

PX 16

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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

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

February 22, 2024

9:25 a.m.

Deposition of WILLIAM GOLDEN, held at
the offices of Goodwin Procter LLP, 620 Eighth
Avenue, New York, New York, pursuant to Rule
30(b)(6) notice, before Laurie A. Collins, a
Registered Professional Reporter and Notary
Public of the State of New York.

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ALSO PRESENT:

ROBERT RUDIS, Videographer

1 THE VIDEOGRAPHER: Good morning. We
2 are going on the record at 9:25 a.m. February
3 22nd, 2024.

4 Please note that the microphones are
5 sensitive and may pick up whispering and
6 private conversations.

7 Please mute your mobile phones at this
8 time.

9 Audio and video recording will continue
10 to take place unless all parties agree to go
11 off the record.

12 This is media unit 1 of the video-
13 recorded deposition of Bill Golden,
14 representing Bank of America, taken by counsel
15 for plaintiff in the matter of In Re Bank of 09:25:22
16 America California Unemployment Benefits
17 Litigation filed in the United States District
18 Court, Southern District of California, Case
19 Number 3:21-md-02992-LAB-MSB.

20 The location of the deposition is 09:25:49
21 Goodwin Procter LLP 620 Eighth Avenue, New
22 York, New York.

23 My name is Robert Rudis. I'm the
24 videographer. The court reporter is Laurie
25 Collins. And we represent the firm Veritext 09:26:02

1 Legal Solutions.

2 I am not related to any party in this
3 action, nor am I financially interested in the
4 outcome.

5 If there are any objections to 09:26:11
6 proceeding, please state them at the time of
7 your appearance. Counsel and all present
8 including remotely will now state your
9 appearances and affiliations for the record,
10 beginning with the noticing attorney. 09:26:20

11 ATTORNEY LEYTON: Stacey Leyton from
12 Altshuler Berzon on behalf of the plaintiffs.

13 ATTORNEY JONES: Colin Jones, also on
14 behalf of the plaintiffs, Altshuler Berzon.

15 ATTORNEY CHAN: Do you want counsel for 09:26:37
16 the plaintiffs on the line to go next or do
17 you want me to go next?

18 THE VIDEOGRAPHER: You can go next.

19 ATTORNEY CHAN: Yvonne Chan from Jones
20 Day on behalf of Bank of America and the
21 witness.

22 ATTORNEY MacCUNE: Marie MacCune on
23 behalf of Bank of America and the witness from
24 Goodwin Procter.

25 THE VIDEOGRAPHER: Thank you. 09:26:50

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1 Will the people on Zoom please announce
2 yourselves?

3 ATTORNEY SHAY: Yes. Good morning.
4 I'm Daniel Shay. I'll be observing today. I
5 represent the individual plaintiffs. 09:27:01

6 ATTORNEY KIRTLEY: And this is Andrew
7 Kirtley of Cotchett, Pitre & McCarthy. I
8 represent class plaintiffs.

9 ATTORNEY PLATKIEWICZ: Ilana
10 Platkiewicz with Swigart Law Group appearing 09:27:24
11 on behalf of individual plaintiffs.

12 THE VIDEOGRAPHER: Anyone else?

13 ATTORNEY BASS: This is Kate Bass with
14 Altshuler Berzon on behalf of the plaintiffs.

15 THE VIDEOGRAPHER: Mr. Rubin? Okay. 09:27:44

16 Would the court reporter please swear
17 in the witness and then counsel may proceed.
18 Thank you.

19 W I L L I A M G O L D E N ,

20 called as a witness, having been duly sworn
21 by the notary public, was examined and
22 testified as follows:

23 EXAMINATION BY

24 ATTORNEY LEYTON:

25 Q. Good morning -- 09:28:03

1 A. Good morning.

2 Q. -- Mr. Golden. As I told you, my name
3 is Stacey Leyton. I'm here on behalf of the
4 plaintiffs. With me is my colleague, Colin Jones.

5 Could you please state and spell your 09:28:16
6 name for the record?

7 A. My name is William, W-I-L-L-I-A-M,
8 Golden, G-O-L-D-E-N, and I go by Bill.

9 Q. Thank you.

10 To start I'm going to go over some 09:28:26
11 ground rules with you so that we're all on the
12 same page.

13 You understand that you are testifying
14 under oath and under penalty of perjury today the
15 same as if you were in court; correct? 09:28:35

16 A. I do.

17 Q. You understand that what you will say
18 here today is being taken down by the court
19 reporter?

20 A. I do. 09:28:44

21 Q. For the court reporter it's important
22 that your responses be verbal, so she can't
23 transcribe if you nod your head or shrug your
24 shoulders or say uh-huh. Does that make sense?

25 A. It does. 09:28:51

1 Q. So that the court reporter can take
2 down everything we say today, we also have to be
3 careful not to interrupt one another. So please
4 wait until I've finished my question before you
5 start to answer, and I will try not to interrupt 09:29:02
6 your answers. Okay?

7 A. Yes.

8 Q. If you don't understand a question,
9 please tell me that you don't understand, and if
10 possible, I will try to rephrase it. Okay? 09:29:12

11 A. Okay.

12 Q. If I ask you a question and you answer
13 it without asking me to explain it or rephrase it,
14 I will assume that you heard the question, that
15 you understood it, and that you've given me your 09:29:21
16 best and complete response. Understand?

17 A. Yes.

18 Q. After the deposition the court reporter
19 will prepare a verbatim transcript of today's
20 proceedings, and you will have a chance to review 09:29:33
21 it and make any necessary changes and corrections.
22 But if you make any corrections, I will be able to
23 comment on those corrections to the judge.
24 Understand?

25 A. I do. 09:29:41

1 Q. You understand that from time to time
2 your attorney will make objections to my
3 questions, but unless she specifically instructs
4 you not to answer, you will still need to answer
5 the question after she finishes her objection. Do 09:29:55
6 you understand?

7 A. I do.

8 Q. Is there any reason you cannot answer
9 my questions truthfully and to the best of your
10 ability today? 09:30:03

11 A. No.

12 Q. Finally, I definitely plan on taking
13 regular breaks today, but if you need to take a
14 break at any time, please let me know and we'll
15 take a break. The one exception is that I will 09:30:12
16 ask you to answer any pending question before we
17 go on break. Understand?

18 A. Yeah.

19 Q. Have you ever been deposed before?

20 A. No. 09:30:24

21 Q. Have you ever provided testimony as a
22 witness in any other form before such as at a
23 trial?

24 A. No, only to the CFPB.

25 Q. To the CFPB. And was that in 09:30:32

1 connection with your role at the bank?

2 A. It was.

3 Q. How many times did you provide
4 testimony?

5 A. Once. 09:30:43

6 Q. And did it concern the subject matter
7 of this deposition?

8 ATTORNEY CHAN: I'll just object and
9 caution the witness not to reveal anything
10 that's protected by the bank examiner 09:30:50
11 privilege or any other privileges. I will let
12 him answer at a very high level, but I think
13 beyond that we're not going to get to the
14 scope of the testimony.

15 A. I did. 09:31:03

16 Q. Let's go through some personal
17 background. I'd like to show you Tab 2, which we
18 will mark as Exhibit 101, which is a biography
19 that we pulled off LinkedIn.

20 (Discussion off the record.) 09:31:29

21 (Exhibit 101, LinkedIn biography of
22 Golden, marked for identification.)

23 Q. Apologize, this is a little bit of a
24 wonky printout, but is this -- do you recognize
25 what this is? 09:31:43

1 A. I do.

2 Q. Did you prepare this LinkedIn
3 biography?

4 A. The biography, yes.

5 Q. You said the biography but not some 09:31:51
6 other parts?

7 A. Not some of the posts and things like
8 that, no.

9 Q. Is this biography accurate regarding
10 your education? 09:32:00

11 A. It is.

12 Q. Second page.

13 A. It is.

14 Q. Okay.

15 And is this biography accurate 09:32:04
16 regarding your employment history?

17 A. It is.

18 Q. So this says that your current position
19 is managing director, global markets operations
20 executive, which began in November 2021 to the 09:32:30
21 present. Is that all accurate?

22 A. That's correct.

23 Q. What are your responsibilities at a
24 general level in that position?

25 A. So I currently run the global markets 09:32:44

1 onboarding team. That team is around 110 people
2 or so. Basically onboard hedge funds, large
3 assets managers to our global markets platform. I
4 also have another group that is focused on
5 anti-money laundering globally. It's around 200 09:33:05
6 people. And I have a team that does off-boarding.
7 All of that for the institutional bank,
8 institutional trading platform.

9 Q. What is your role and relationship to
10 the Bank of America call centers? 09:33:21

11 ATTORNEY CHAN: Objection. Are you --
12 are you talking about all call centers across
13 the entire bank or specific to the EDD prepaid
14 cards?

15 Q. Why don't you ask [sic] in relation to 09:33:34
16 all call centers to begin with?

17 ATTORNEY CHAN: Objection.
18 Go ahead.

19 A. I currently have no relationship to any
20 Bank of America call centers. 09:33:42

21 Q. What about what is your relationship in
22 relationship to the call centers that service the
23 EDD prepaid debit card customers?

24 A. Sure. So I currently don't have any
25 role for that business. I came in, started 09:33:55

1 running that business in August of 2020 during the
2 pandemic, and then I changed roles about November
3 of '21.

4 Q. And tell me what your role was with
5 relationship to those call centers between August 09:34:16
6 2020 and November 2021.

7 A. So I built a Bank of America team to
8 oversee the call centers. Initially it was the
9 main call center for prepaid card, then it was the
10 claims call center. And then we had a quality 09:34:32
11 assurance team and others. But it was to run
12 basically the call centers for the bank.

13 Q. What about the fraud call center?

14 A. The fraud call center -- fraud call
15 center, I had oversight as far as hiring the 09:34:47
16 resources for them, helping manage the vendors
17 that were on the -- in the call centers. But I
18 wasn't responsible for any of the fraud
19 decisioning of strategies or anything of that kind
20 of stuff, just the call centers. 09:35:02

21 Q. But the front call centers.

22 A. Yeah.

23 Q. When you were in that position, to whom
24 did you report?

25 A. So in Workday it showed that I rolled 09:35:10

1 in to Joe Guardino, but I really worked directly
2 for Paul since then. He was the one directly
3 involved with me running the call centers.

4 Q. Who reported to you?

5 A. Let's see. Scott Robbins ran -- helped 09:35:28
6 me run the call centers. I had Reggie -- or,
7 excuse me, Rocco Blasi; Brandy Bowles; Naydia -- I
8 can't remember her last name, but she was one of
9 my project managers that rolled in to me; Emily
10 Crenshaw, she worked for me; Jackie Govoni; and 09:35:51
11 Thea Collins, but Thea was not involved in
12 prepaid.

13 Q. Prior to August 2020 what was your
14 position?

15 A. So I was a global markets ops exec, and 09:36:10
16 I ran what was called client off-boarding, data,
17 and controls; so worked for the same gentleman,
18 Joe Guardino, and I was responsible for
19 off-boarding our markets clients. I had a data
20 quality team that worked for me and then a team 09:36:29
21 that managed activity around our trading accounts.

22 Q. Did you have any role with respect to
23 the EDD prepaid debit cardholder call centers?

24 A. Not at all.

25 Q. Did somebody else have primary 09:36:45

1 responsibility for the EDD prepaid cardholder call
2 centers?

3 ATTORNEY CHAN: Objection.

4 A. They did.

5 Q. Who was that? 09:36:56

6 A. The main call center sat in what's
7 called global transaction services. I believe
8 Rocco Blasi ran that at that time. The claims
9 call center sat in consumer, and the fraud call
10 center was in treasury fulfillment services 09:37:14
11 organization.

