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

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

This Document Relates to All Actions

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VIDEOTAPED & VIDEOCONFERENCED DEPOSITION OF  
WILLIAM MATTHEW MARTIN

Atlanta, Georgia

Wednesday, February 14, 2024

Court Reporter:

Michelle M. Boudreaux-Phillips, CCR

JOB No. 6459932

PAGES 1 - 336

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February 14, 2024

9:17 a.m.

Videotaped and videoconferenced  
deposition of WILLIAM MATTHEW MARTIN, held at  
Jones Day, 1221 Peachtree Street, N.E.,  
Suite 400, Atlanta, Georgia, pursuant to  
Agreement, before Michelle M. Boudreaux-  
Phillips, a Certified Court Reporter in the  
State of Georgia.

## APPEARANCES

On behalf of the Plaintiffs:

CONNIE K. CHAN, Esq.

Altshuler Berzon LLP

177 Post Street

Suite 300

San Francisco, California 94108

415.421.7151

cchan@altshulerberzon.com

ANDREW F. KIRTLEY, Esq.

Cotchett, Pitre & McCarthy, LLP

San Francisco Airport Office Center

840 Malcolm Road

Suite 200

Burlingame, California 94010

650.697.6000

akirtley@cpmlegal.com

JOSHUA SWIGART, Esq. (via Zoom)

Swigart Law Group APC

2221 Camino Del Rio S.

Suite 308

San Diego, California 92108

866.219.3343

josh@swigartlawgroup.com

APPEARANCES (Cont'd)

On behalf of the Defendant:

MATTHEW L. RIFFEE, Esq.

Goodwin Procter LLP

1900 N Street NW

Washington, District of Columbia 20036

202.346.4000

mriffee@goodwinlaw.com

ANGELICA RANKINS, Esq.

Goodwin Procter LLP

100 Northern Avenue

Boston, Massachusetts 02210

617.570.1000

arankins@goodwinlaw.com

LINDSAY E. HOYLE, Esq. (via Zoom)

Goodwin Procter LLP

The New York Times Building

620 Eighth Avenue

New York, New York 10018

212.813.8800

lhoyle@goodwinlaw.com

Videographer: Mike Brown

1 THE VIDEOGRAPHER: We're on the record.  
2 The date, February the 14th, 2024. The time  
3 on the video monitor, 9:17 a.m. Marks the  
4 beginning of Video No. 1, deposition of  
5 Matt Martin, in the matter In Re  
6 Bank of America California Unemployment  
7 Benefits.

8 Location of the deposition, 1221  
9 Peachtree Street, Atlanta, Georgia.

10 My name is Mike Brown, representing  
11 Veritext Legal Solutions. I'm the  
12 videographer. Our court reporter is  
13 Michelle Boudreaux.

14 Counsel in the room, please state your  
15 name for the record and whom you represent.

16 MS. CHAN: Connie Chan representing  
17 class plaintiffs.

18 MR. KIRTLEY: And Andrew Kirtley, also  
19 representing class plaintiffs.

20 MR. RIFFEE: Good morning. Matt Riffie,  
21 representing Bank of America, and with me is  
22 Angelica Rankins.

23 THE VIDEOGRAPHER: Okay. Counsel on  
24 Zoom?

25 MS HOYLE: Yes. Lindsay Hoyle, Goodwin

1 Procter, also representing Bank of America.

2 MR. SWIGART: Josh Swigart on behalf of  
3 individual plaintiffs.

4 THE VIDEOGRAPHER: Will the court  
5 reporter please swear in the witness.

6 WILLIAM MATTHEW MARTIN,  
7 being first duly sworn, was examined and testified as  
8 follows:

9 EXAMINATION

10 BY MS. CHAN:

11 Q Good morning, Mr. Martin. My name is  
12 Connie Chan. As I said, I'm one of the counsel for  
13 class plaintiffs in this case, and with me today is my  
14 co-counsel, Andrew Kirtley. Thank you very much for  
15 being here. We really appreciate your time.

16 Can you please state your full name for the  
17 record?

18 A It's William Matthew Martin.

19 Q So to start, I'm going to go over a few  
20 ground rules with you just so that we're all on the  
21 same page.

22 You understand that you are testifying under  
23 oath and under penalty of perjury today the same as if  
24 you were in court?

25 A I do.

1 Q And you understand that what you say here  
2 today is being taken down by the court reporter?

3 A I do.

4 Q For the court reporter, it's important that  
5 your responses be verbal, so please don't nod your head  
6 or shrug your shoulders. A verbal response would be  
7 appreciated. Does that make sense?

8 A It does.

9 Q If you don't understand a question, can you  
10 please tell me so that I can rephrase it and clarify  
11 myself?

12 A Okay.

13 Q And if you do answer a question, I will  
14 assume that you understood it. Is that fair?

15 A Yes.

16 Q You should feel free at any time to amend  
17 your answer if you need to clarify. If you do so,  
18 plaintiffs will be permitted to bring that change to  
19 the attention of the judge or jury. Is that fair?

20 A Yes.

21 Q And, in addition, after the deposition the  
22 court reporter will prepare a verbatim transcript of  
23 today's proceedings, and you will have the opportunity  
24 to review it and make any corrections if necessary.  
25 But, again, if you do make corrections, we will be able

1 to point those out to the judge or jury. Do you  
2 understand that?

3 A Yes.

4 Q I don't want you to guess if you don't know  
5 the answer to a question, but I am entitled to your  
6 best estimate.

7 Do you understand the difference between a  
8 guess and an estimate?

9 A I believe so.

10 Q So, for example, if I ask you to estimate the  
11 length of this table, I would be entitled to your best  
12 estimate. But if I asked you to estimate the size of  
13 my desk back at my own home, you wouldn't be able to  
14 offer an opinion because you would have no basis for  
15 guessing. Does that make sense?

16 A I understand, yes.

17 Q Great.

18 And you understand that from time to time  
19 your counsel, Mr. Riffie, may state objections to my  
20 questions; but unless he specifically instructs you not  
21 to answer, you do need to answer the question after  
22 he's finished the objection. Does that make sense?

23 A It does.

24 Q Great.

25 Is there any reason you cannot answer my

1 questions truthfully and to the best of your ability  
2 today?

3 A No.

4 Q Are you under the influence of alcohol or any  
5 medications that would impede your ability to give your  
6 best answer today?

7 A No.

8 Q And this is not an endurance contest. I plan  
9 on taking some regular breaks. If you ever need a  
10 break at any time, please feel free to request one. If  
11 there is a pending question, I would just ask that you  
12 answer the question before we go on break. Does that  
13 make sense?

14 A Yes.

15 Q Great.

16 So you understand this is a 30(b)(6)  
17 deposition of Bank of America?

18 A I do.

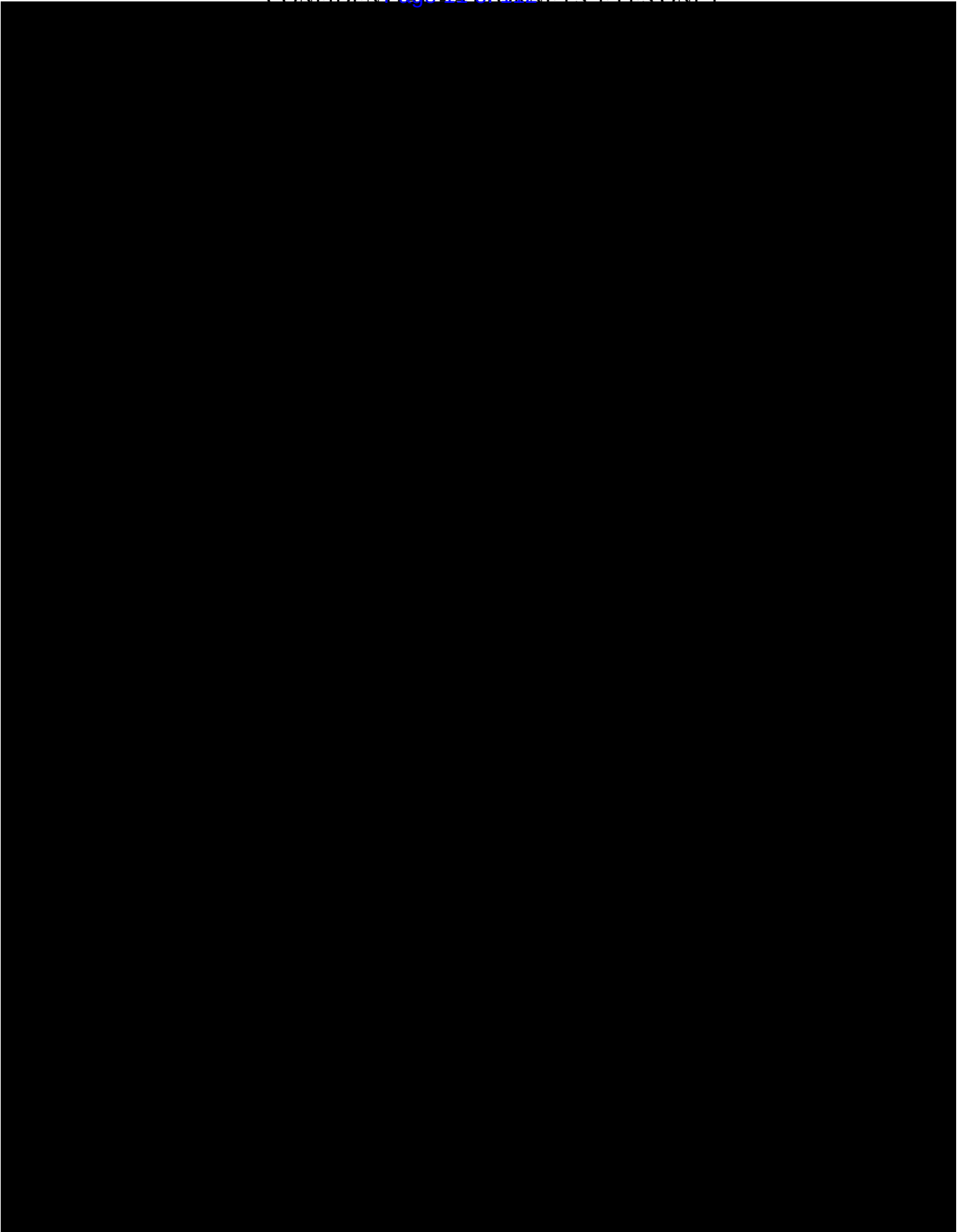
19 Q Have you received and reviewed a copy of the  
20 revised 30(b)(6) deposition notice?

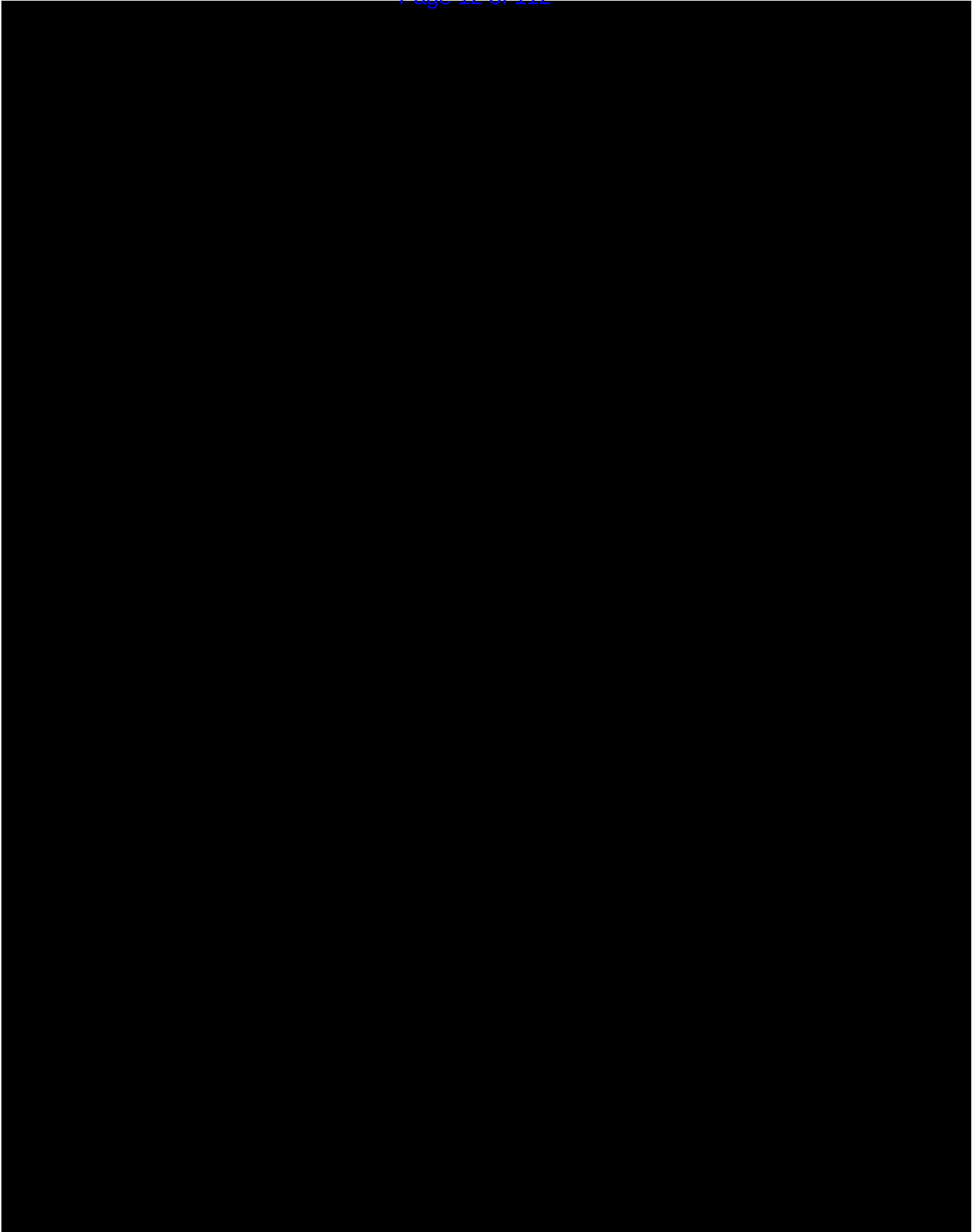
21 A I have.

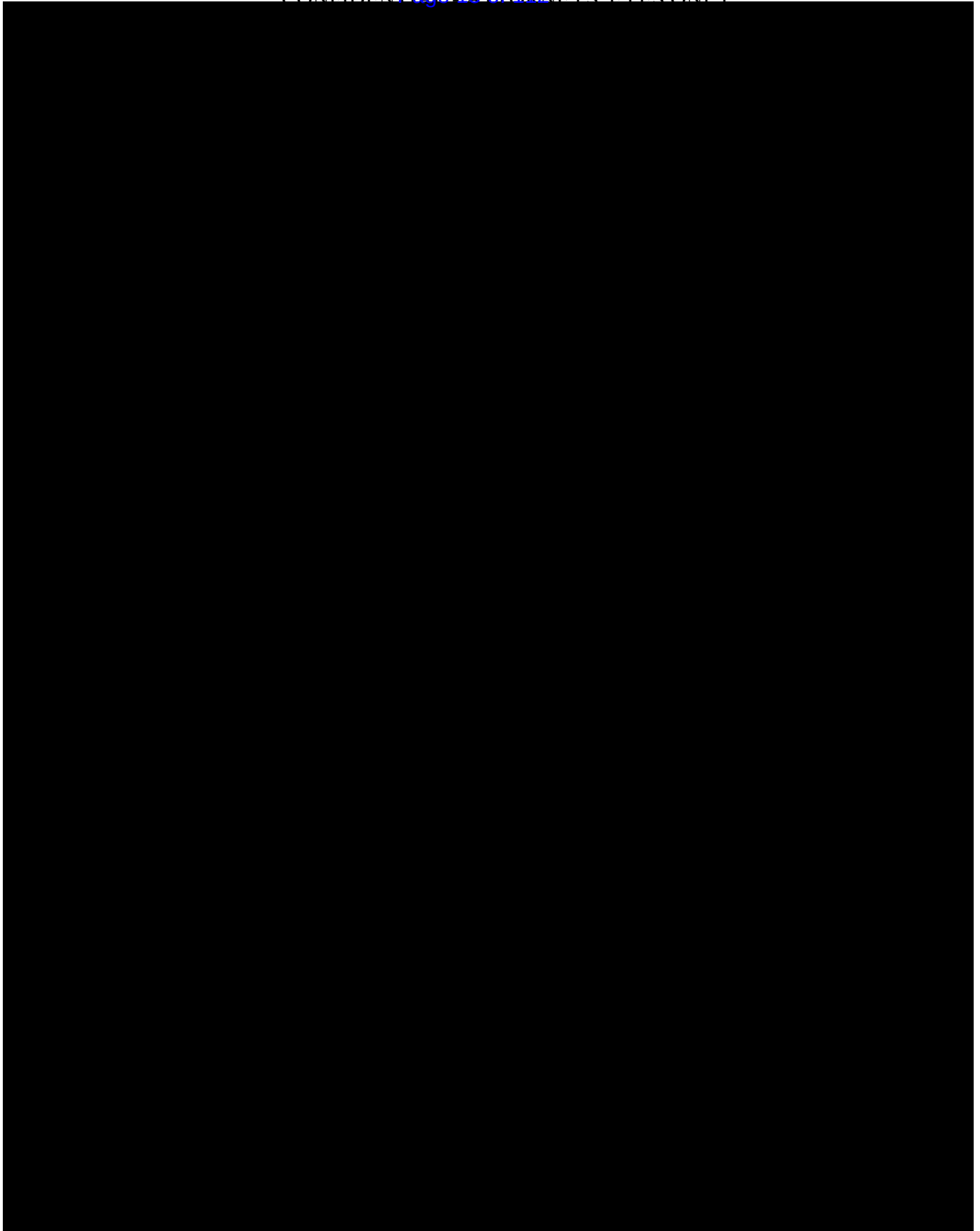
22 (Discussion off the written record.)

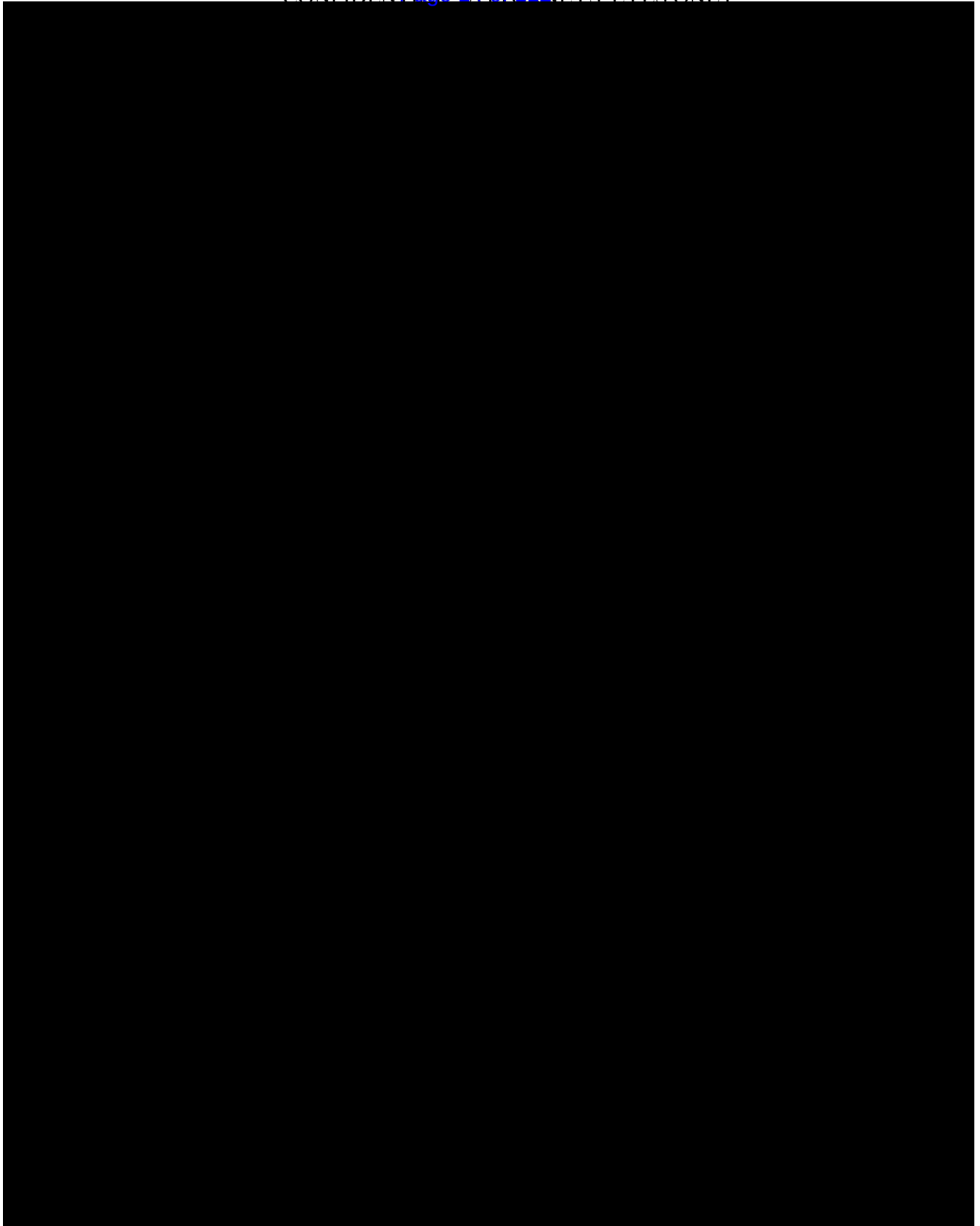
23 MS. CHAN: This has previously been  
24 marked Exhibit 1.

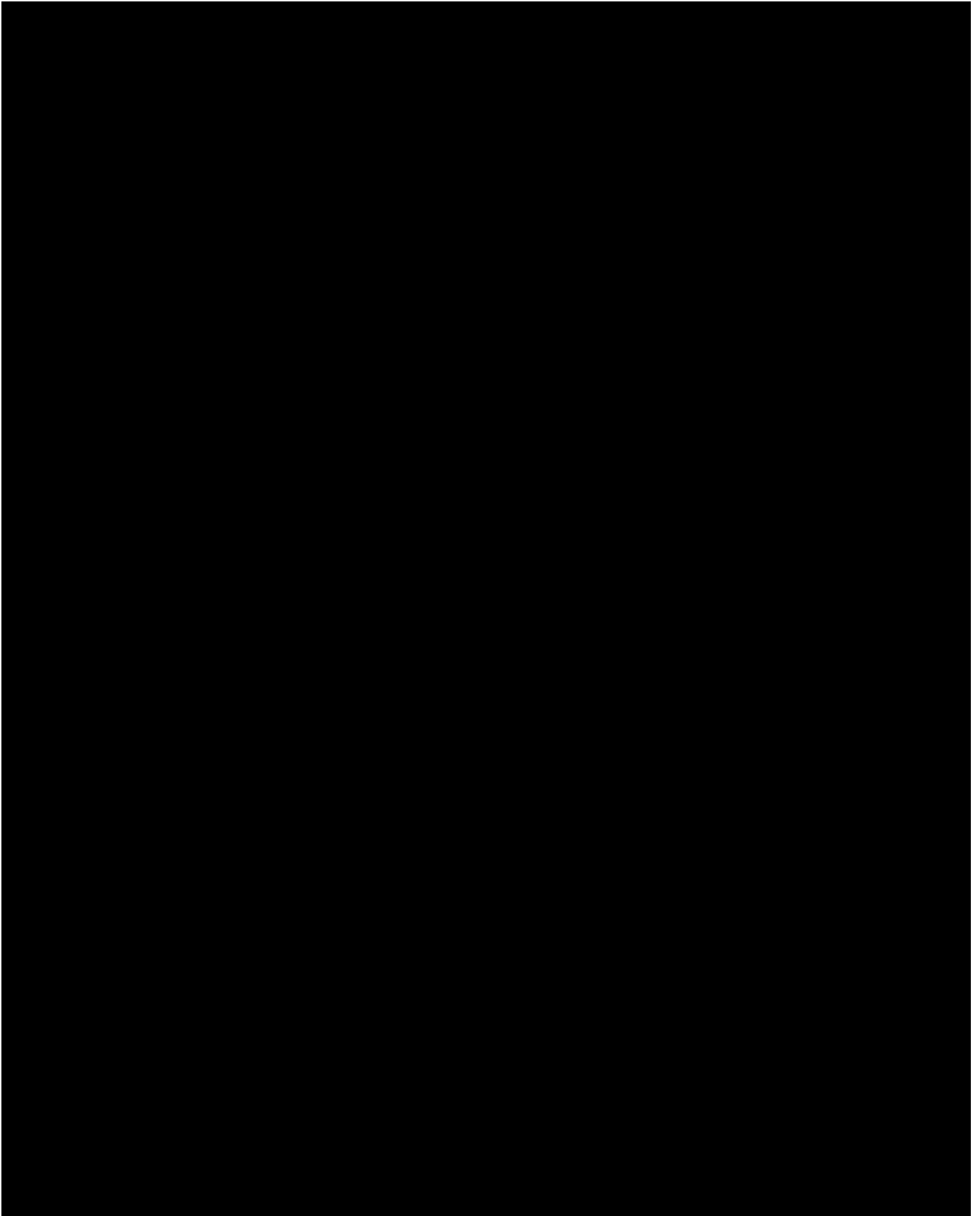
25 Q (By Ms. Chan) I just handed you a document

