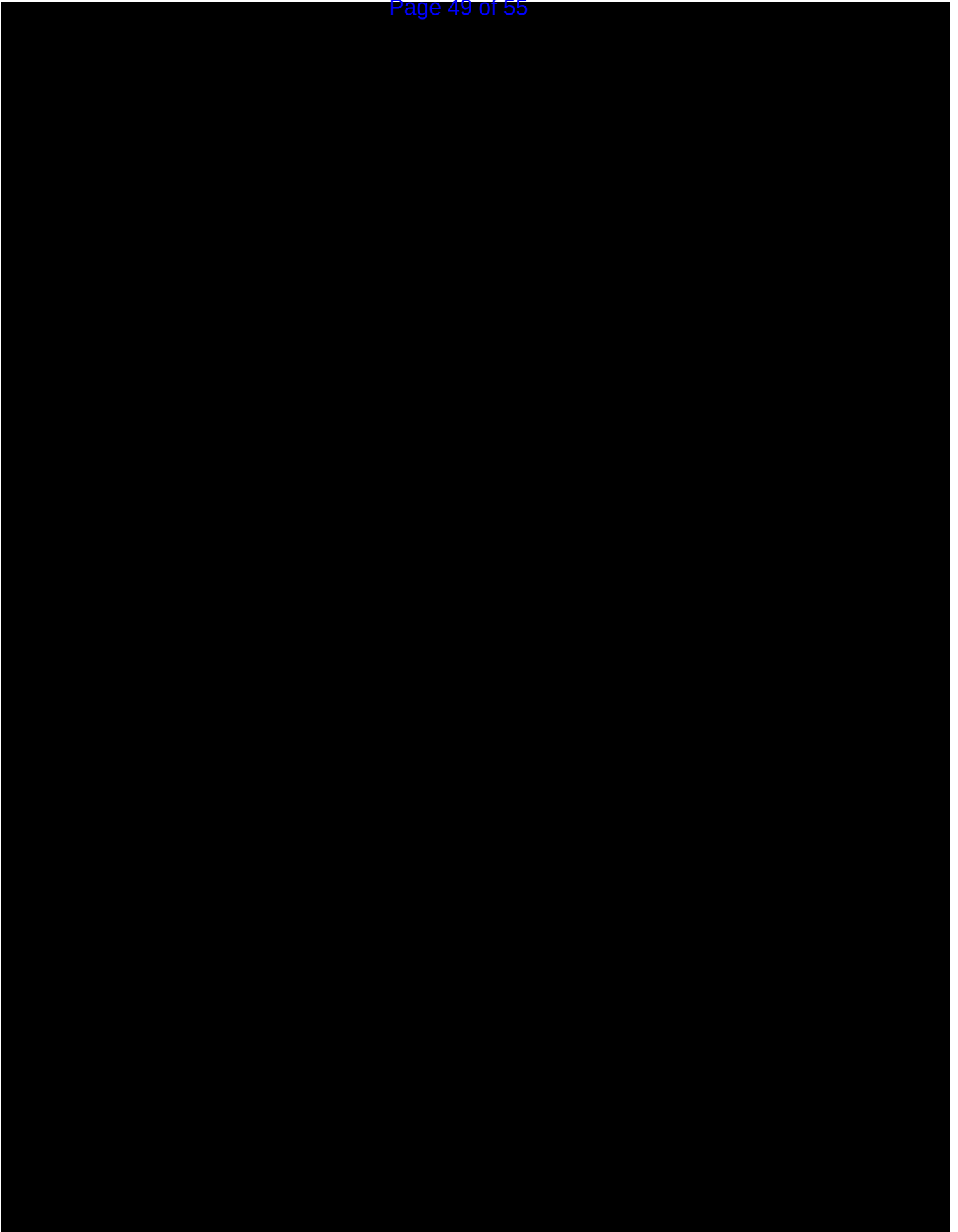


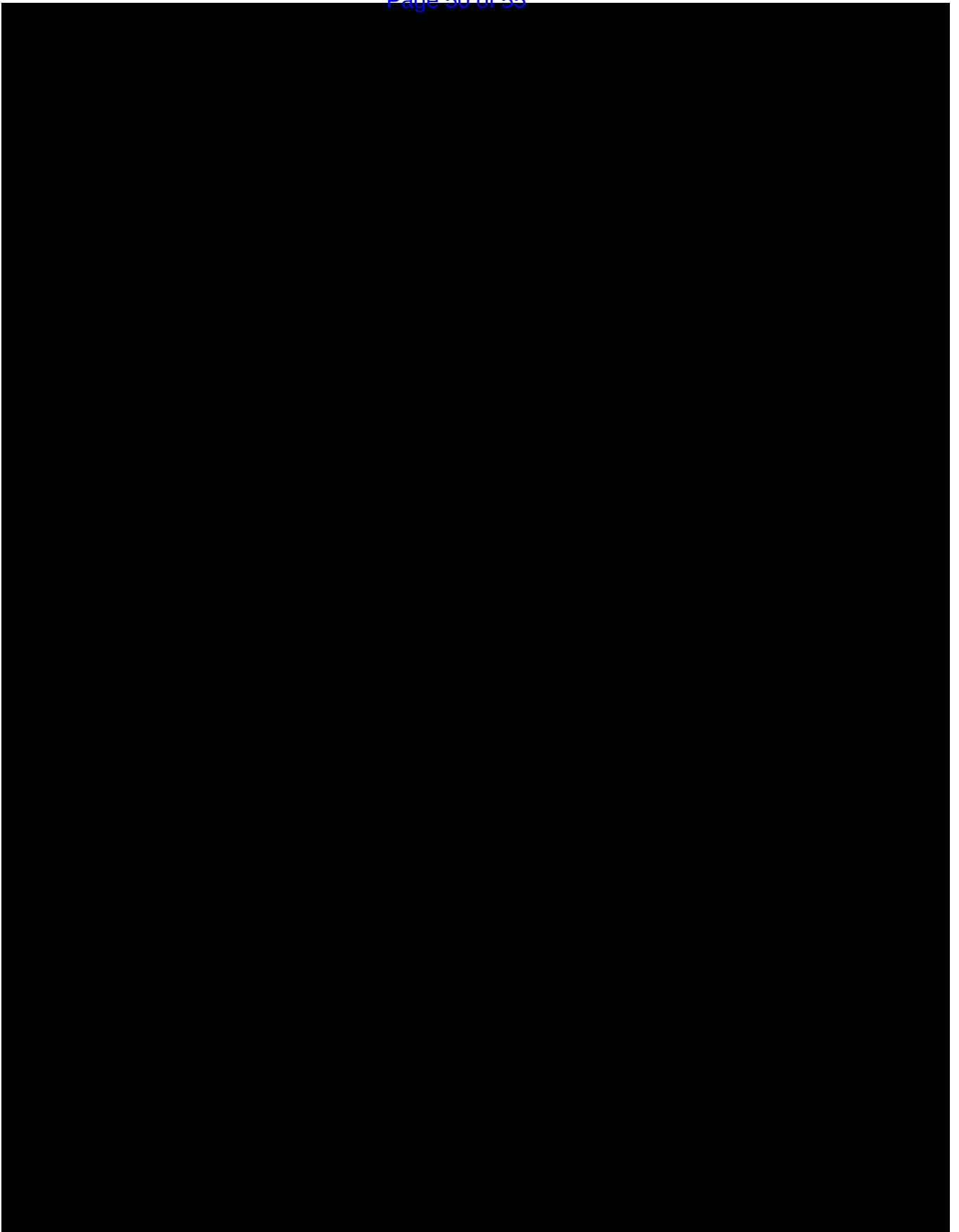


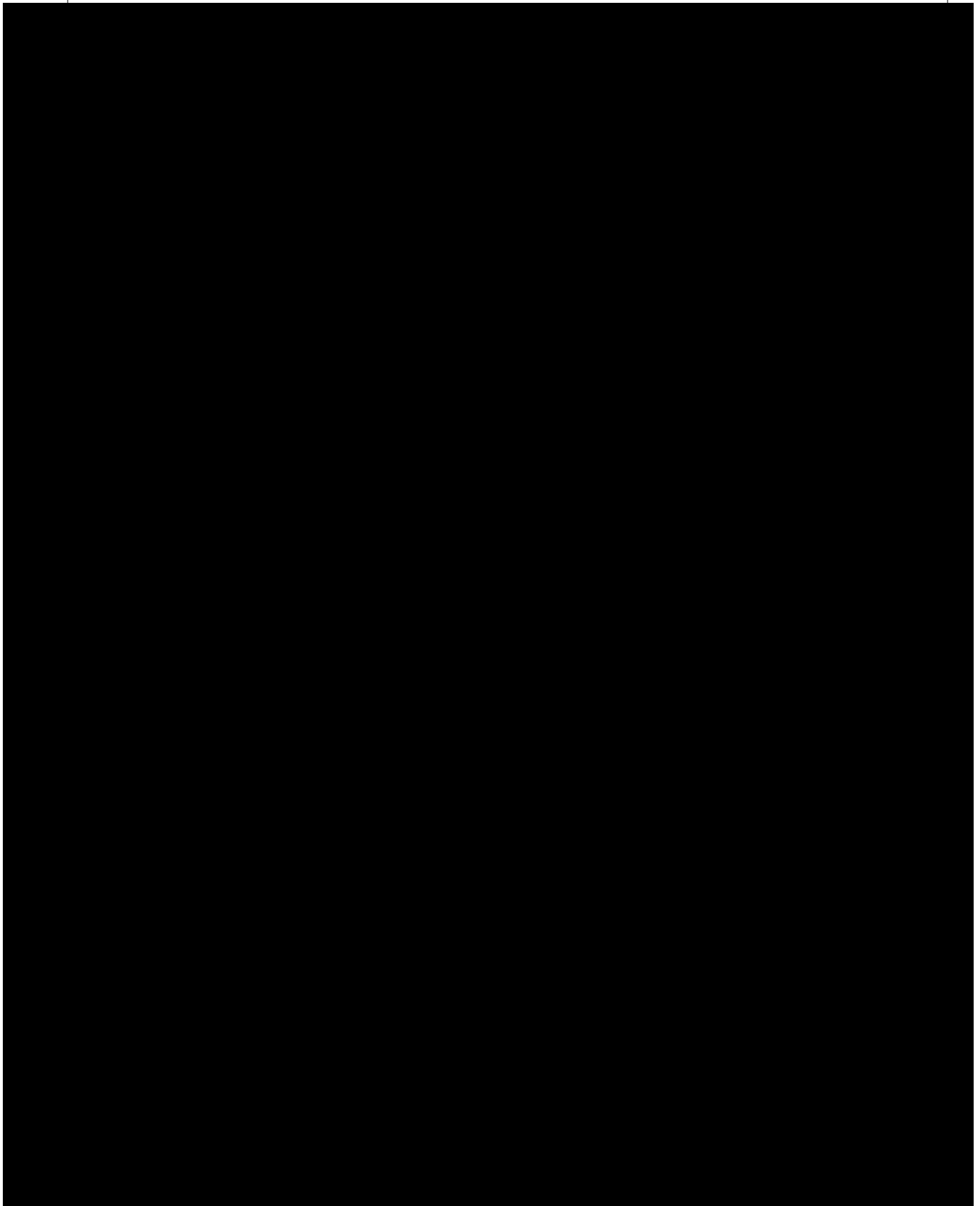












1 STATE OF TEXAS)

2 COUNTY OF DALLAS)

3 I, Michelle L. Munroe, Certified Shorthand
4 Reporter in and for the State of Texas, certify that
5 the foregoing deposition of SHANE DANIELS was
6 reported stenographically by me at the time and place
7 indicated, said witness having been placed under oath
8 by me, and that the deposition is a true record of
9 the testimony given by the witness;

10 That the amount of time used by each party at
11 the deposition is as follows:

Mr. Kirtley - 7 hours, 4 minutes

12
13 I further certify that I am neither counsel for
14 nor related to any party in this cause and am not
15 financially interested in its outcome.