12 Q. Is there someone who you could describe
13 as having had main responsibility for the claims
14 call center?

15 ATTORNEY CHAN: Objection. 09:37:27

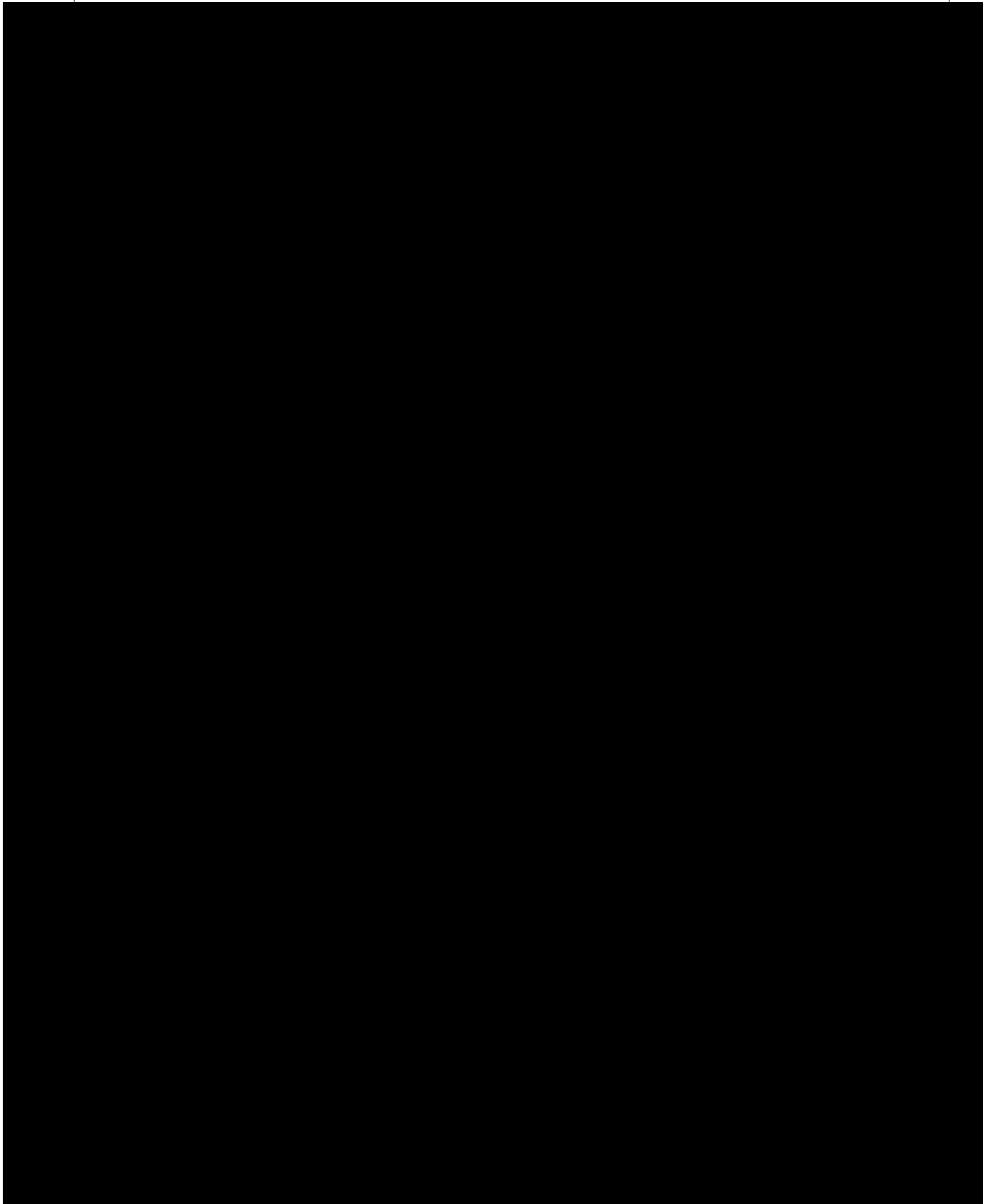
16 A. Bob Stone I believe had responsibility
17 for the claims call center.

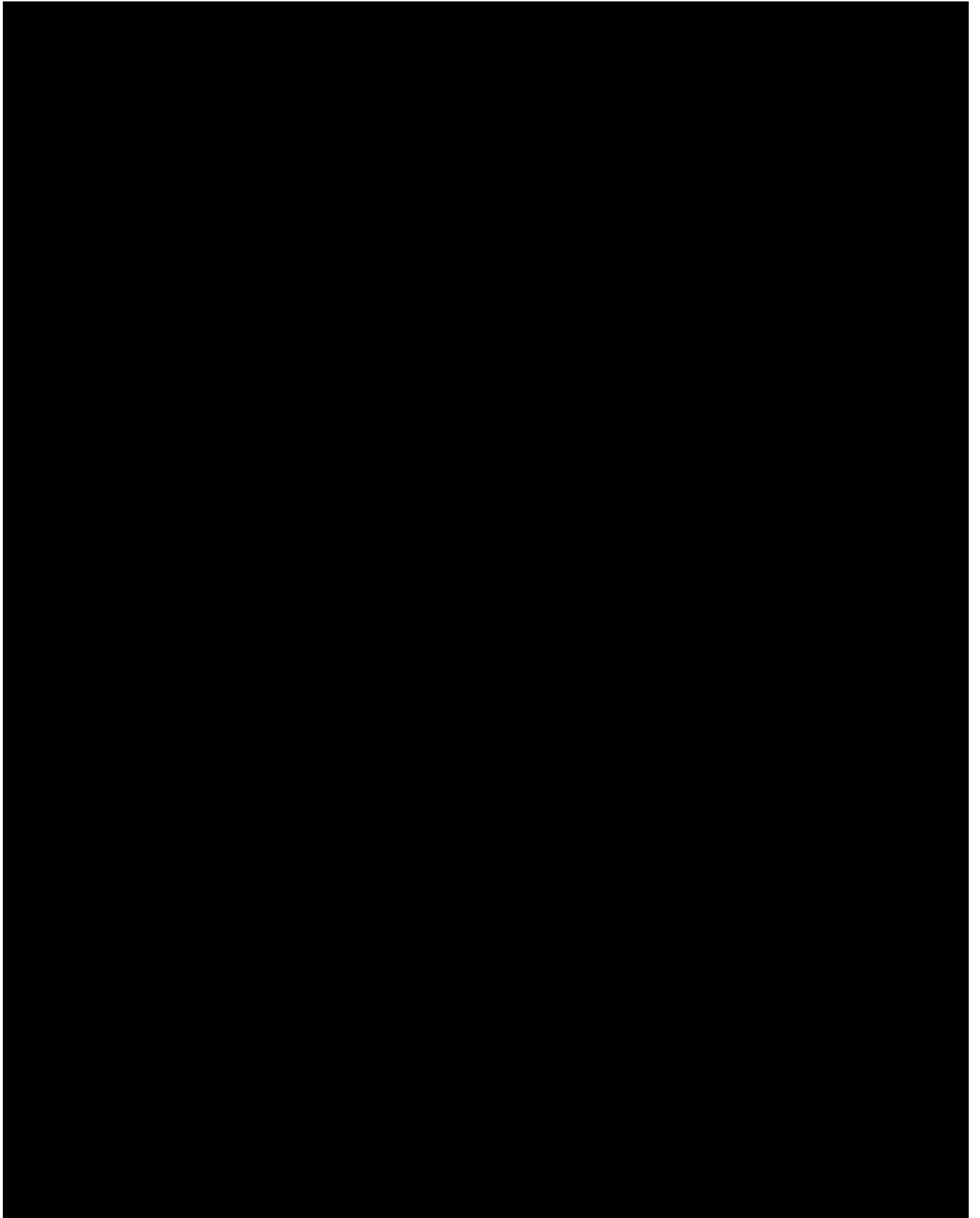
18 Q. And how about for the fraud call
19 center?

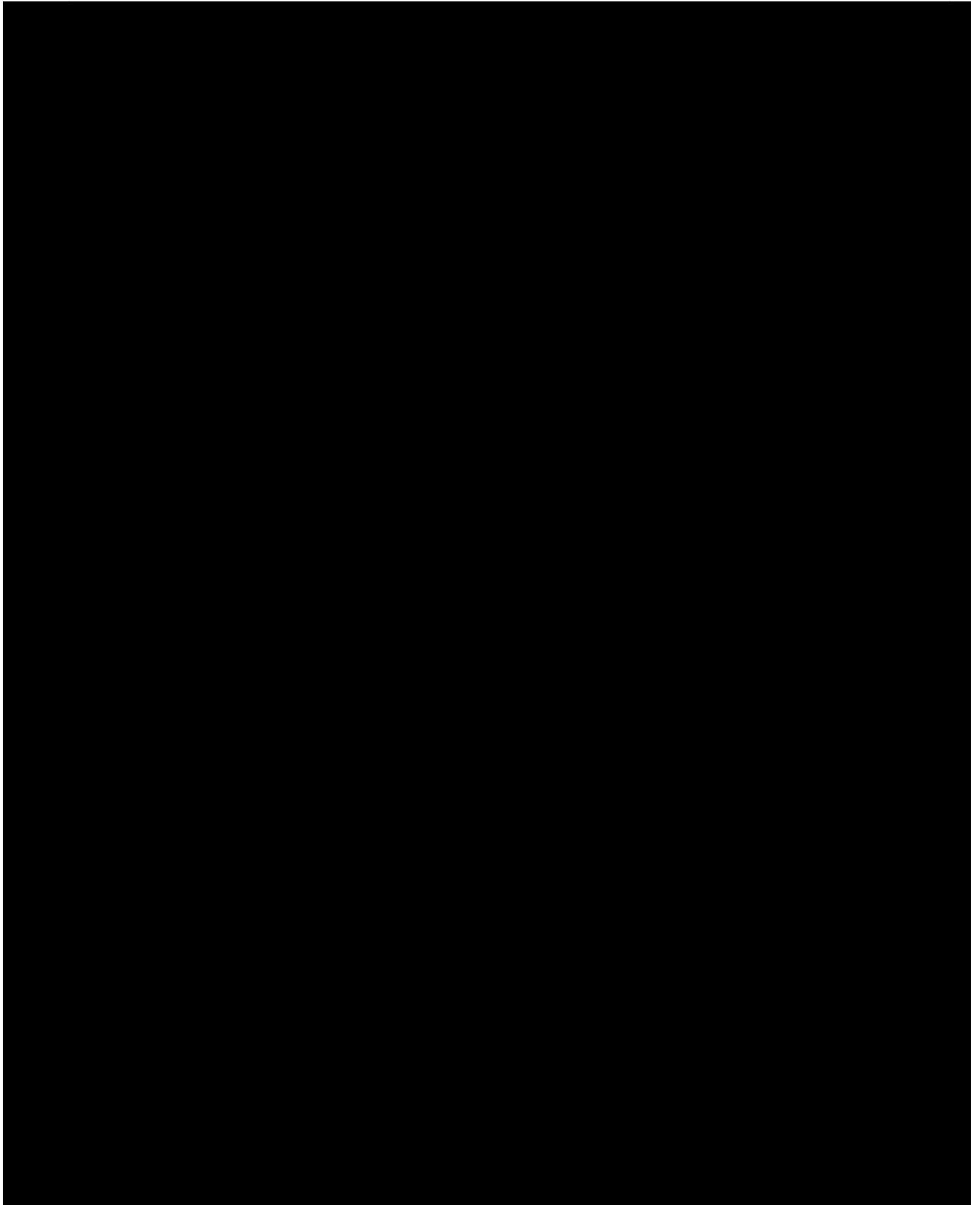
20 A. I'm not sure who ran that. 09:37:39

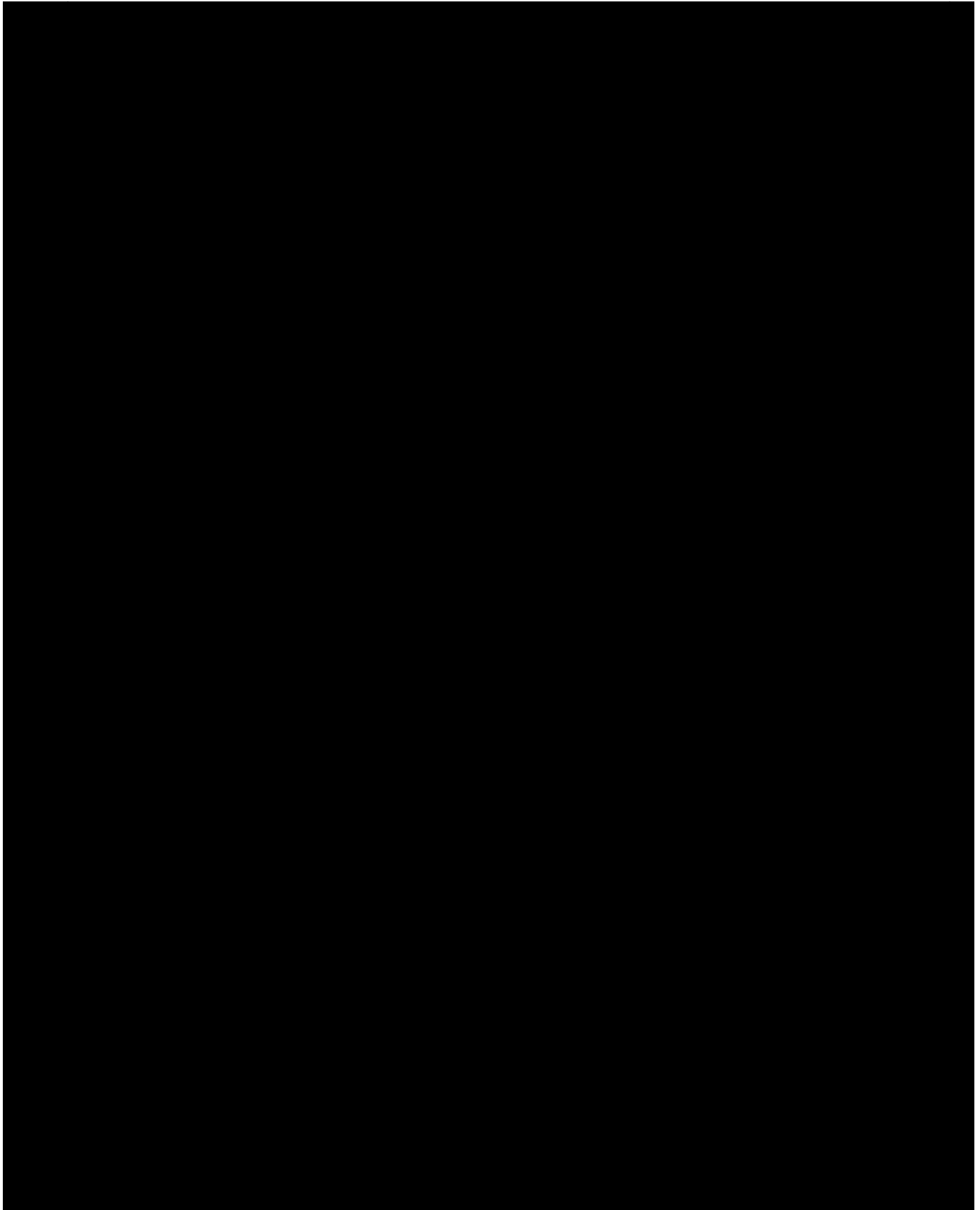
21 Q. I'd like to show you Tab 17, which I
22 will mark as Exhibit 102 -- no, I'm sorry, I'm
23 sorry, Tab 17 has previously been marked as
24 Exhibit 42.