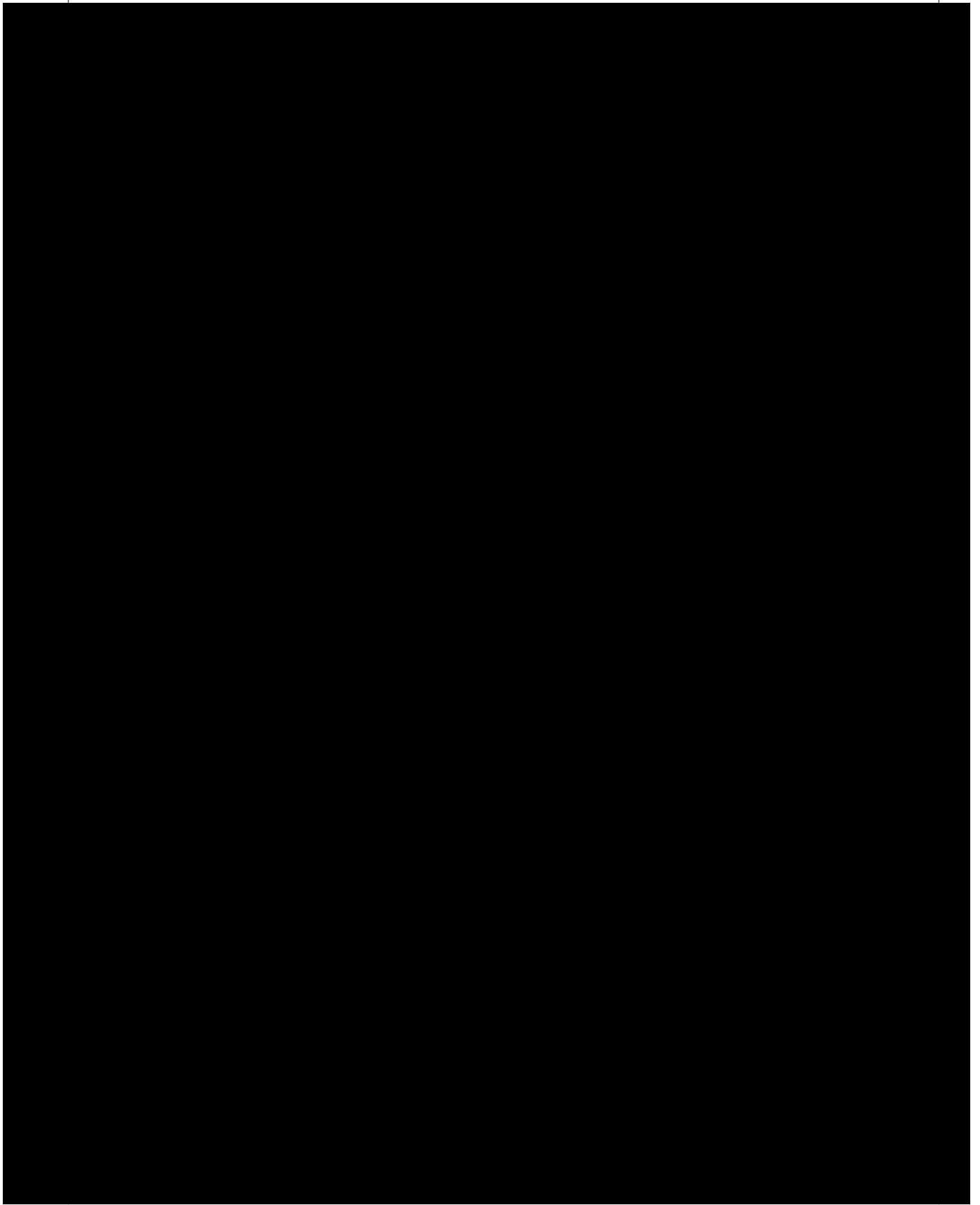


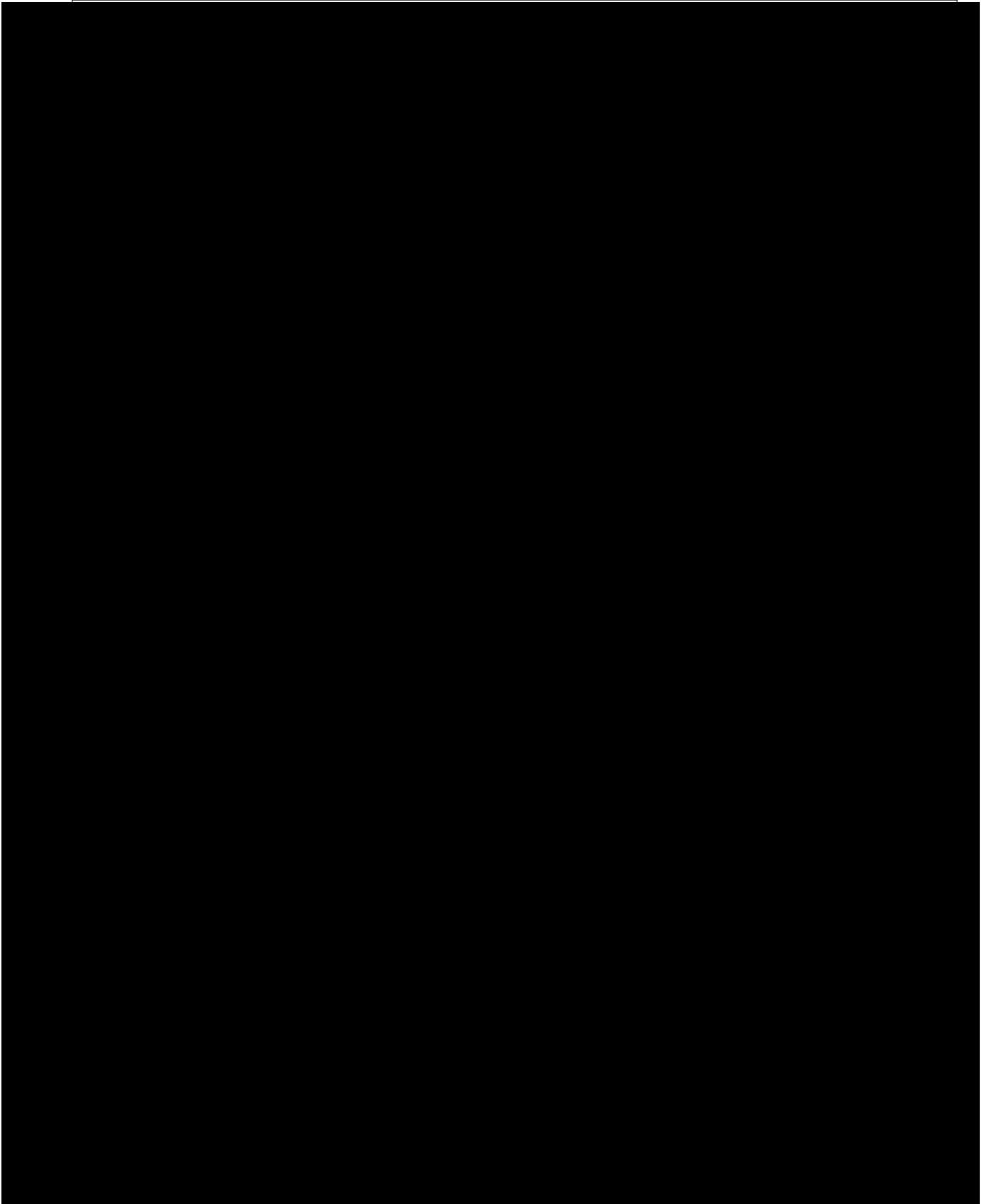


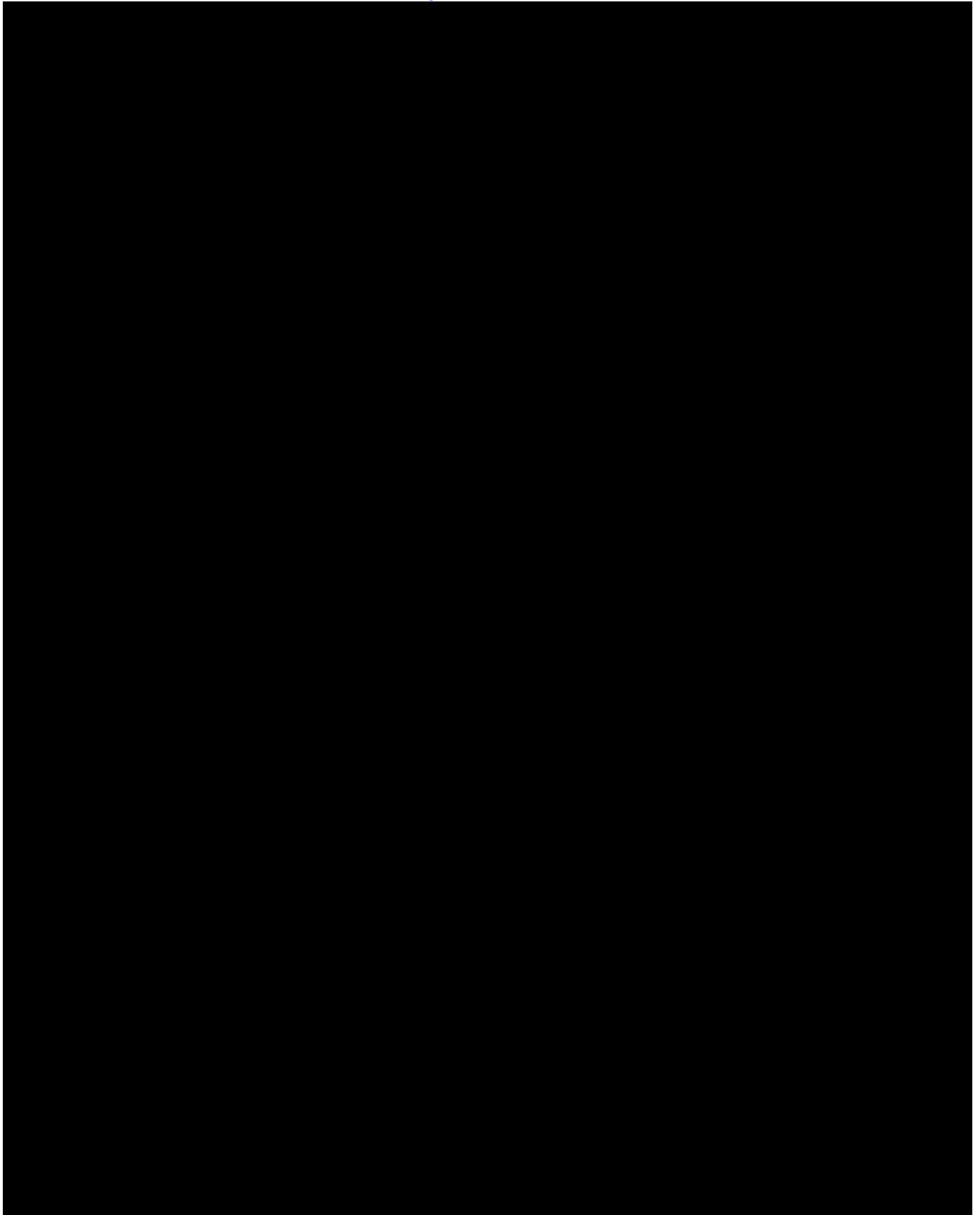


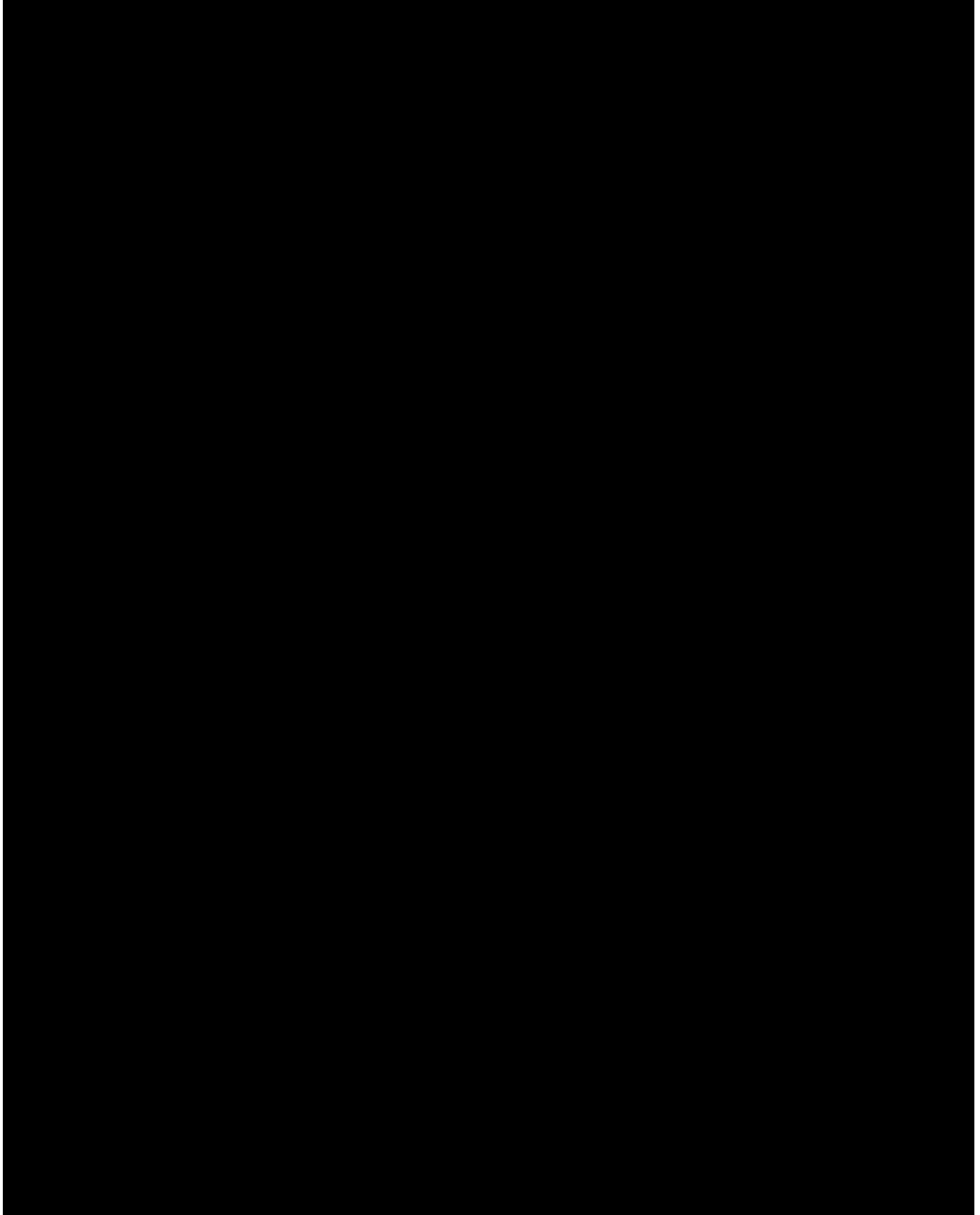


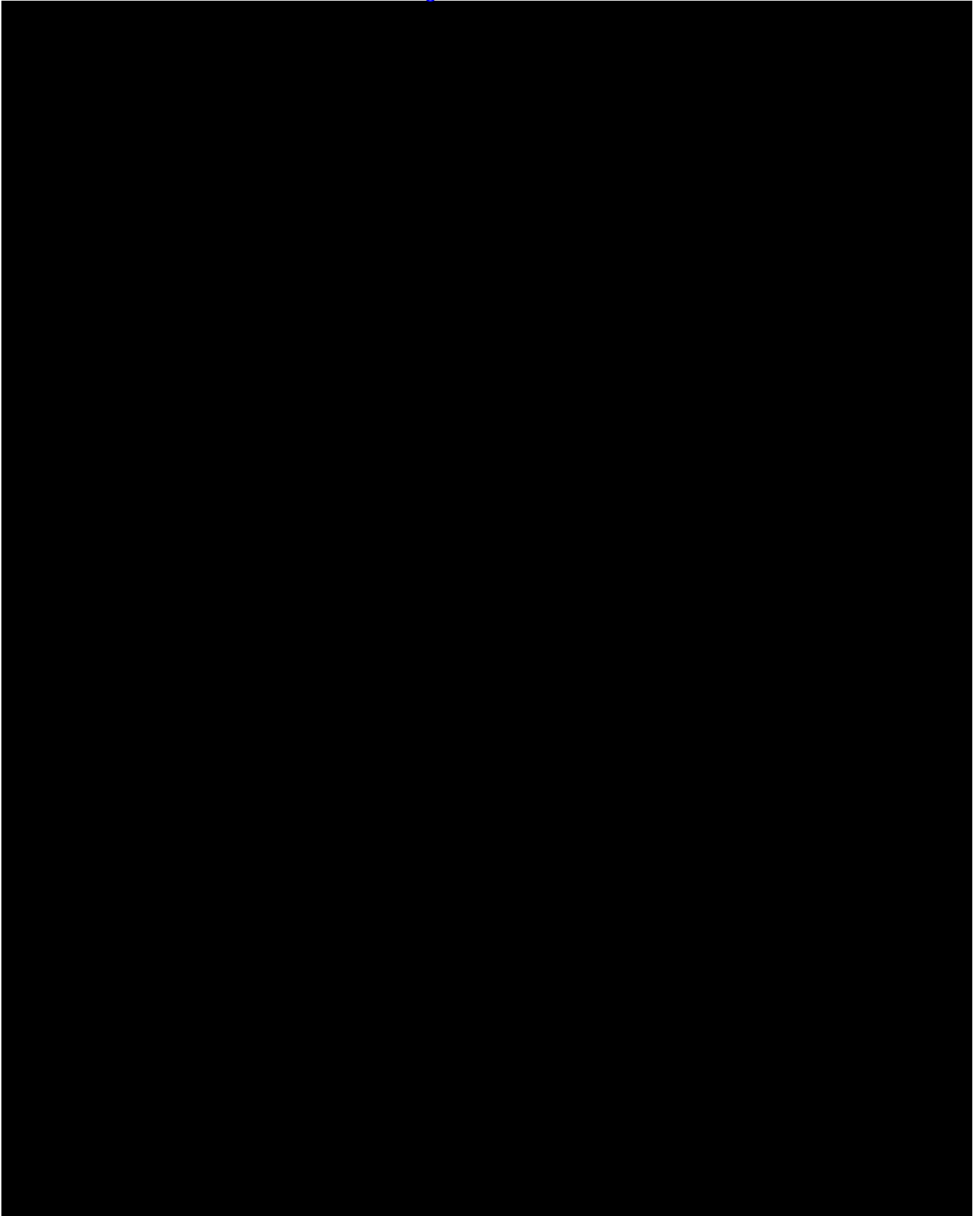


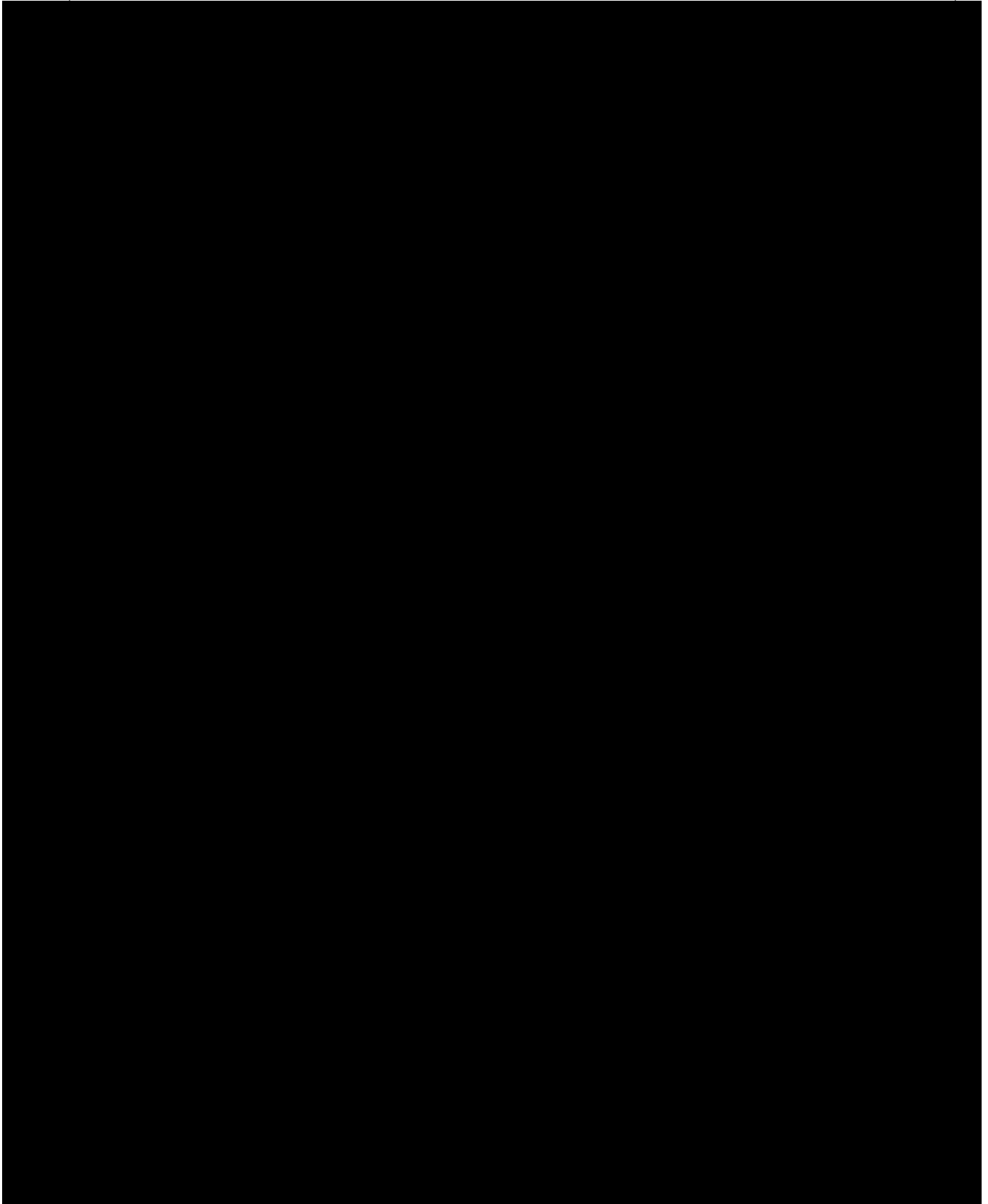


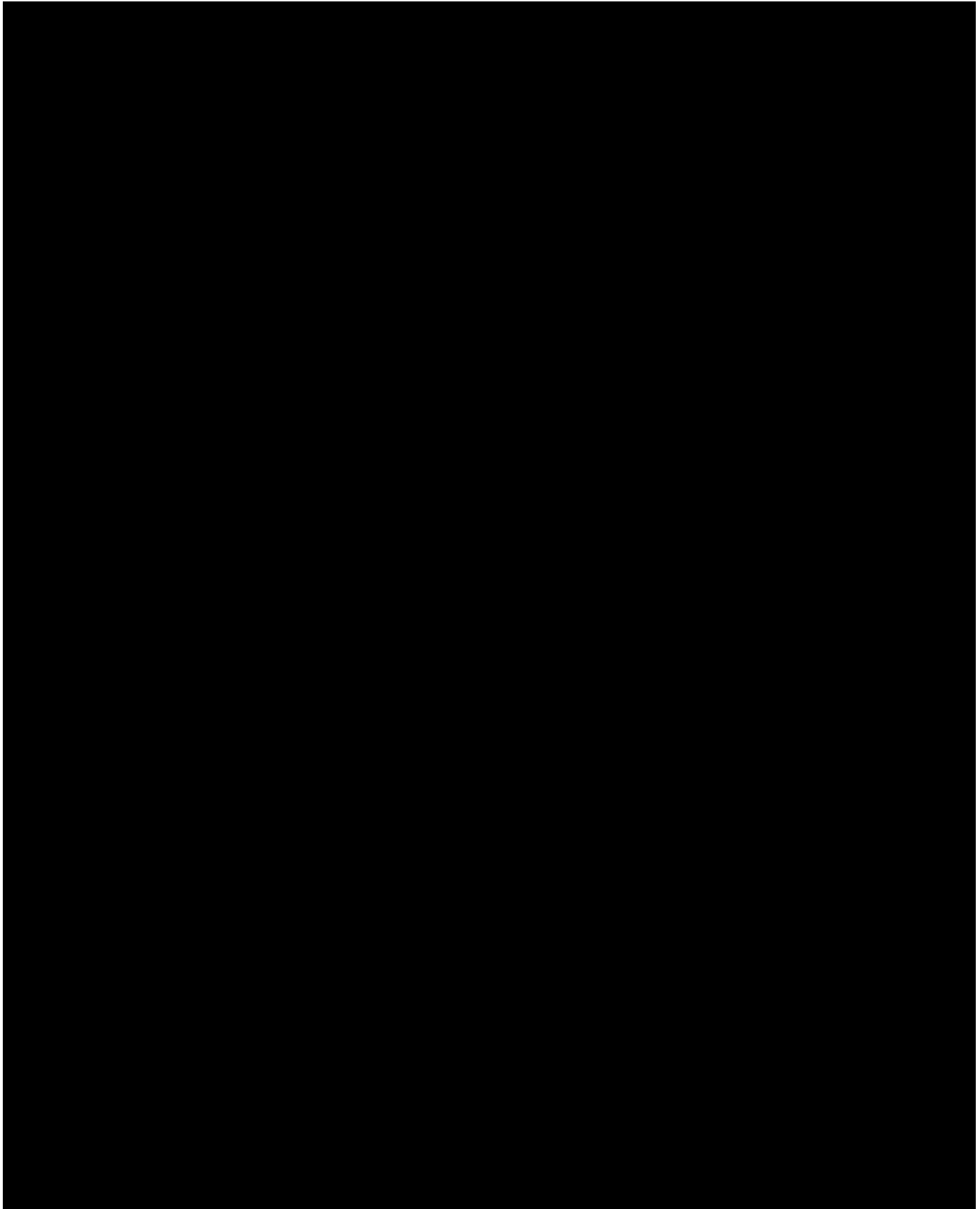




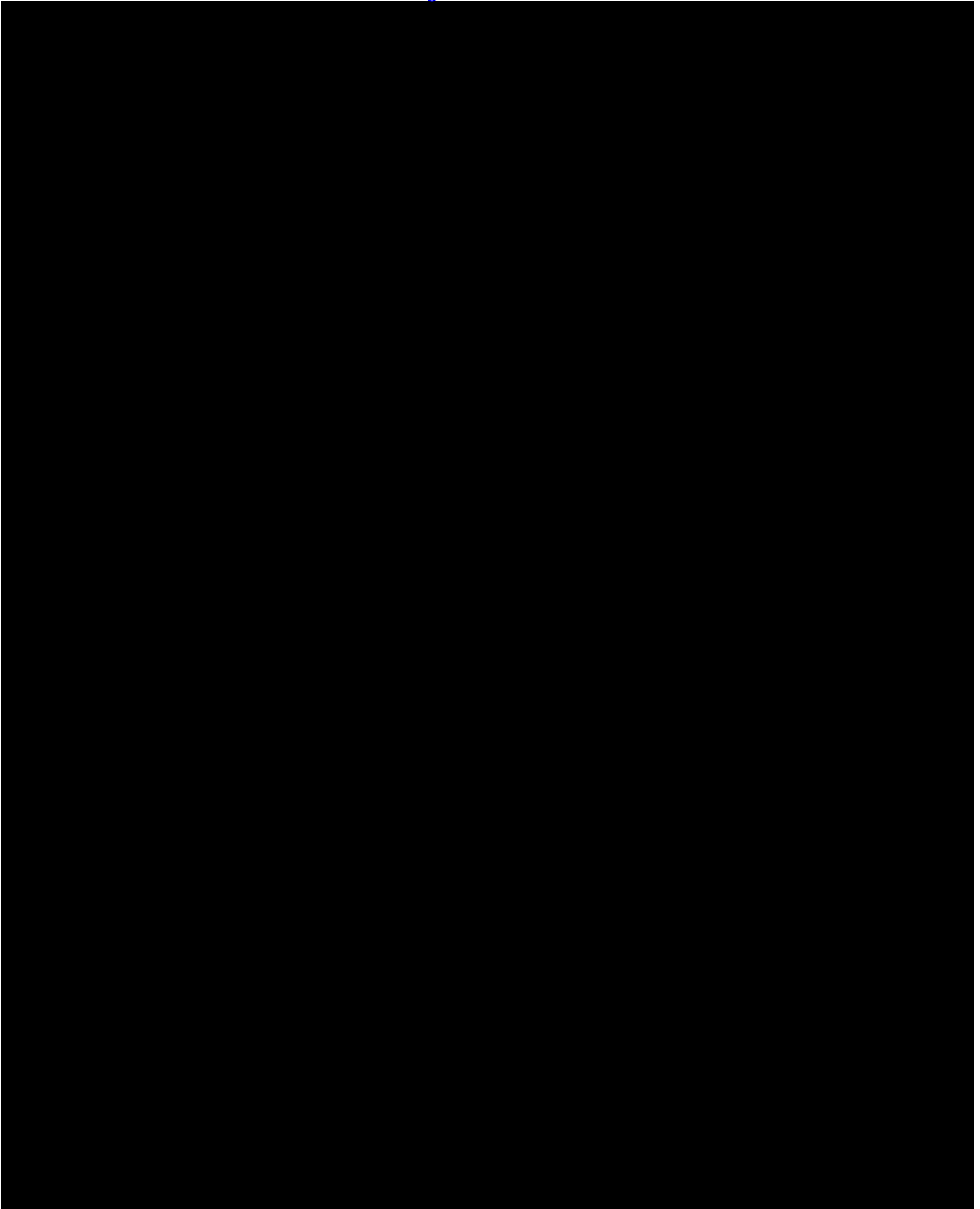


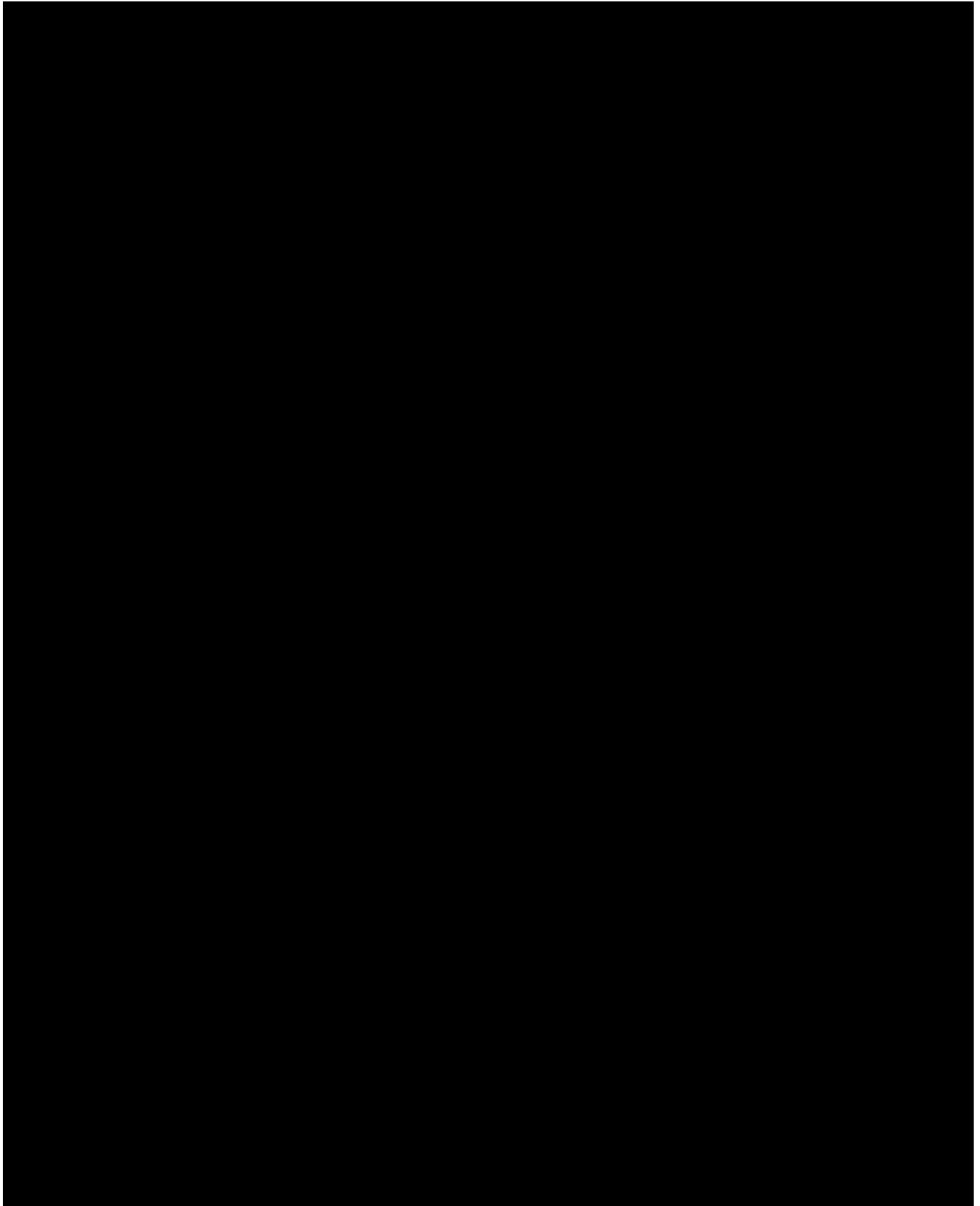


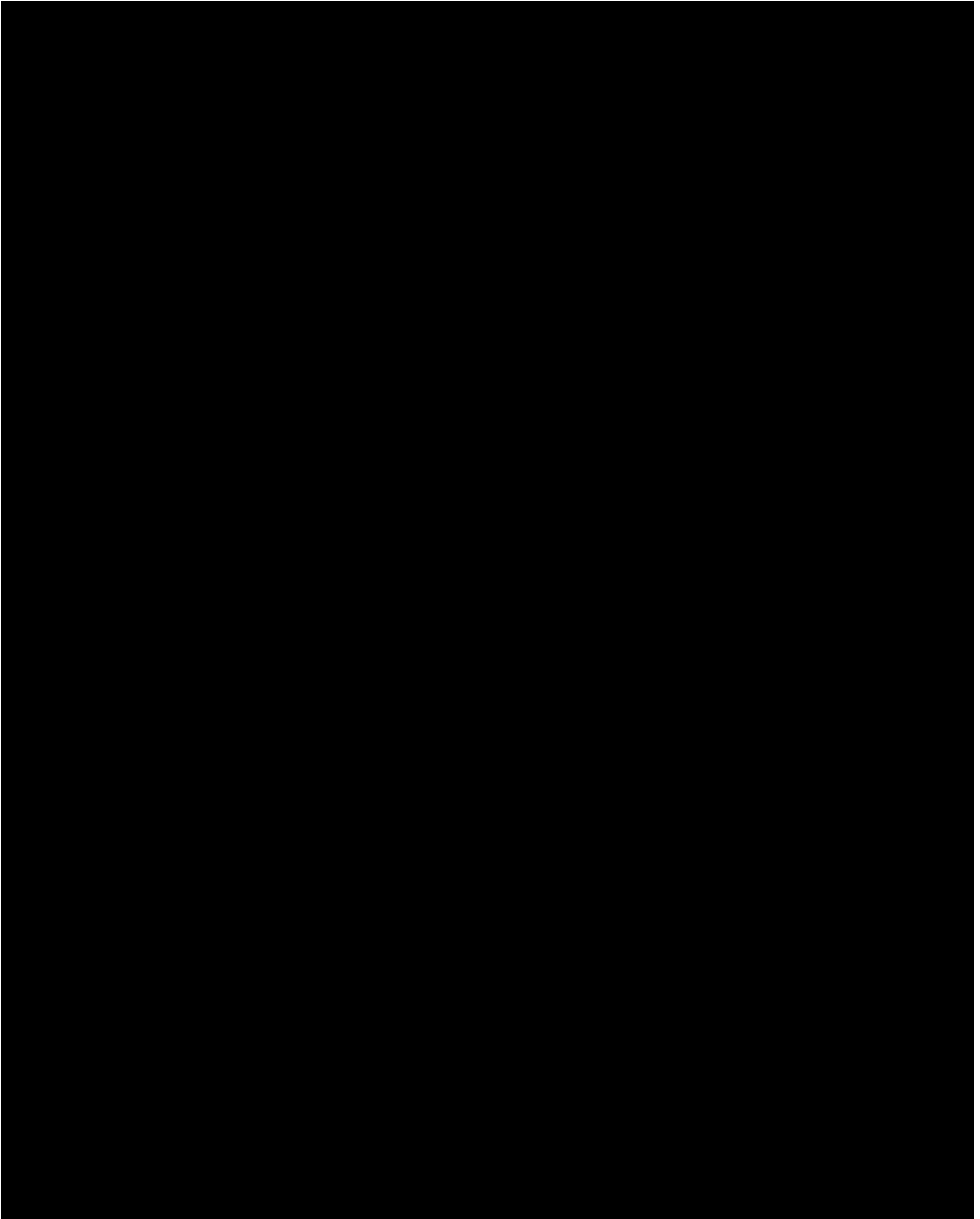


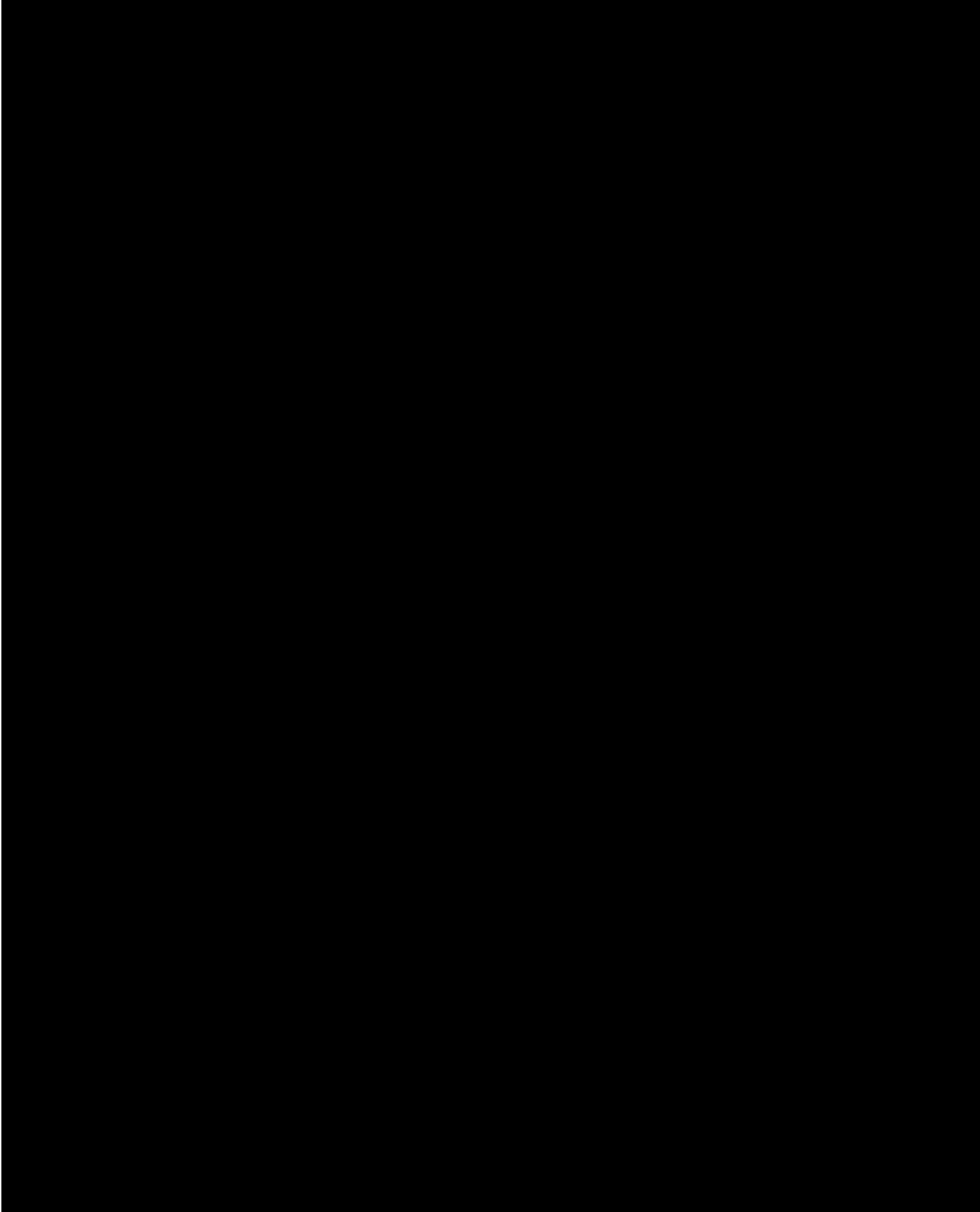


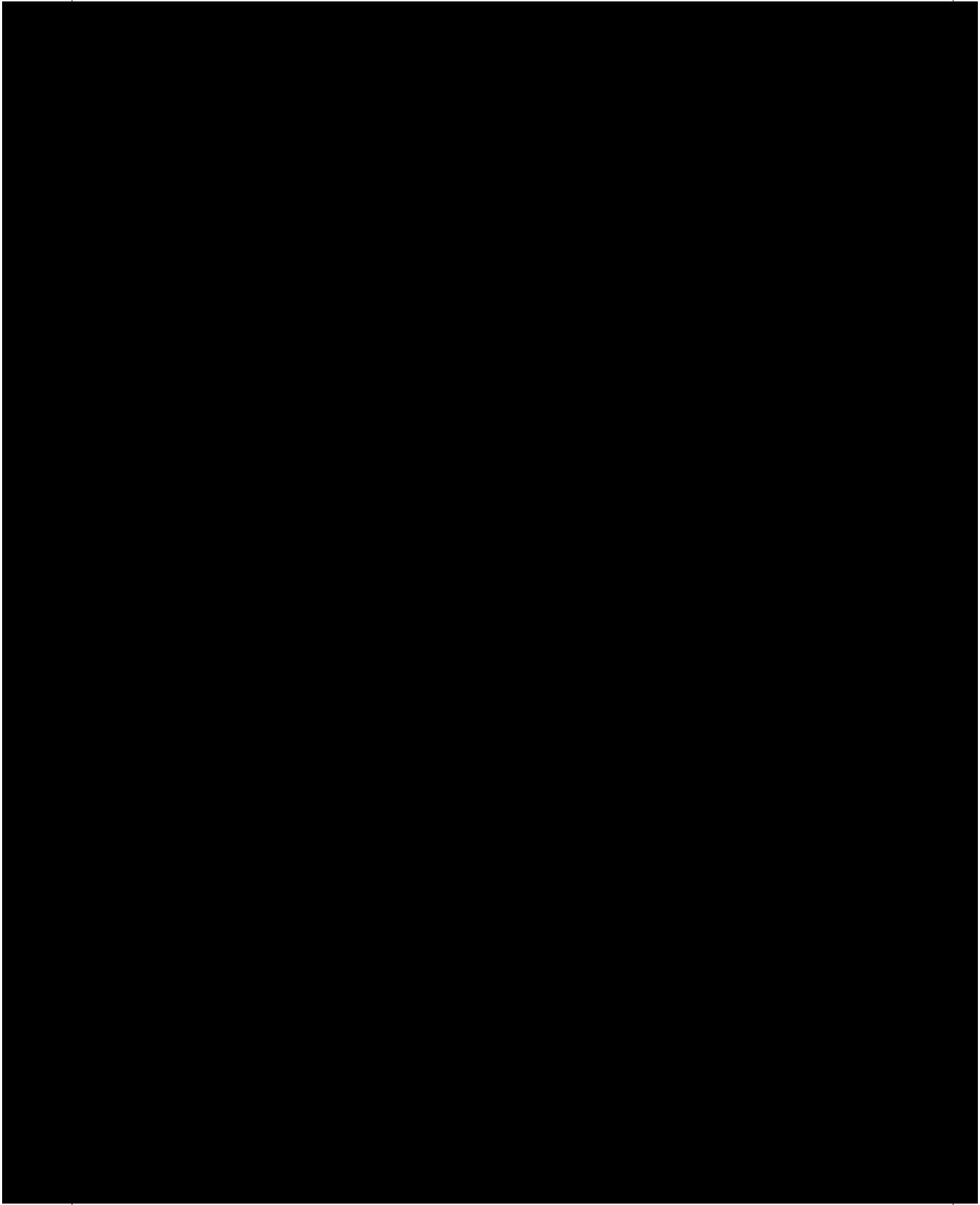
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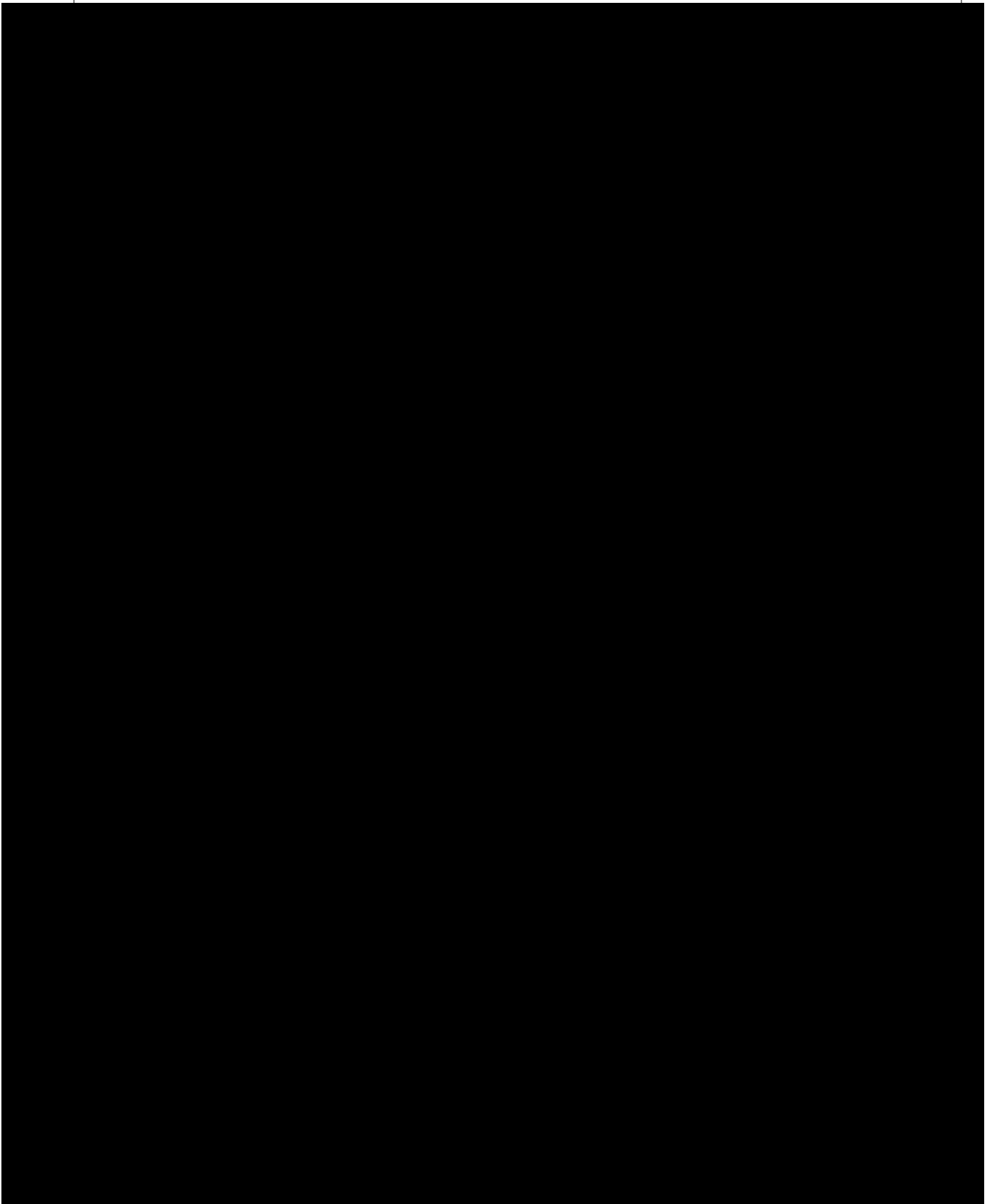