16 Given under my hand on this the 21st day
17 of February, 2024.

18
19
20 
21

Michelle L. Munroe, CSR No. 6011

Commission expires 1-31-26

Firm Registration #571

22 VERITEXT LEGAL SOLUTIONS

300 Throckmorton Street, Suite 1600

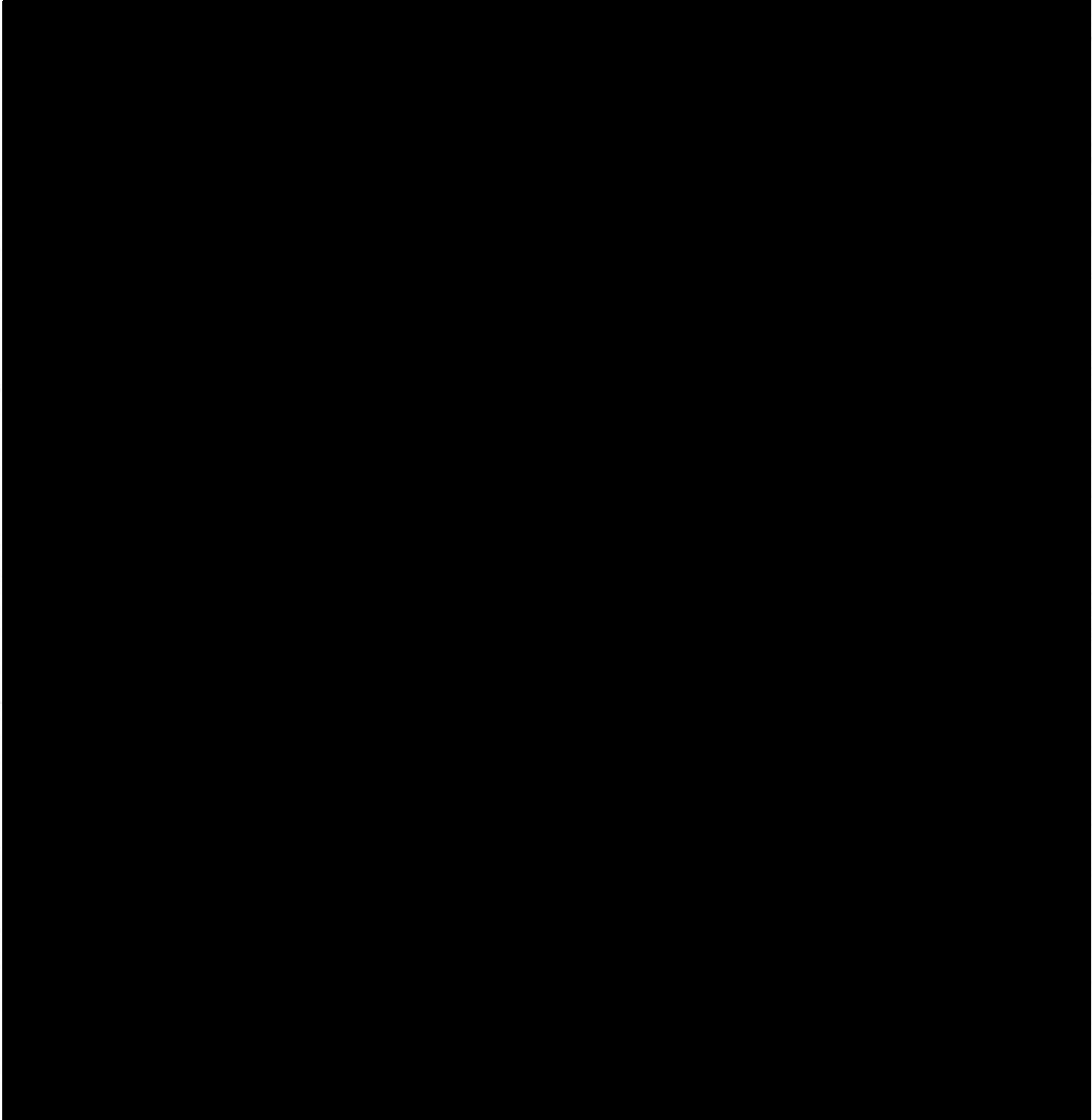
24 Fort Worth, Texas 76102

817.336.3042 telephone

In re Bank of America California Unemployment Benefits Litigation
Case No. 3:21-MD-02992-LAB-MSB

Errata for Deposition of Shane Daniels, February 6, 2024

Page	Line(s)	Change	Reason
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In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. I have listed my changes on the above Errata Sheet, listing page and line numbers. I request that these changes be entered as part of the record of my testimony, and request and authorize that this Errata Sheet be appended to the transcript of my testimony and be incorporated therein..

Executed this 18th day of March 2024.


SHANE DANIELS