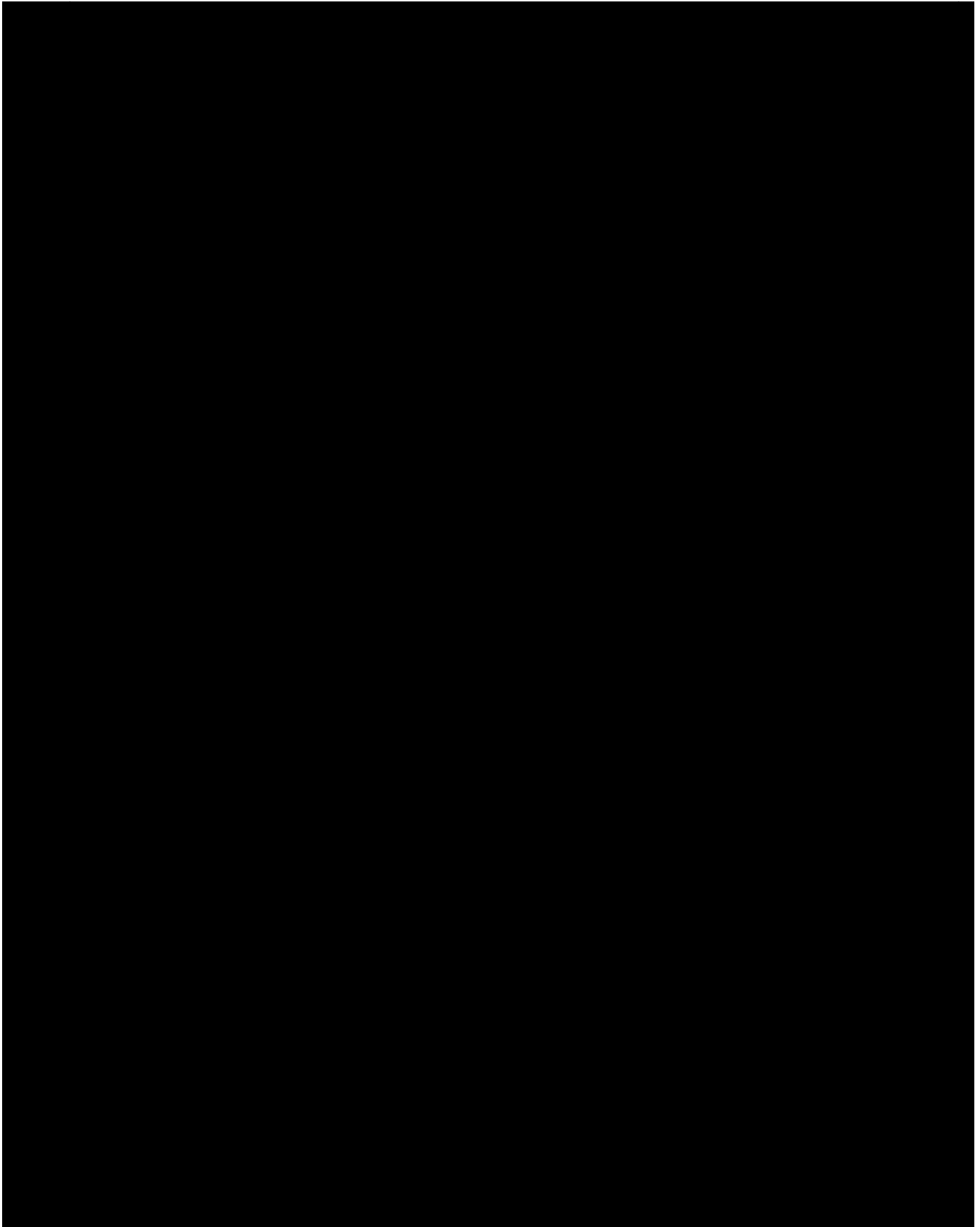
25 (Discussion off the record.) 09:38:05