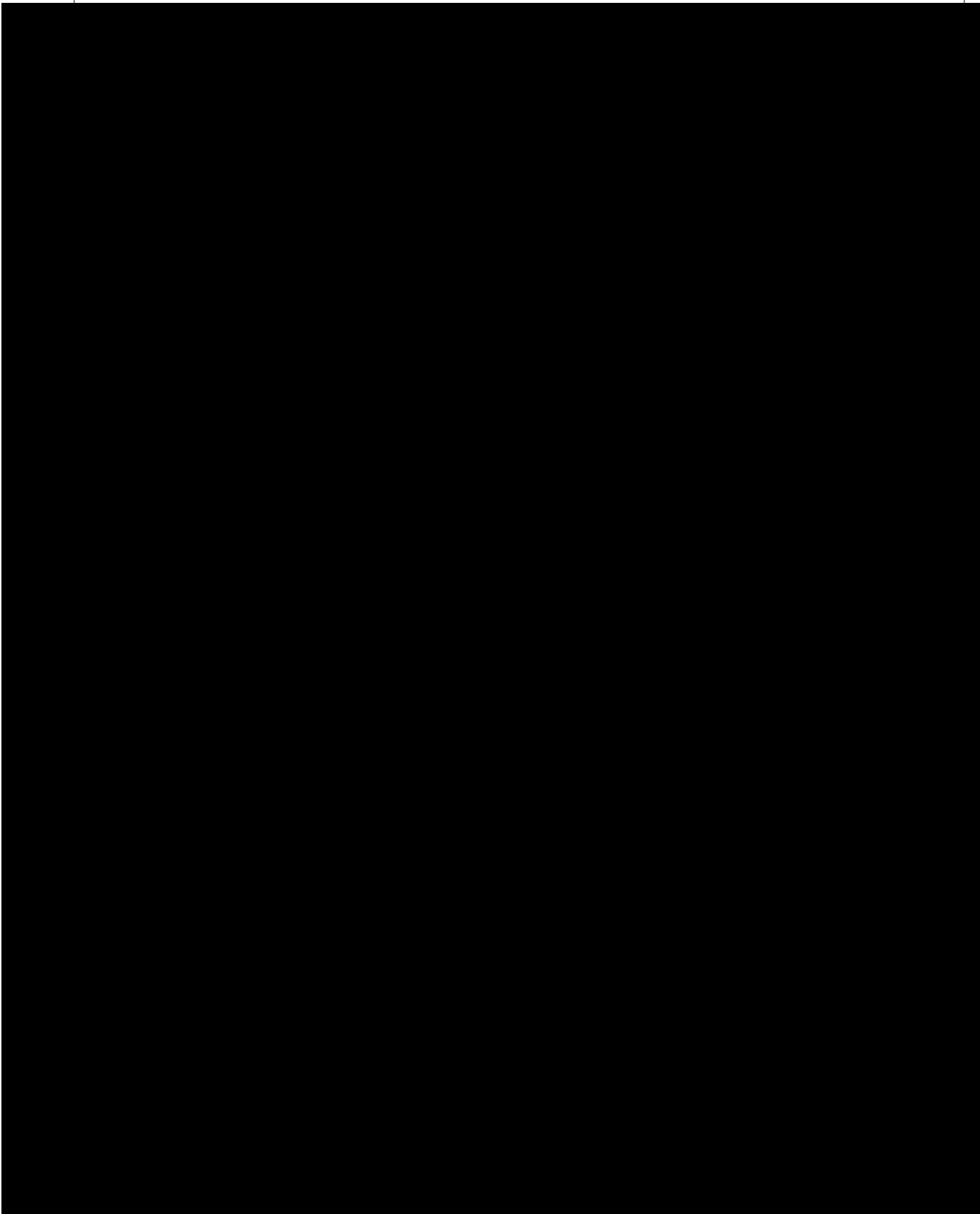


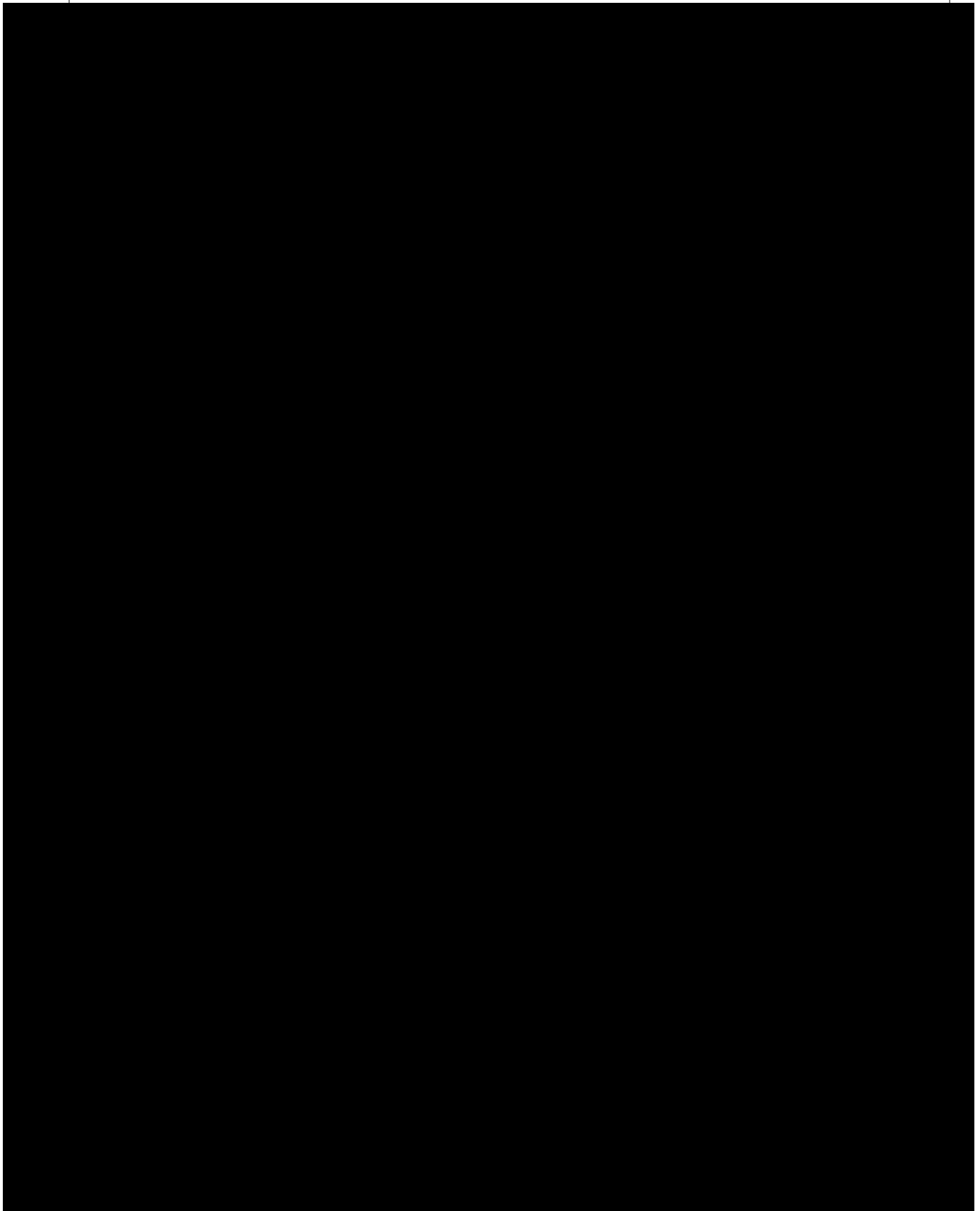


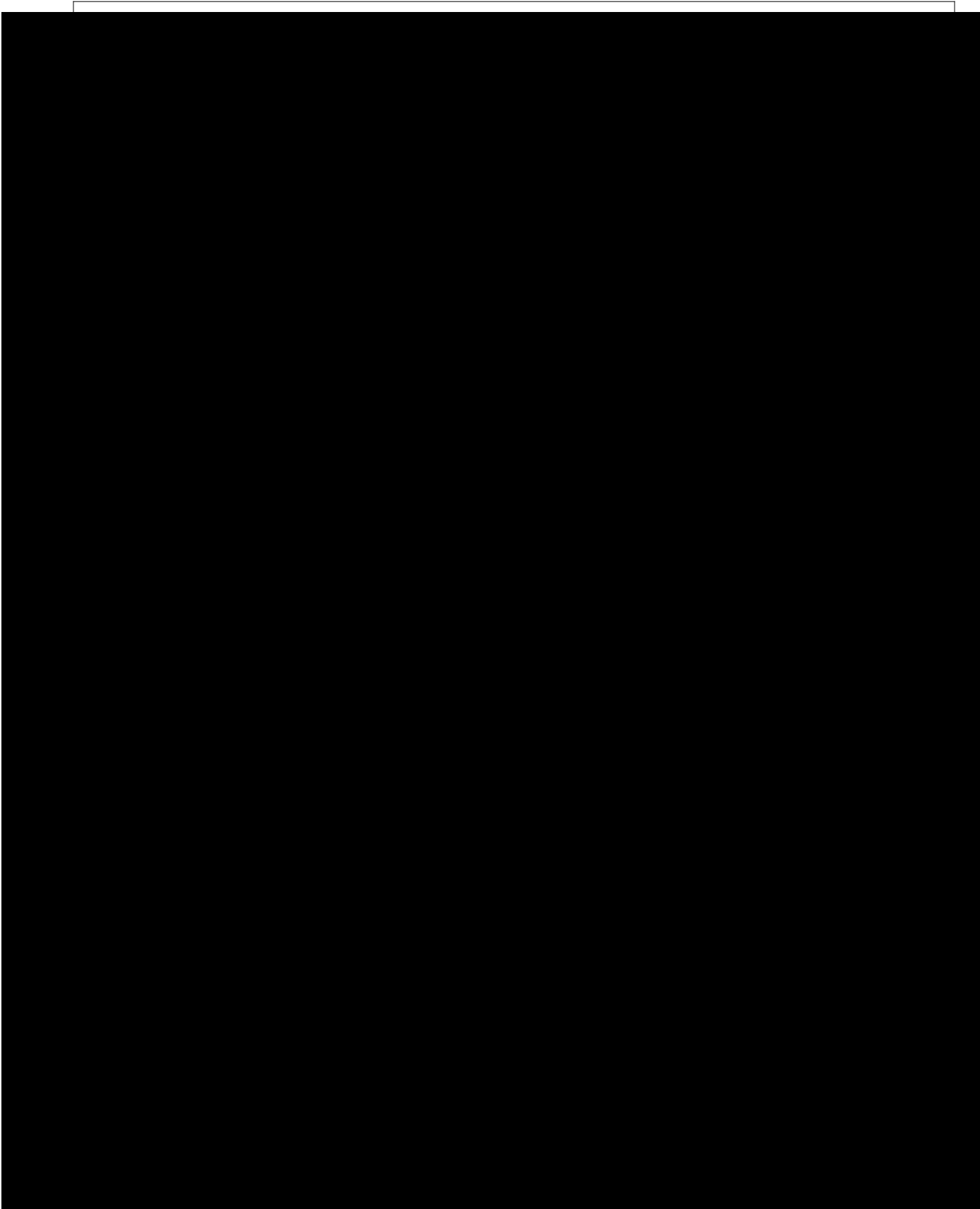


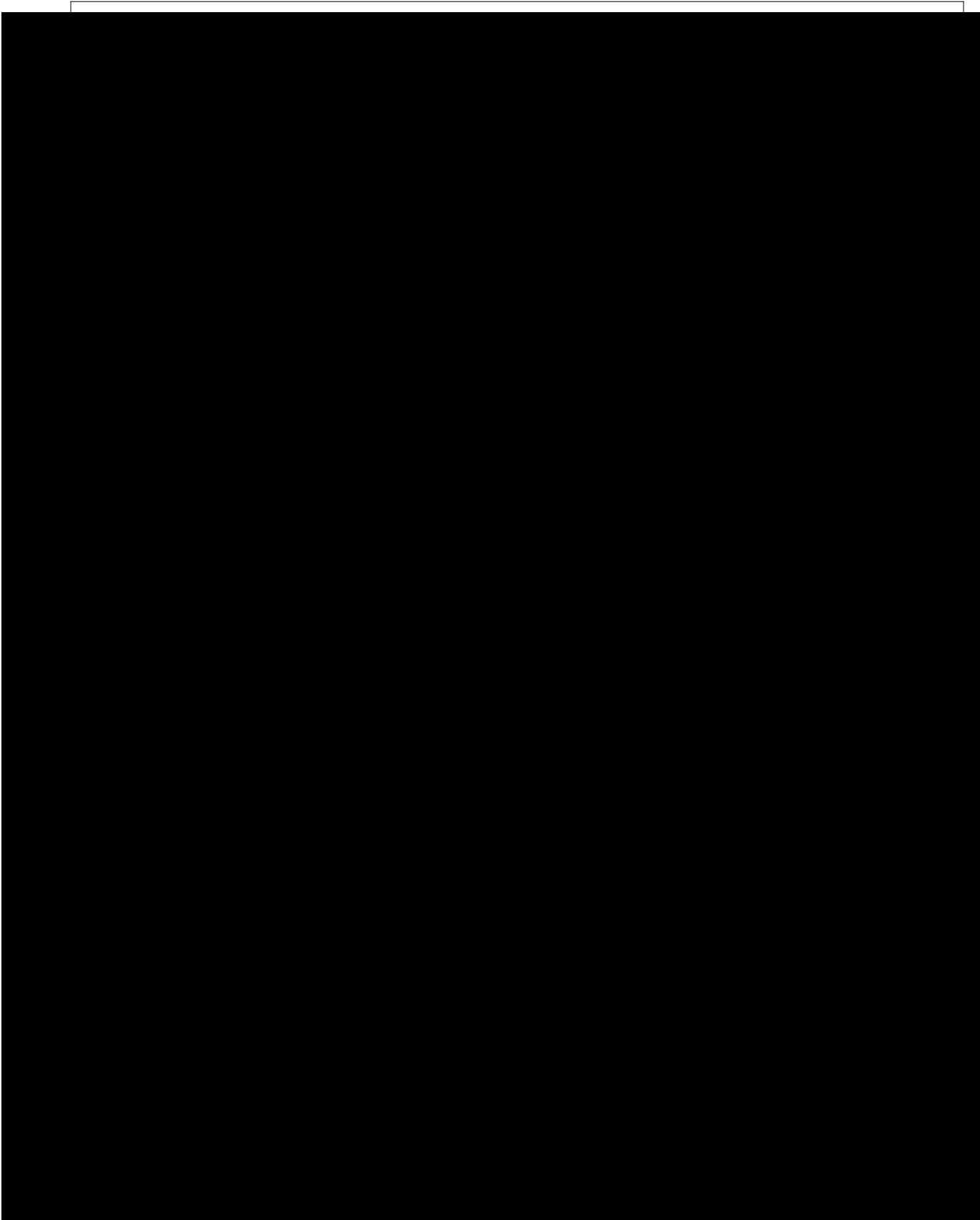


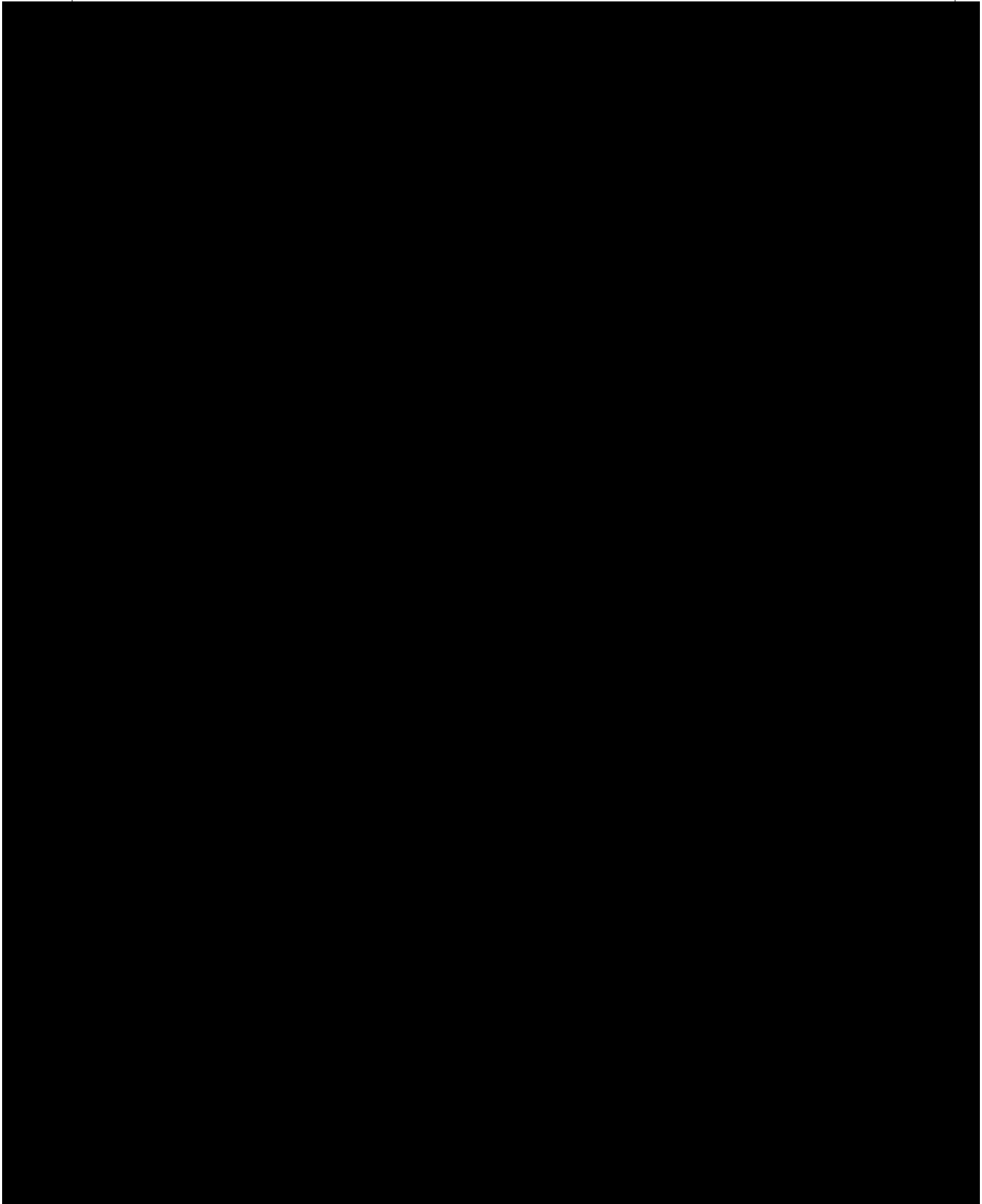




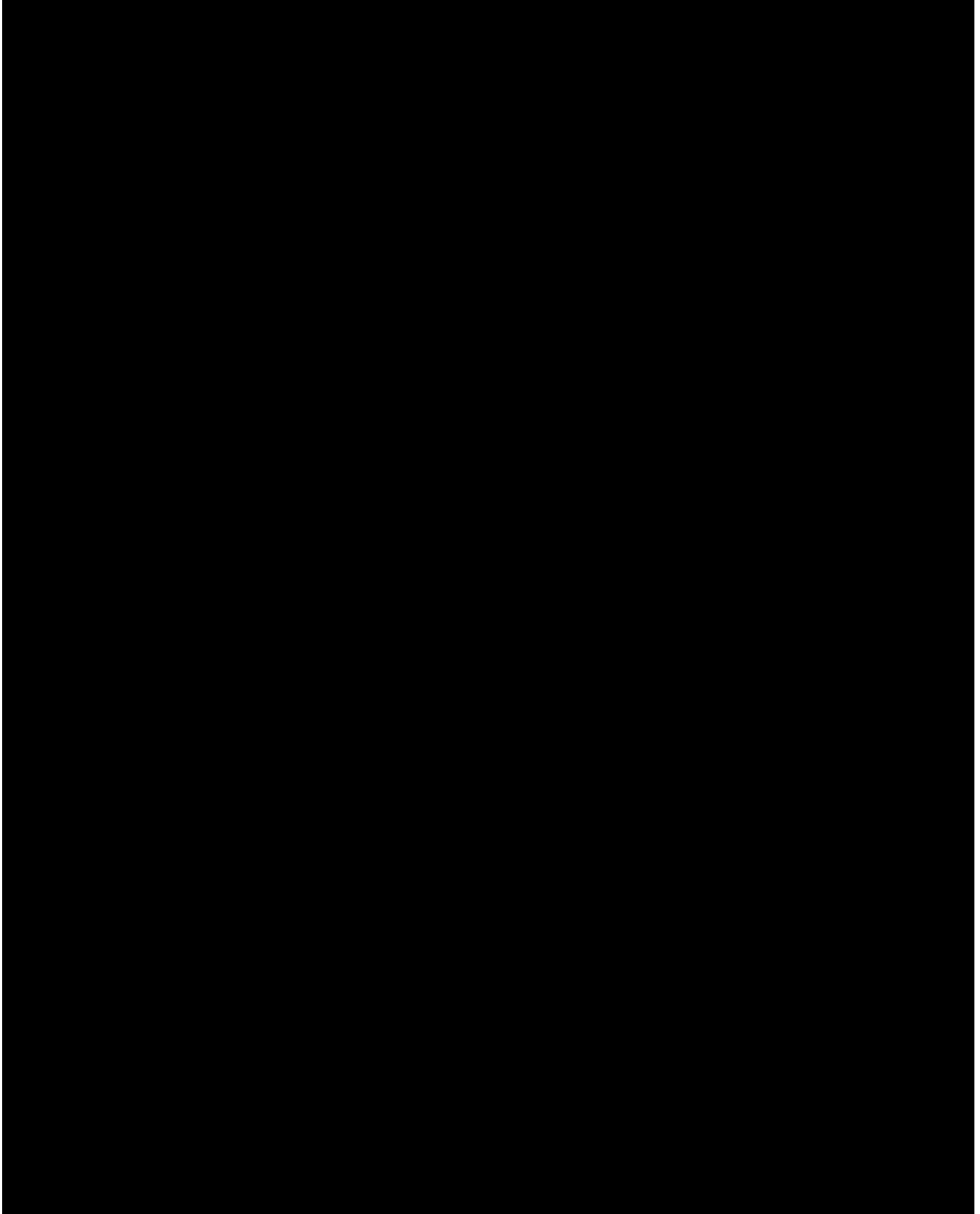


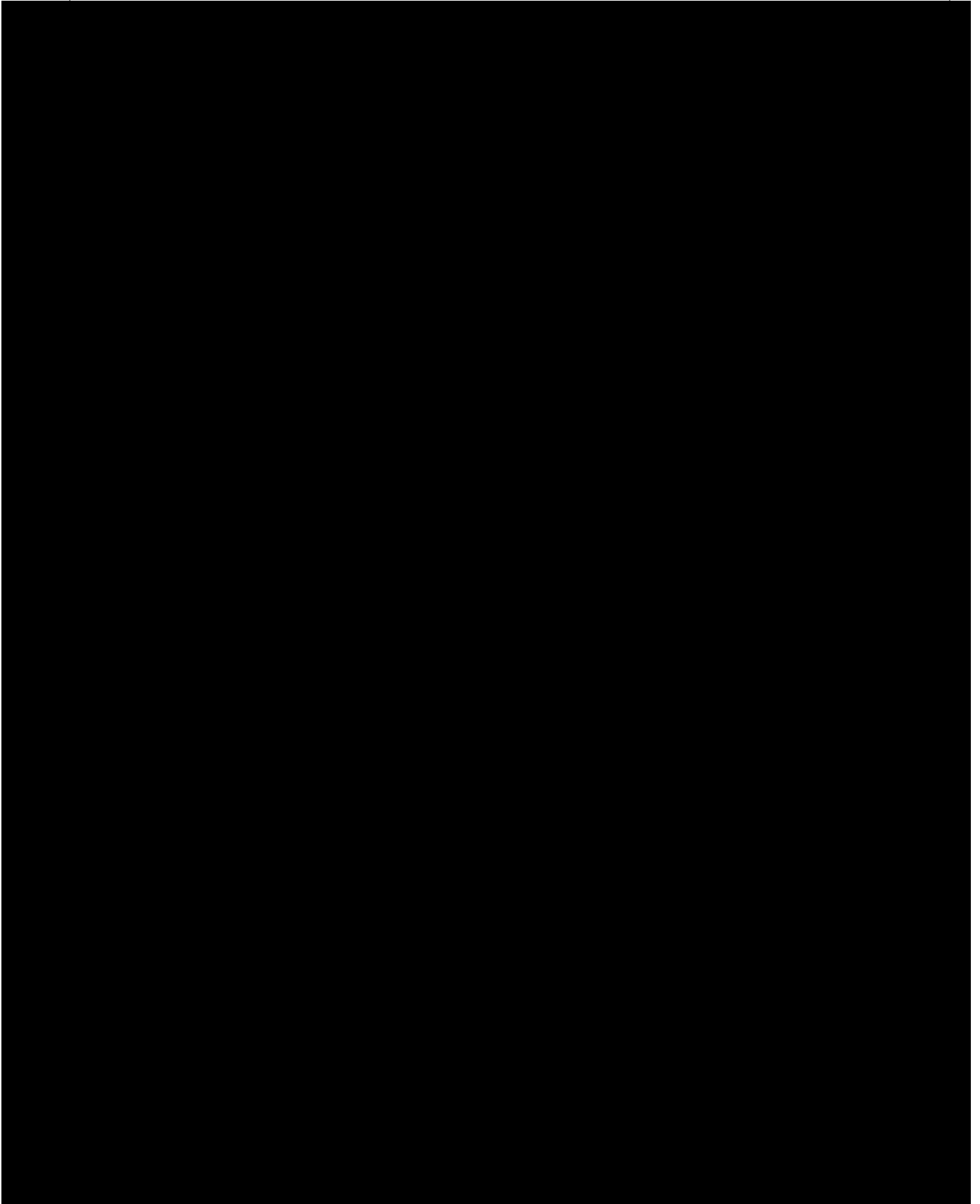


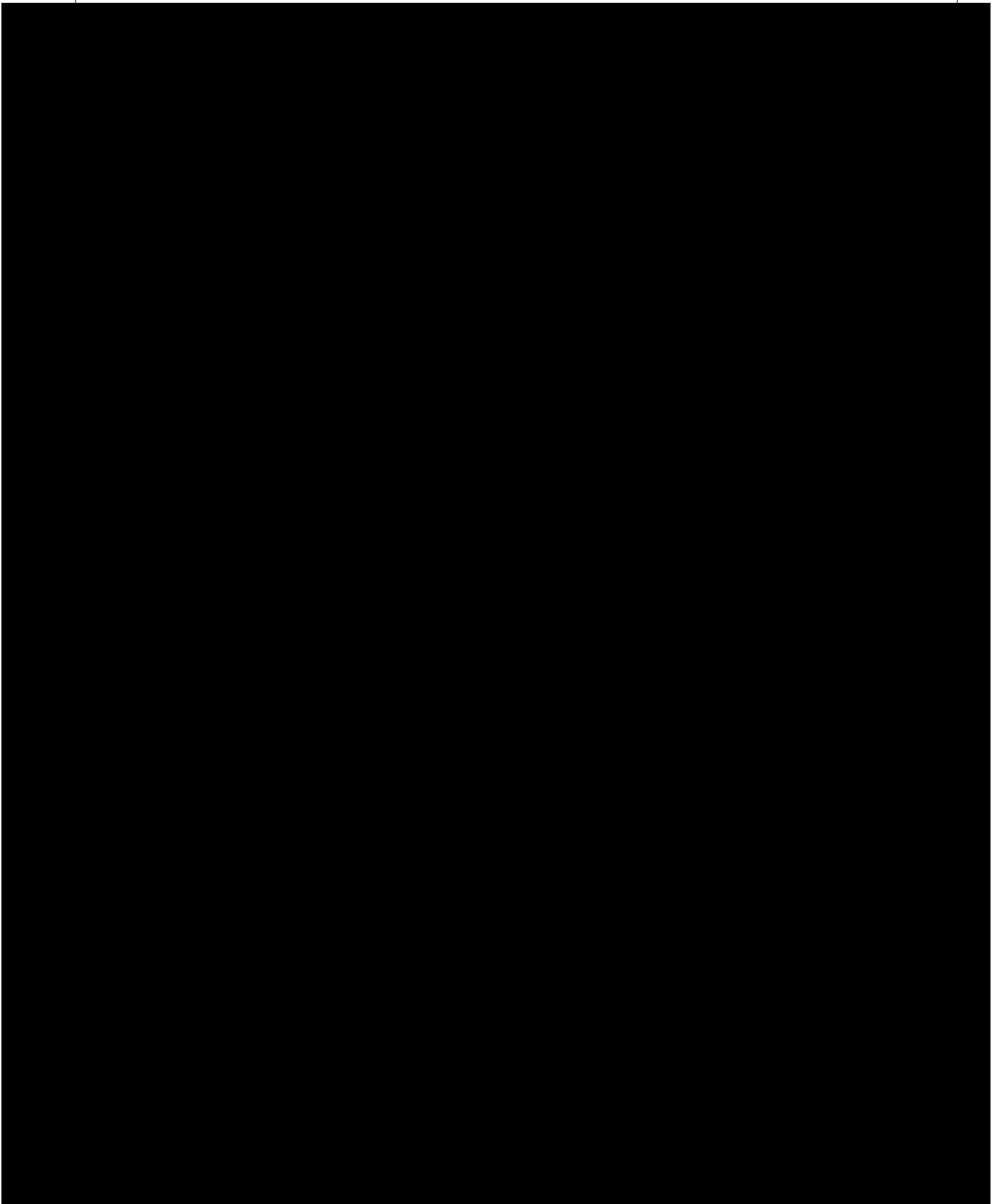


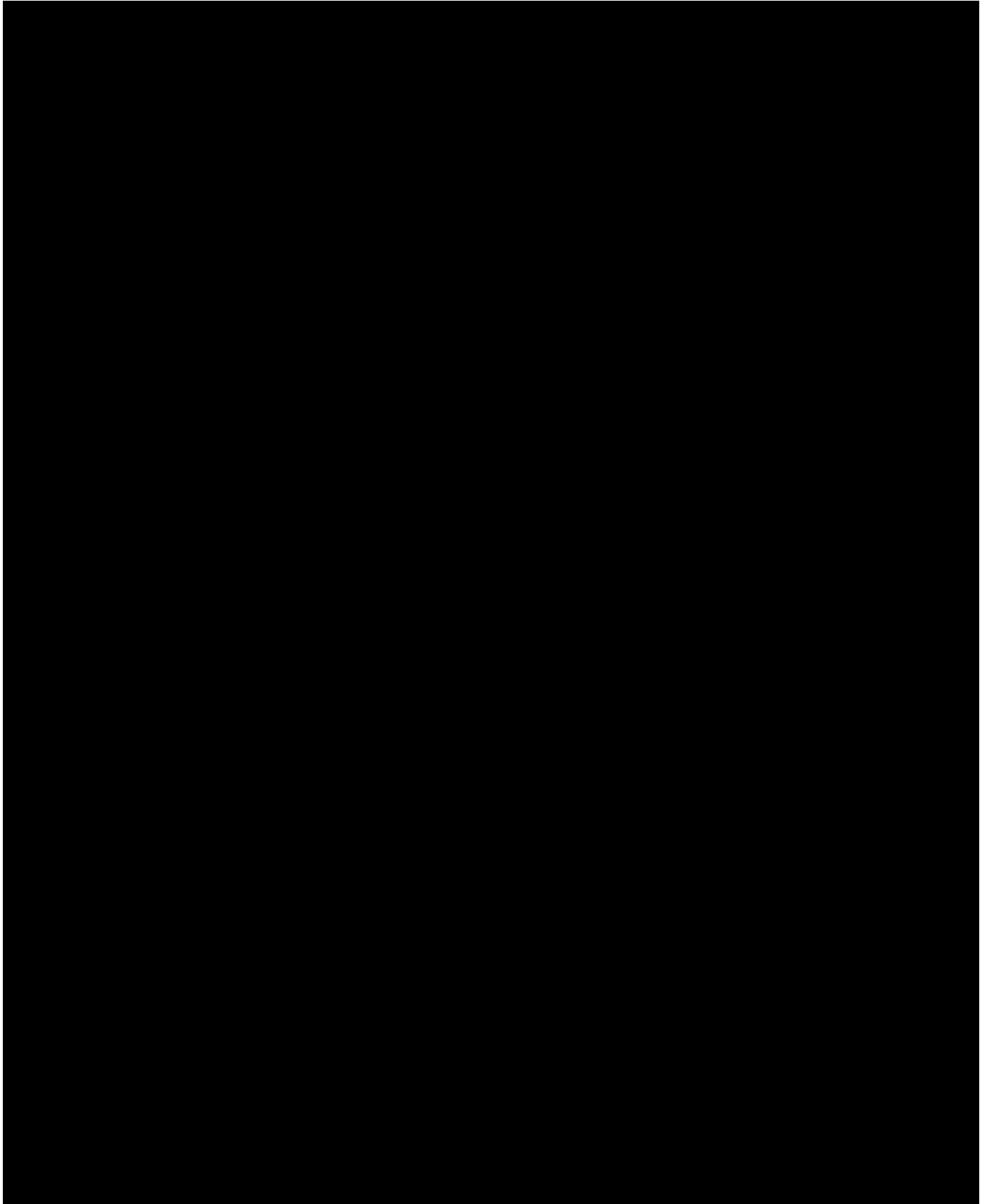


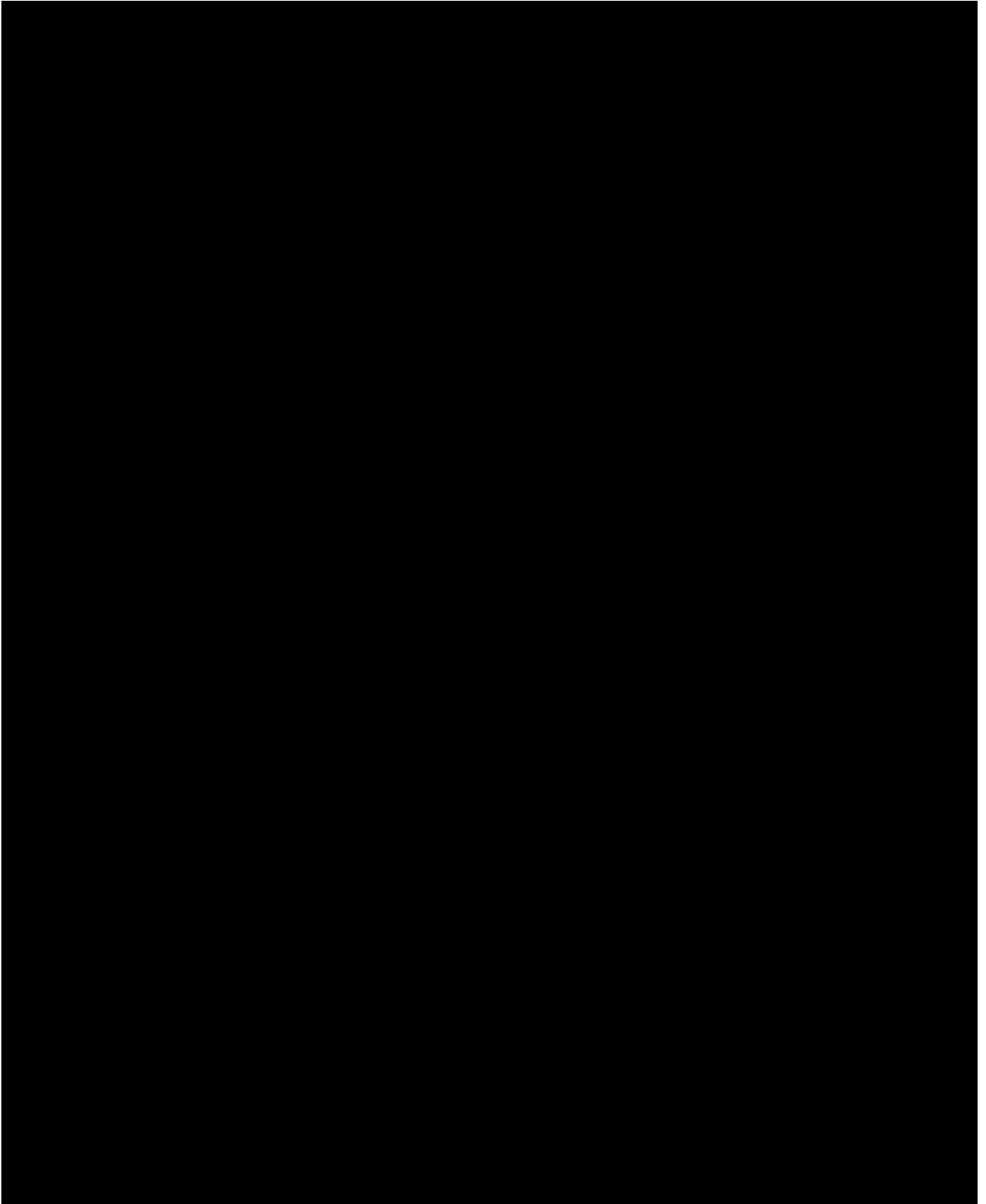


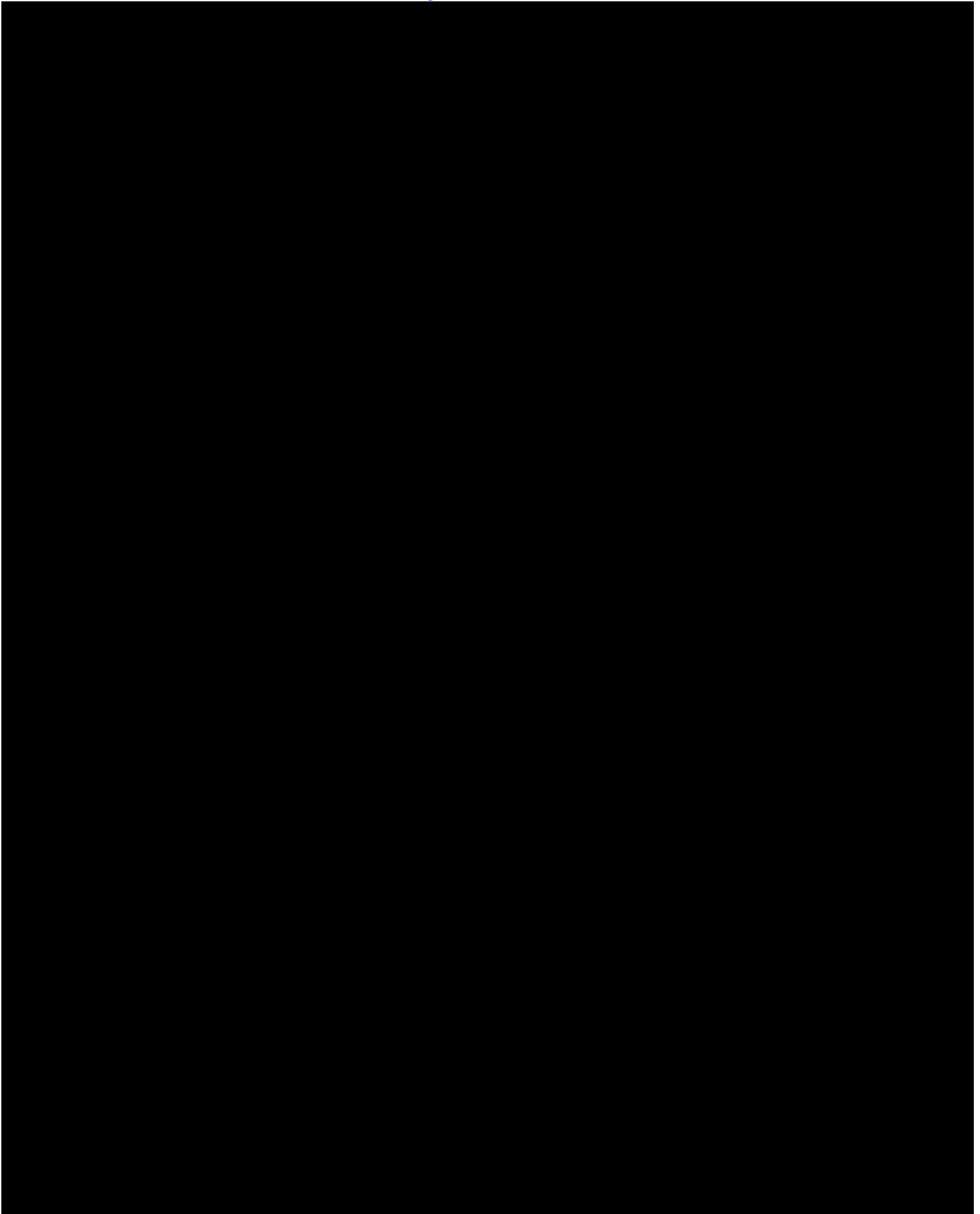


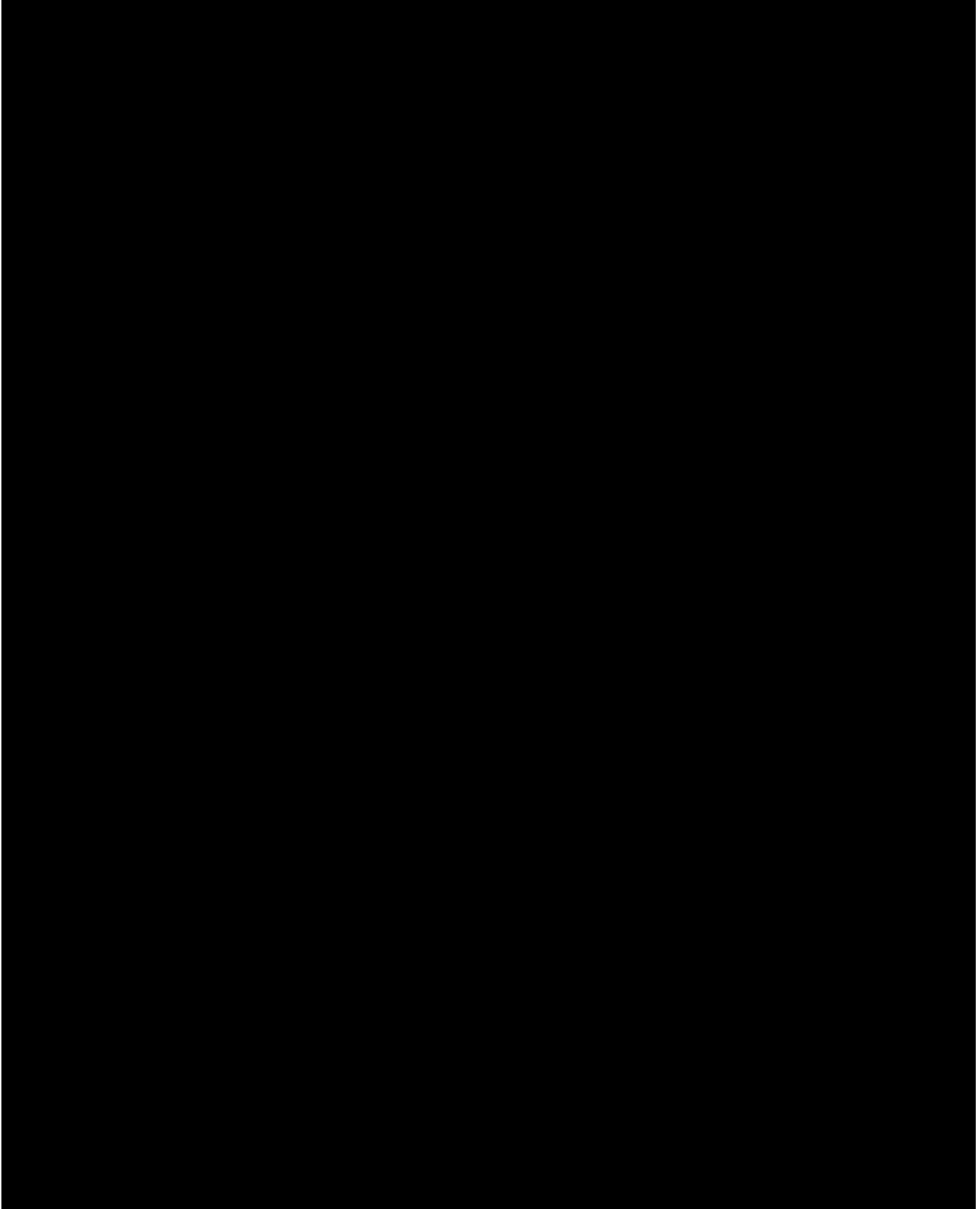


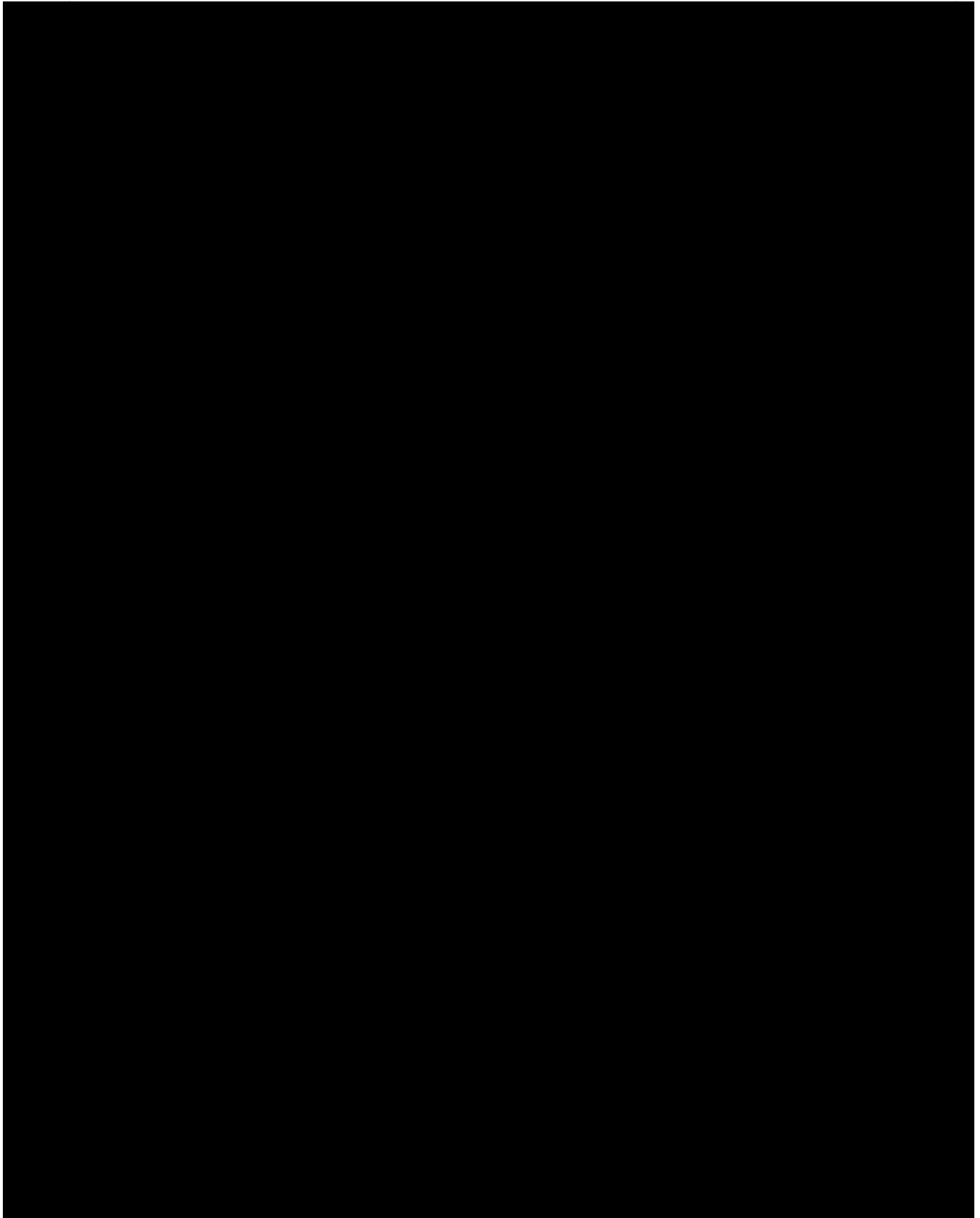


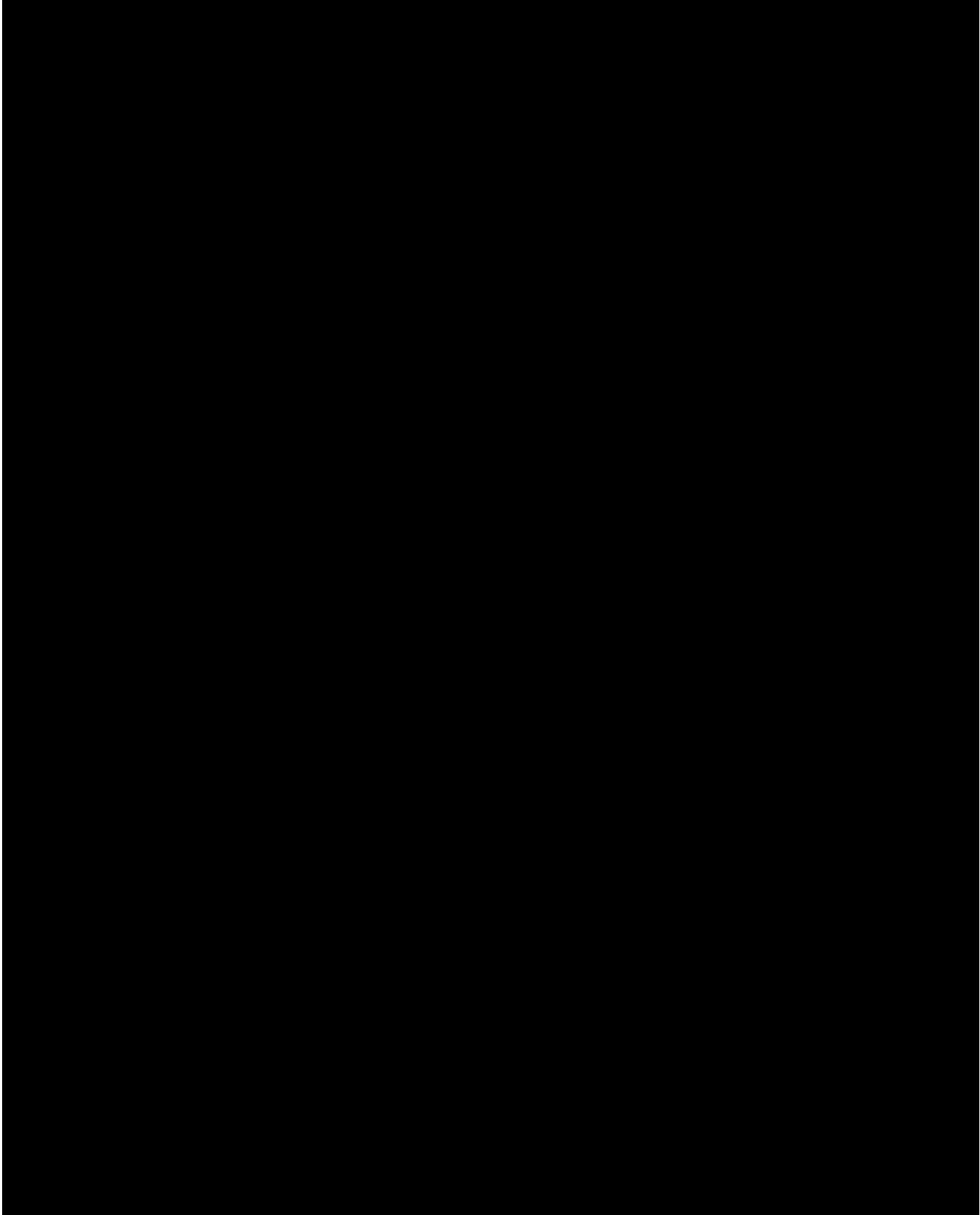


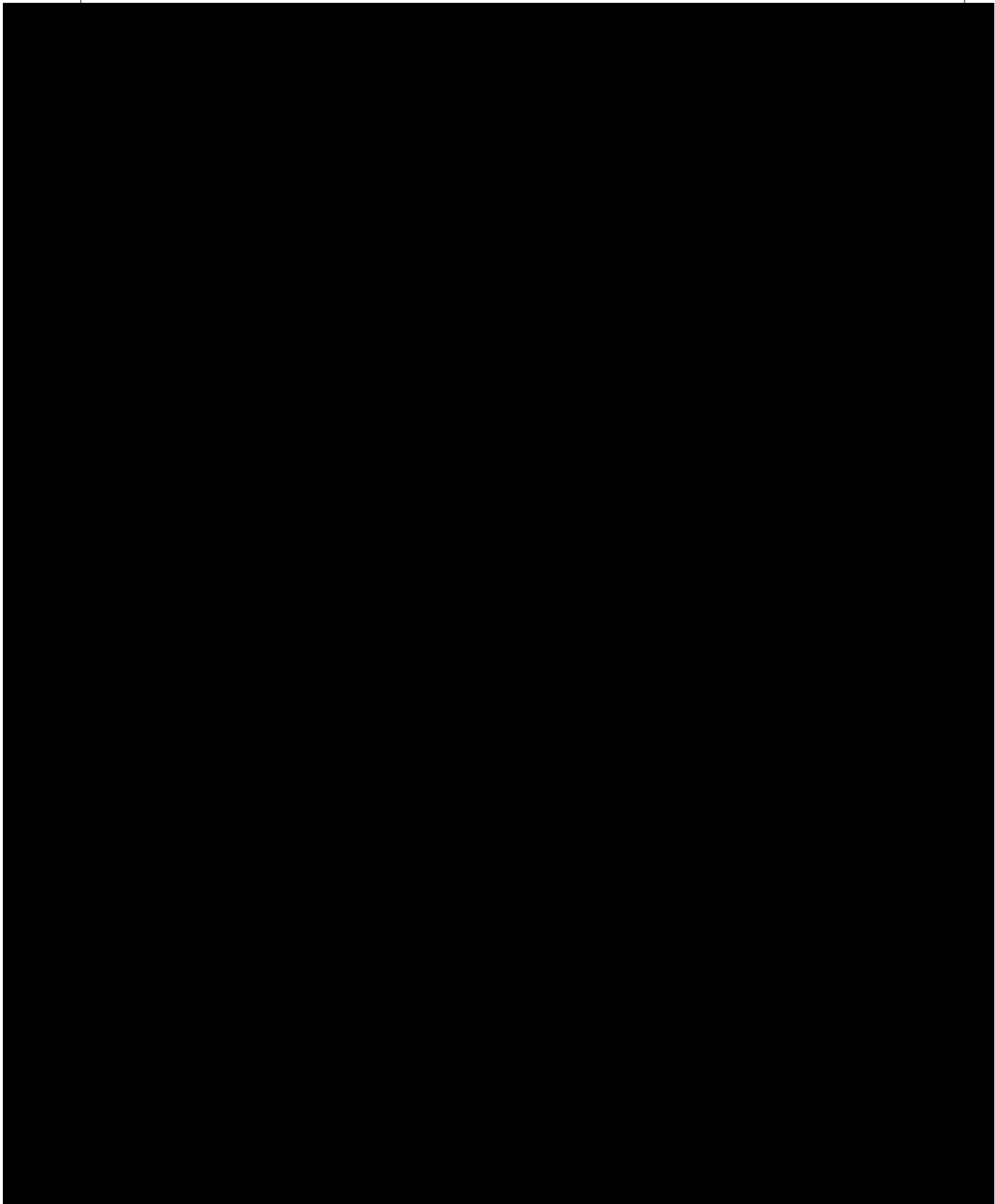


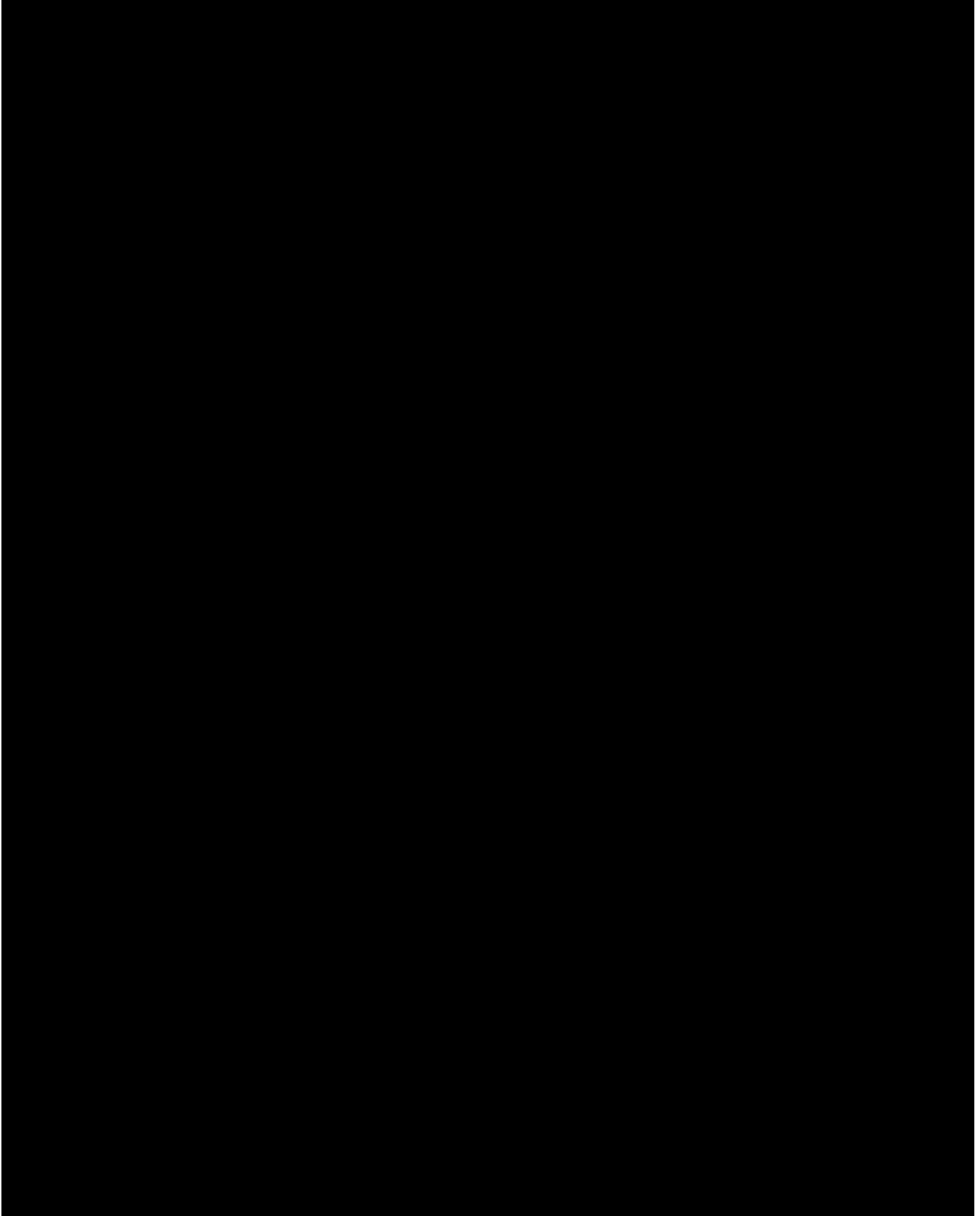


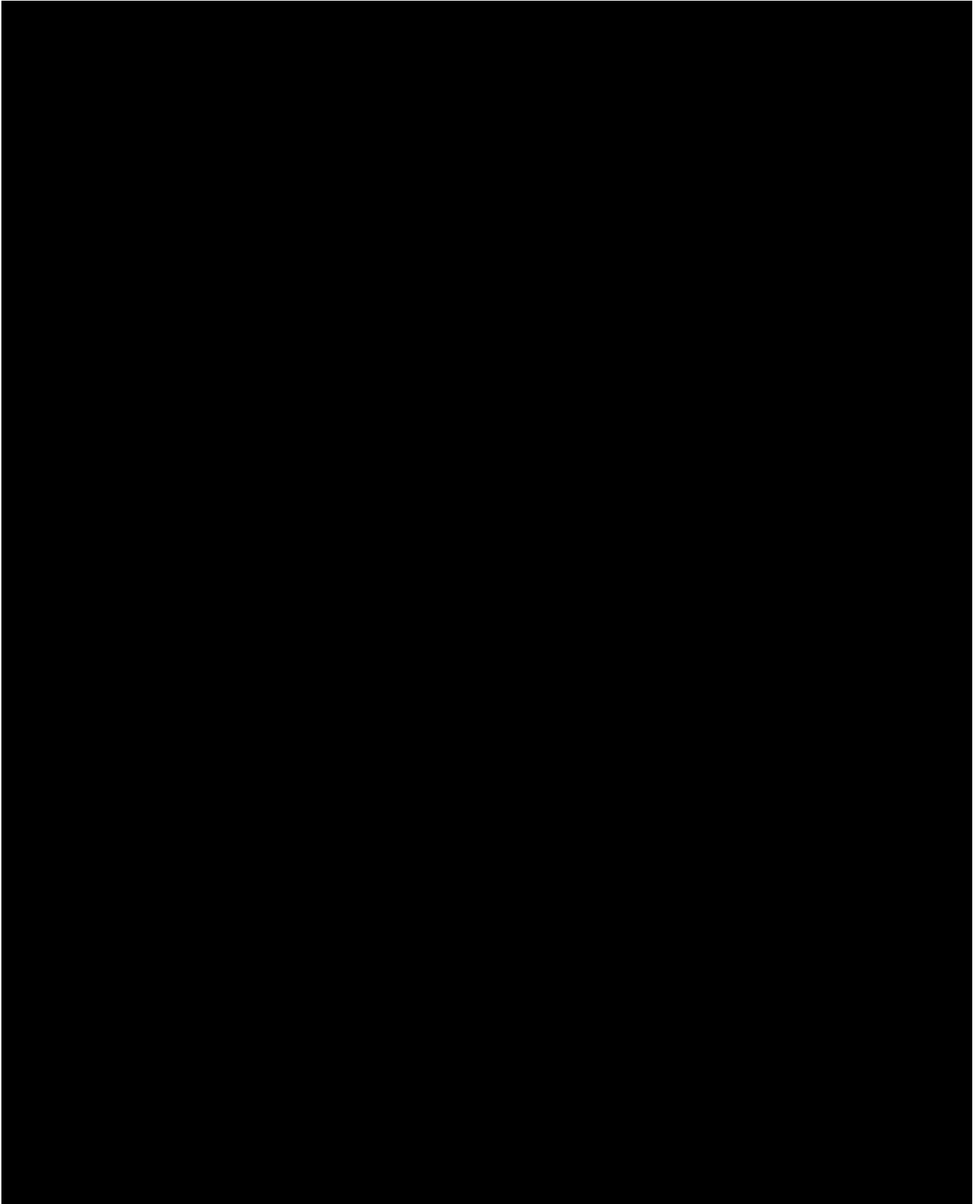


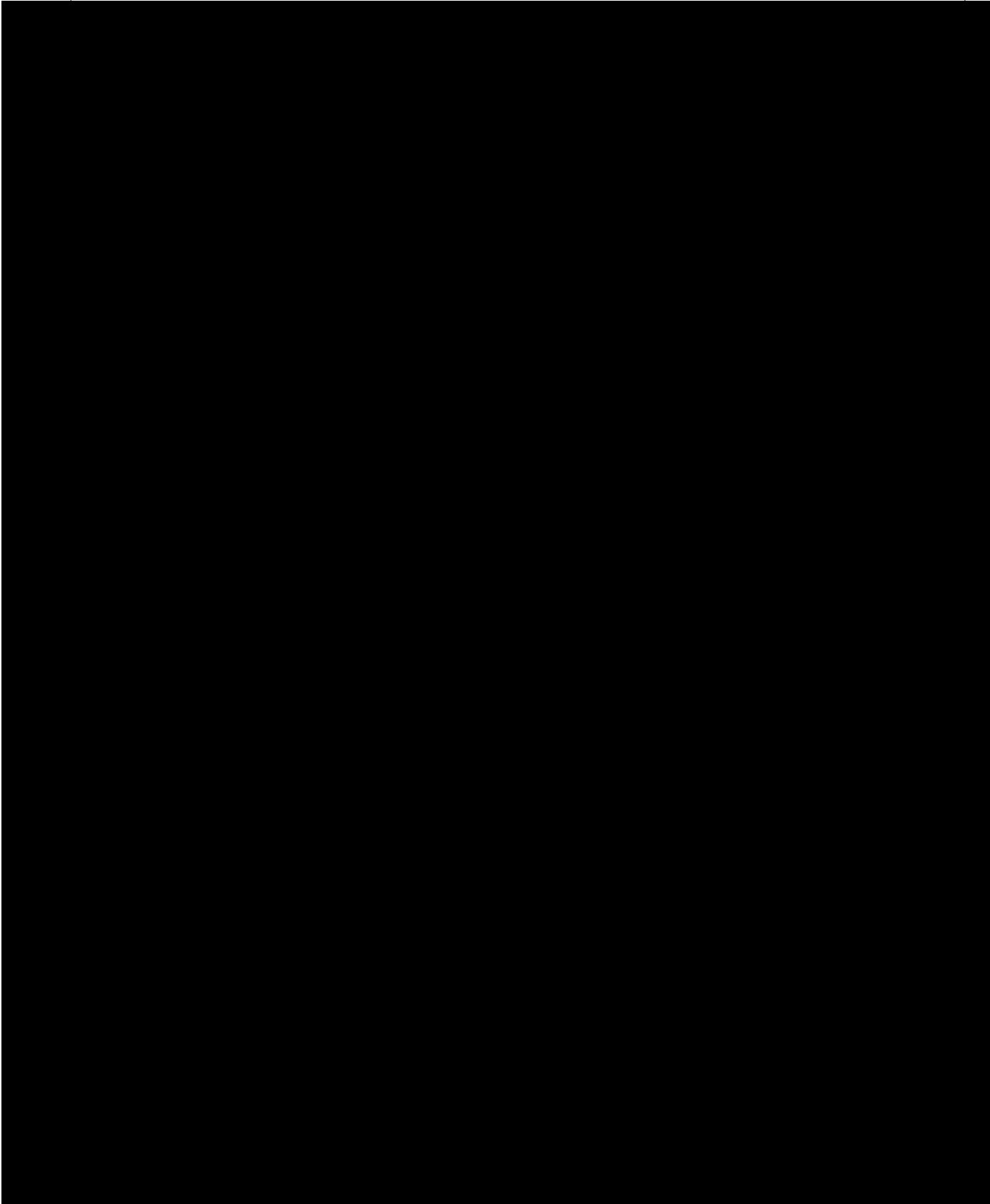


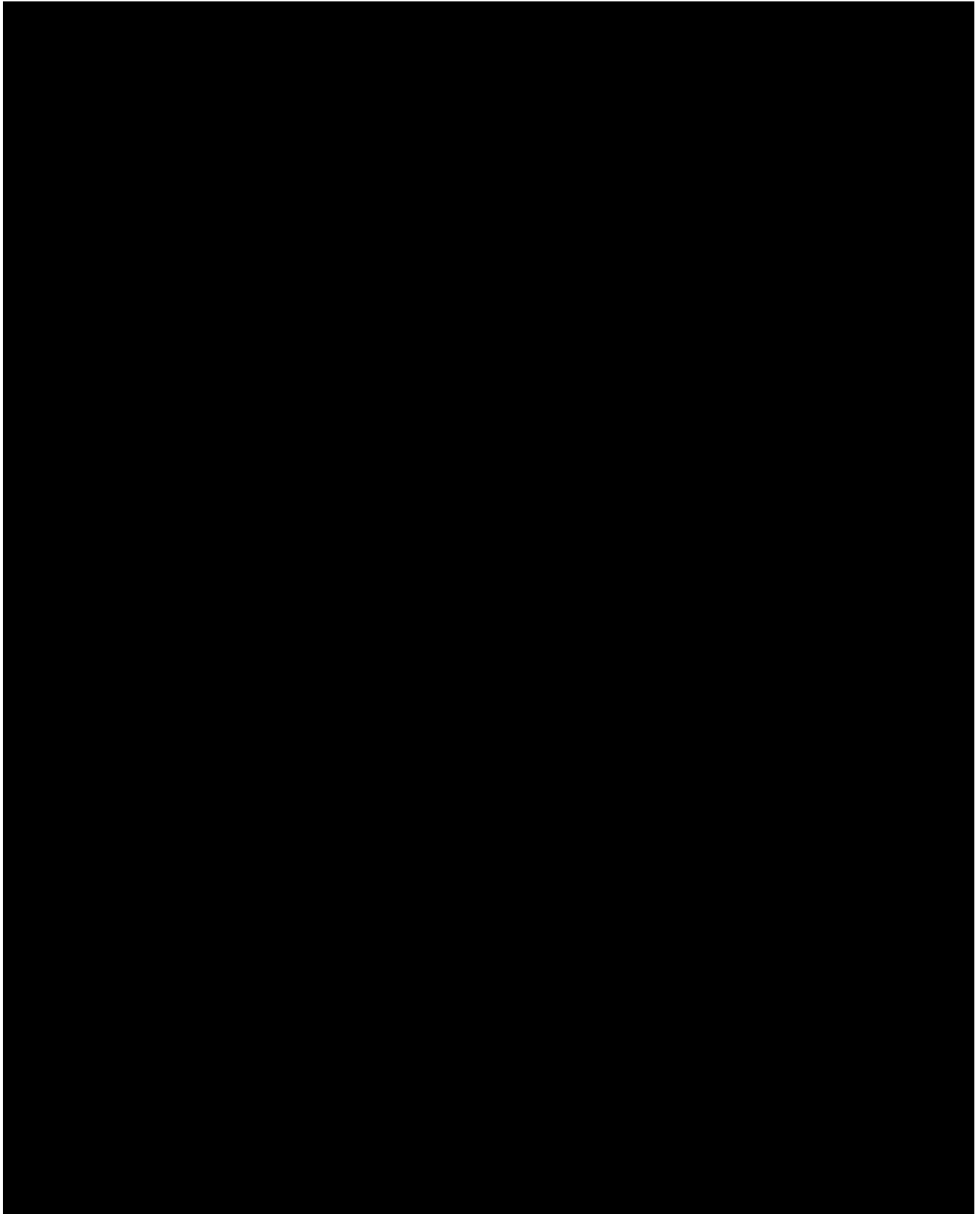


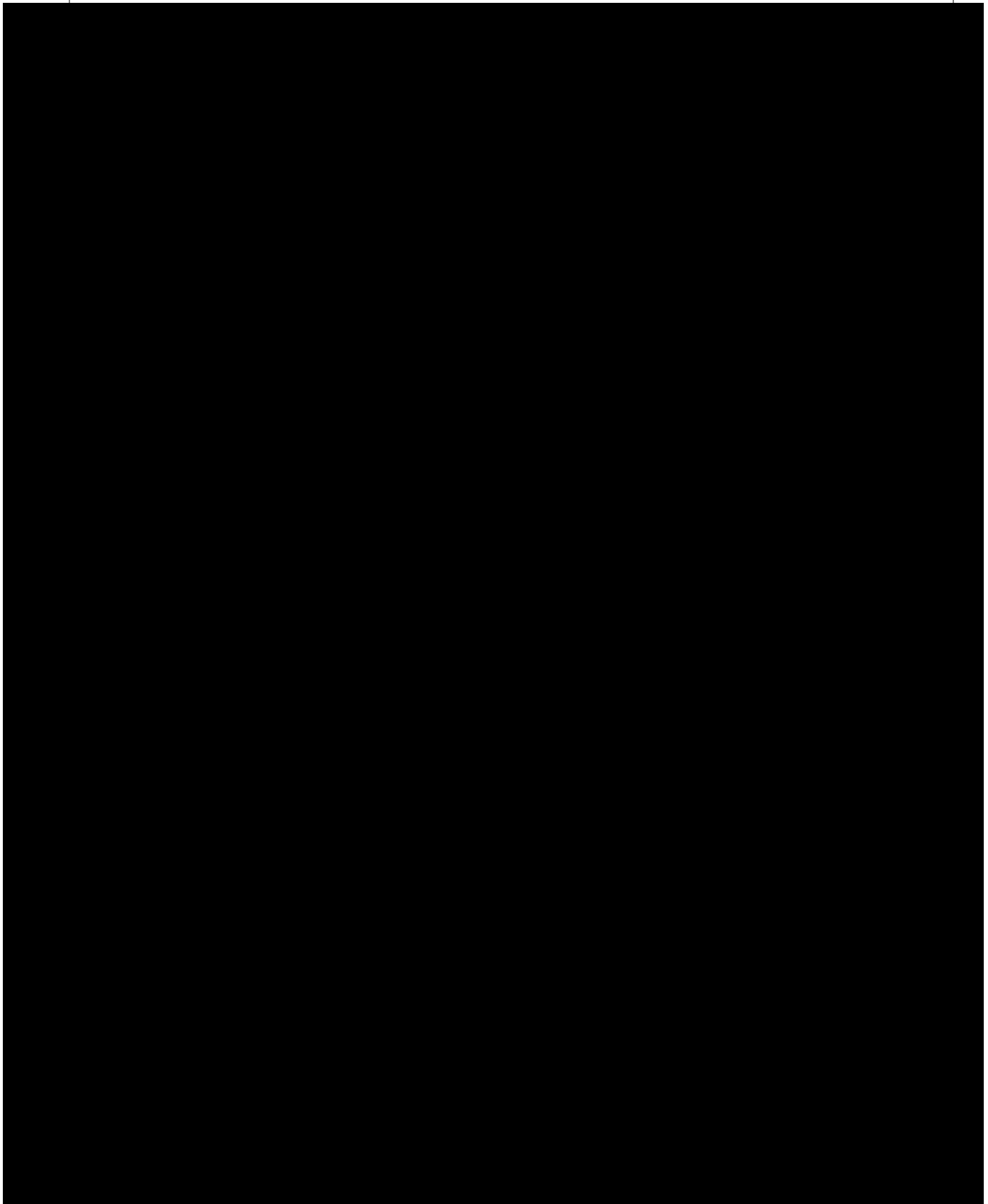


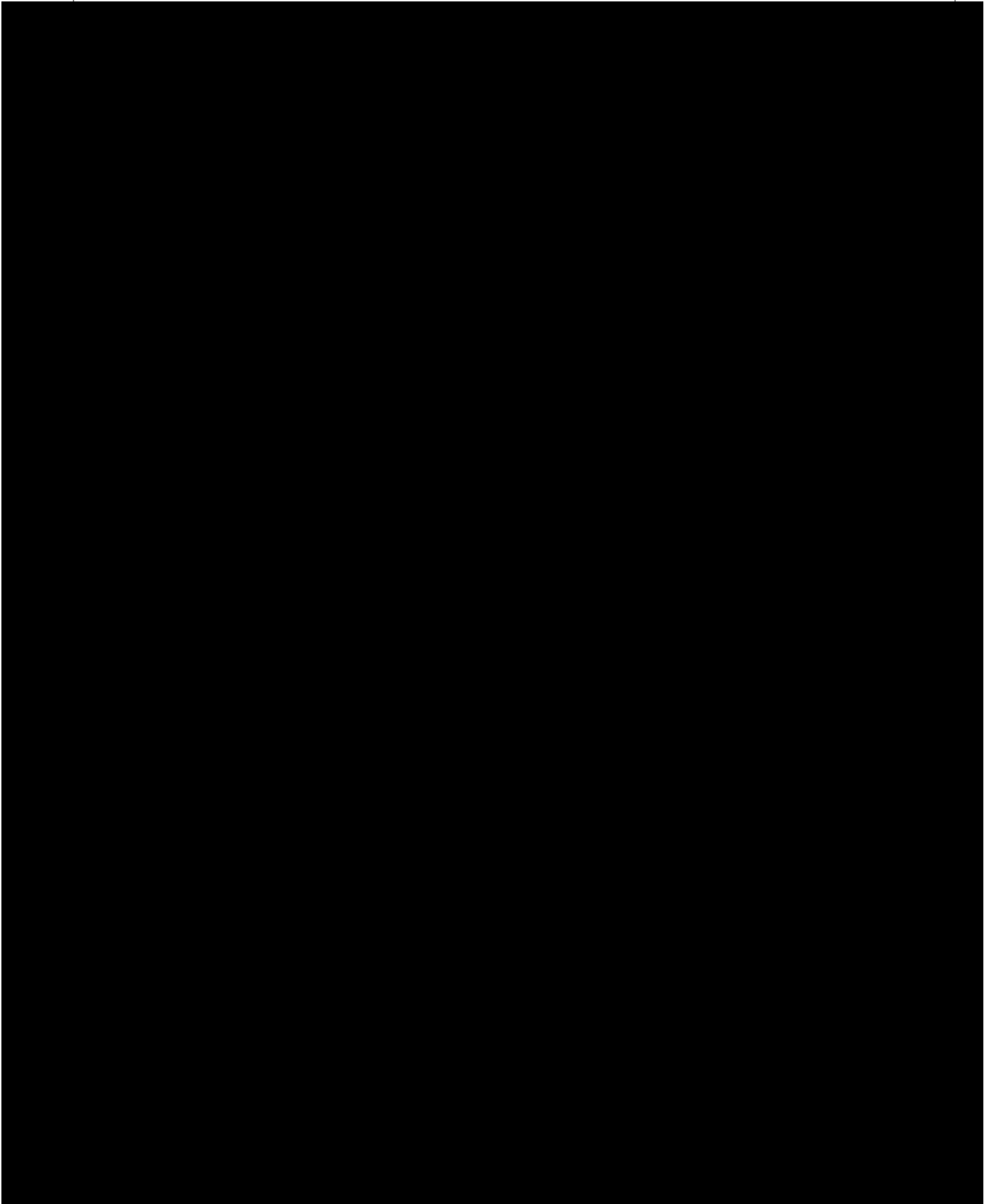


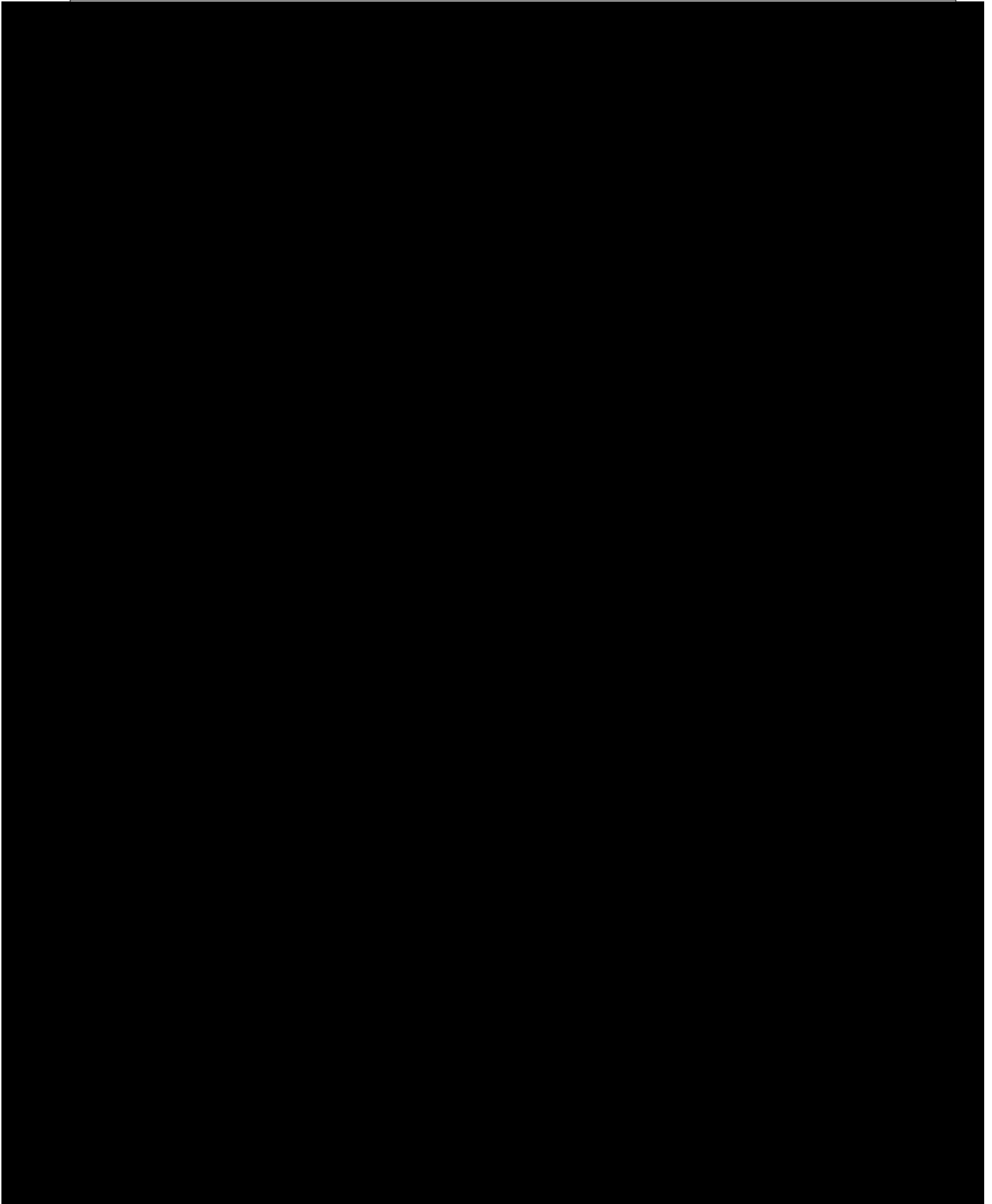


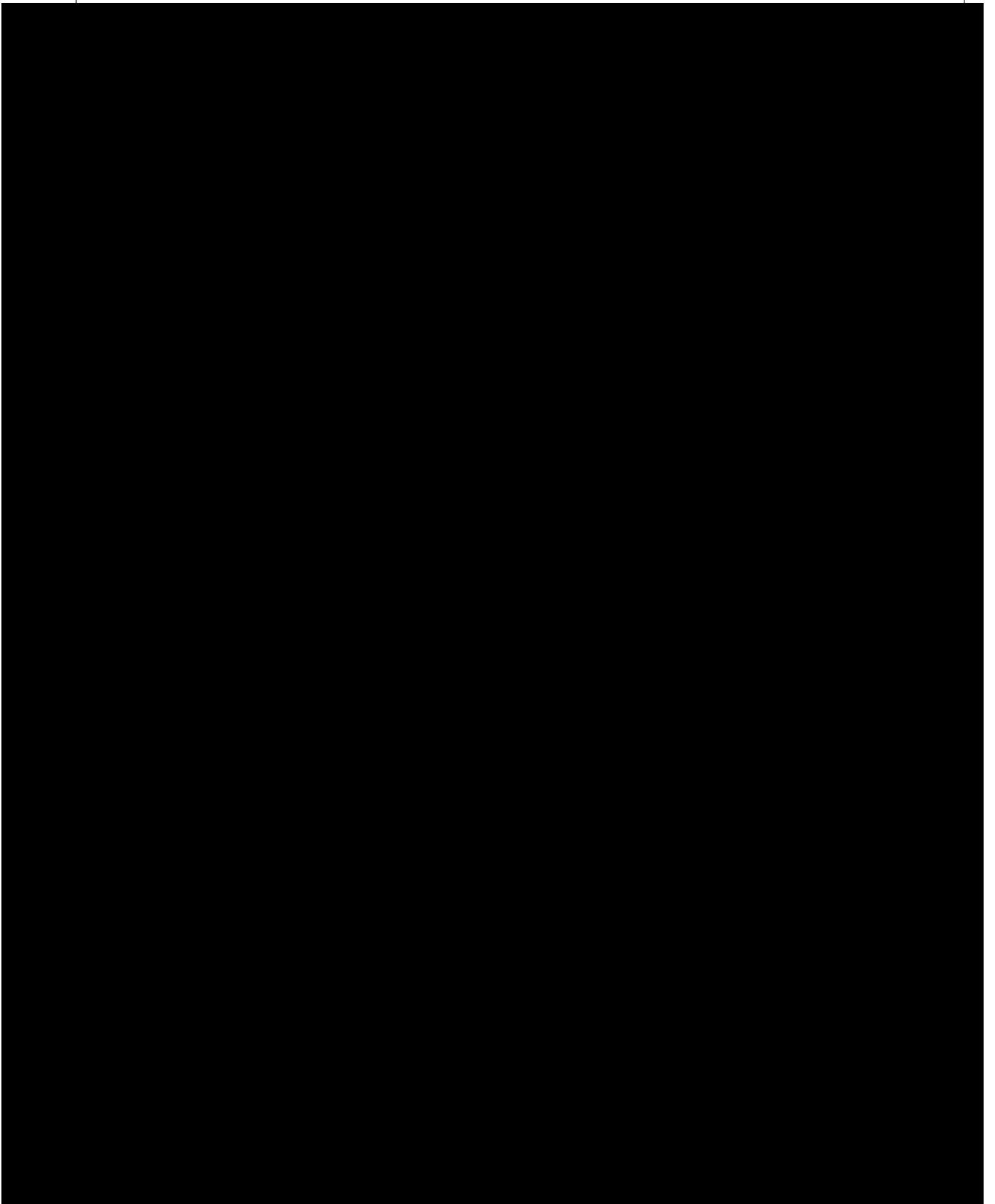


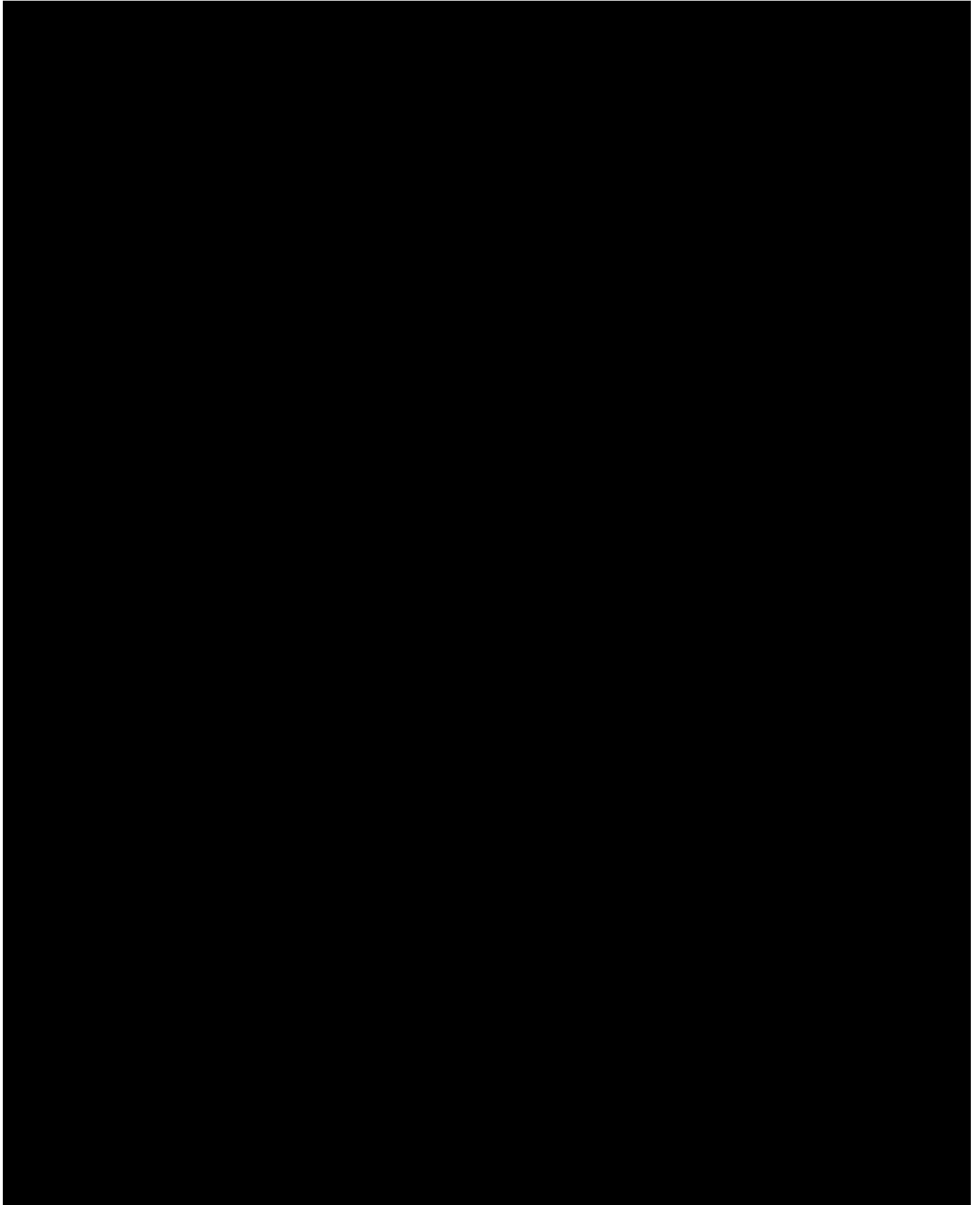


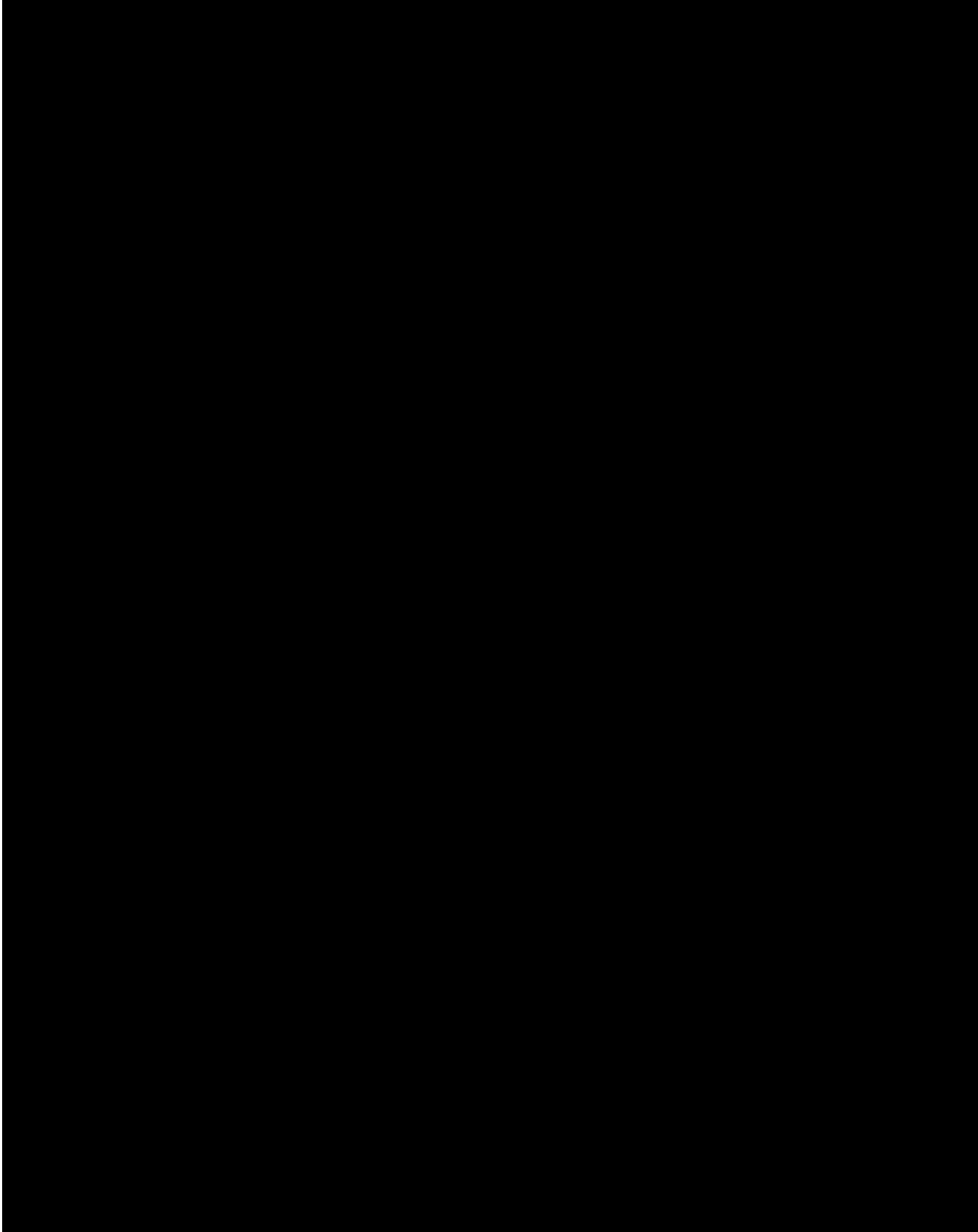


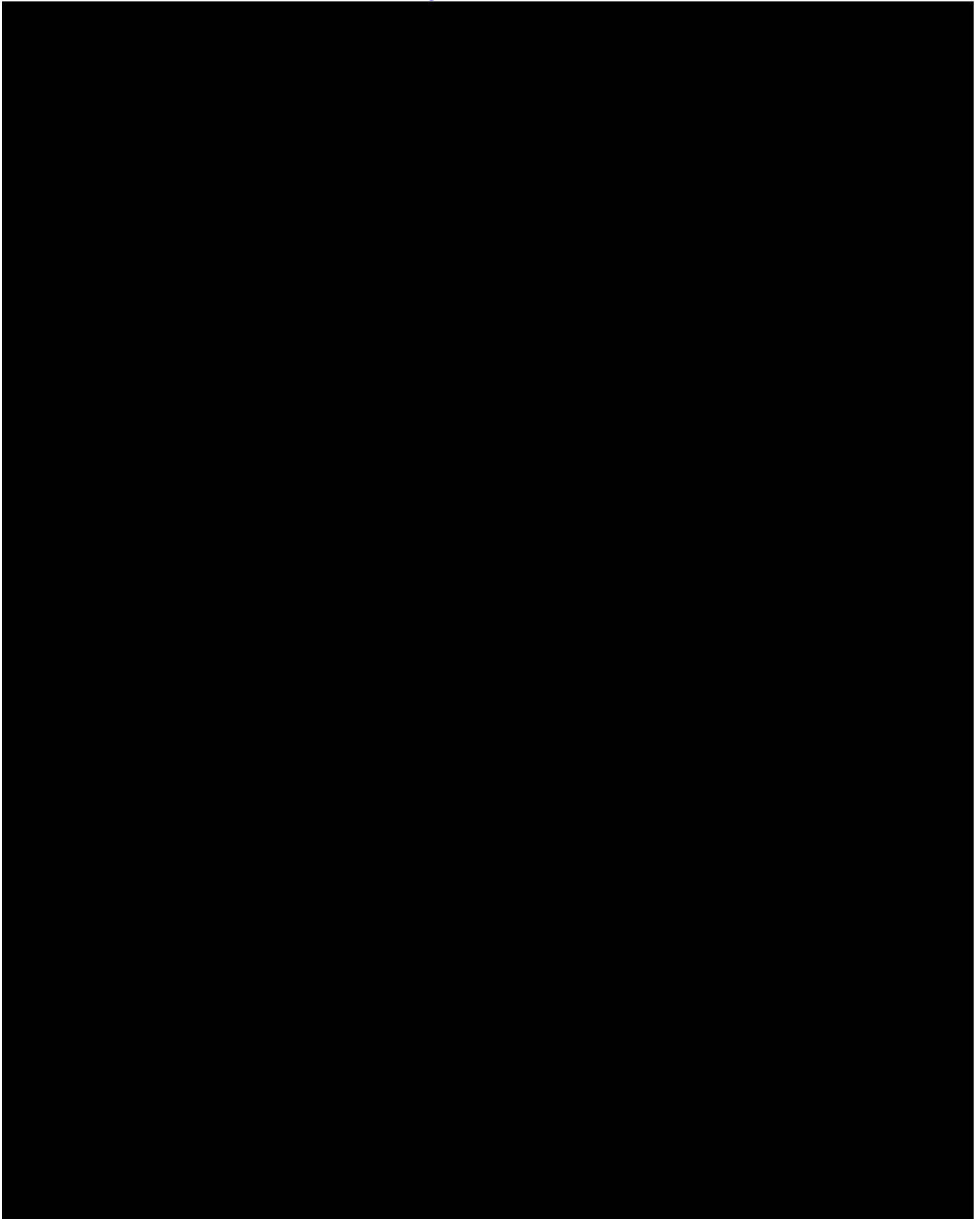


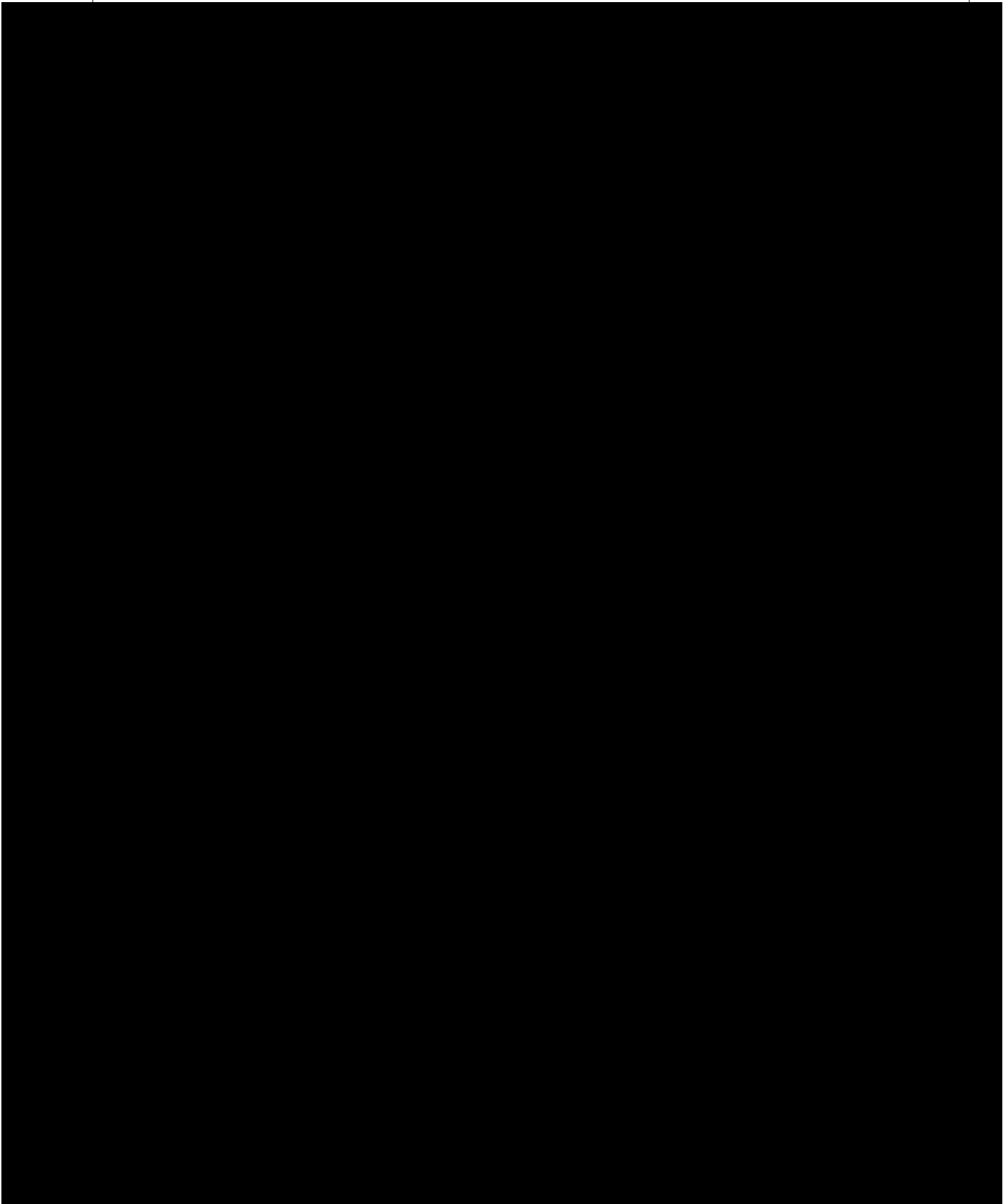


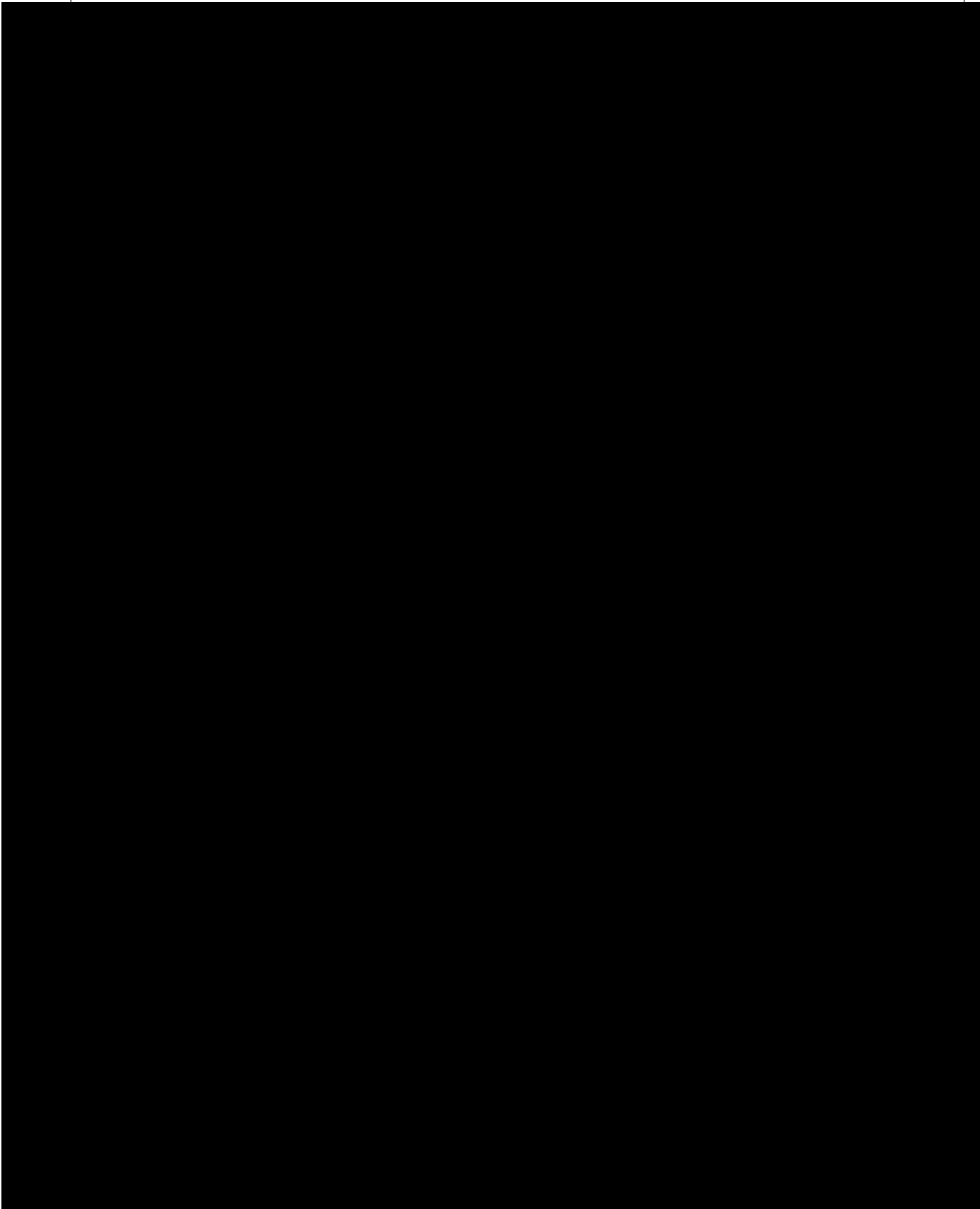


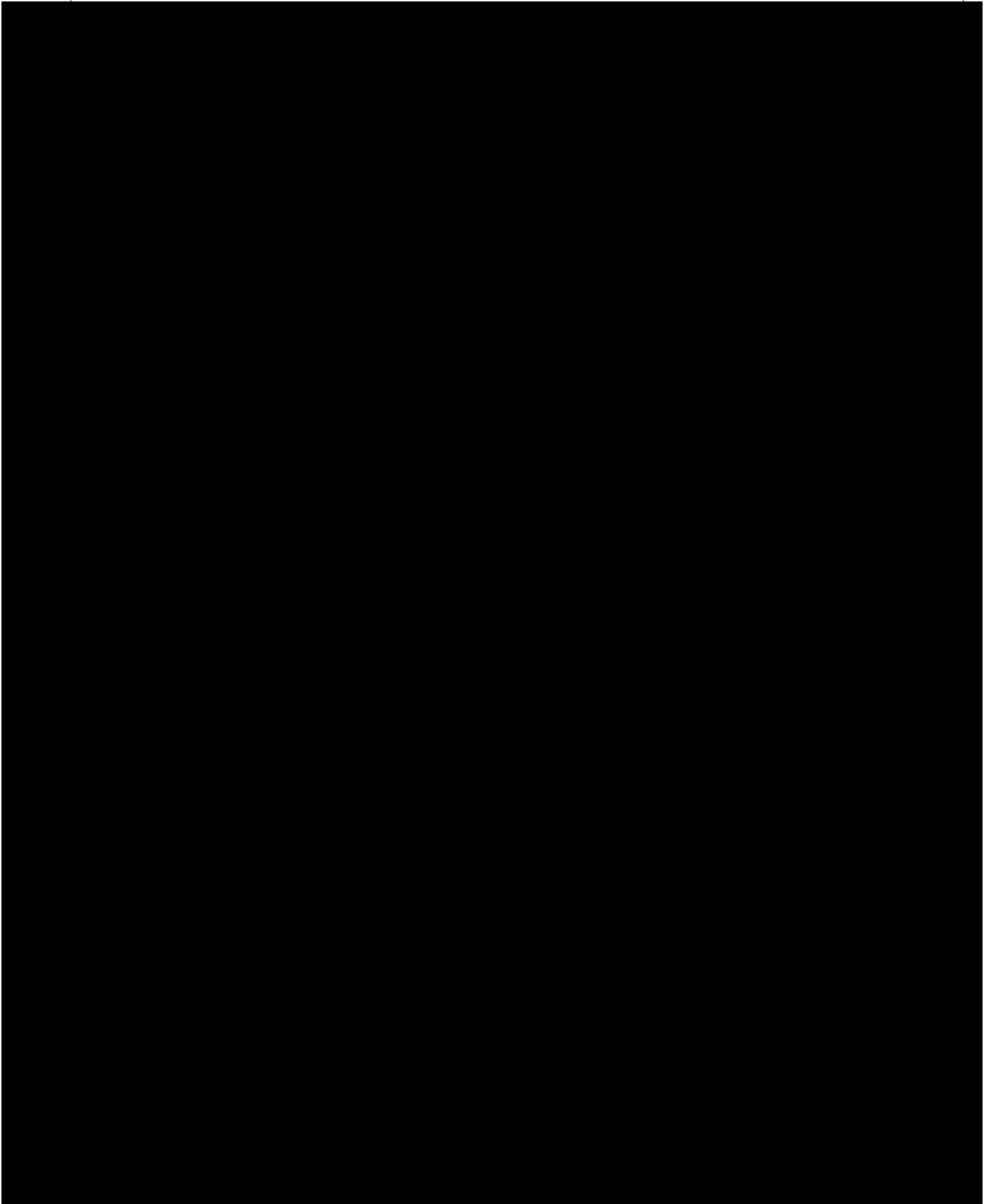






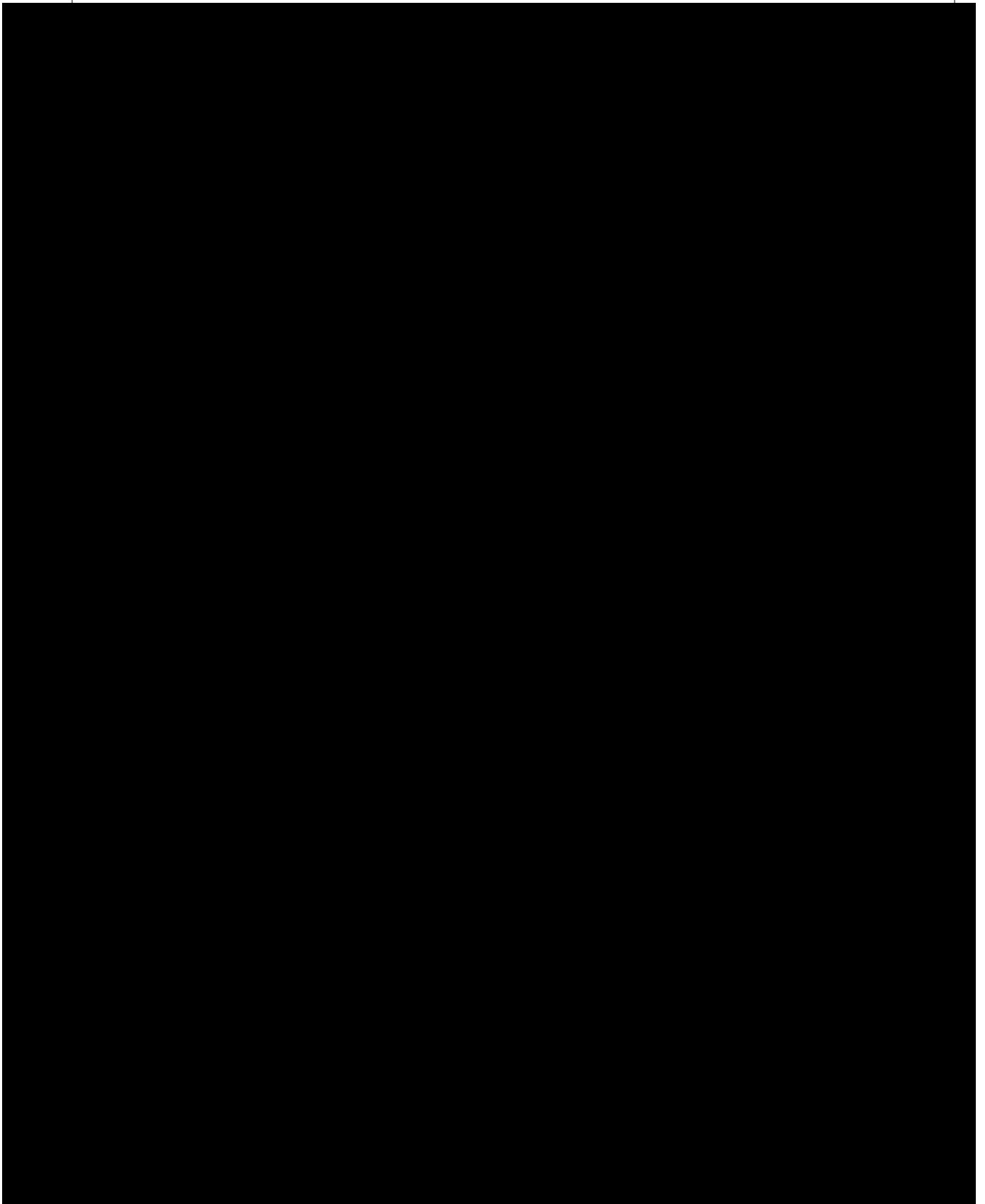