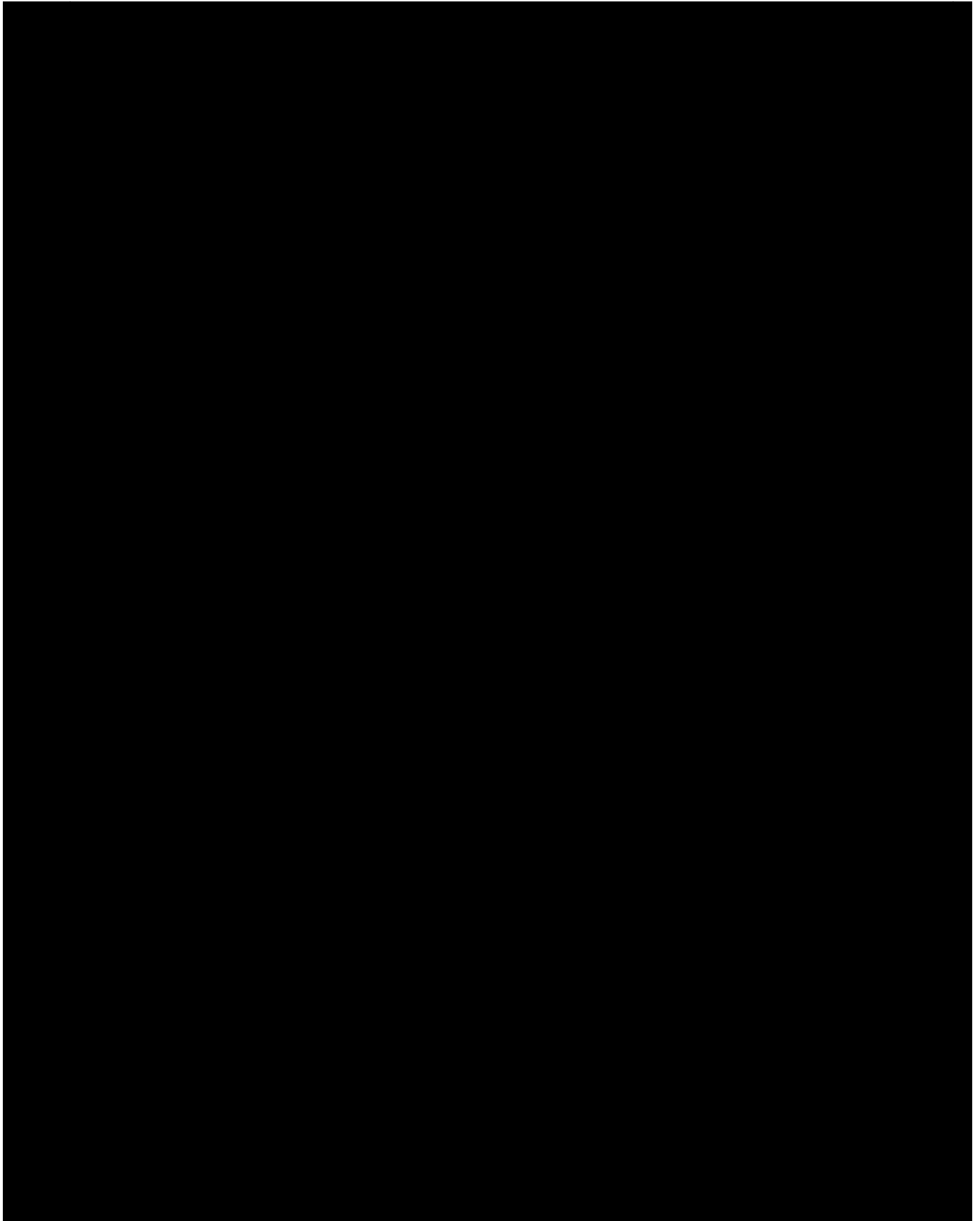


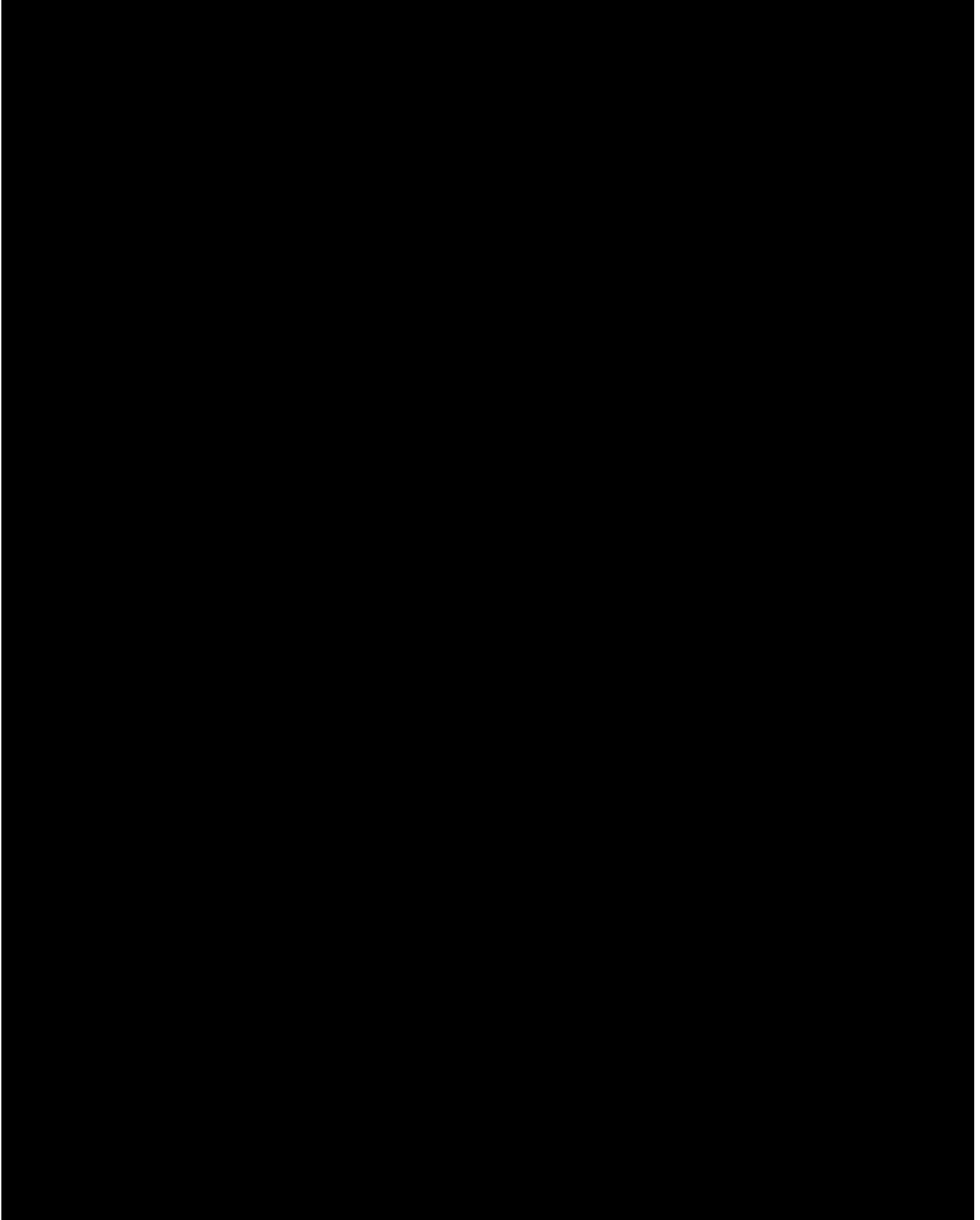


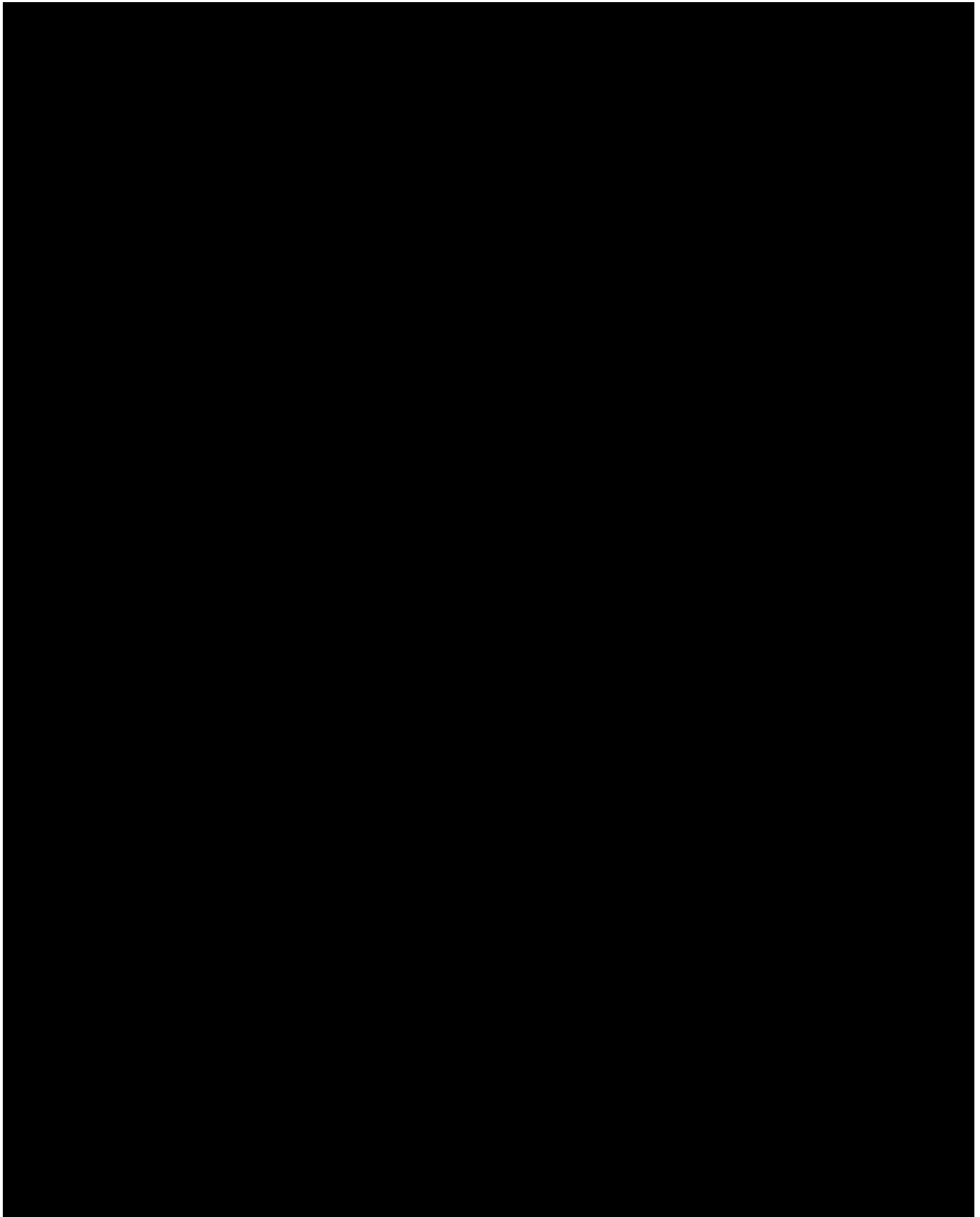


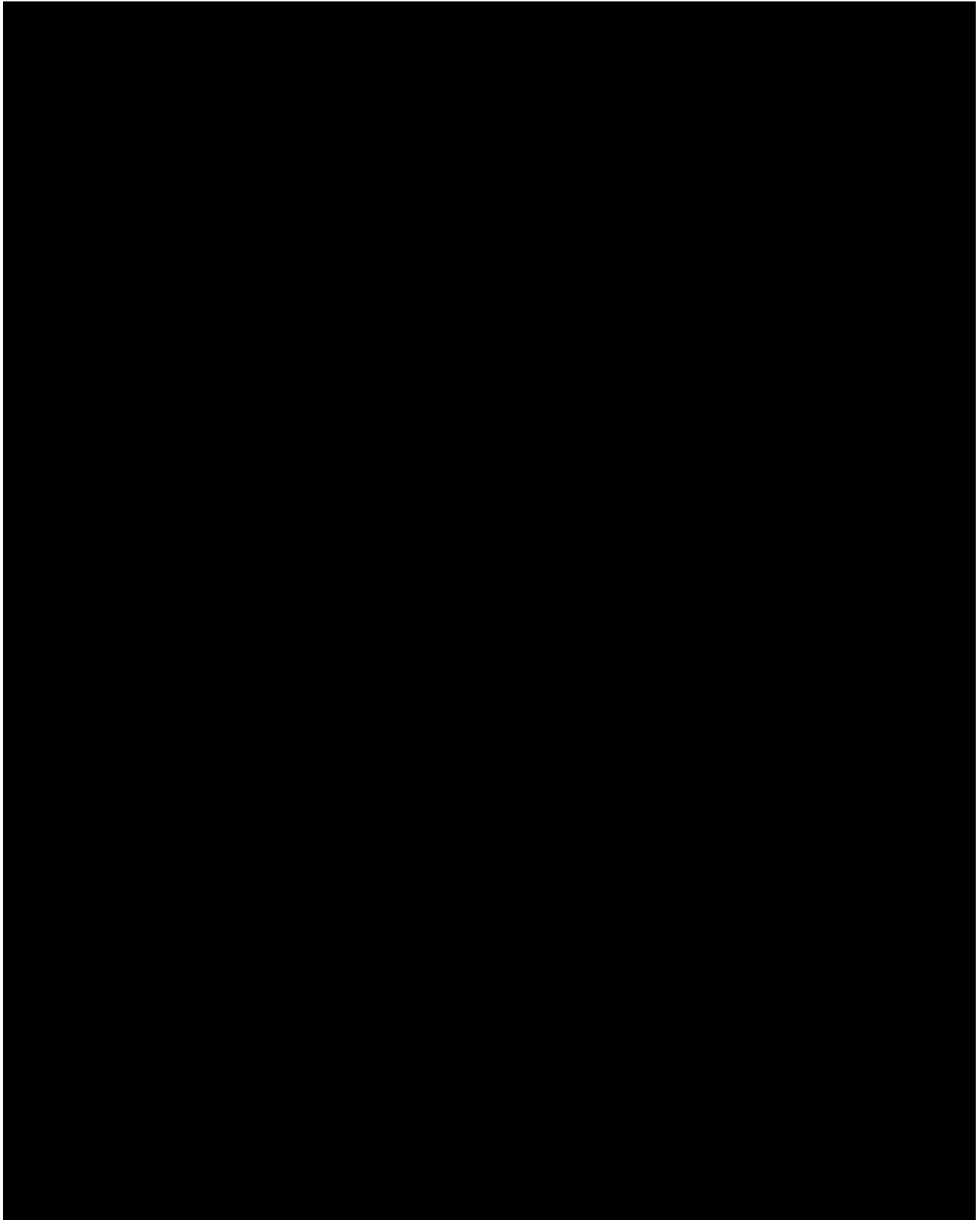


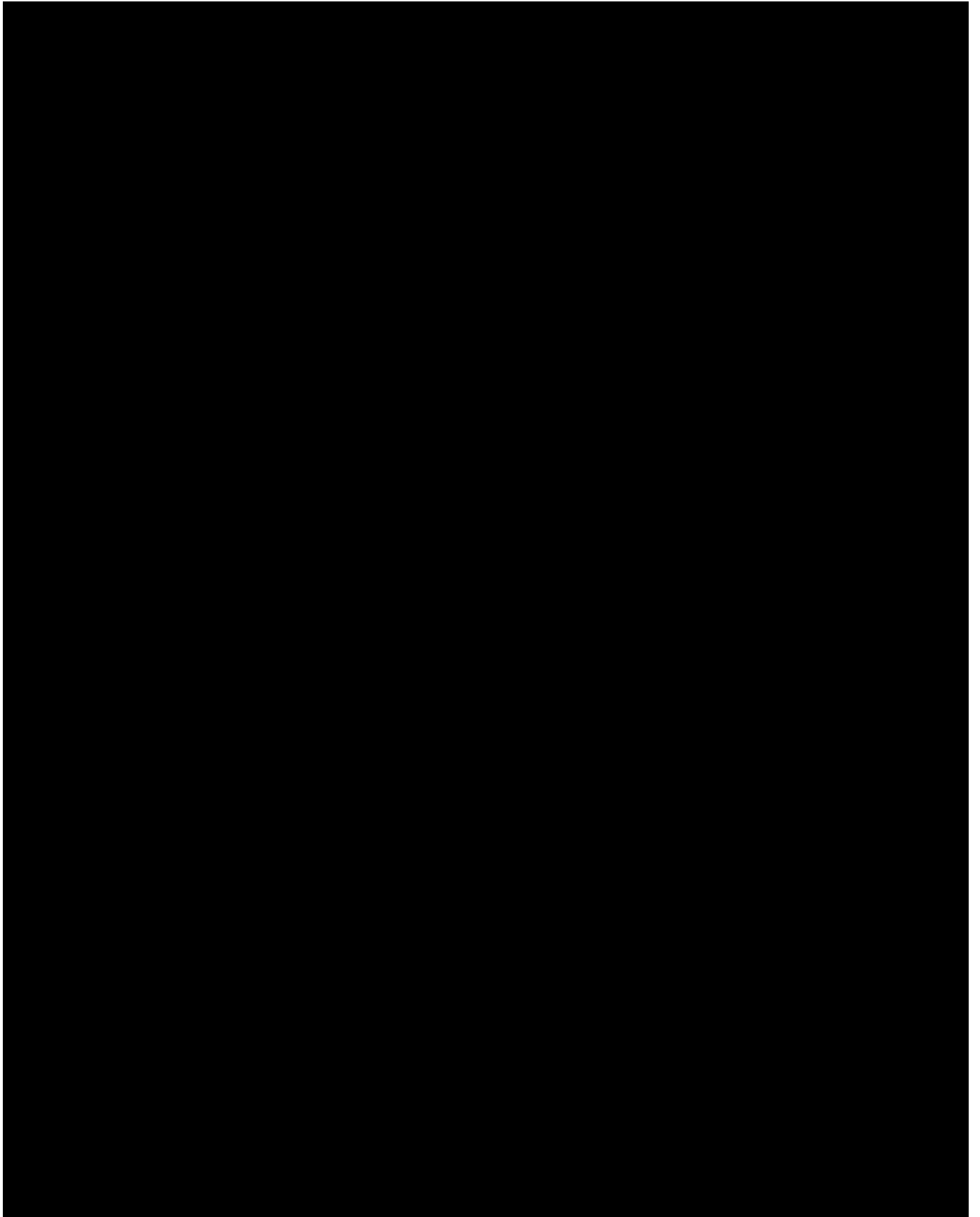


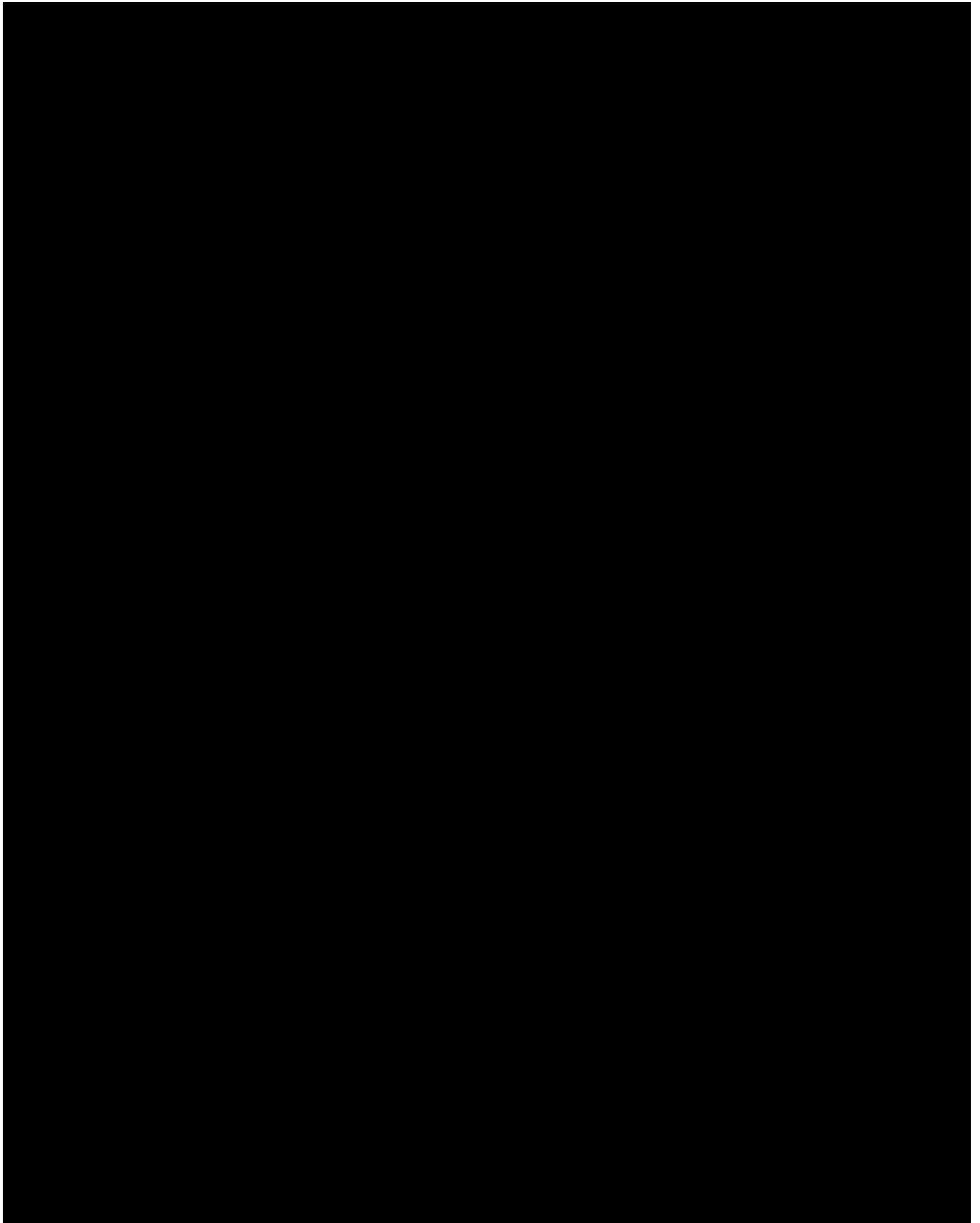


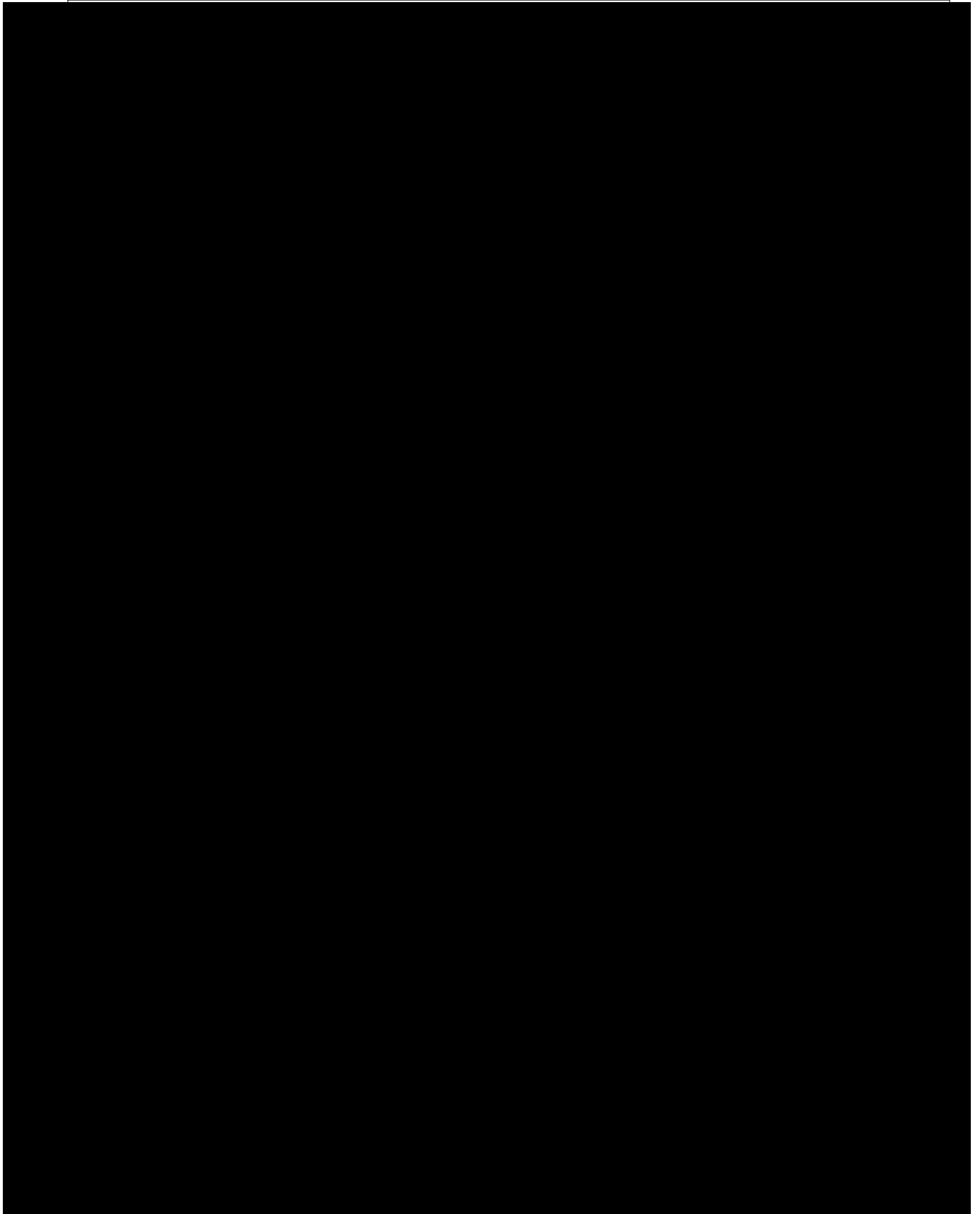


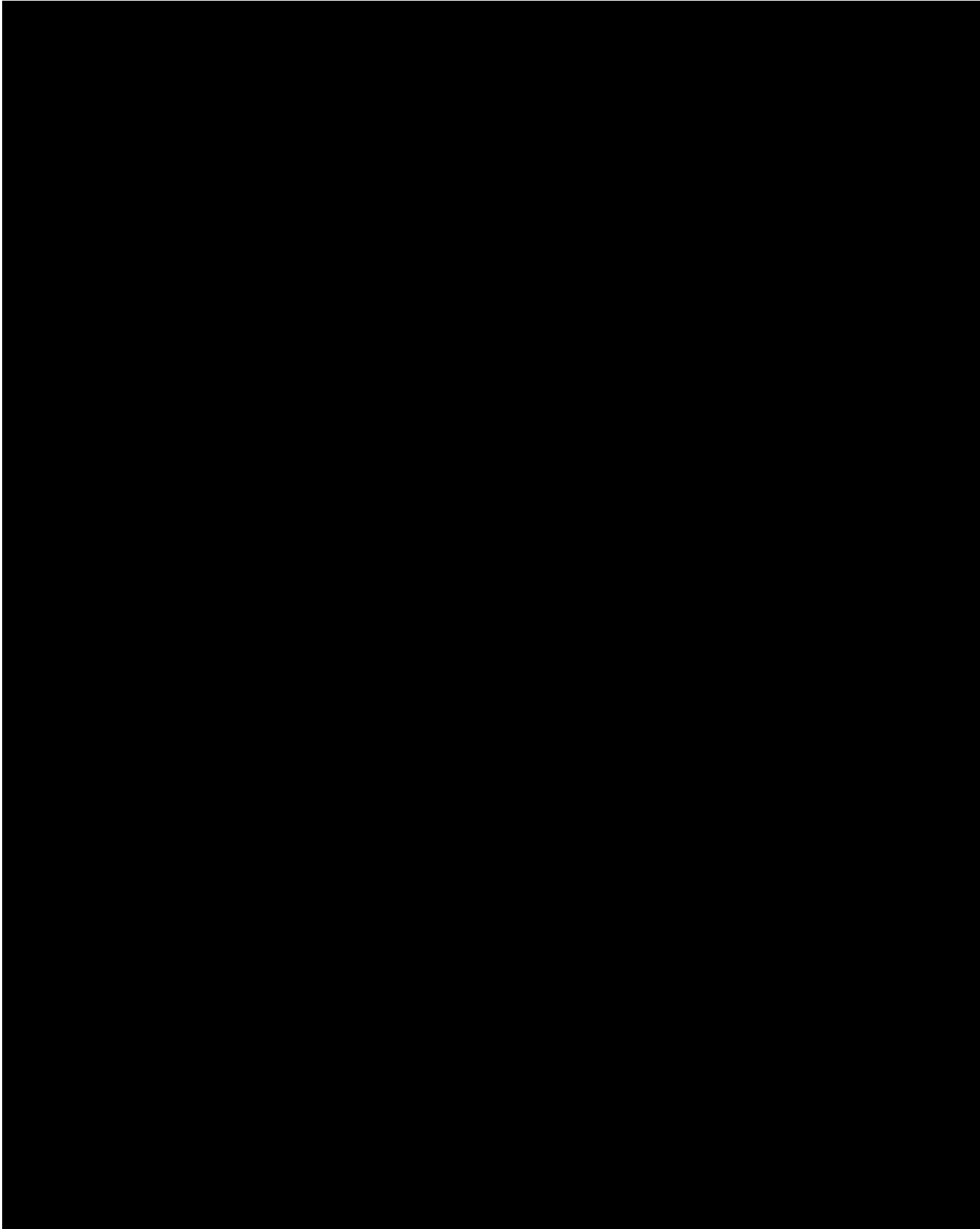