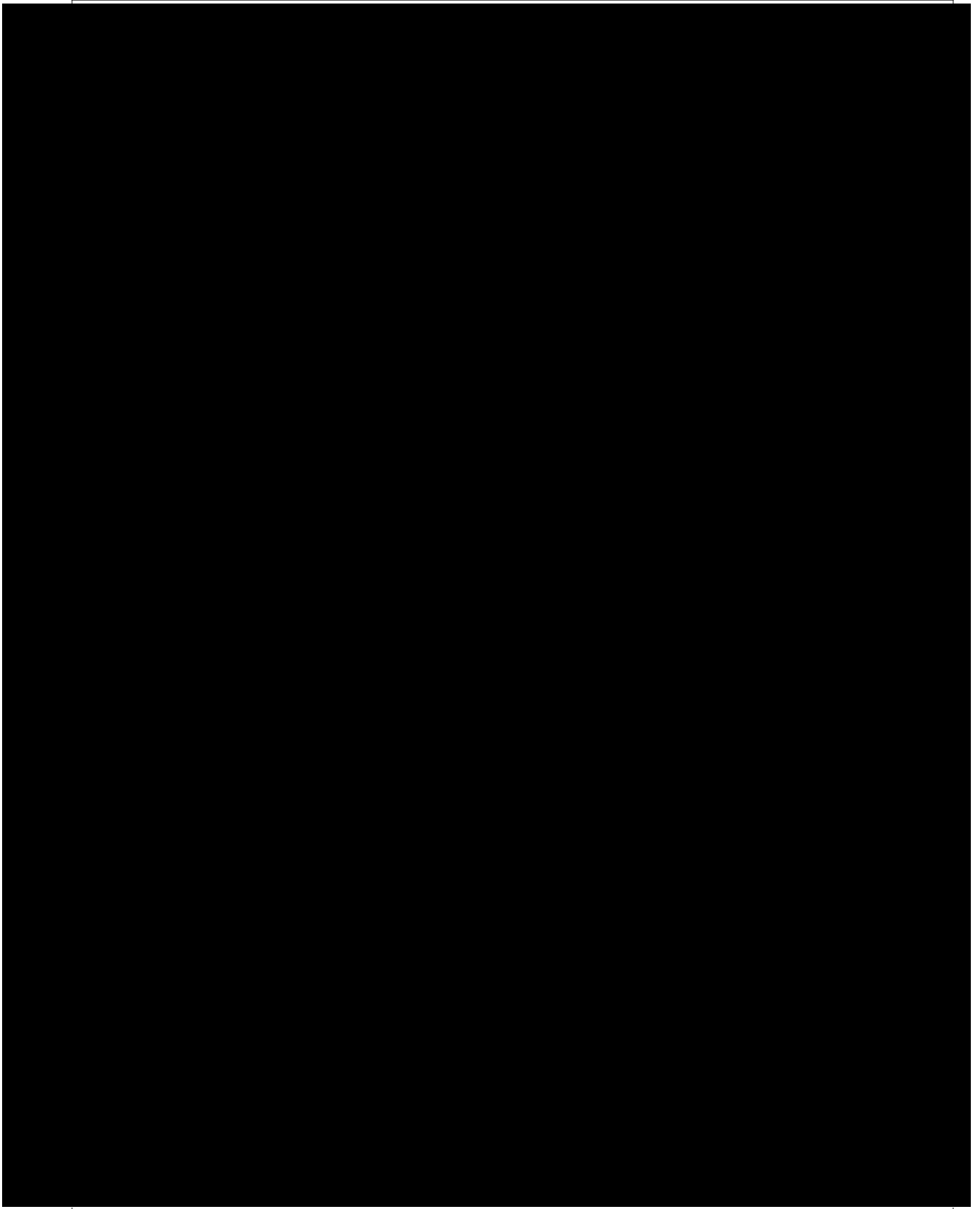


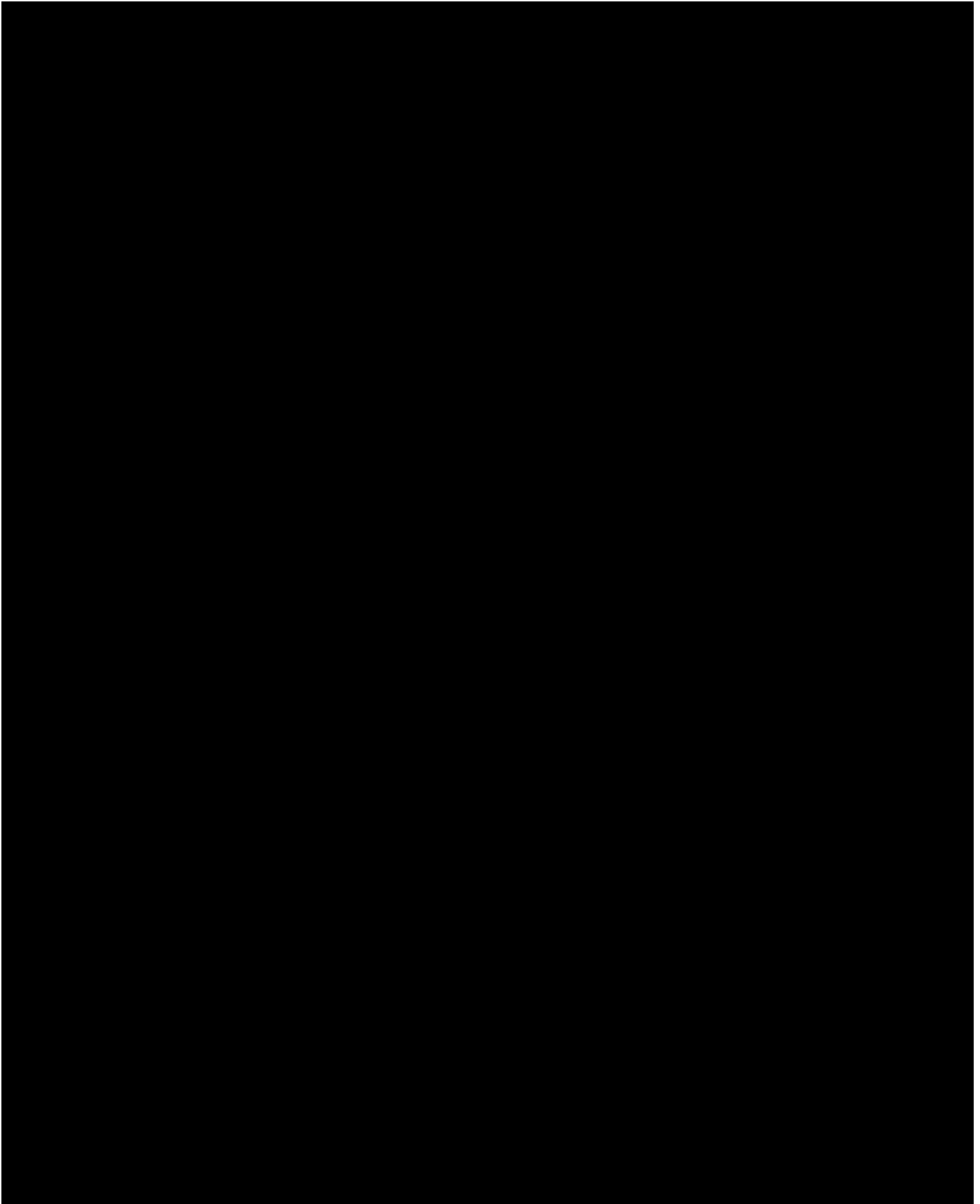


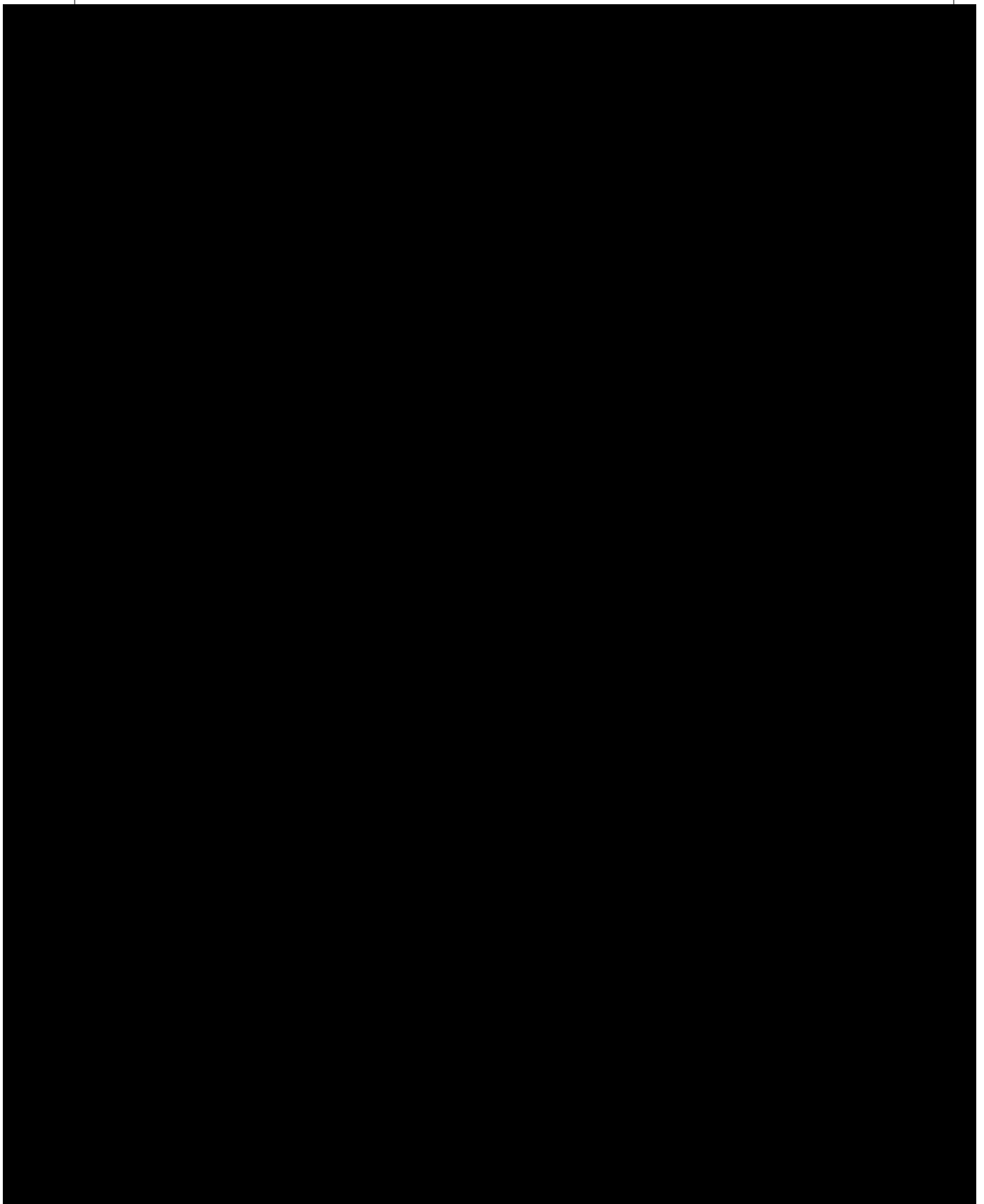


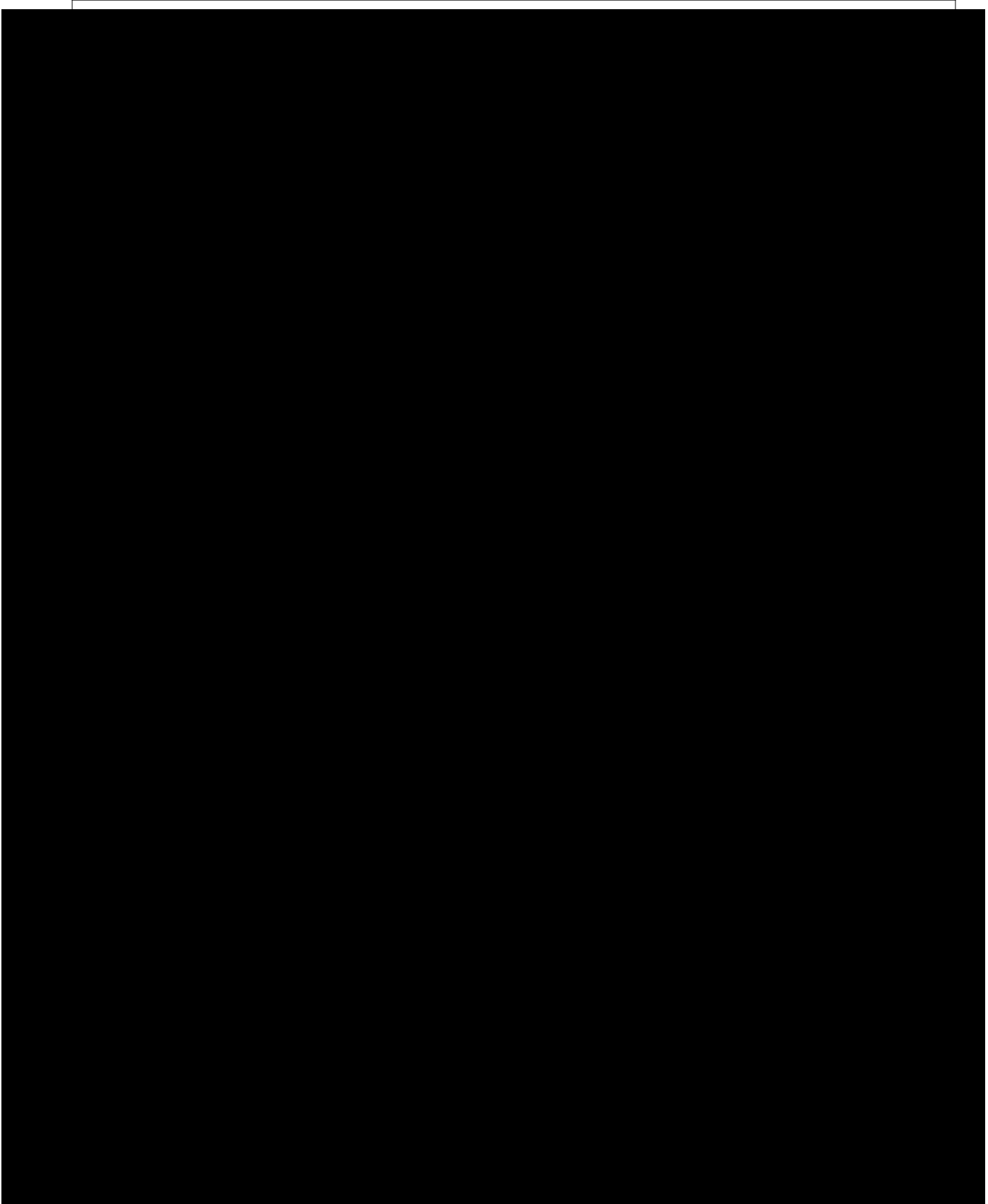


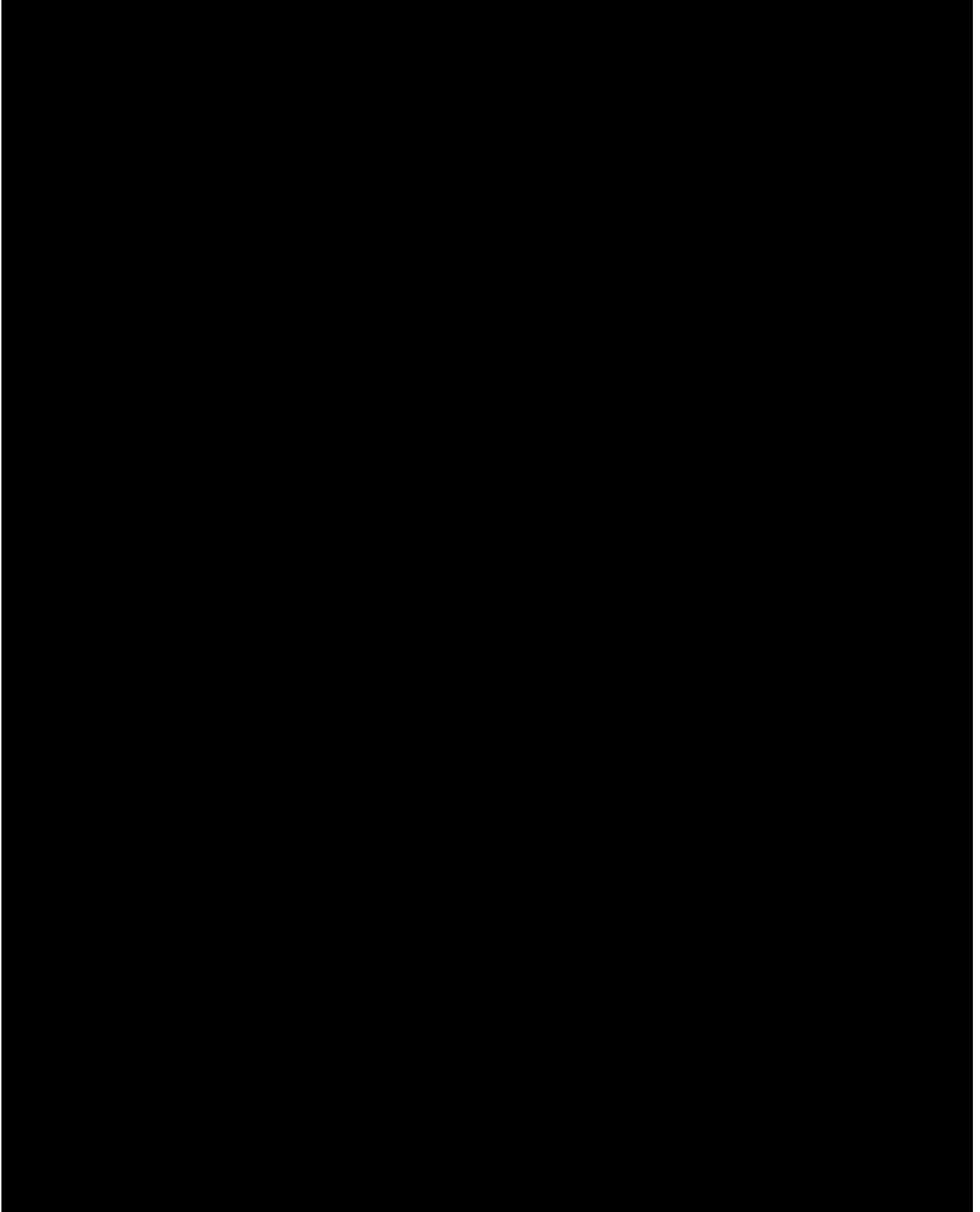


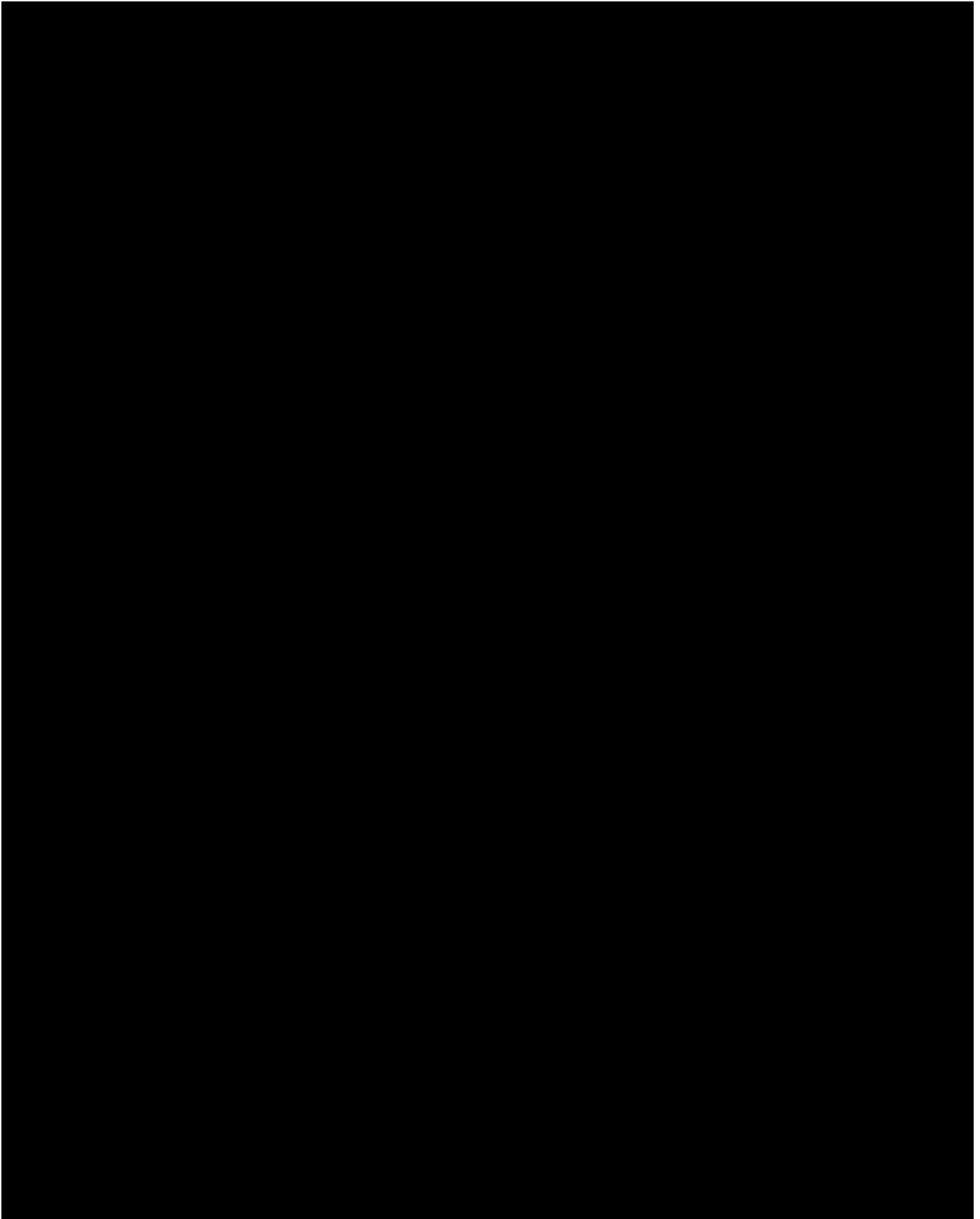


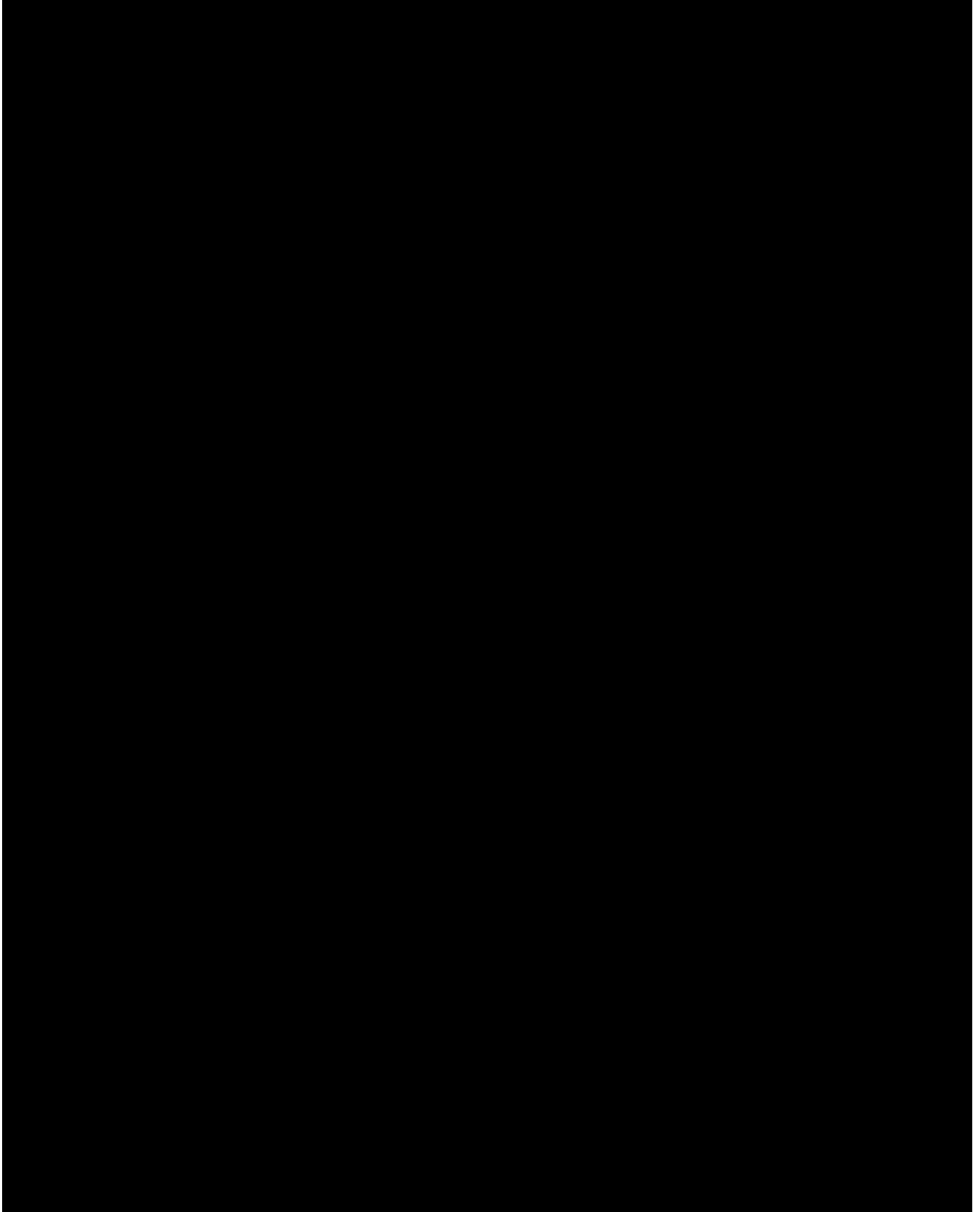


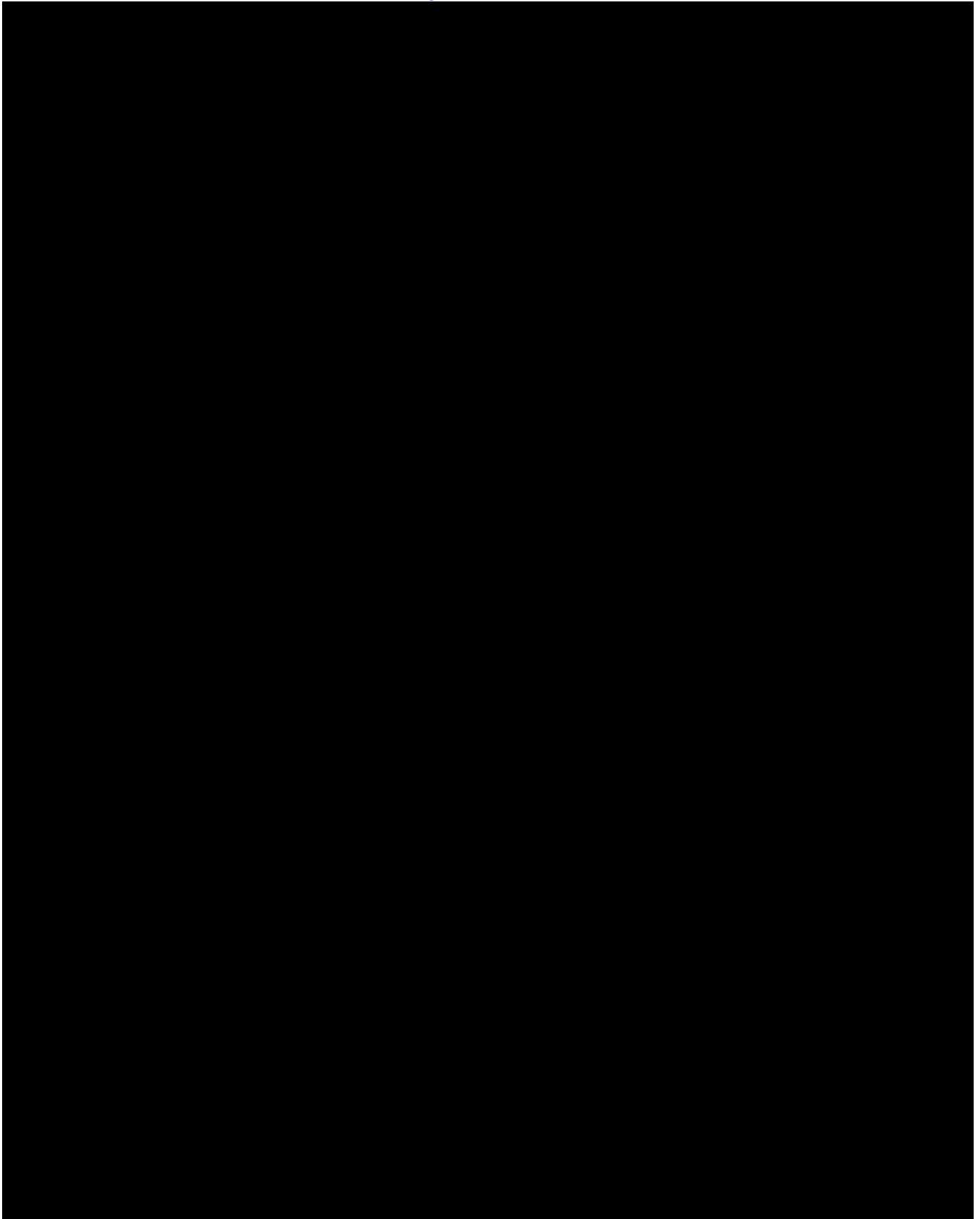


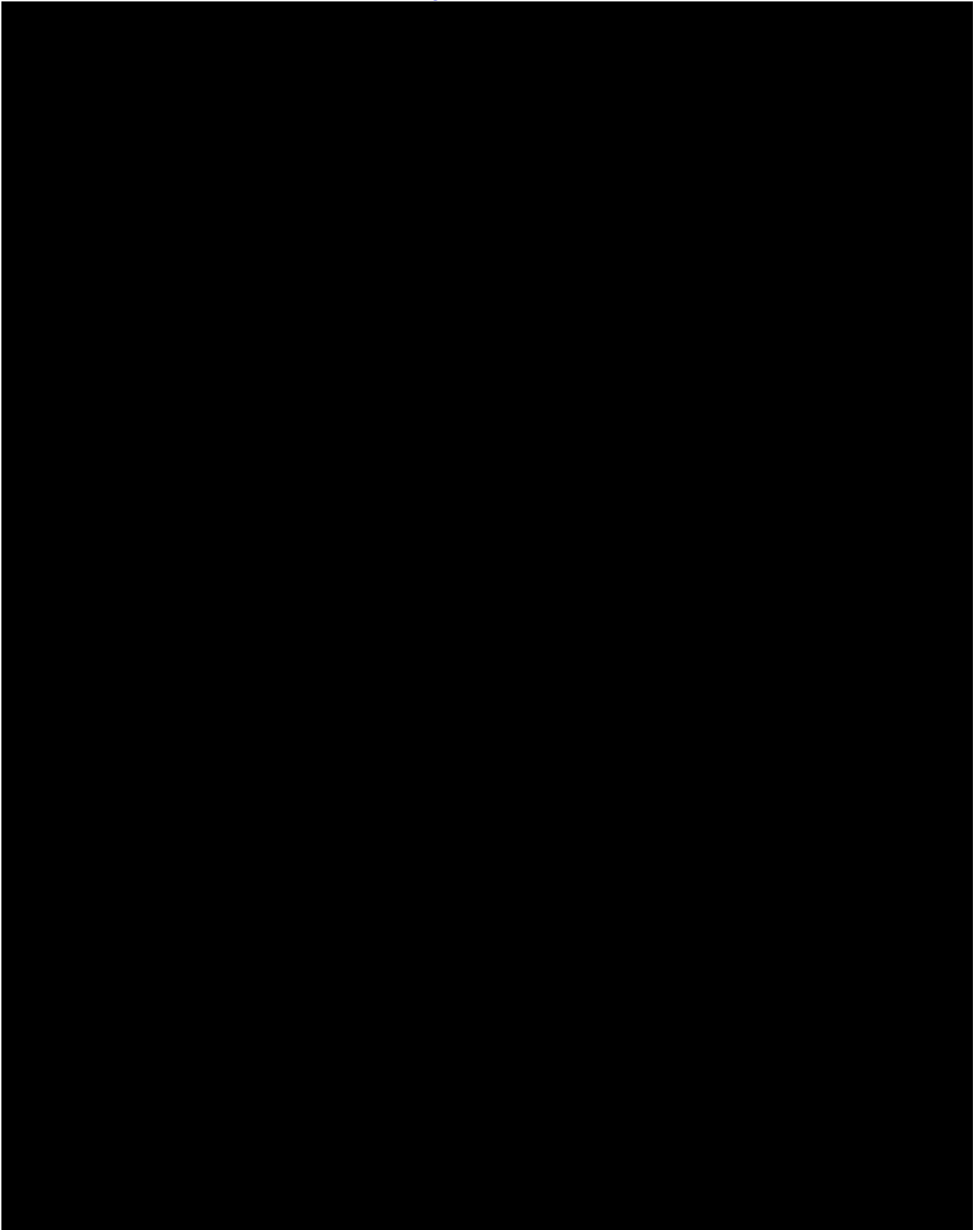


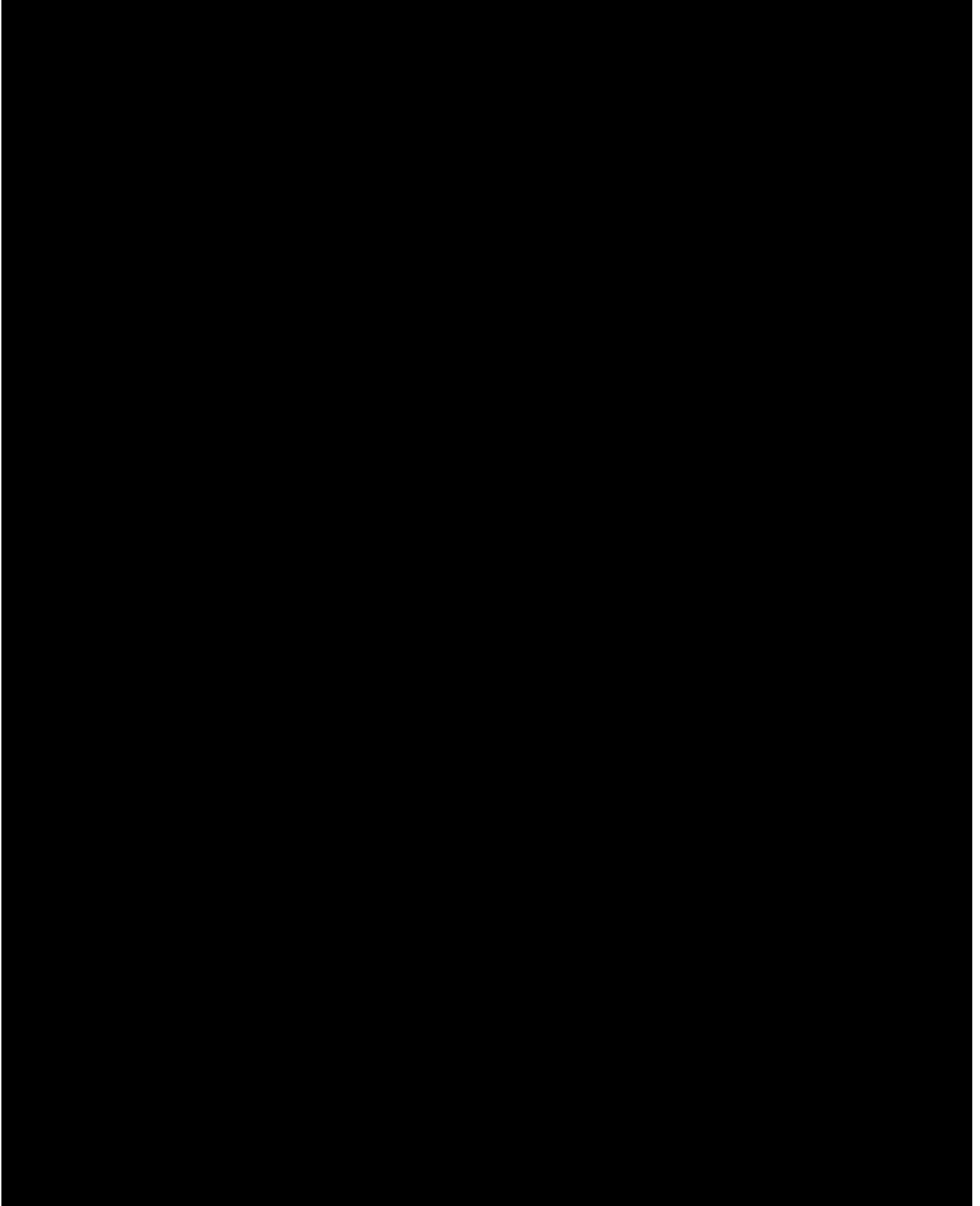


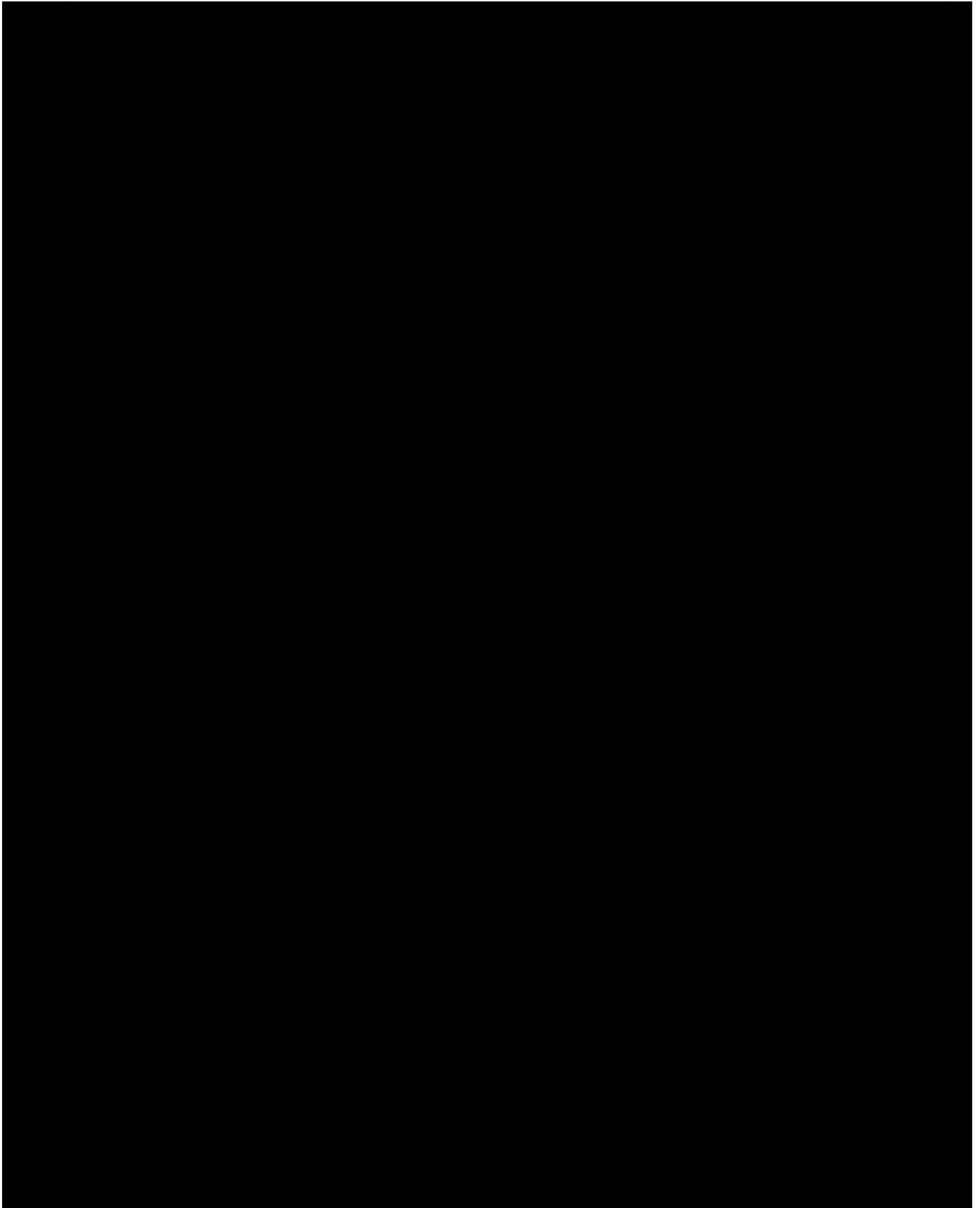


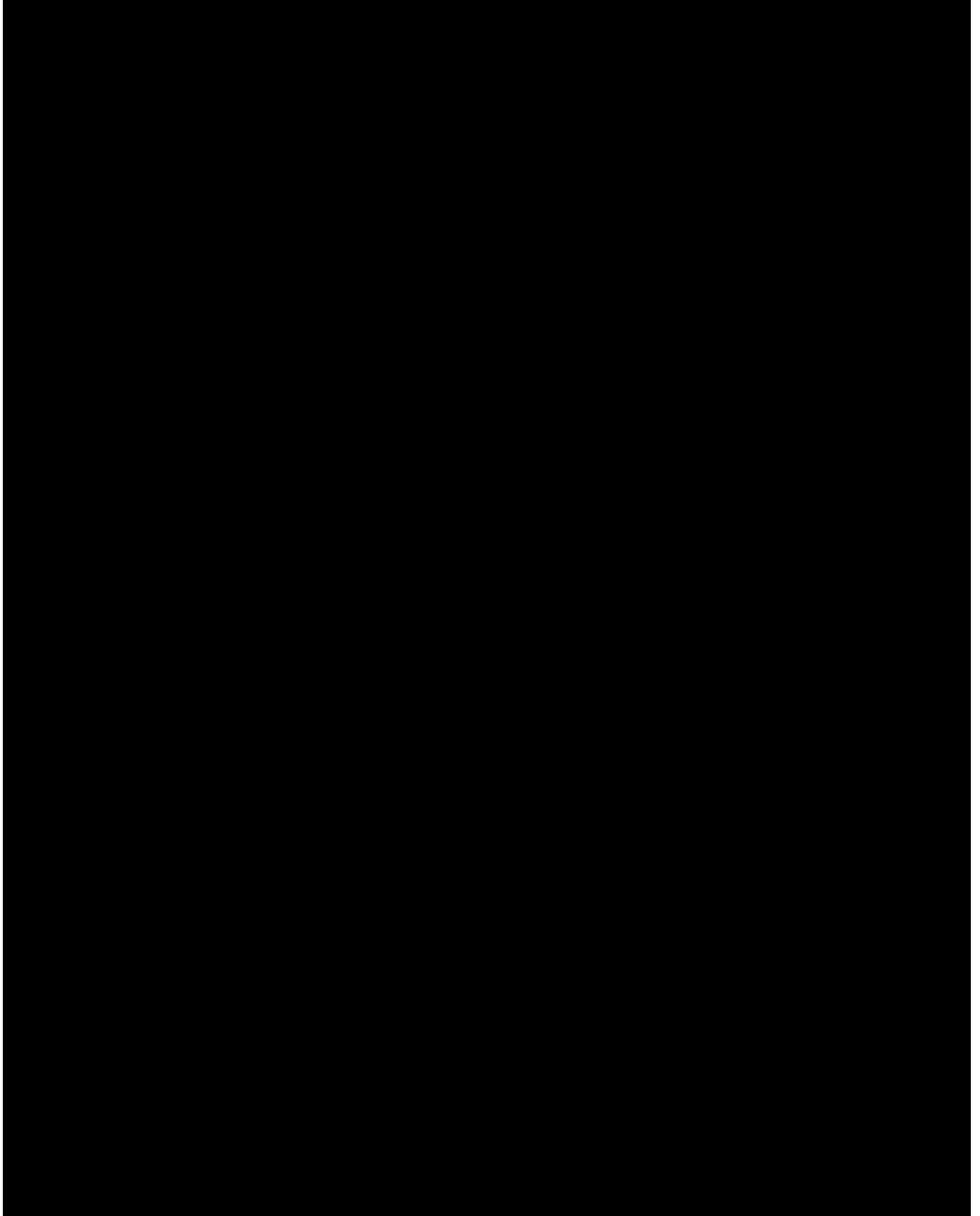


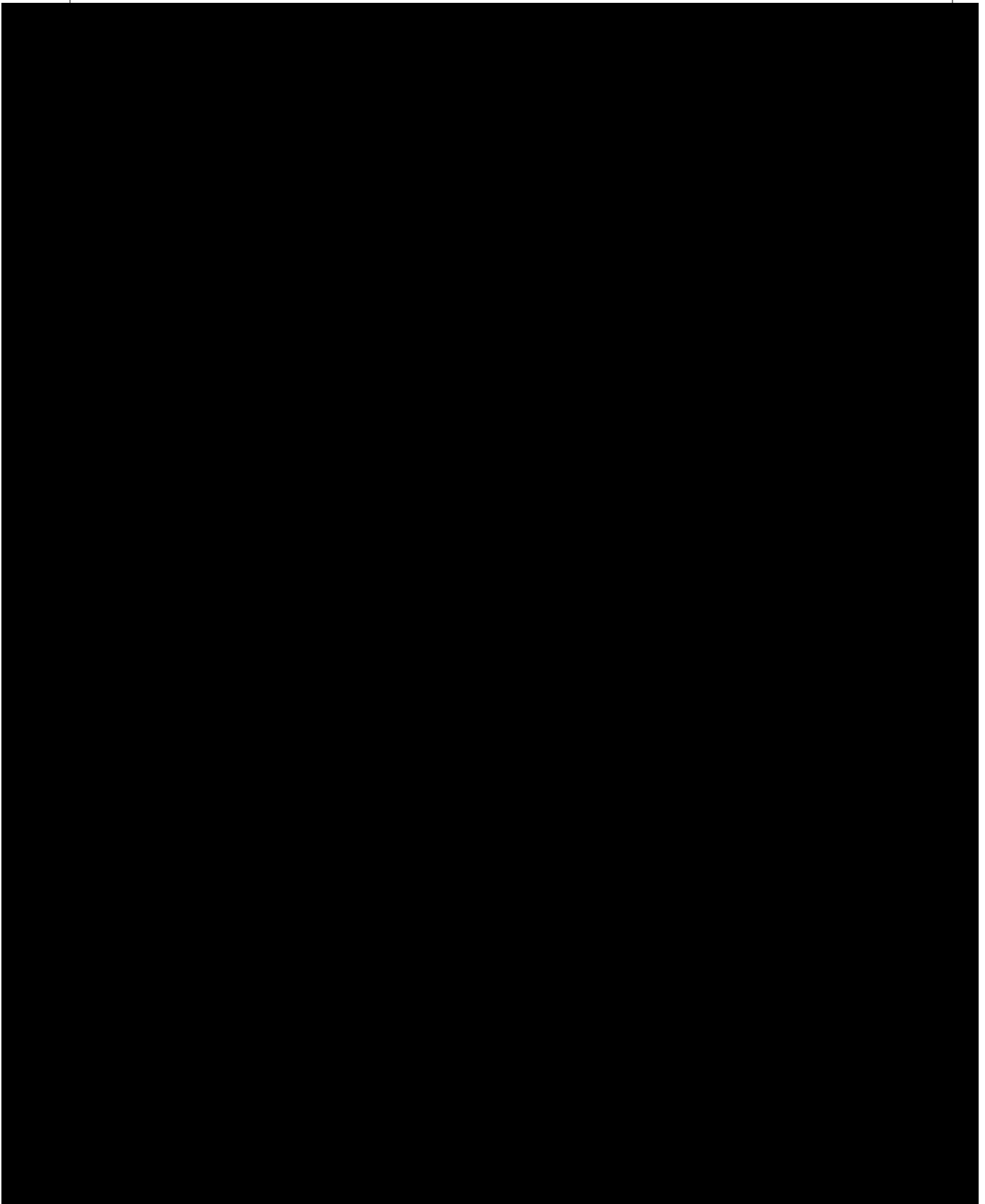


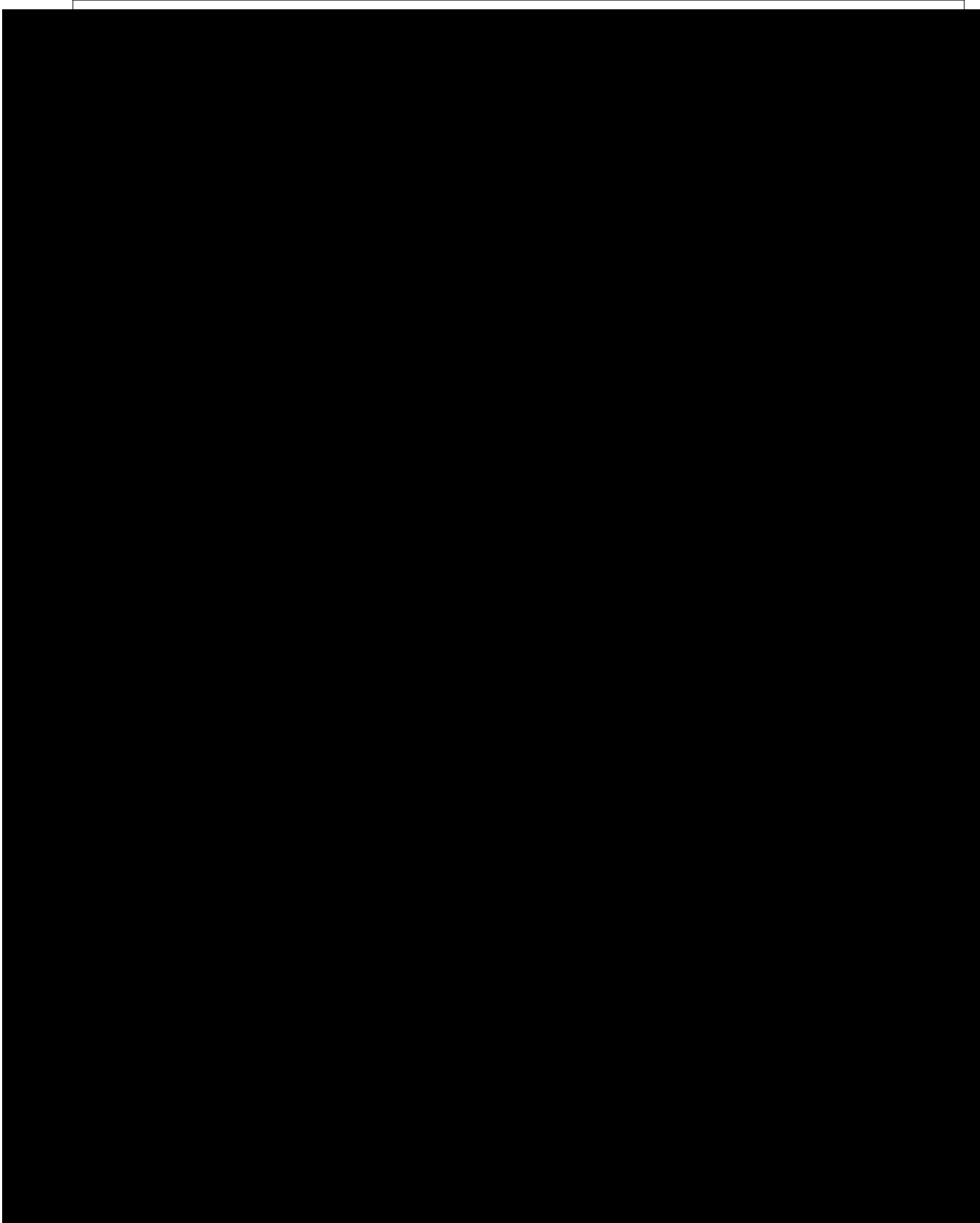




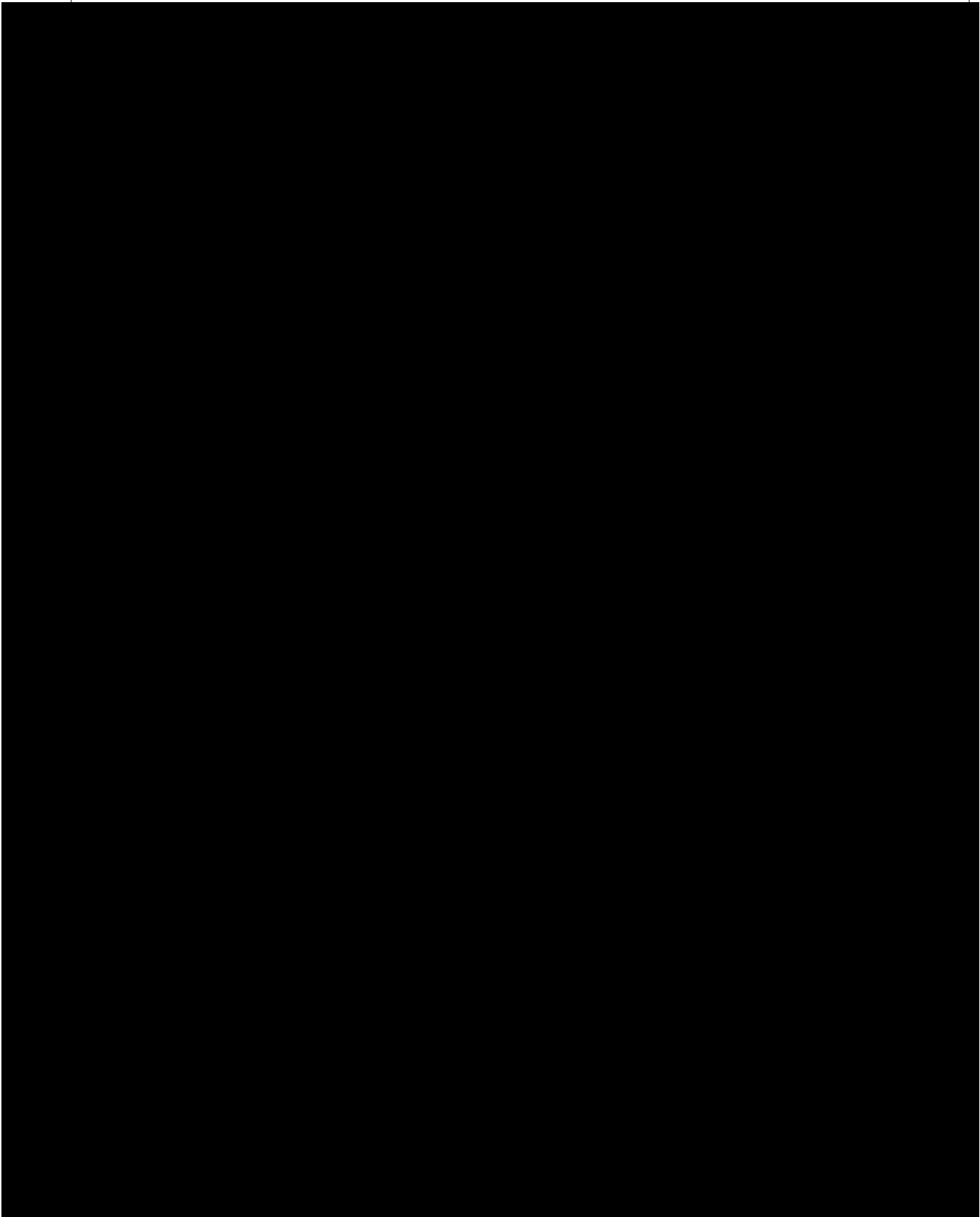