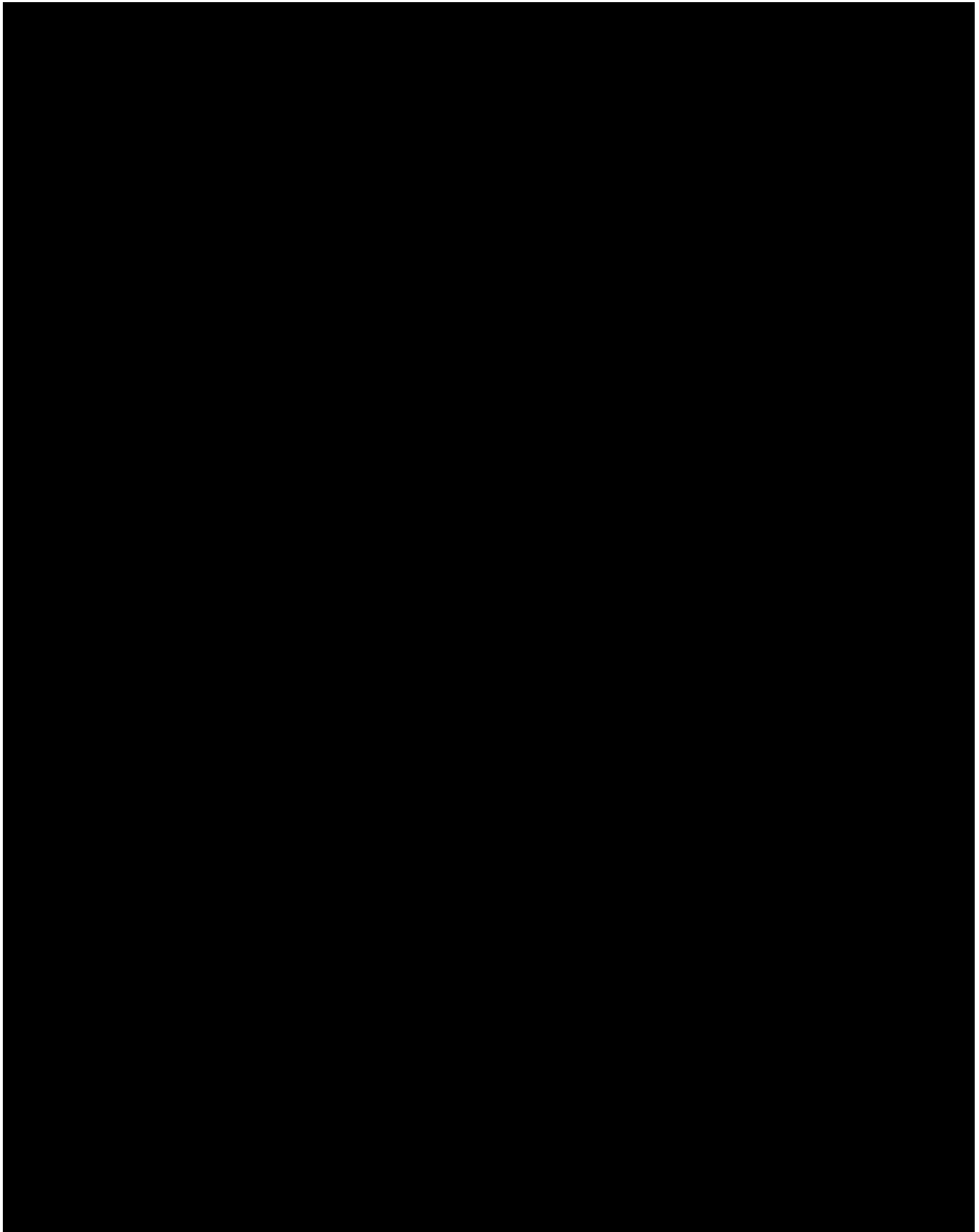


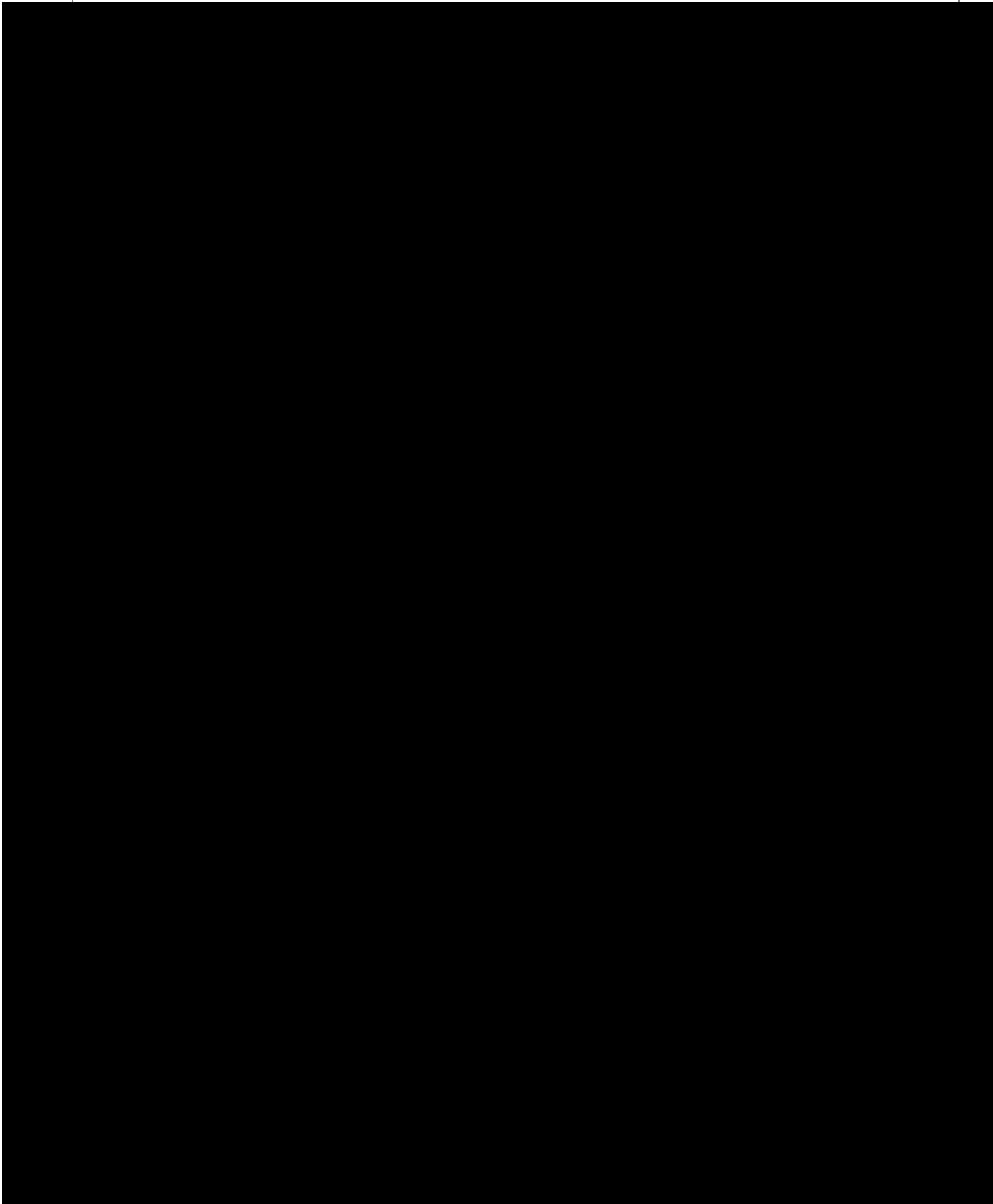


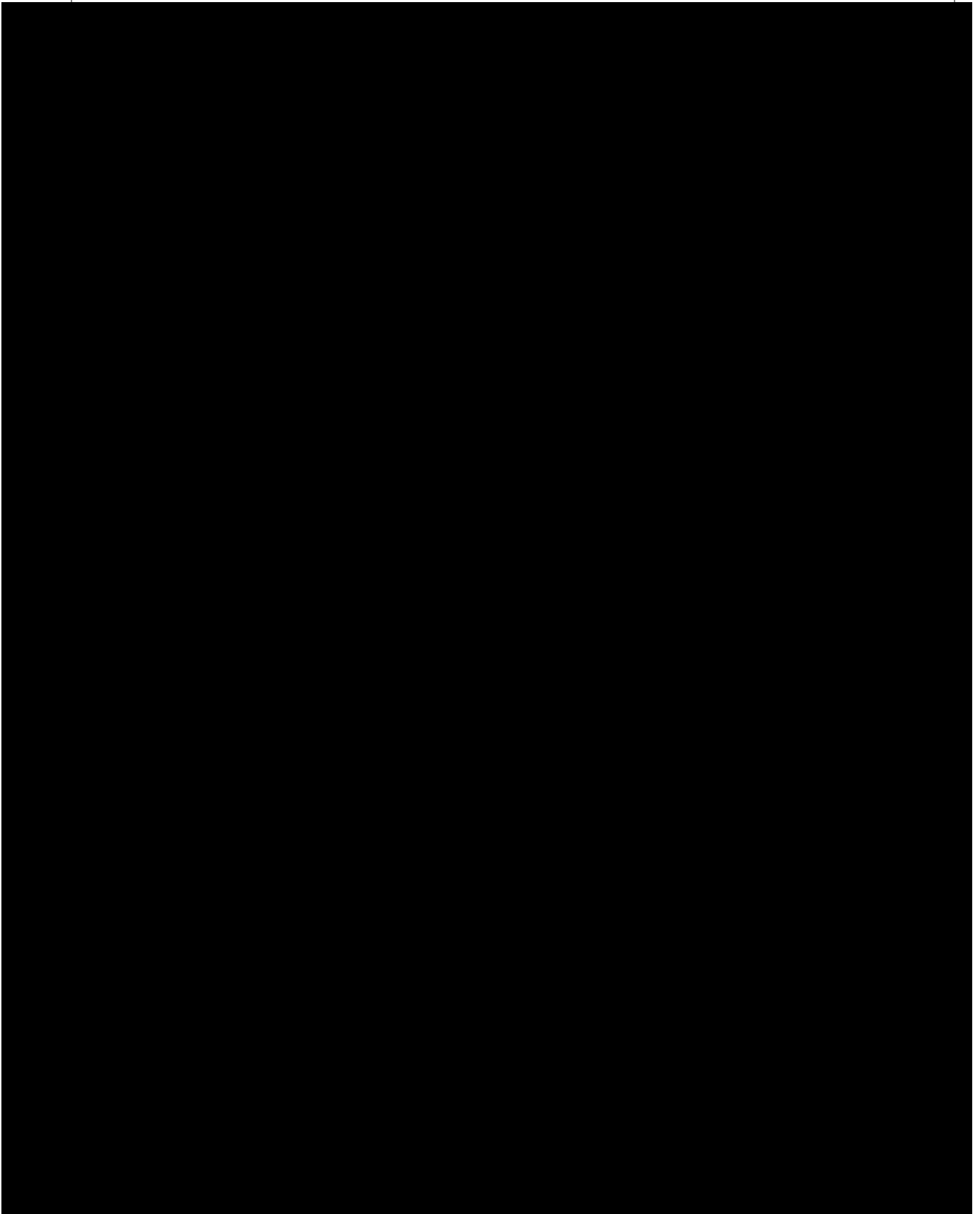


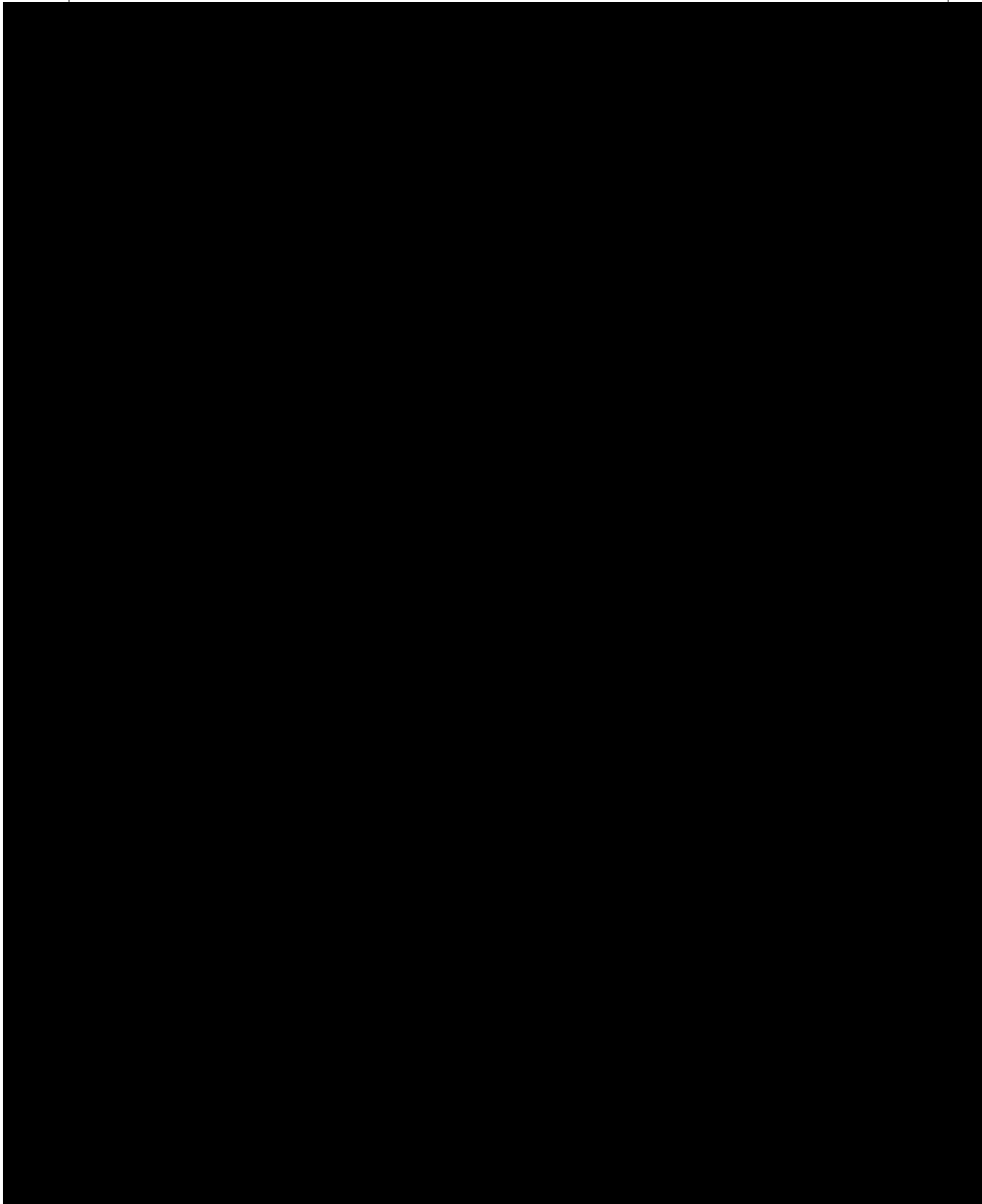