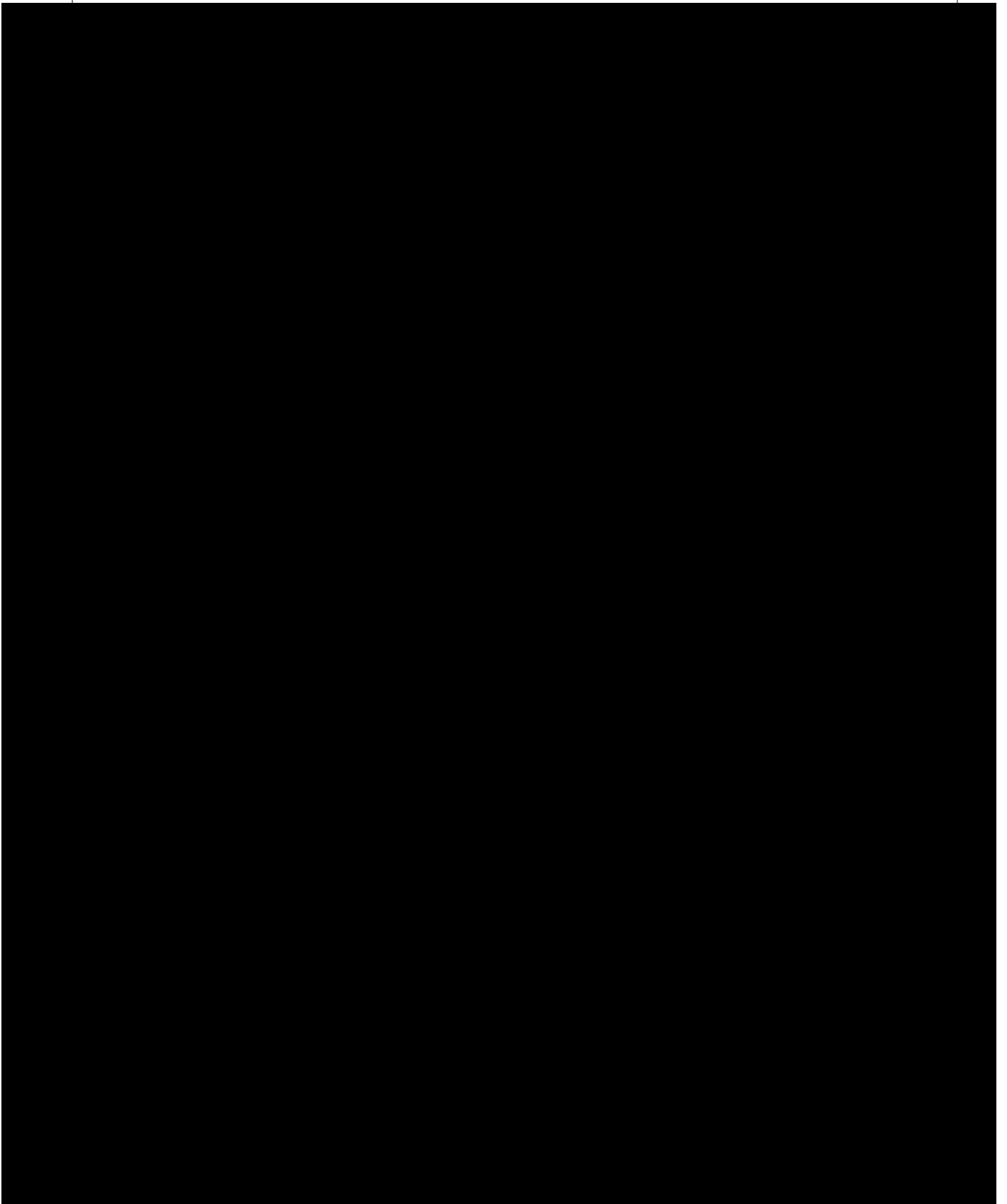


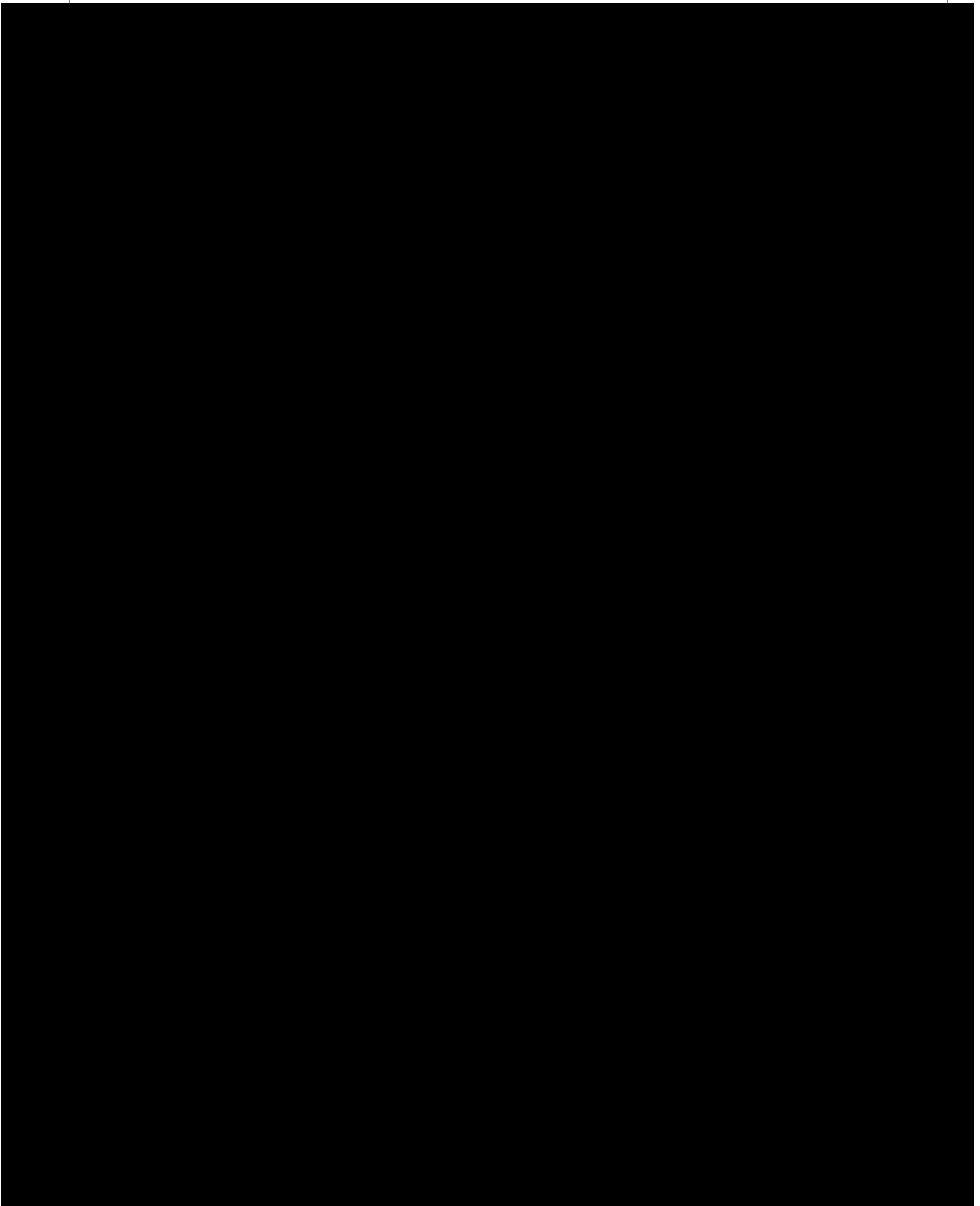


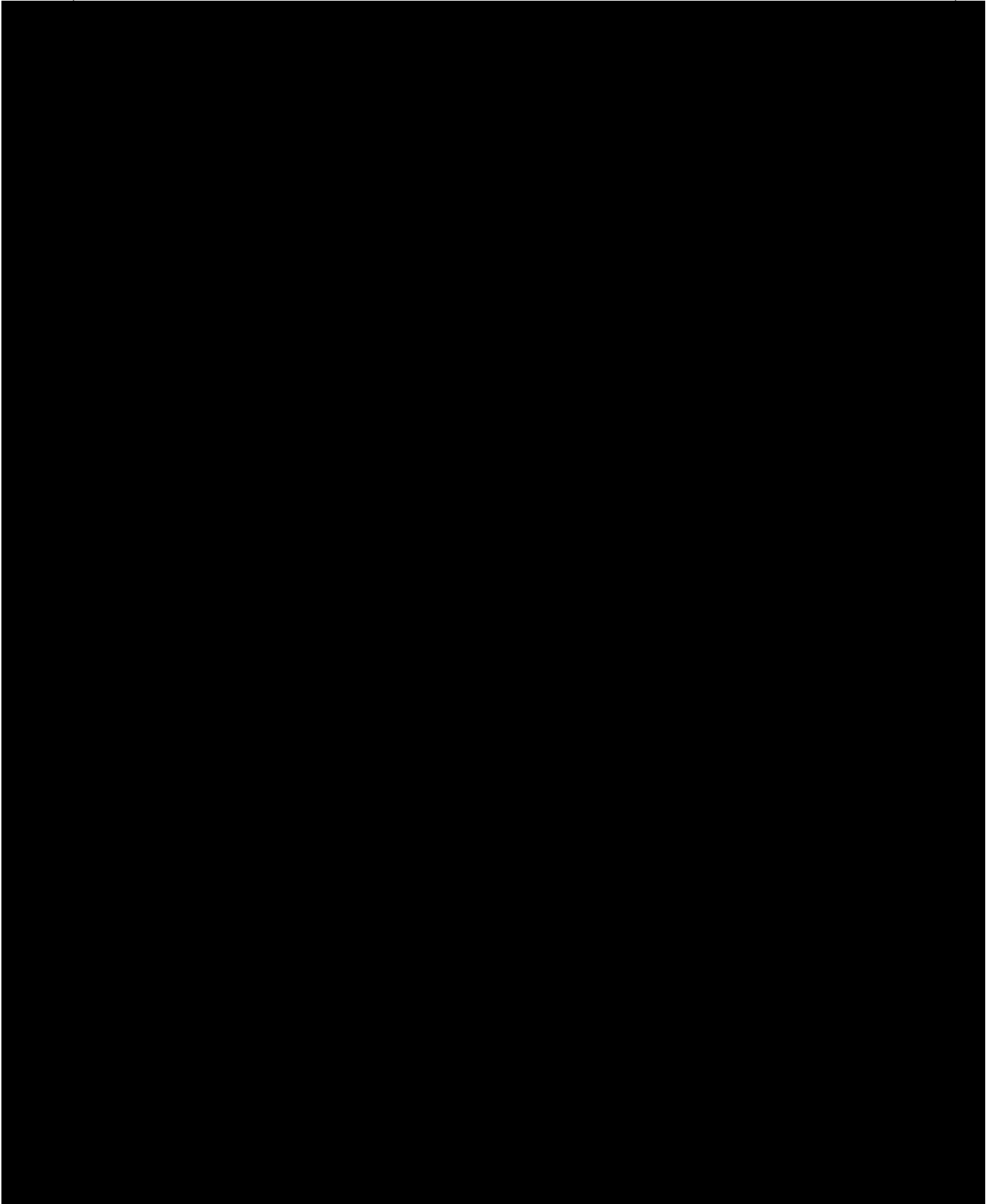


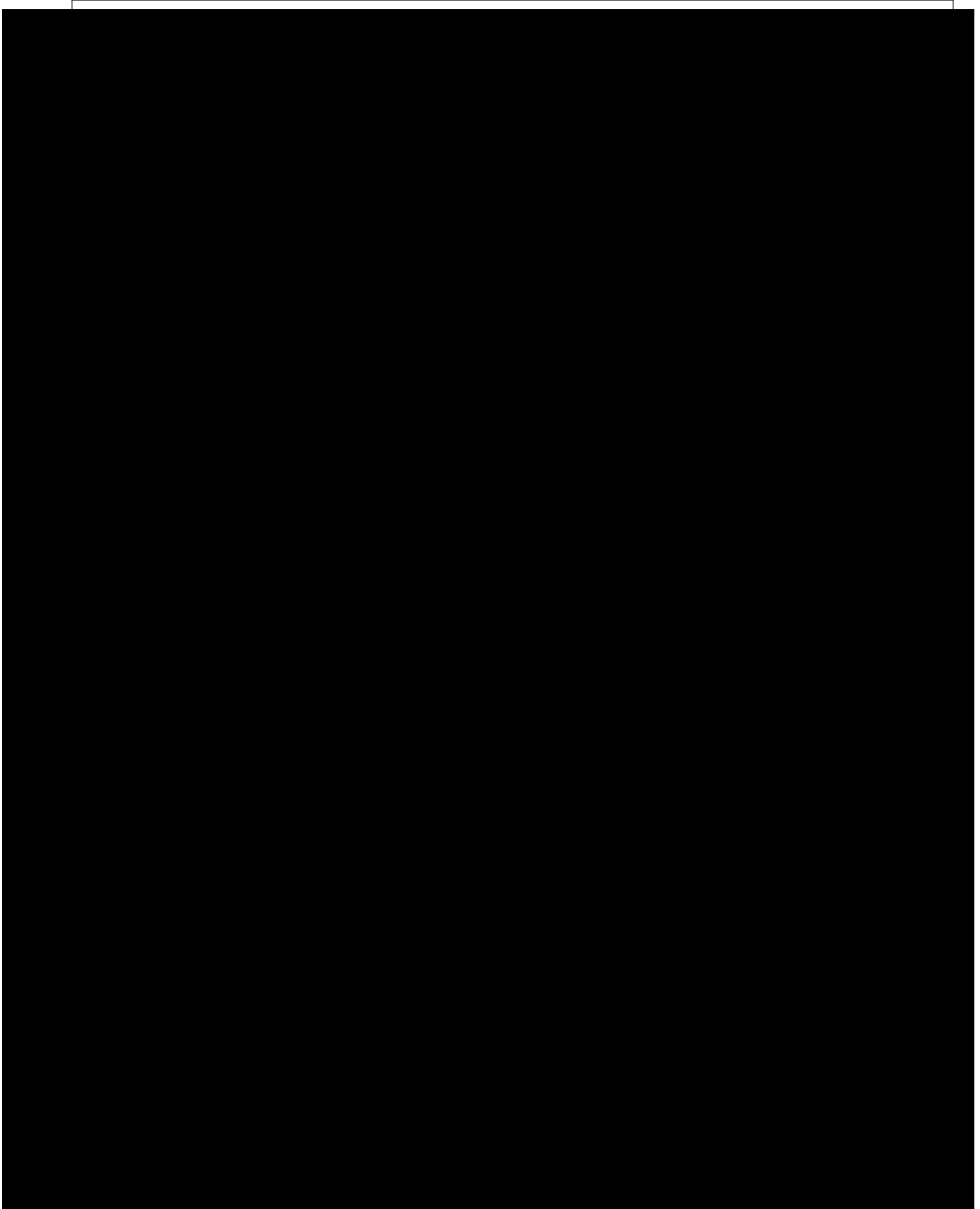


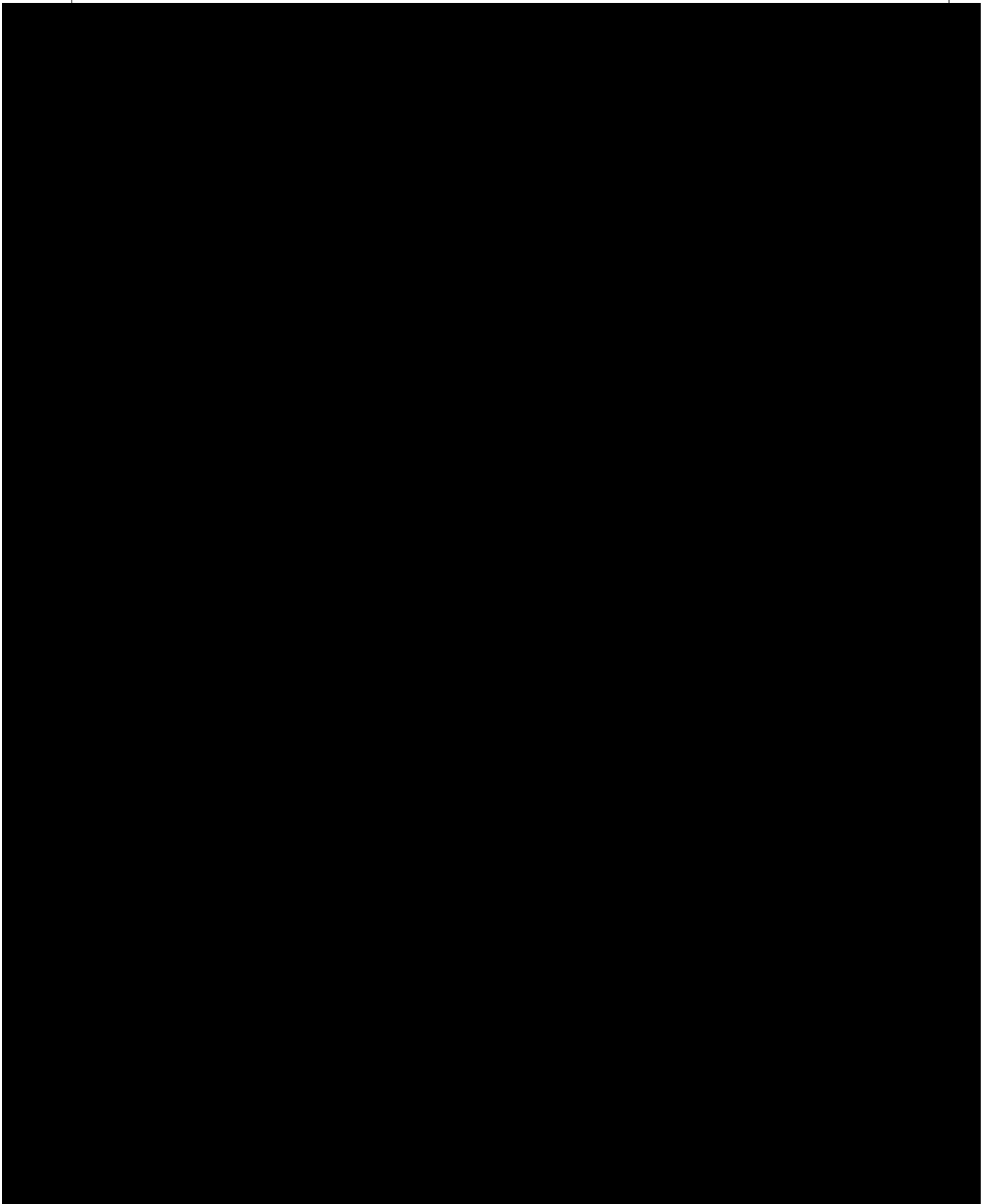


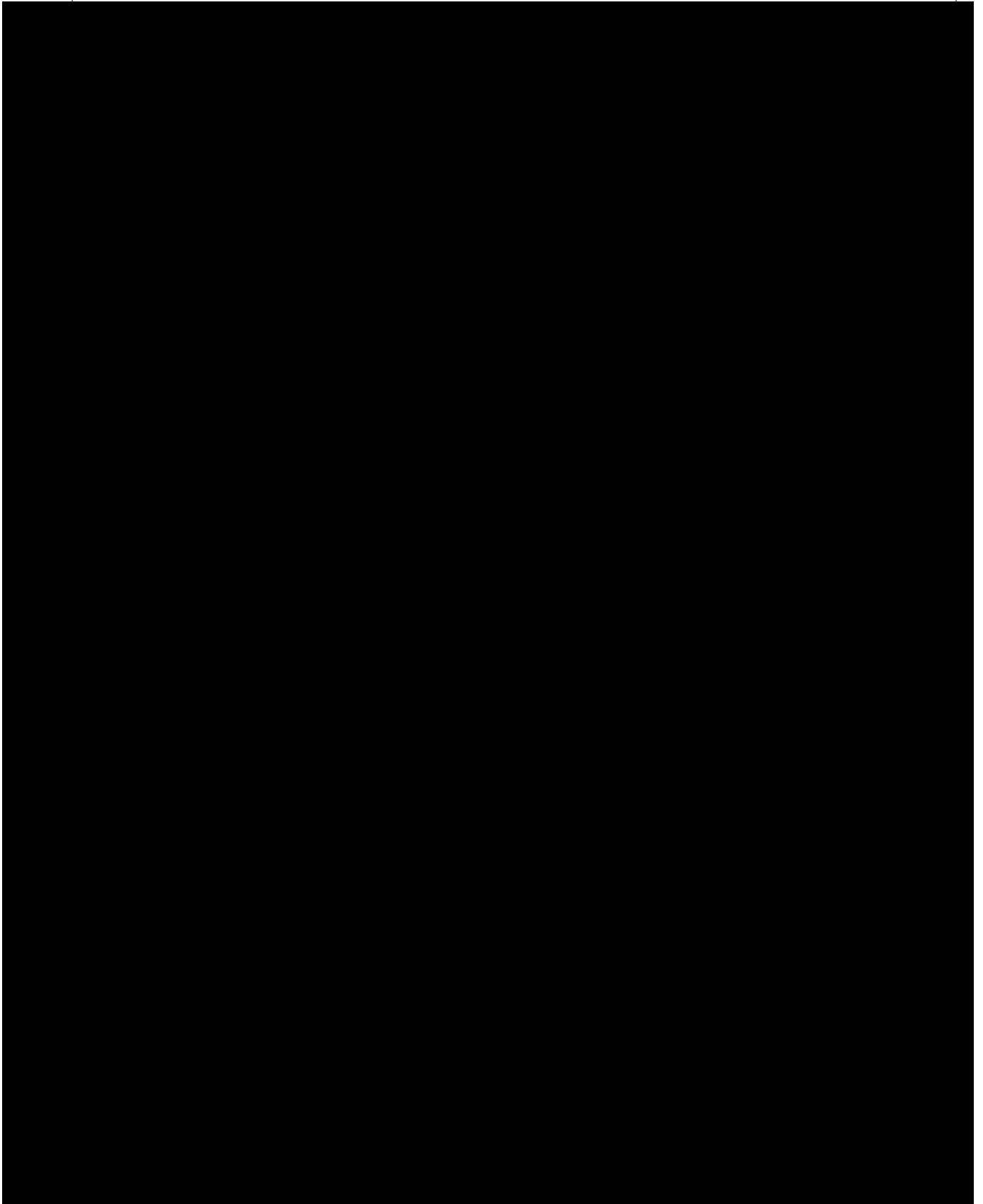


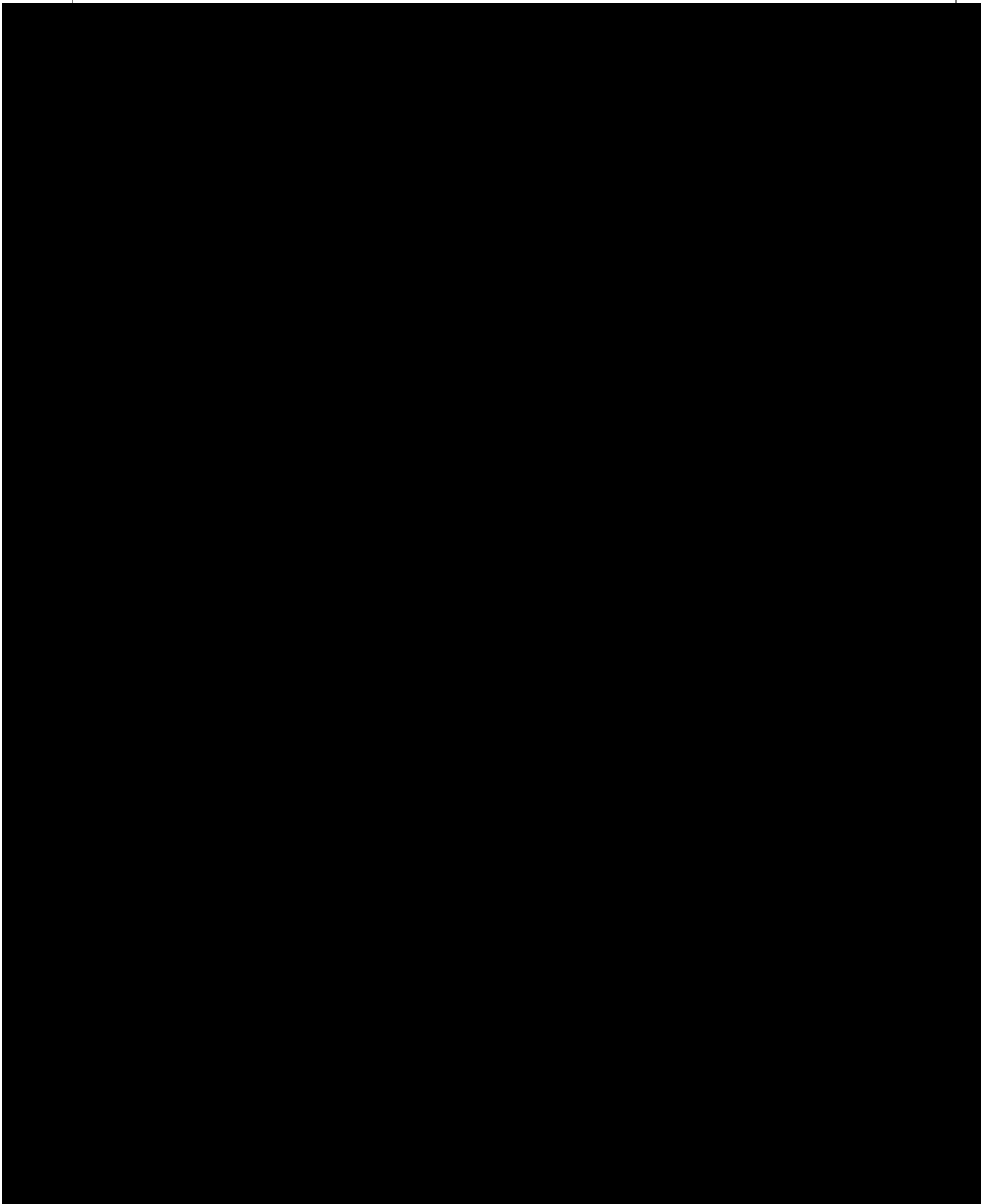


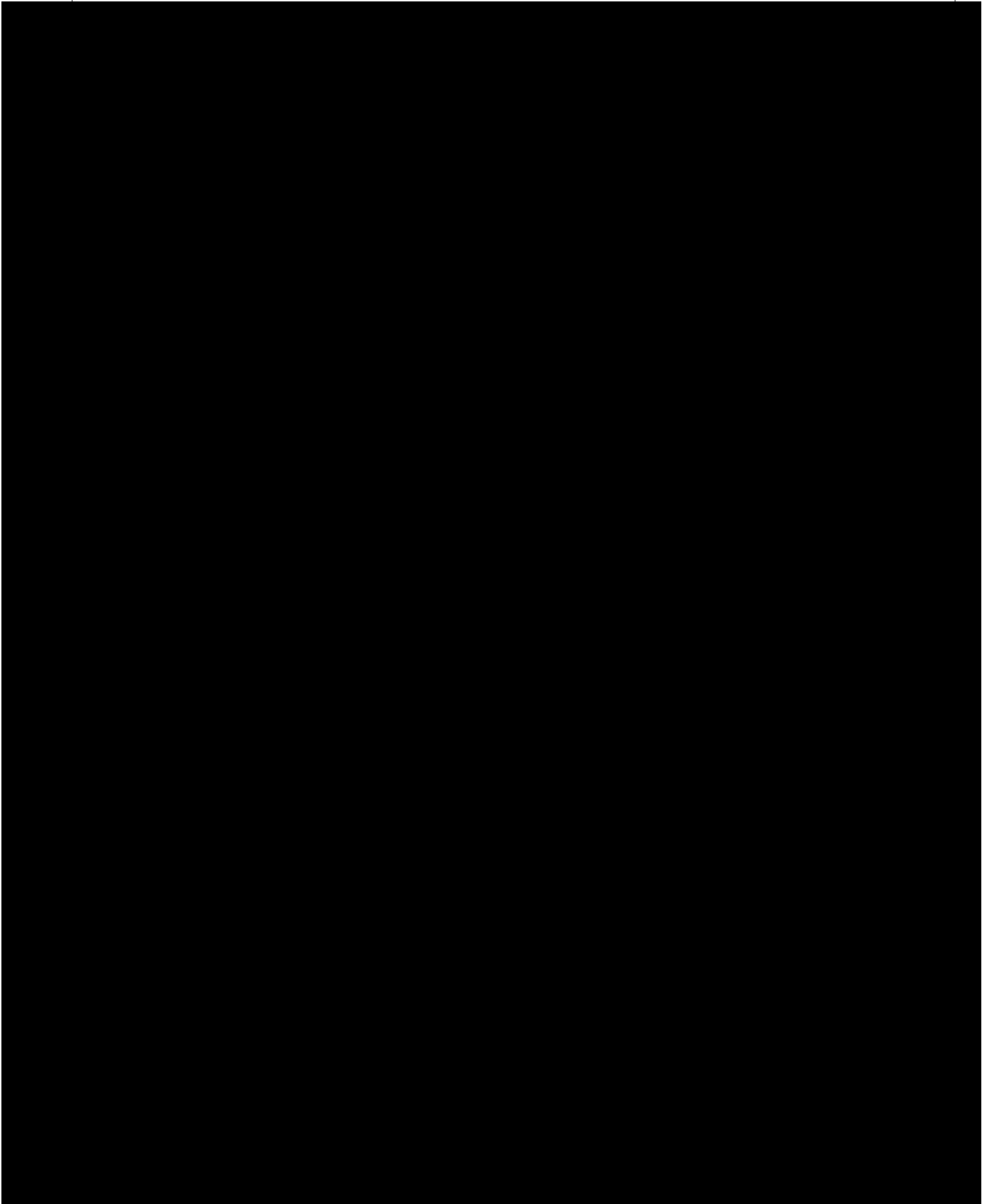


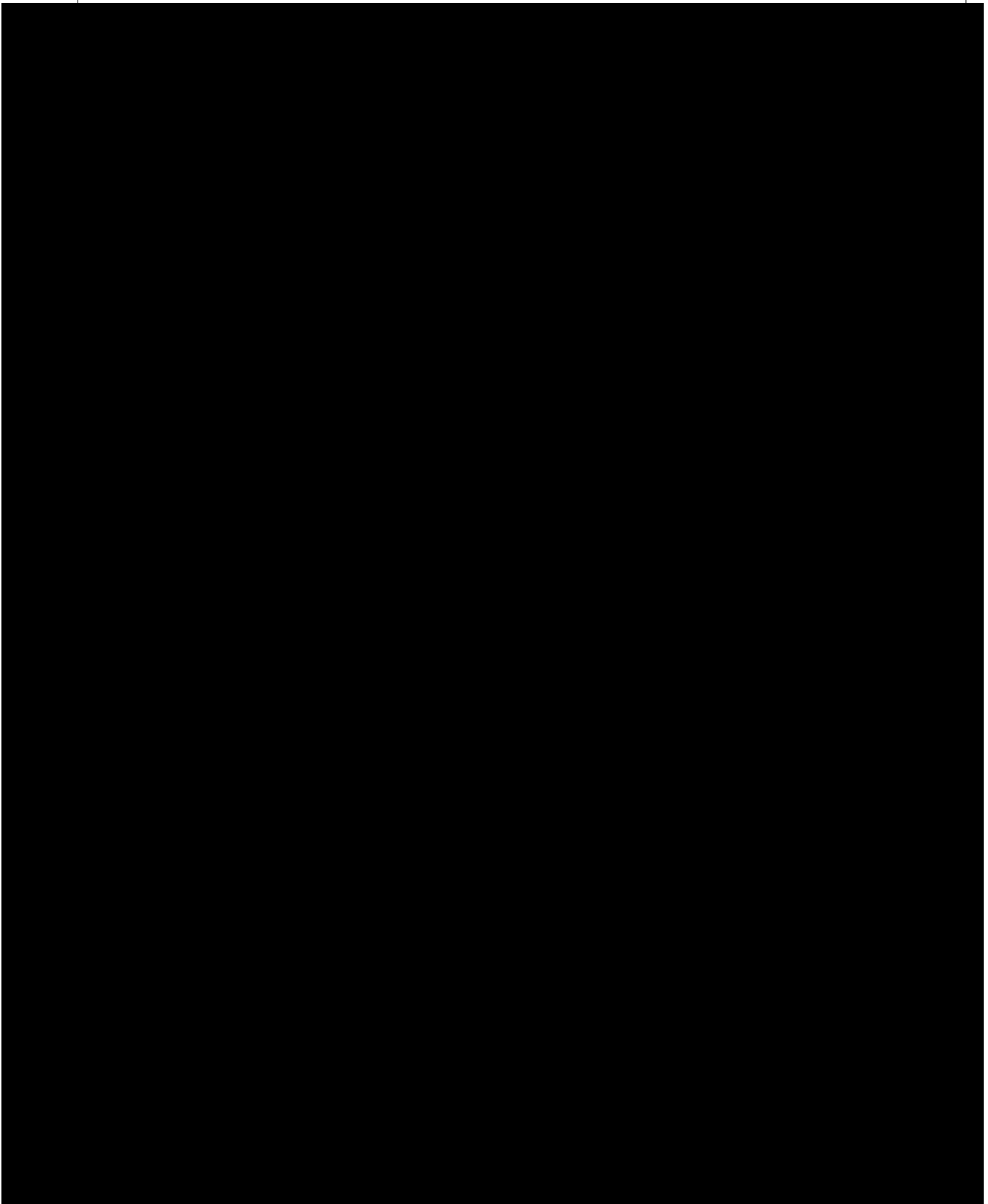


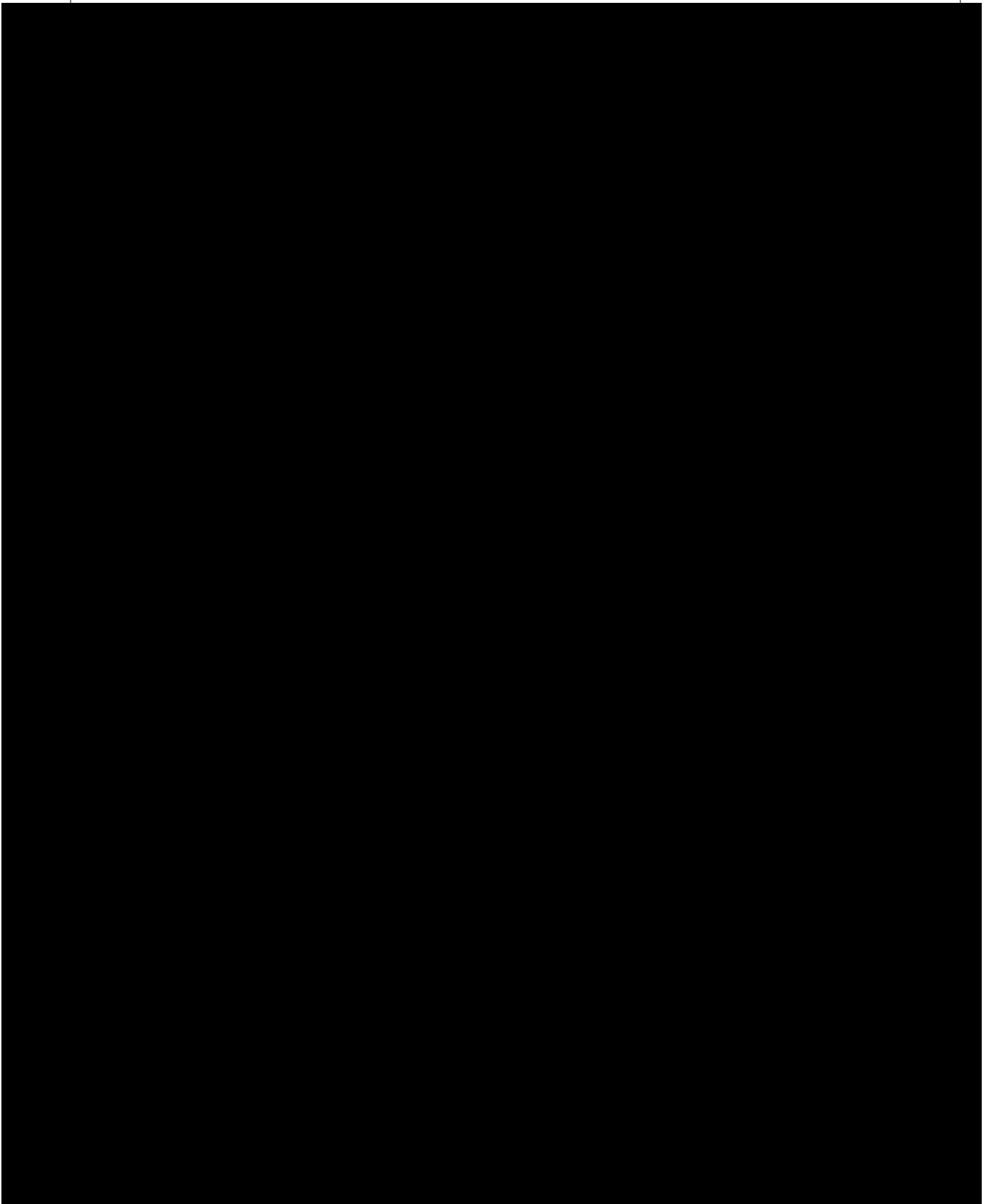


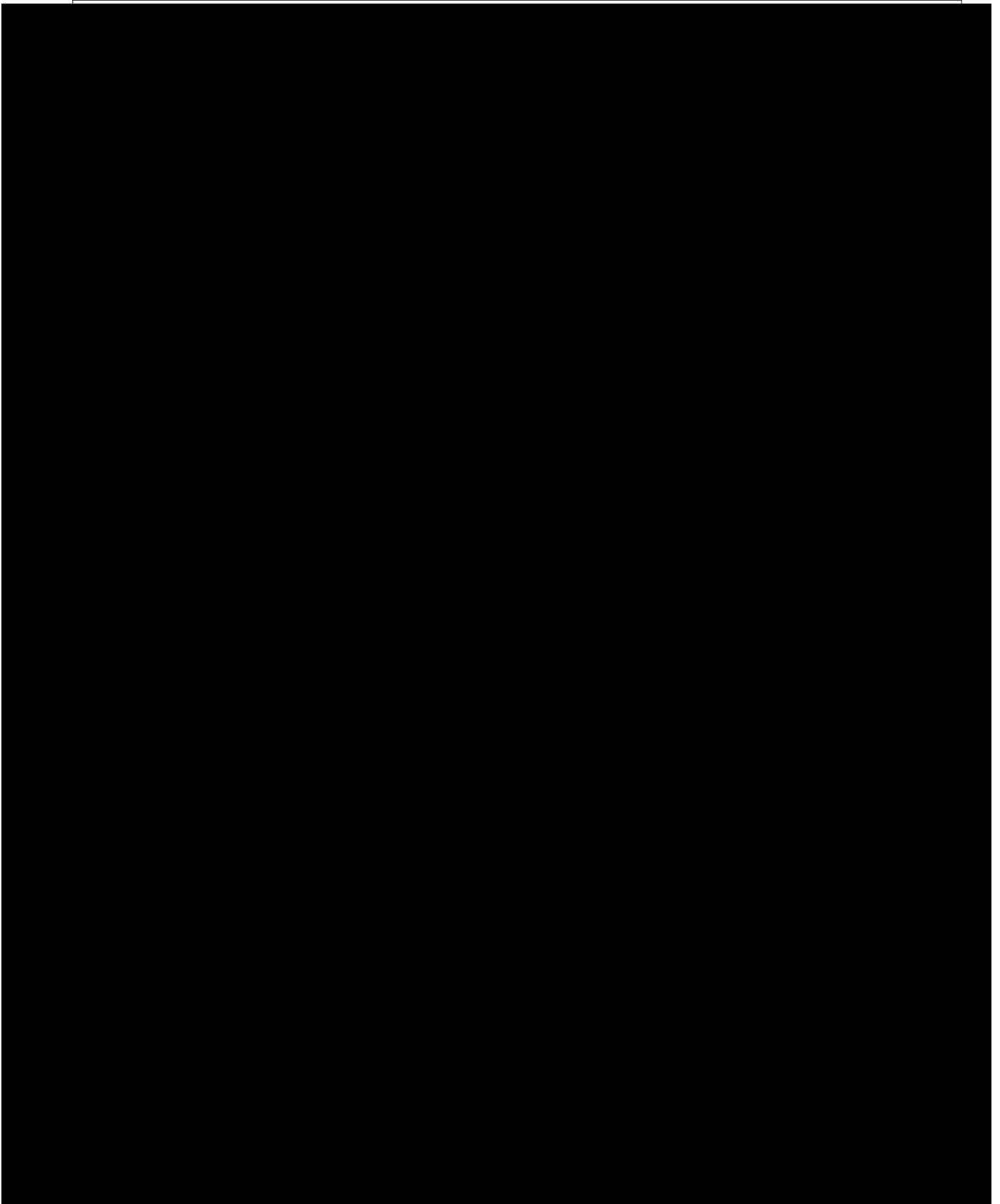


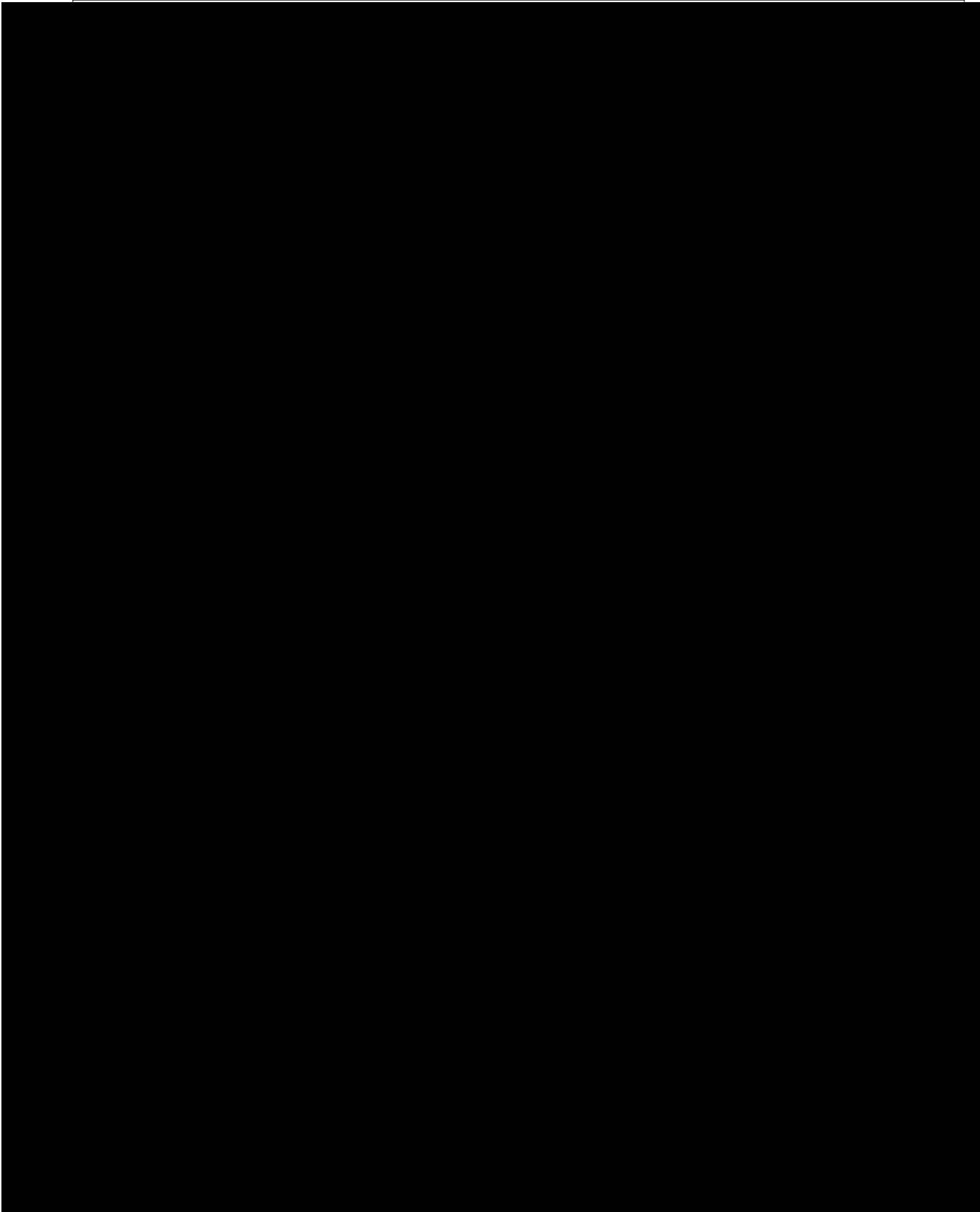


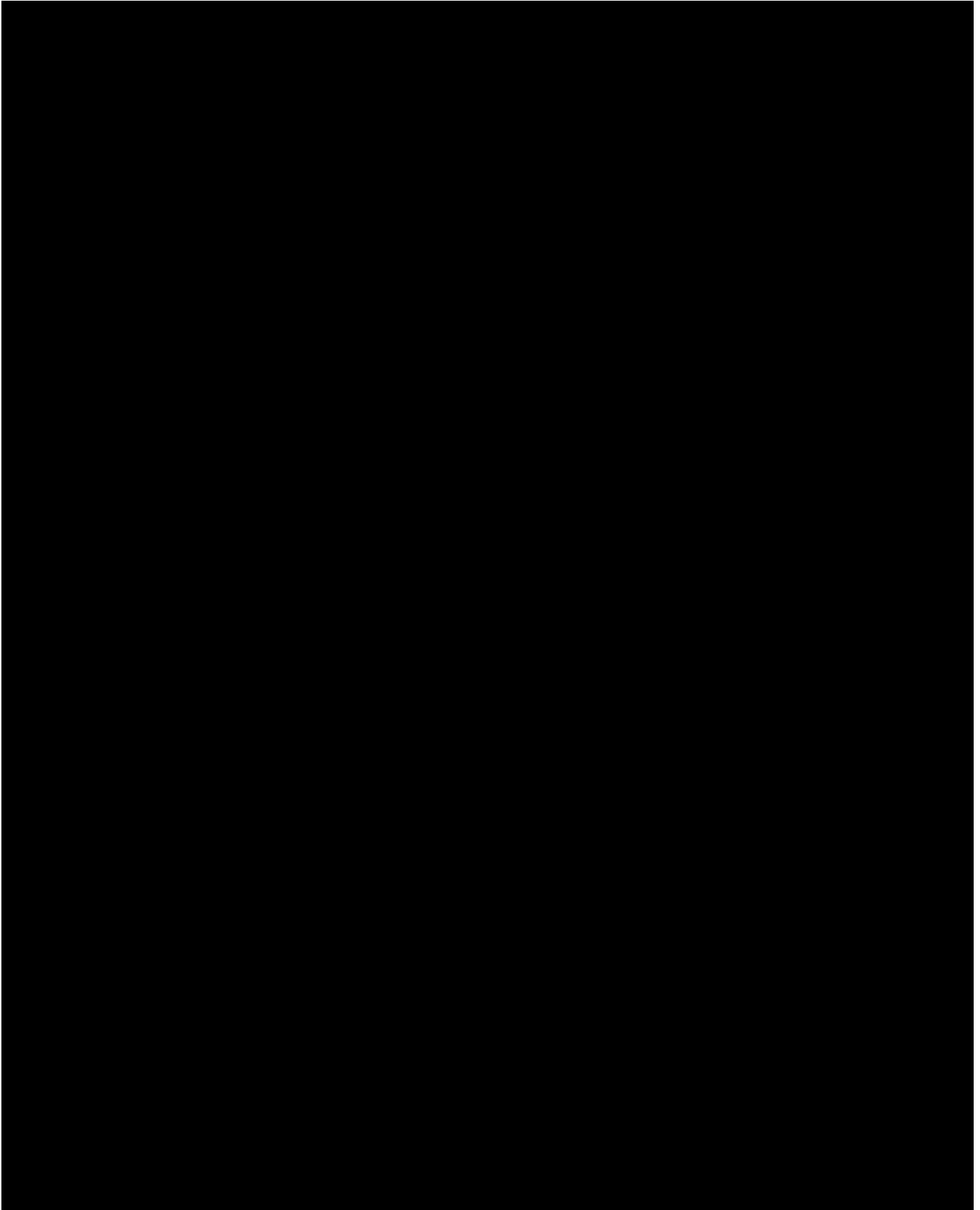


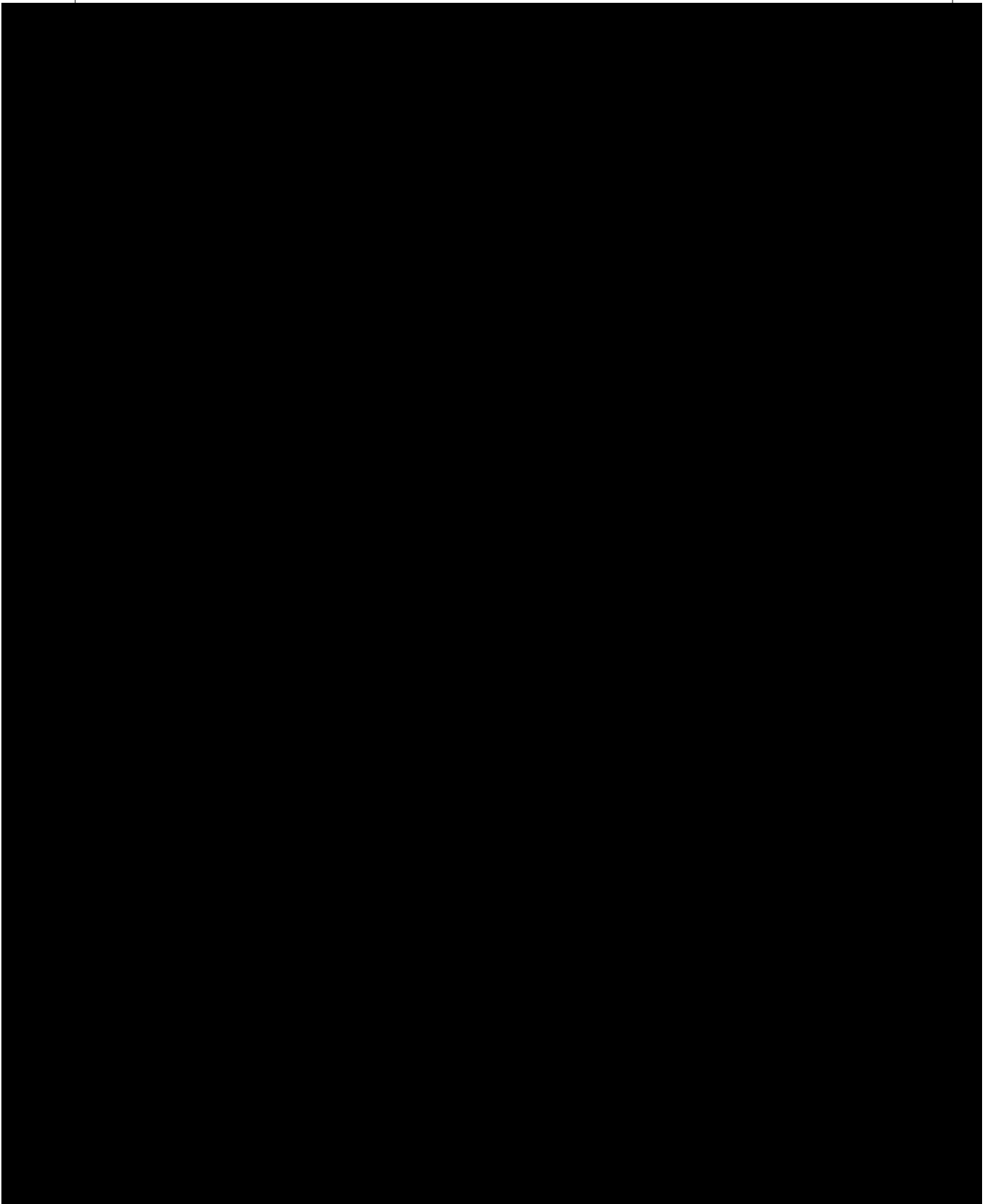