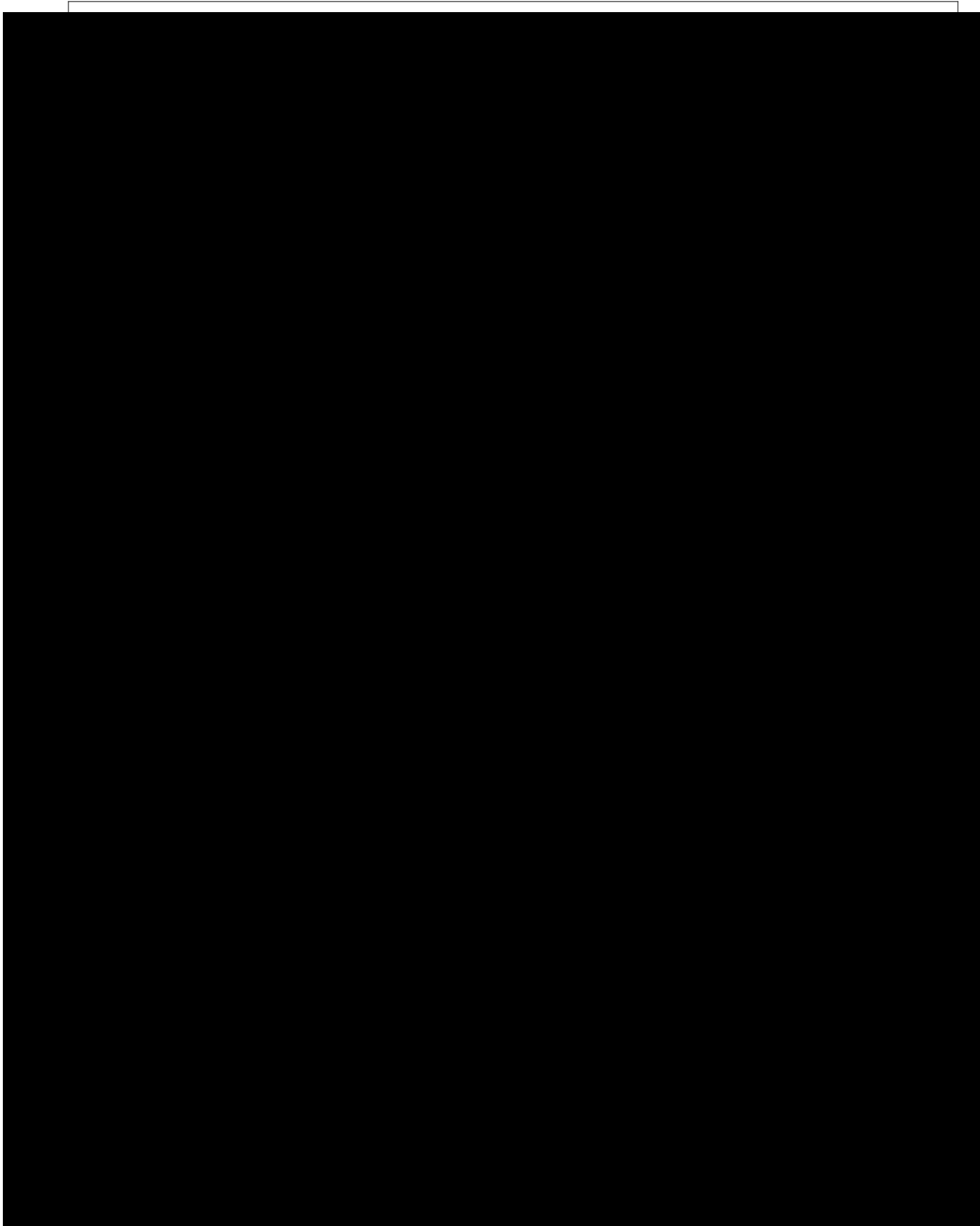


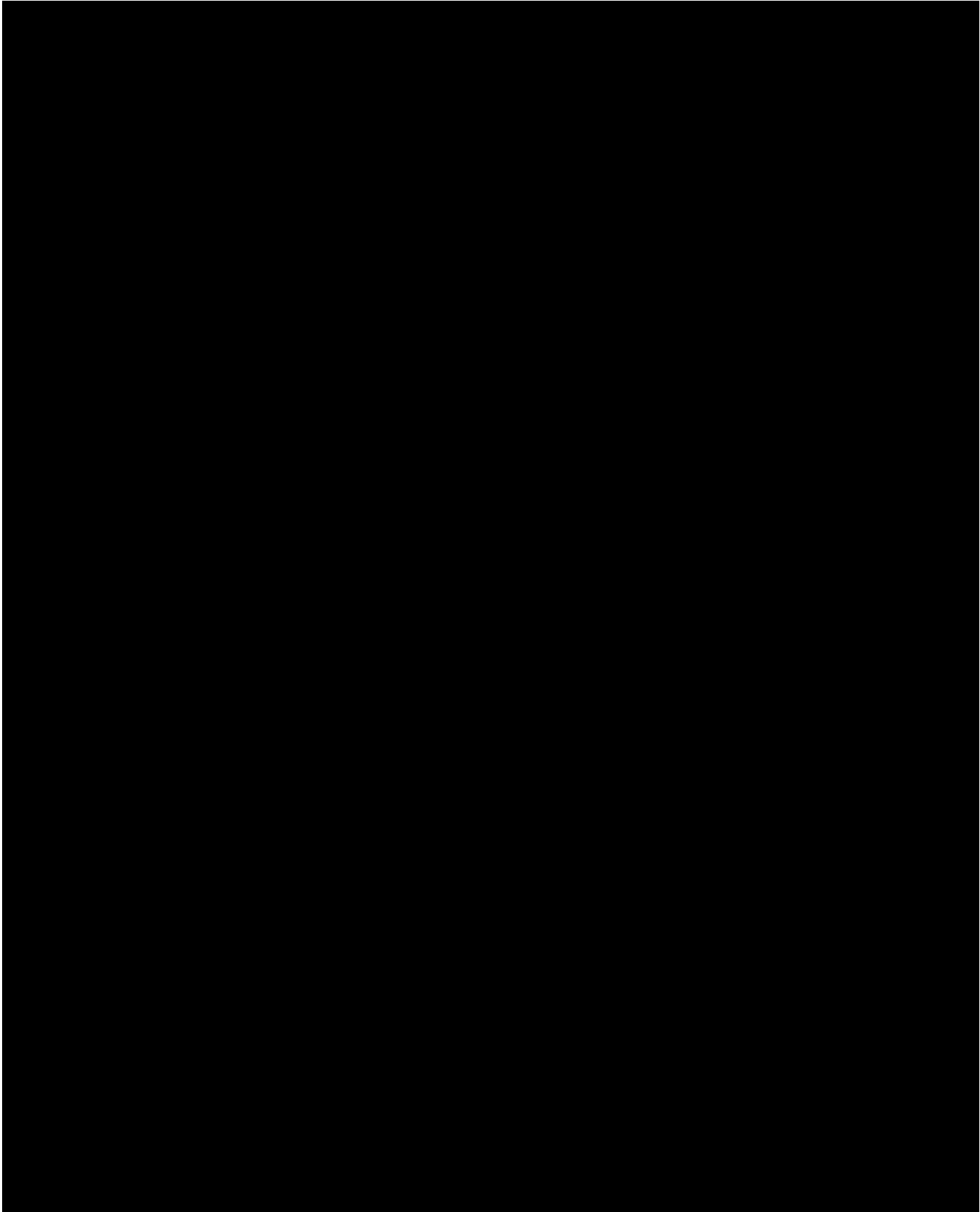


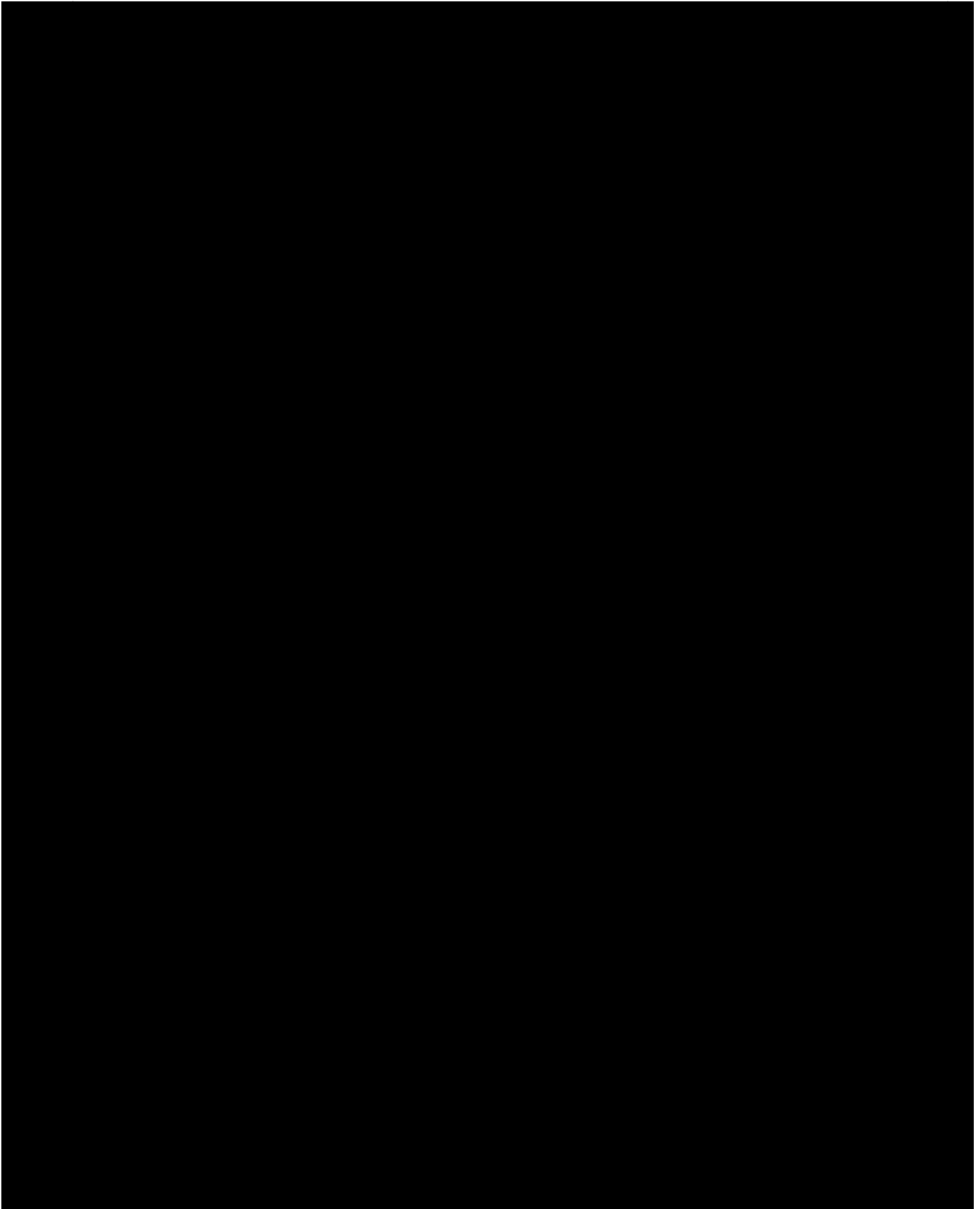


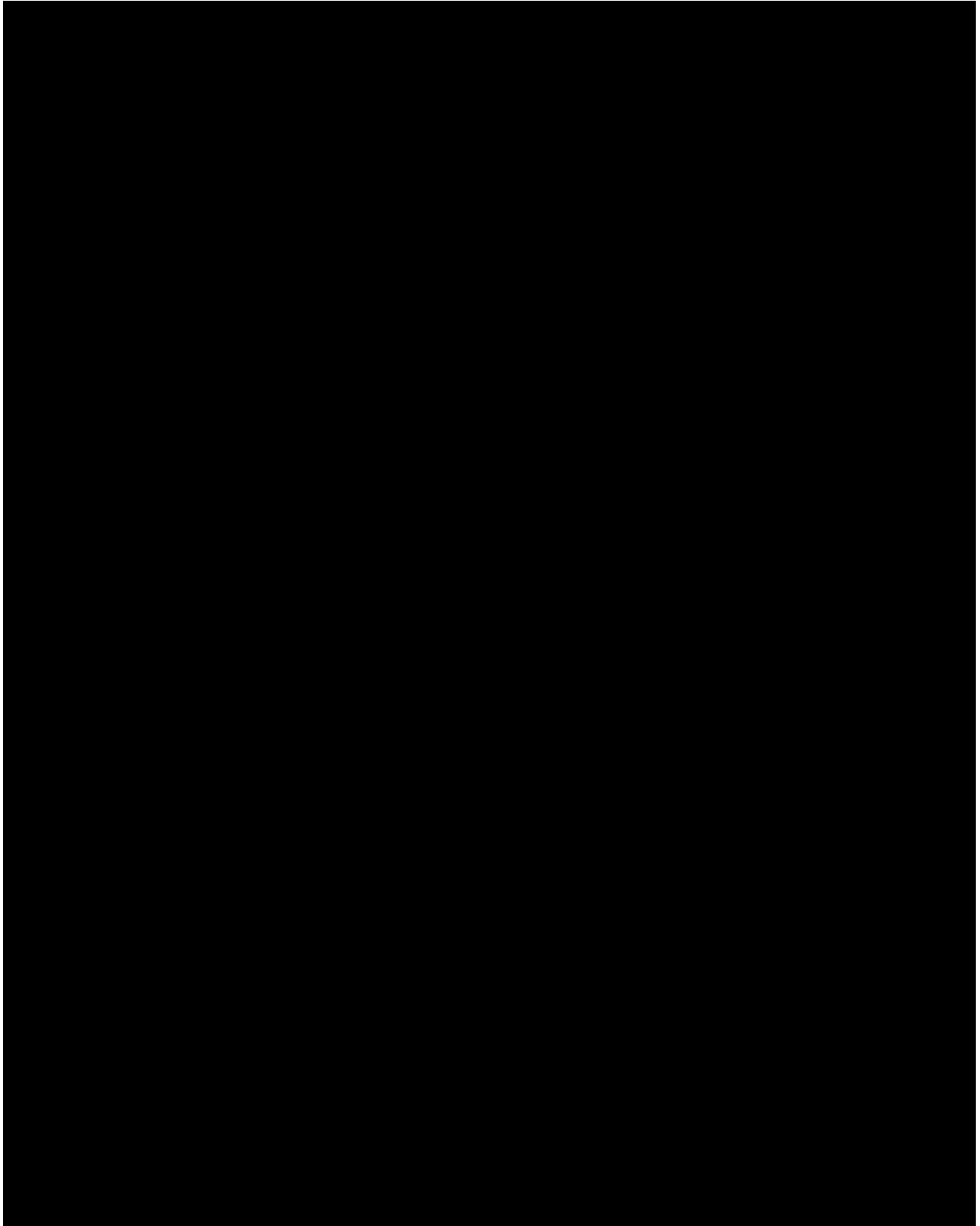