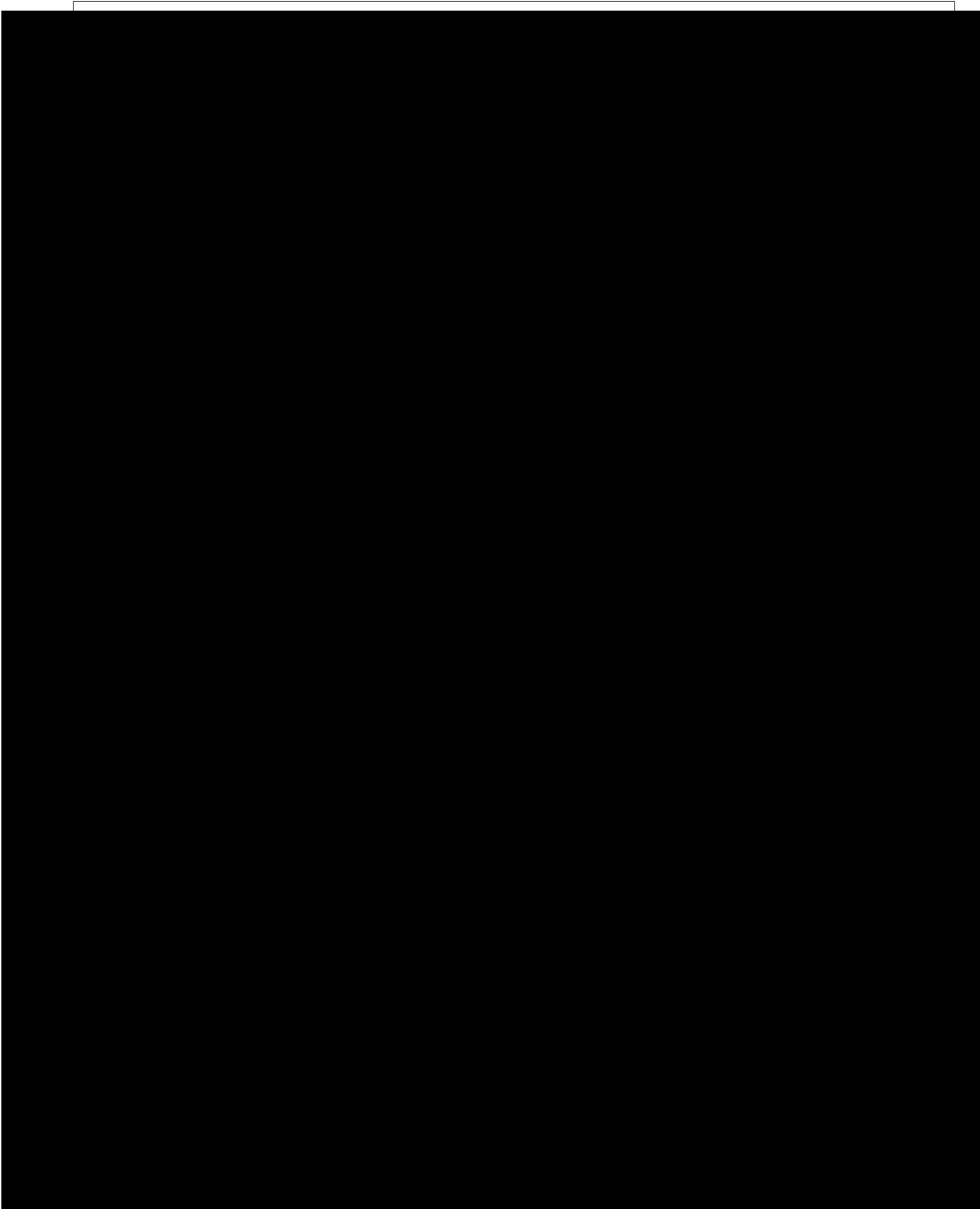


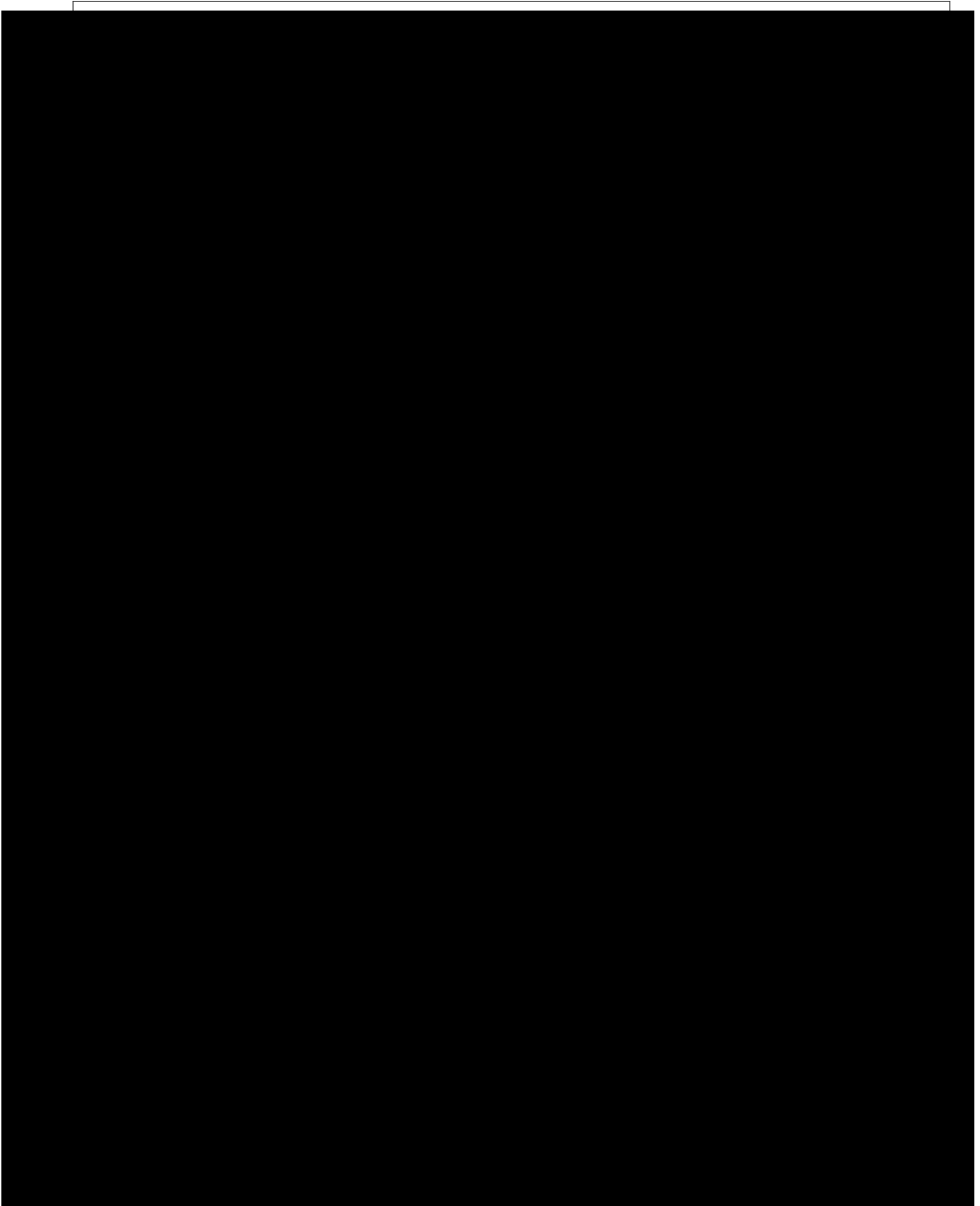


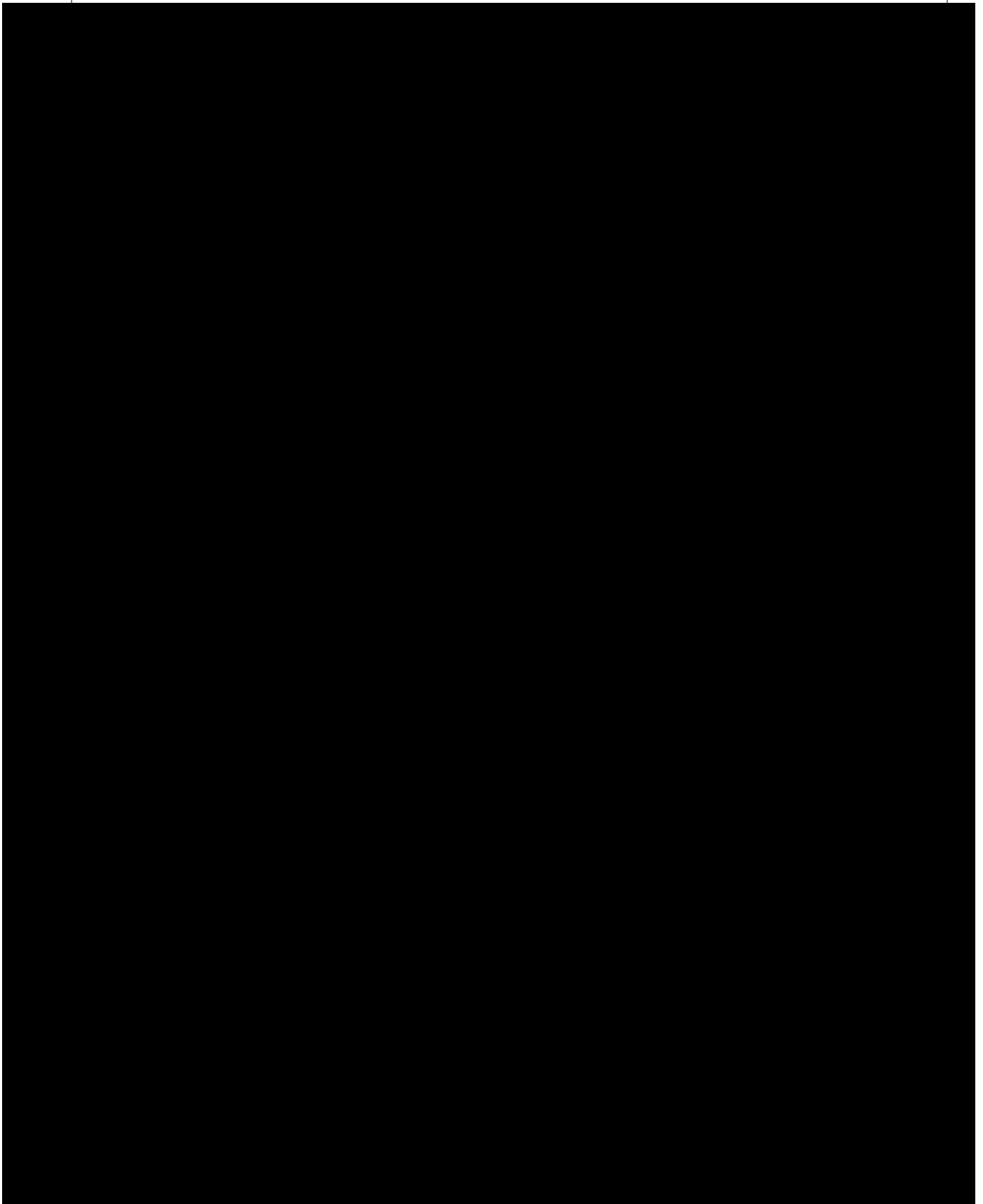


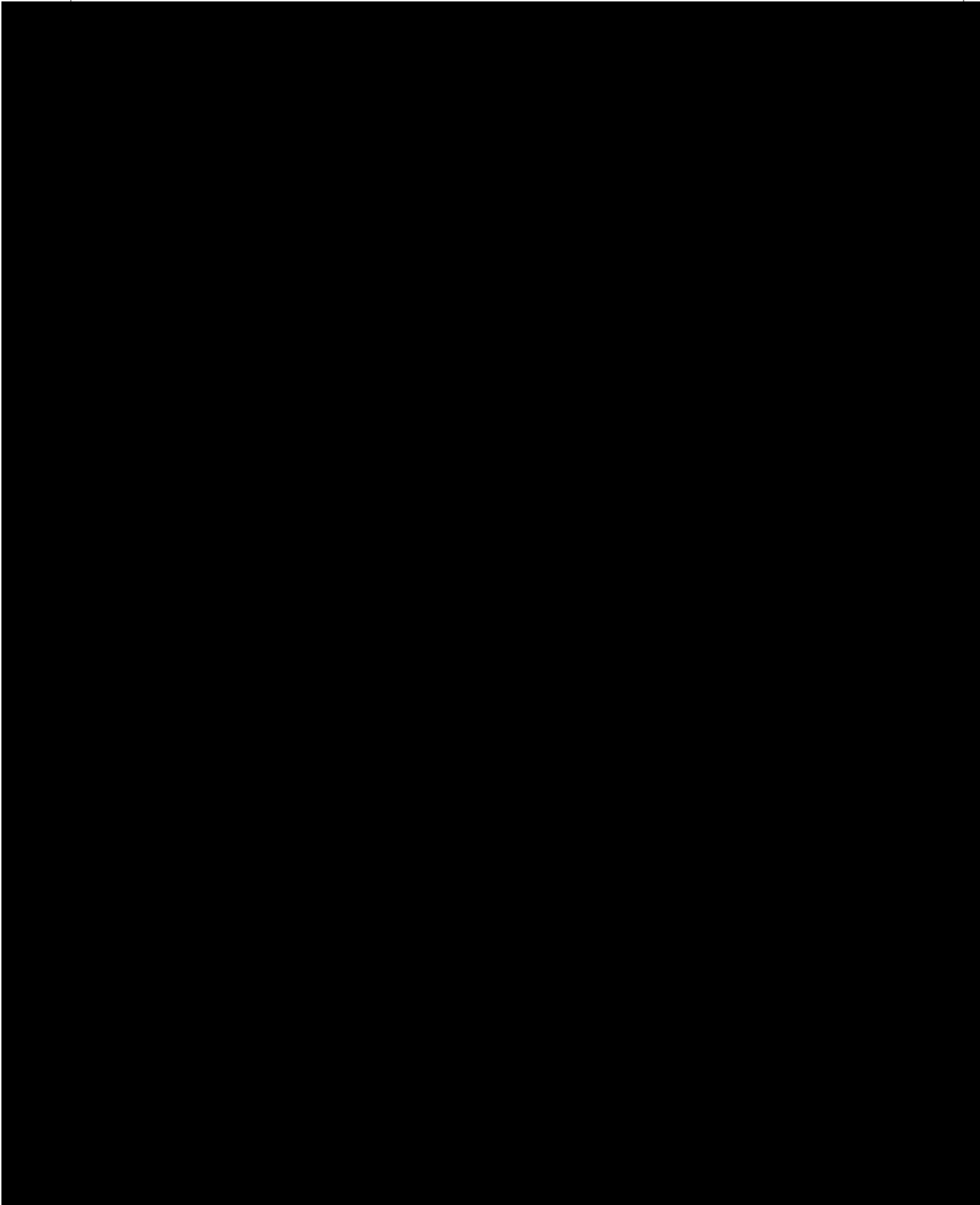




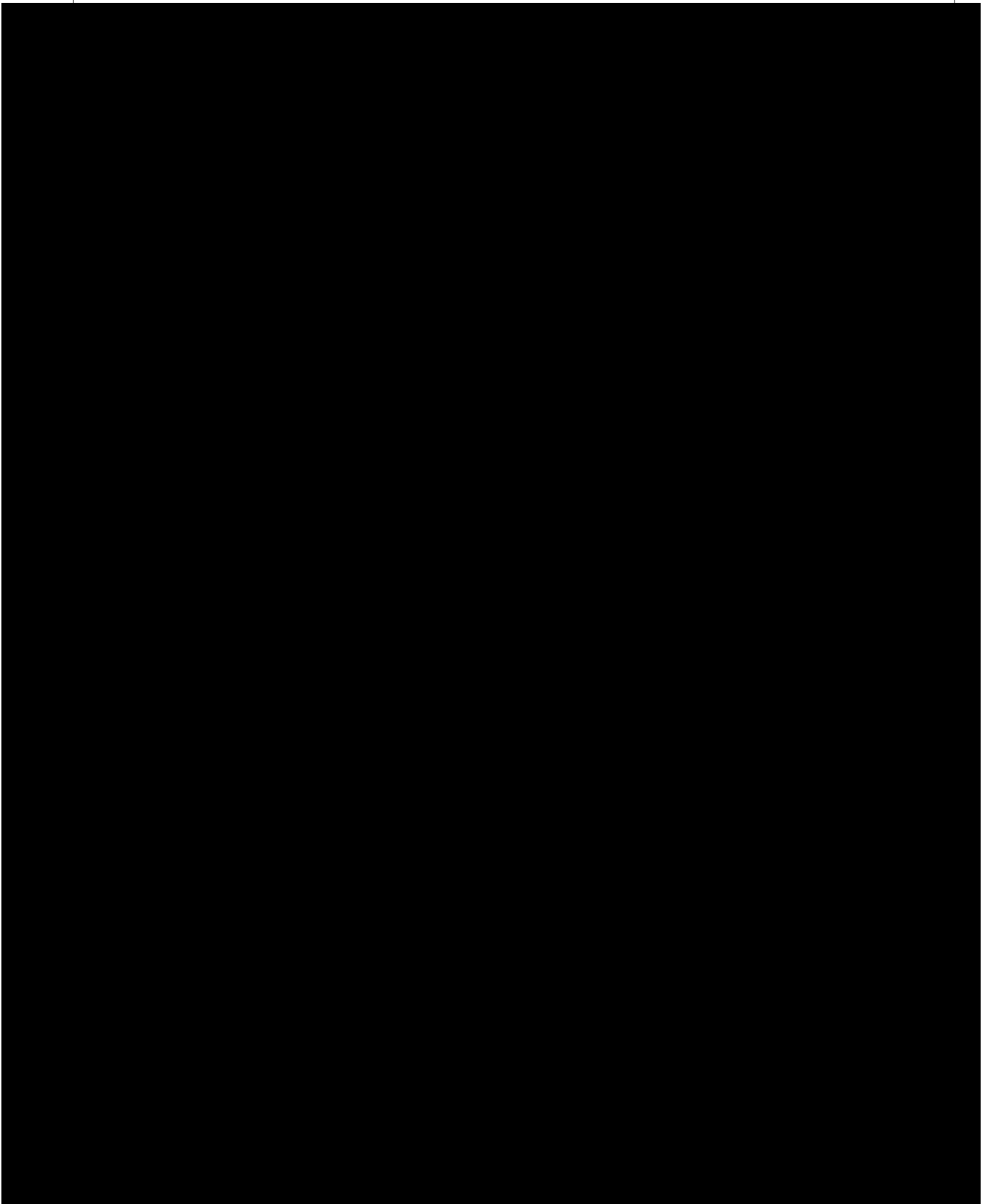


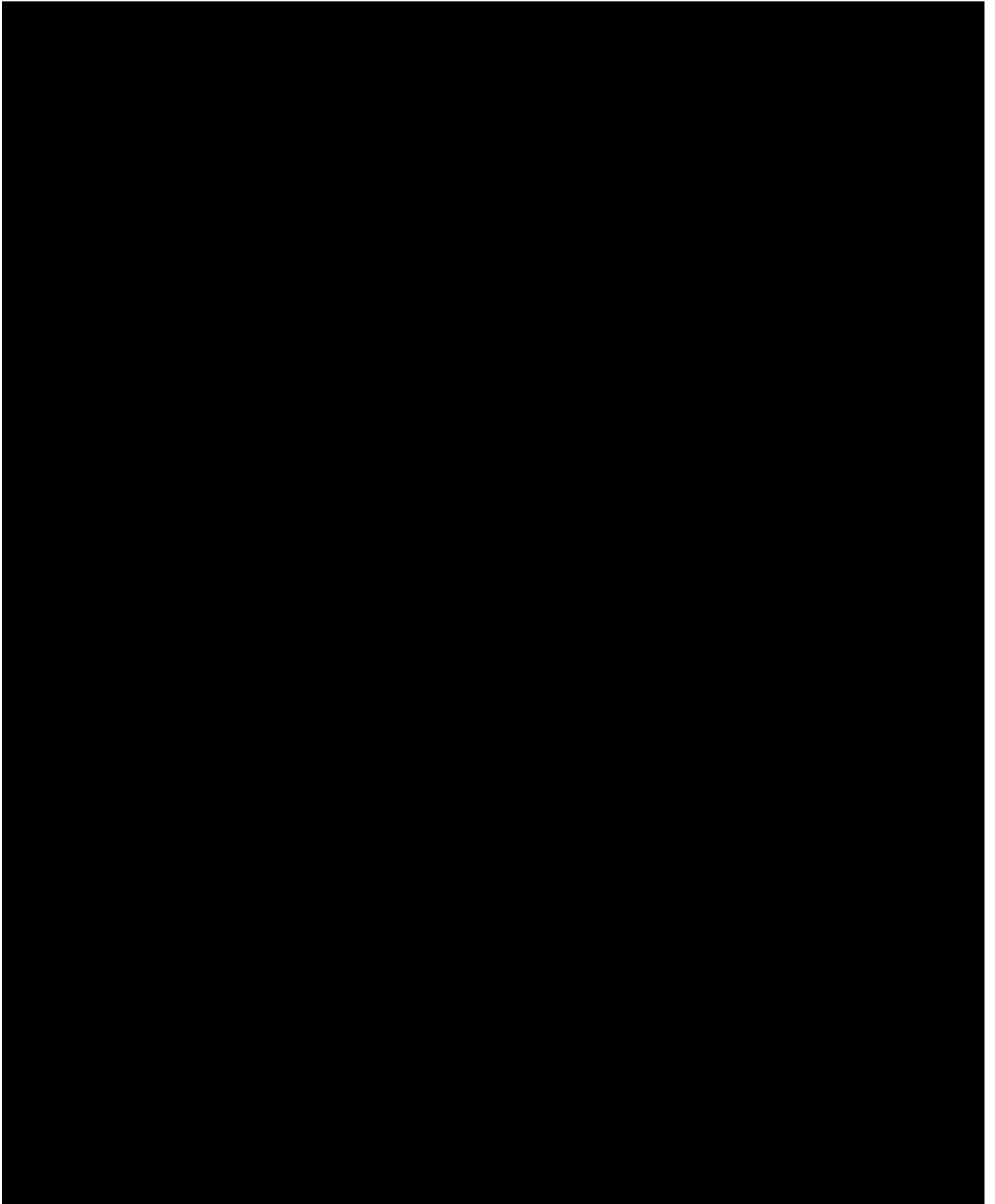


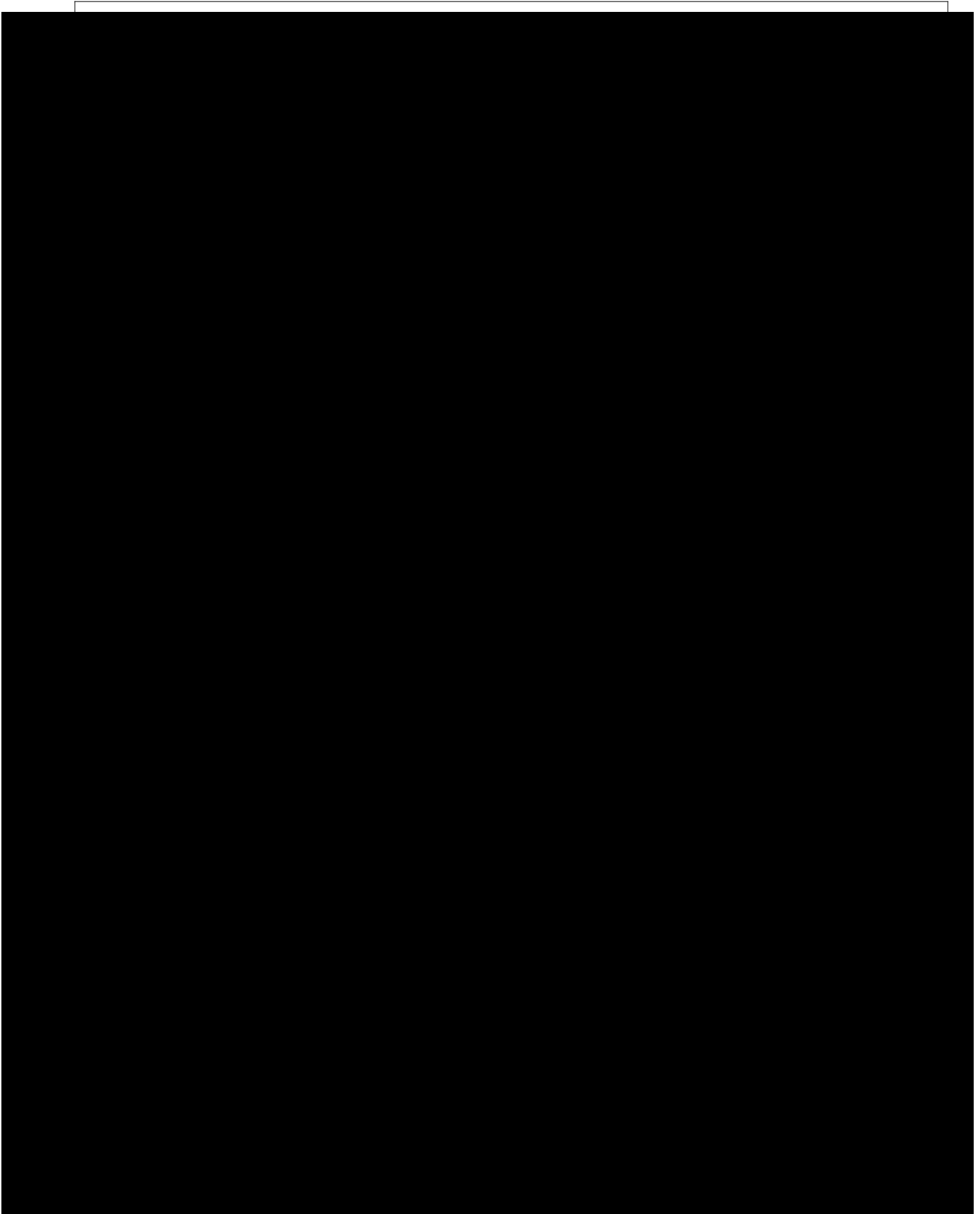


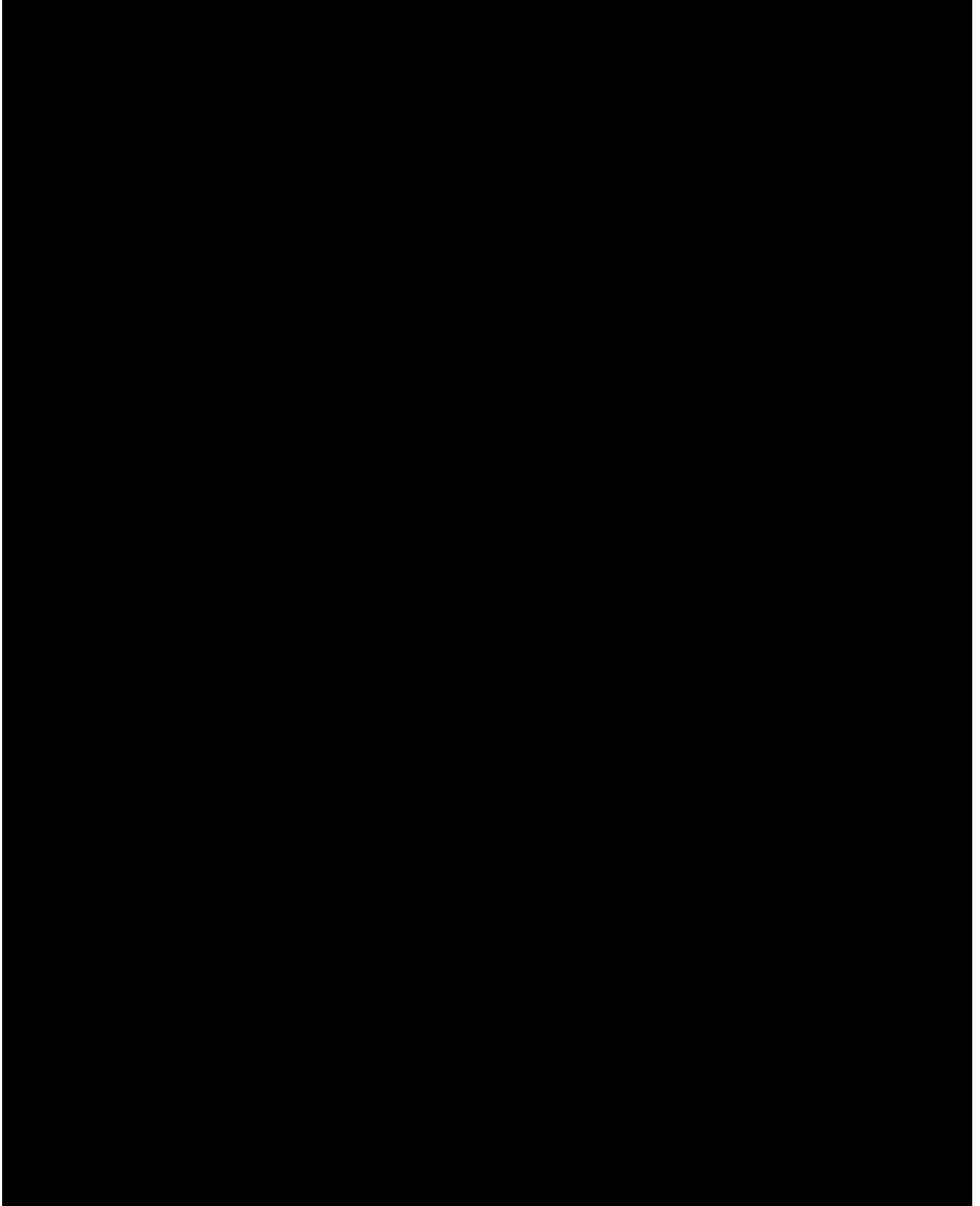




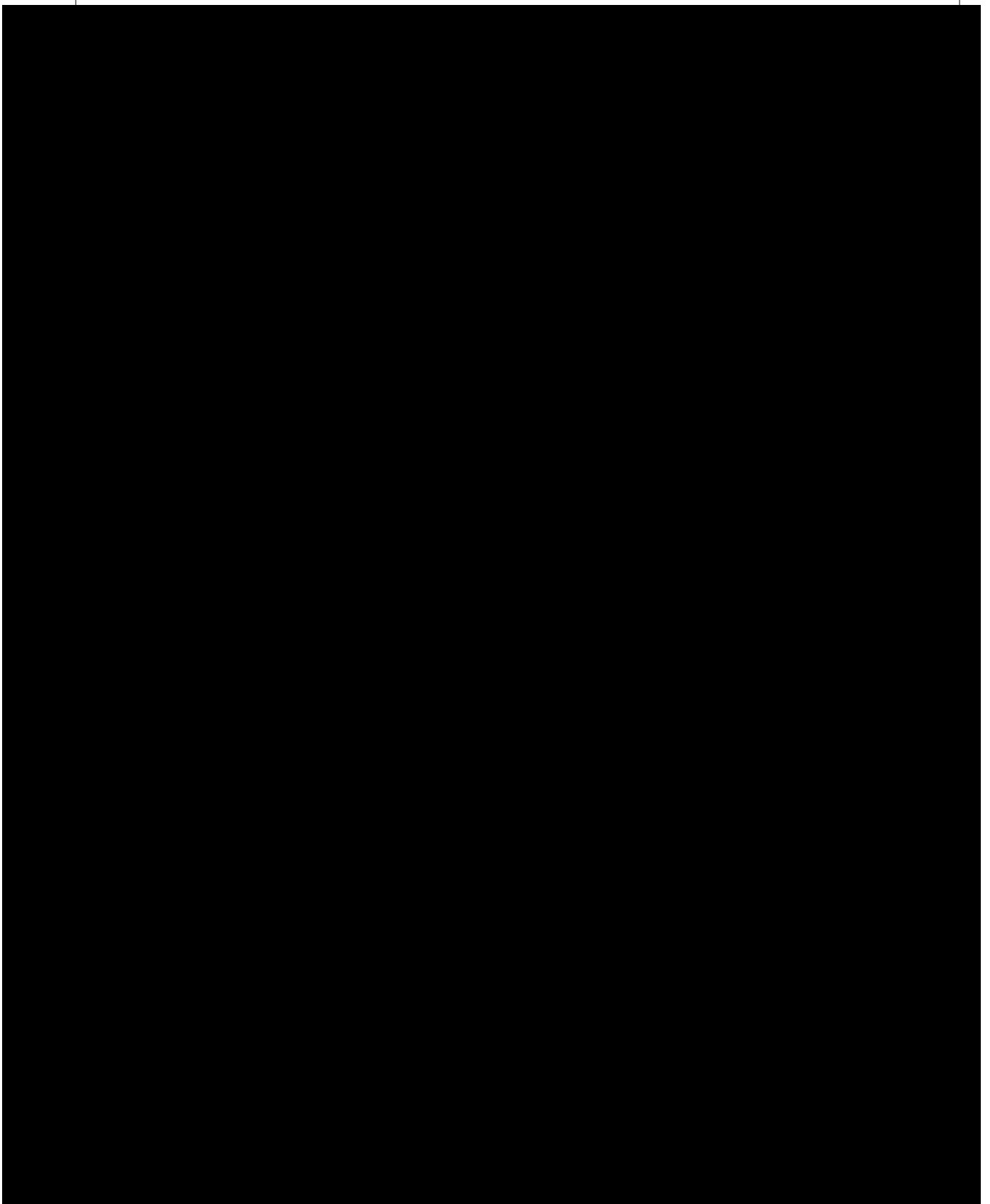




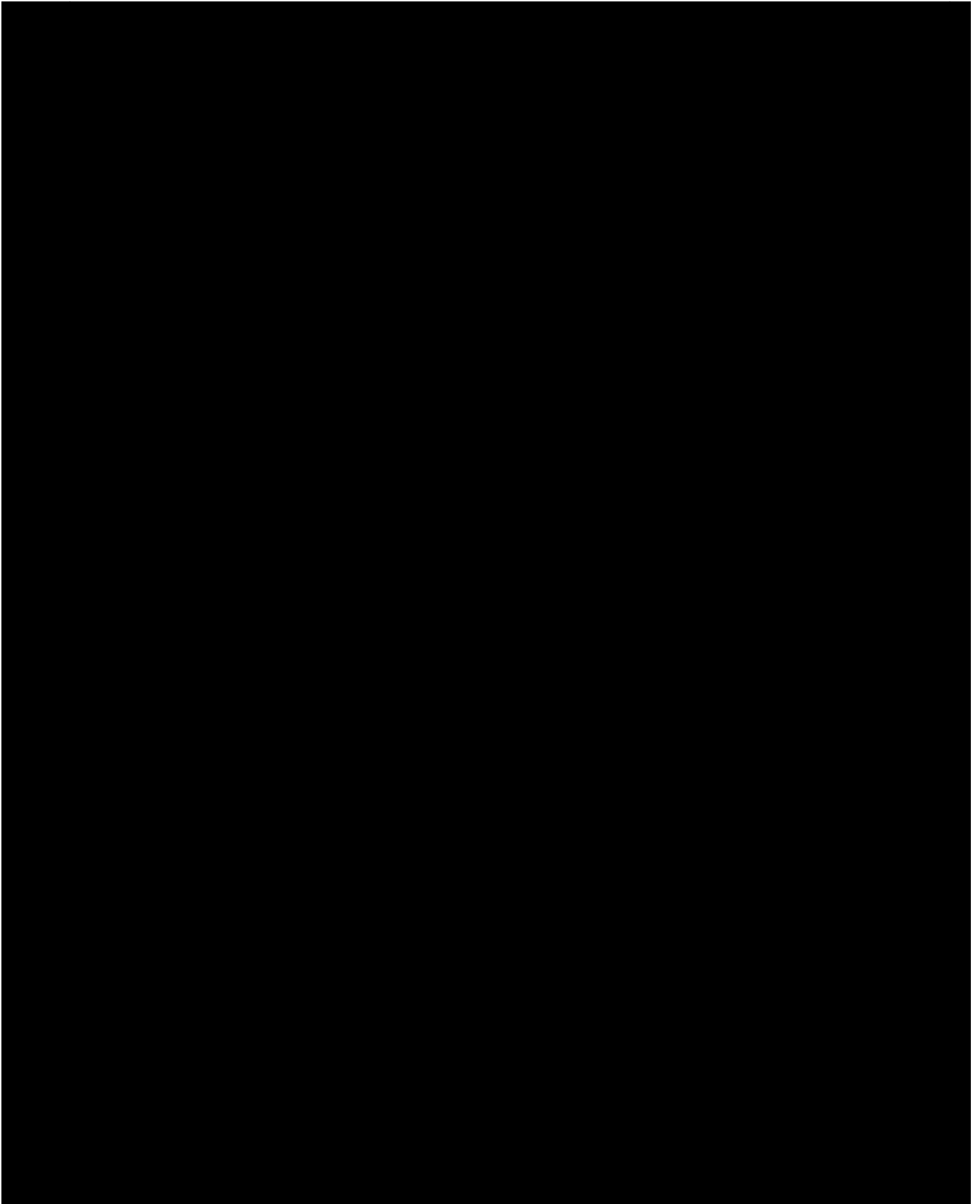


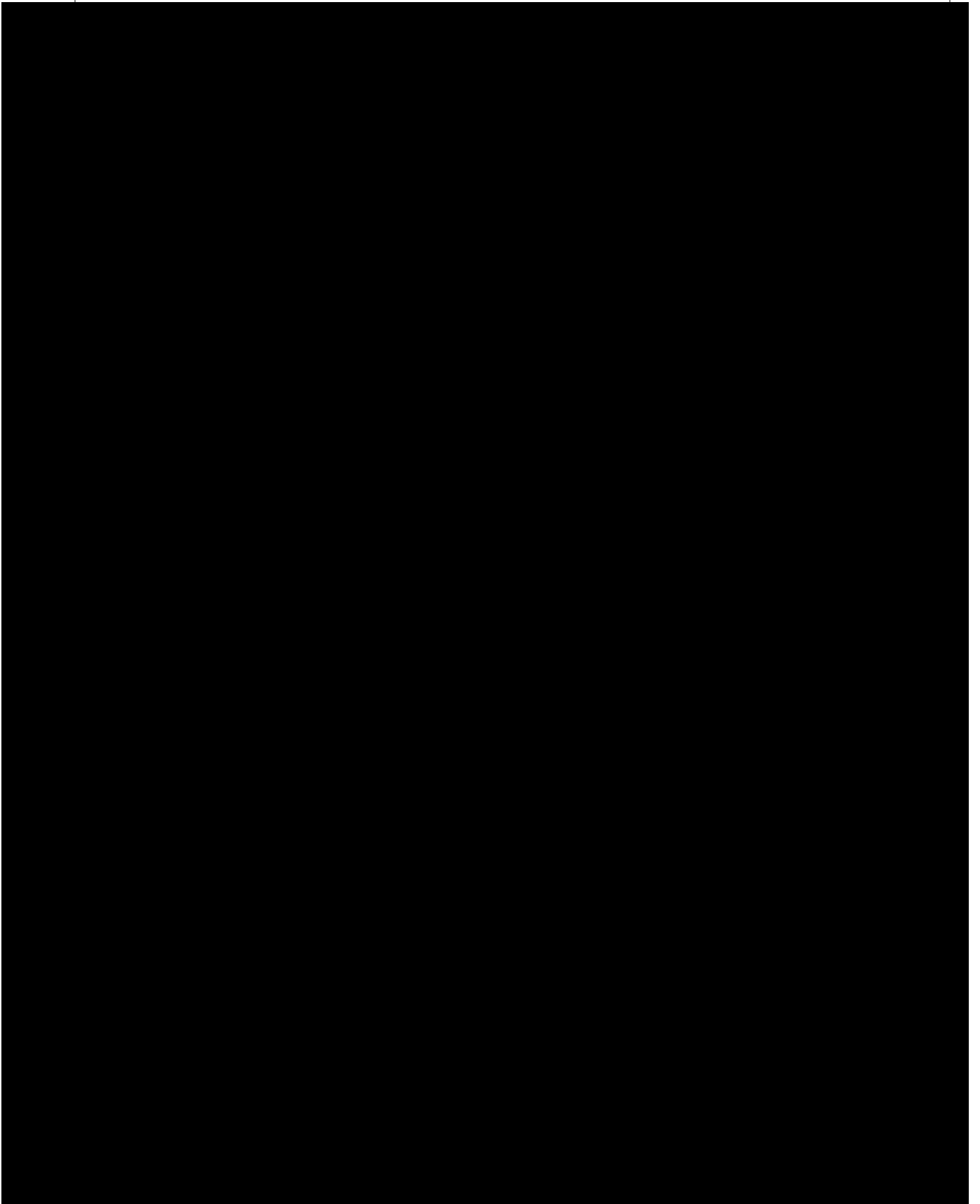


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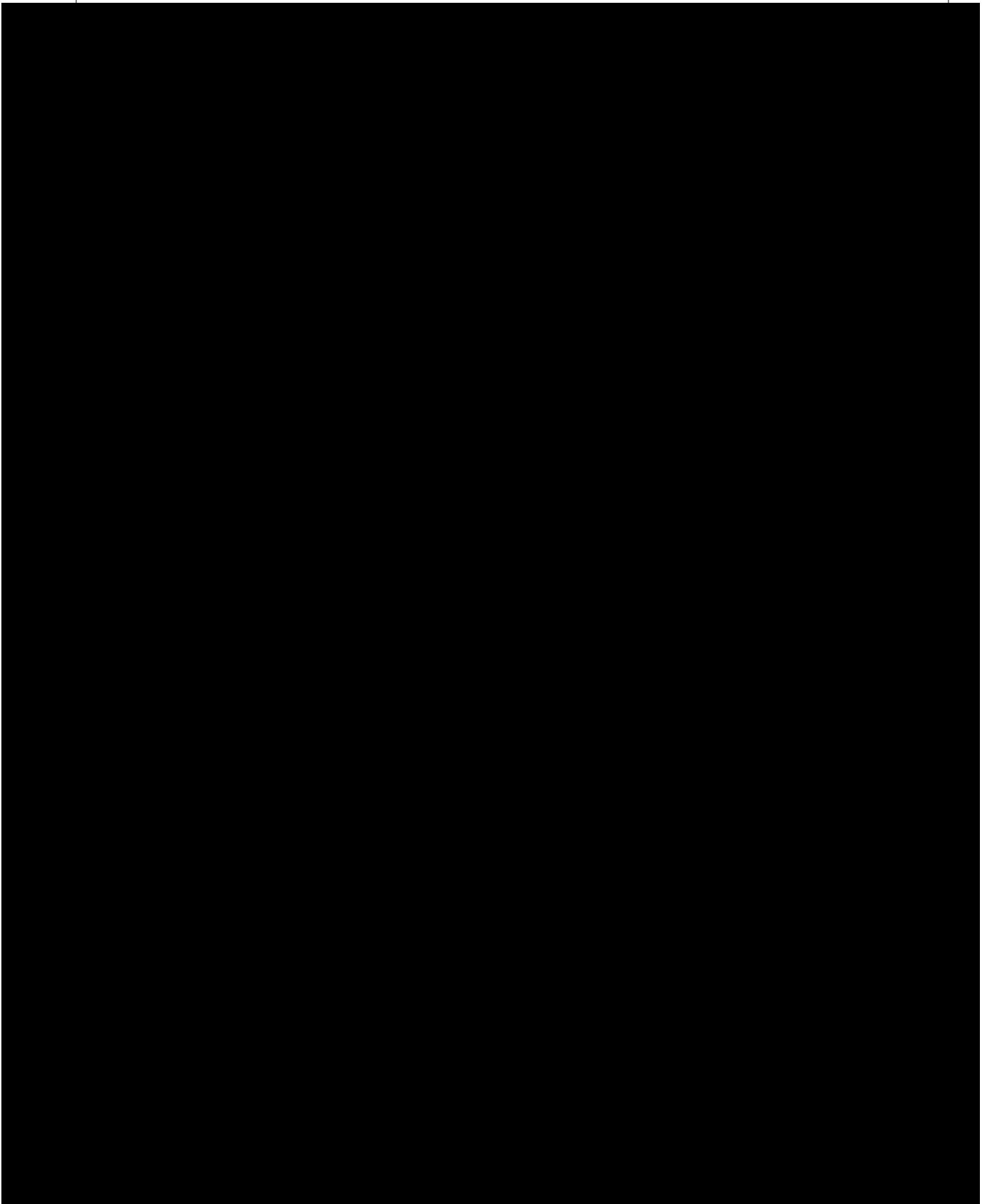


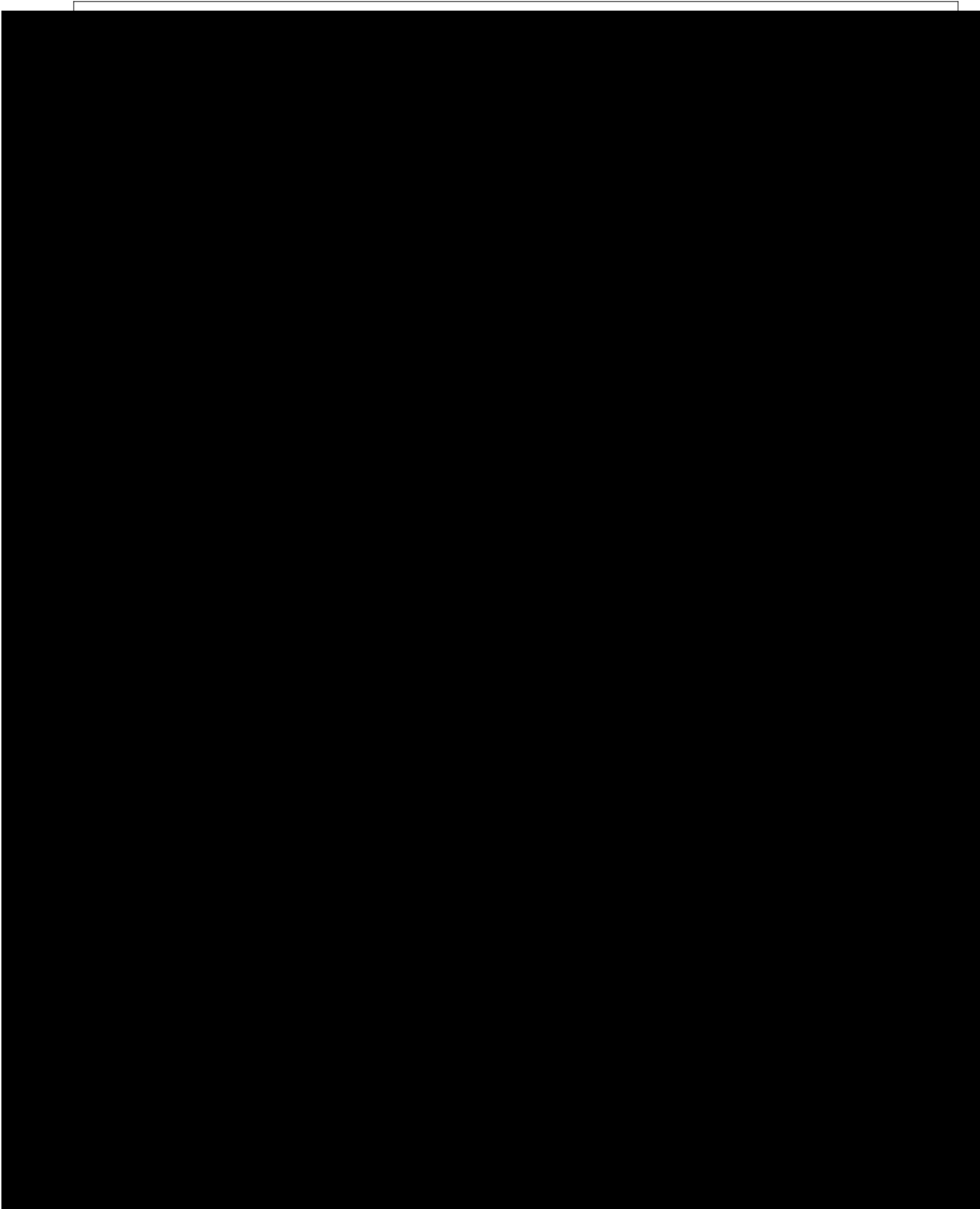
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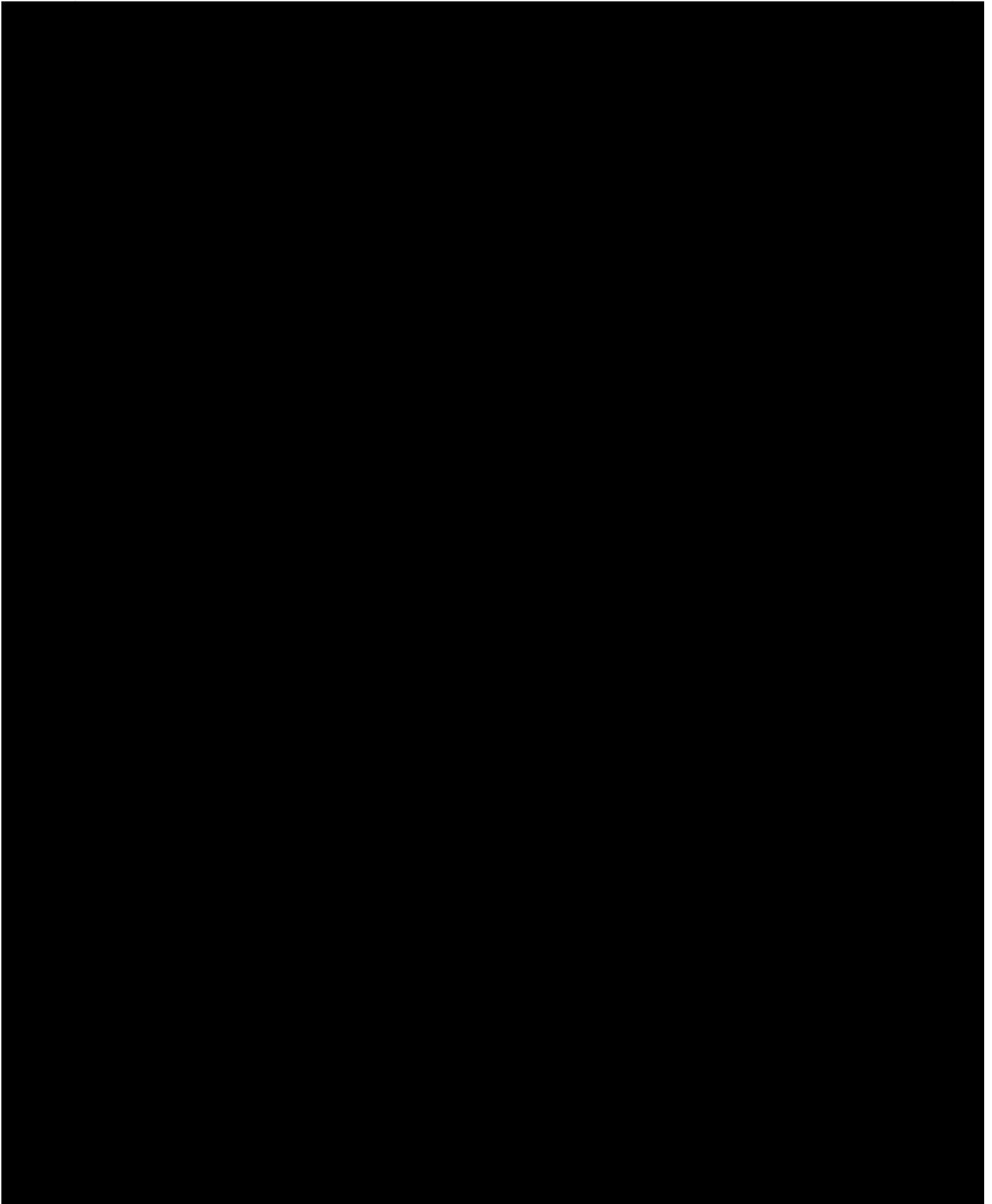




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## C E R T I F I C A T E

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.

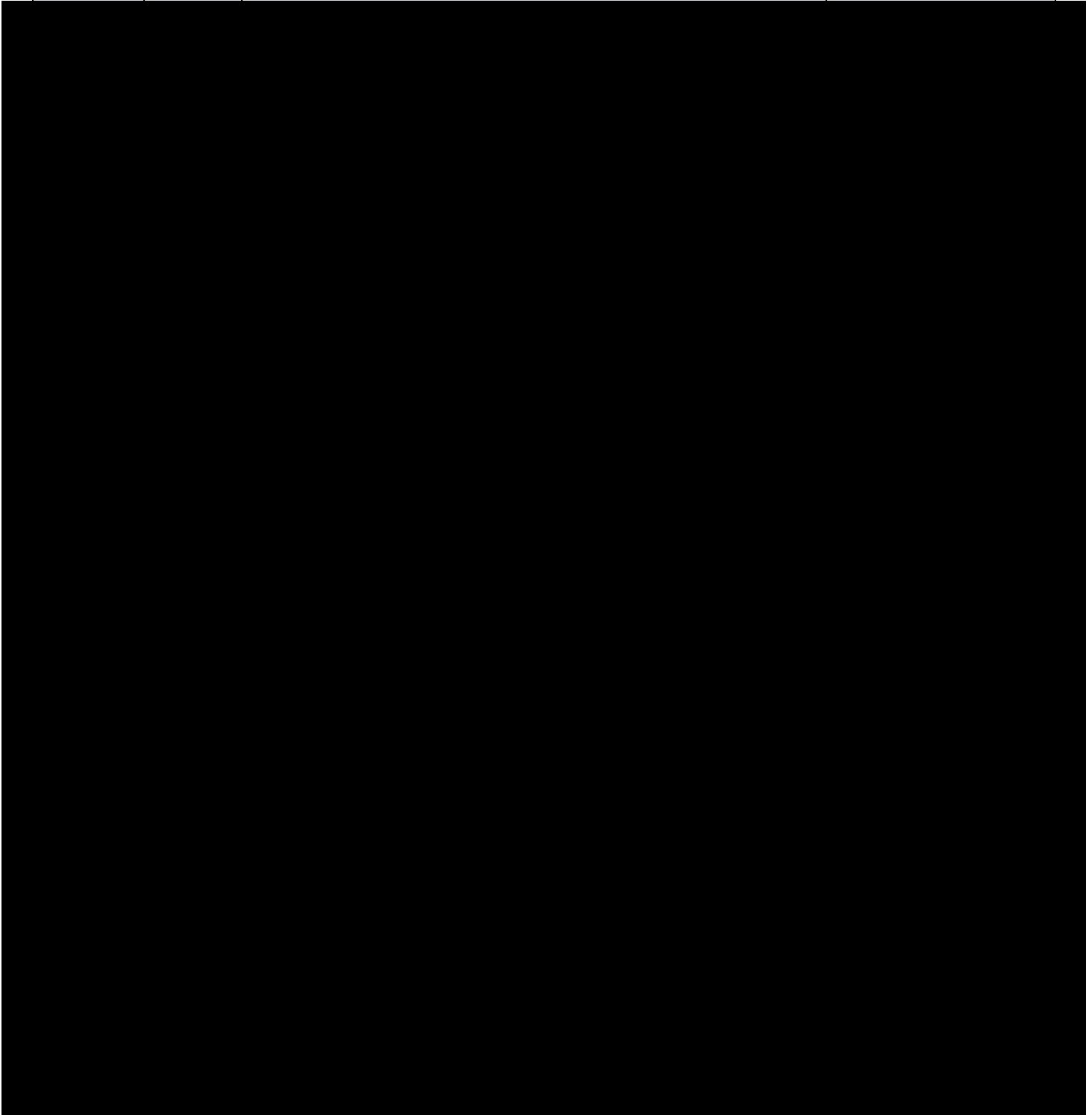


MICHELLE M. BOUDREAUX-PHILLIPS, CCR

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

**Errata for Deposition of William Mathew Martin, February 14, 2024**

| Page | Line(s) | Change | Reason |
|------|---------|--------|--------|
|------|---------|--------|--------|



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 \_\_22\_\_ day of \_\_\_\_\_ March \_\_\_\_\_, 2024.

  
WILLIAM M. MARTIN

.