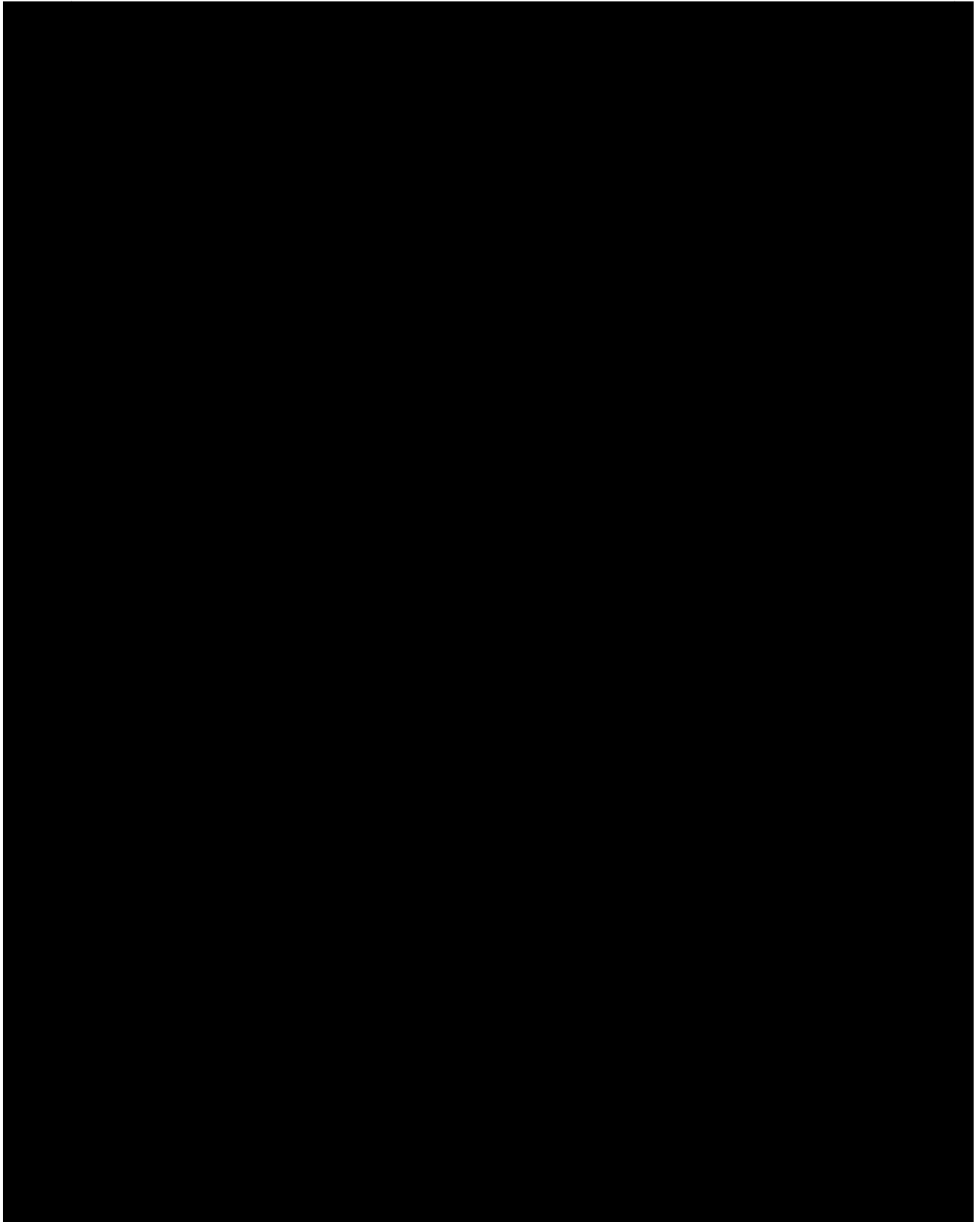


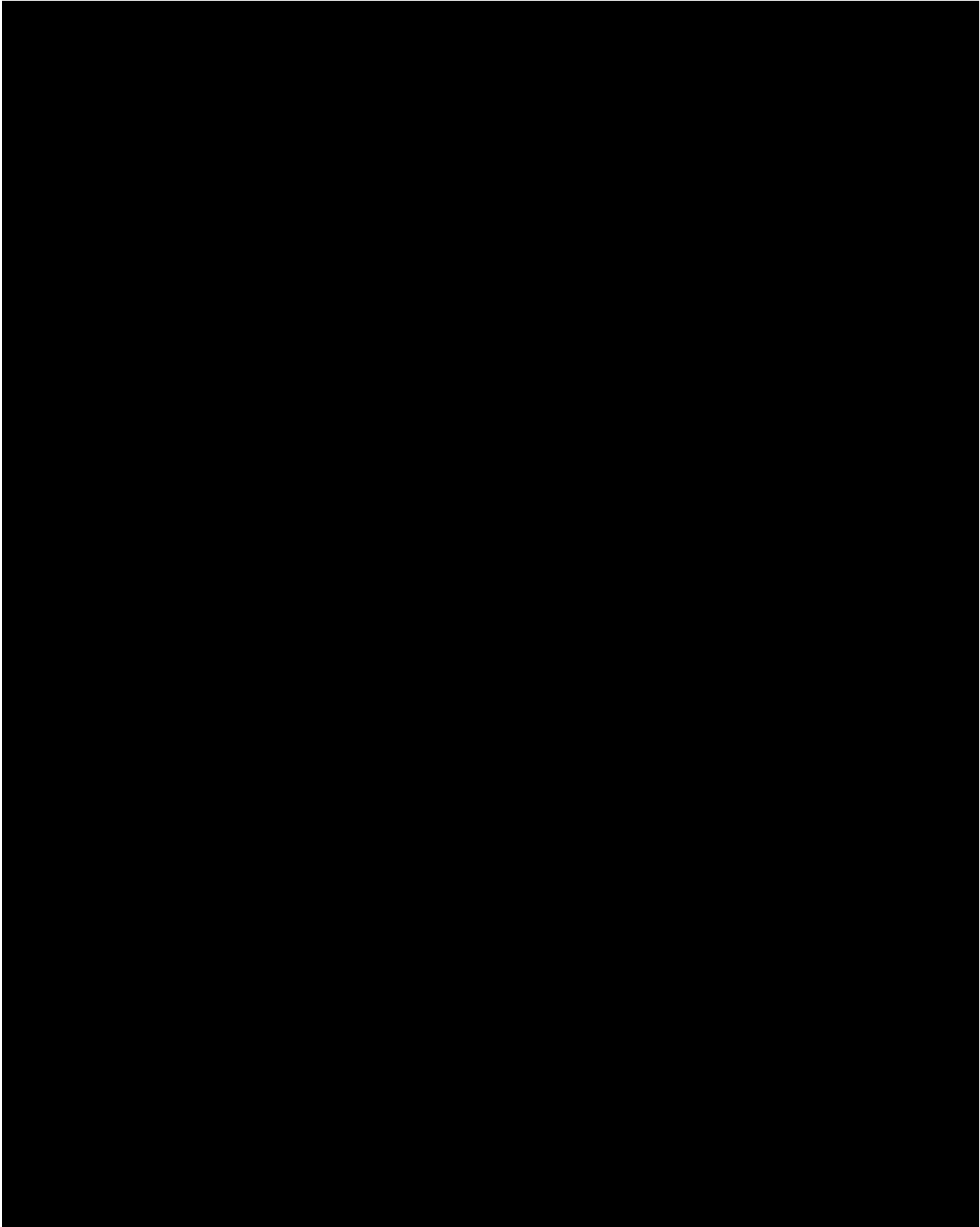


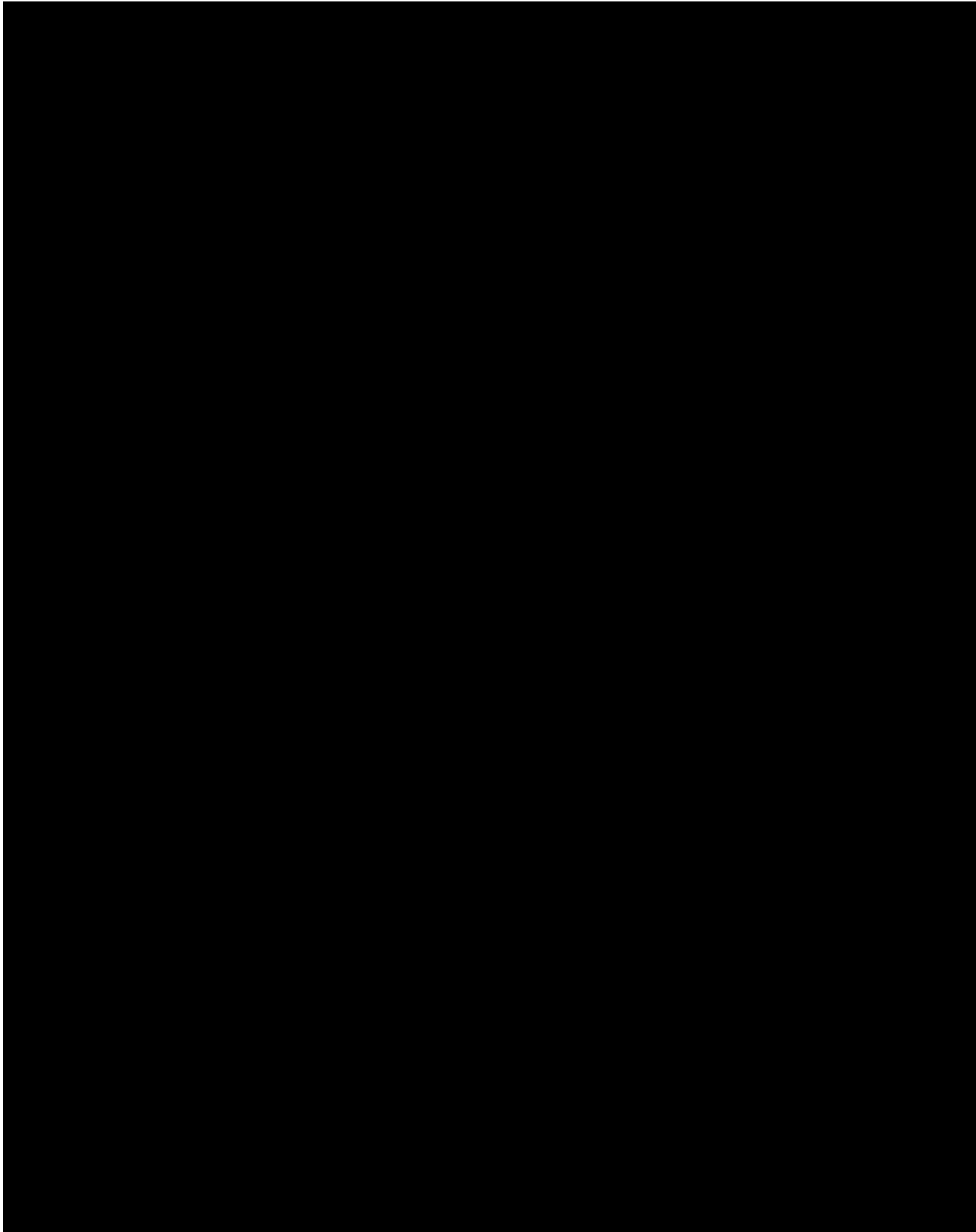


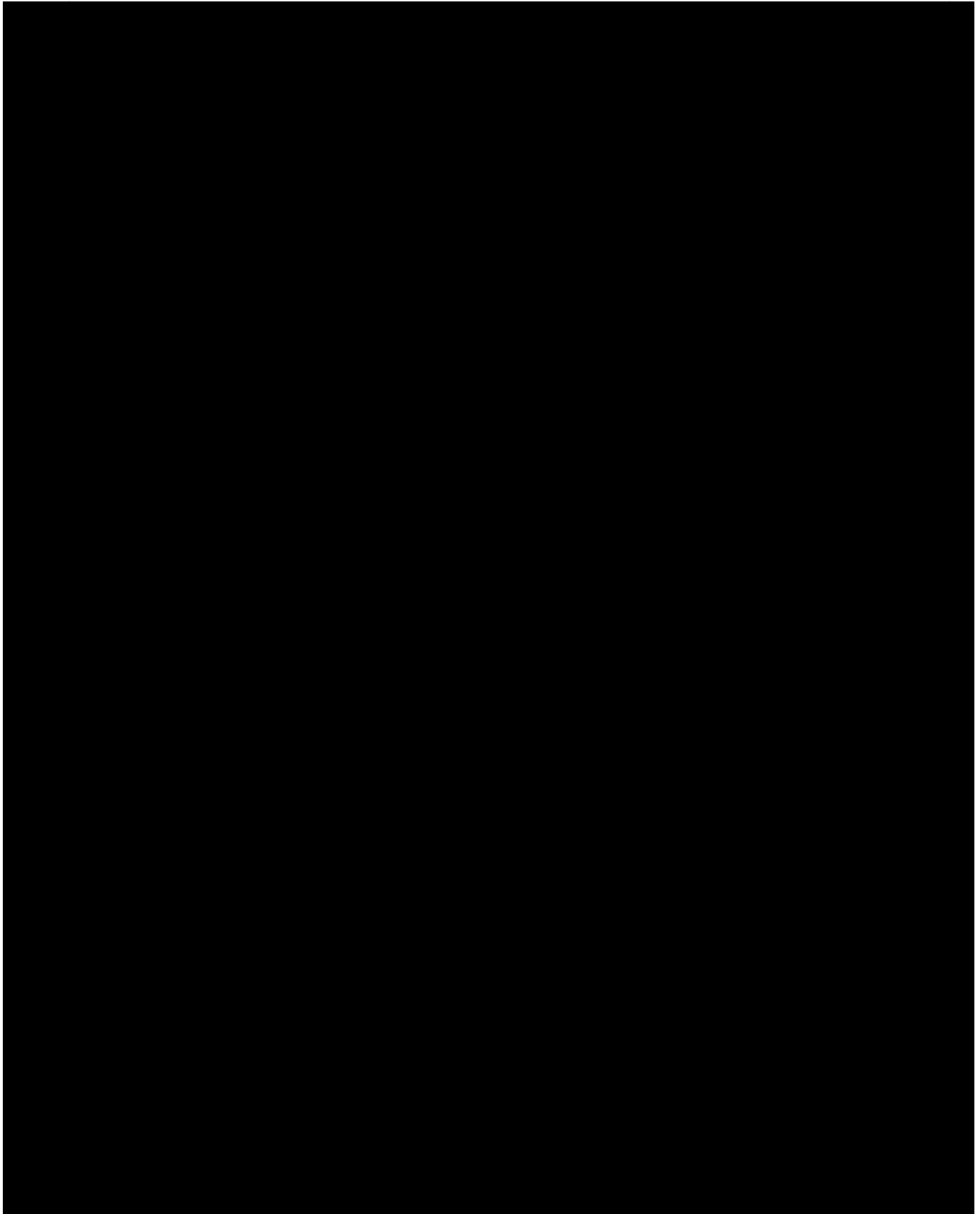


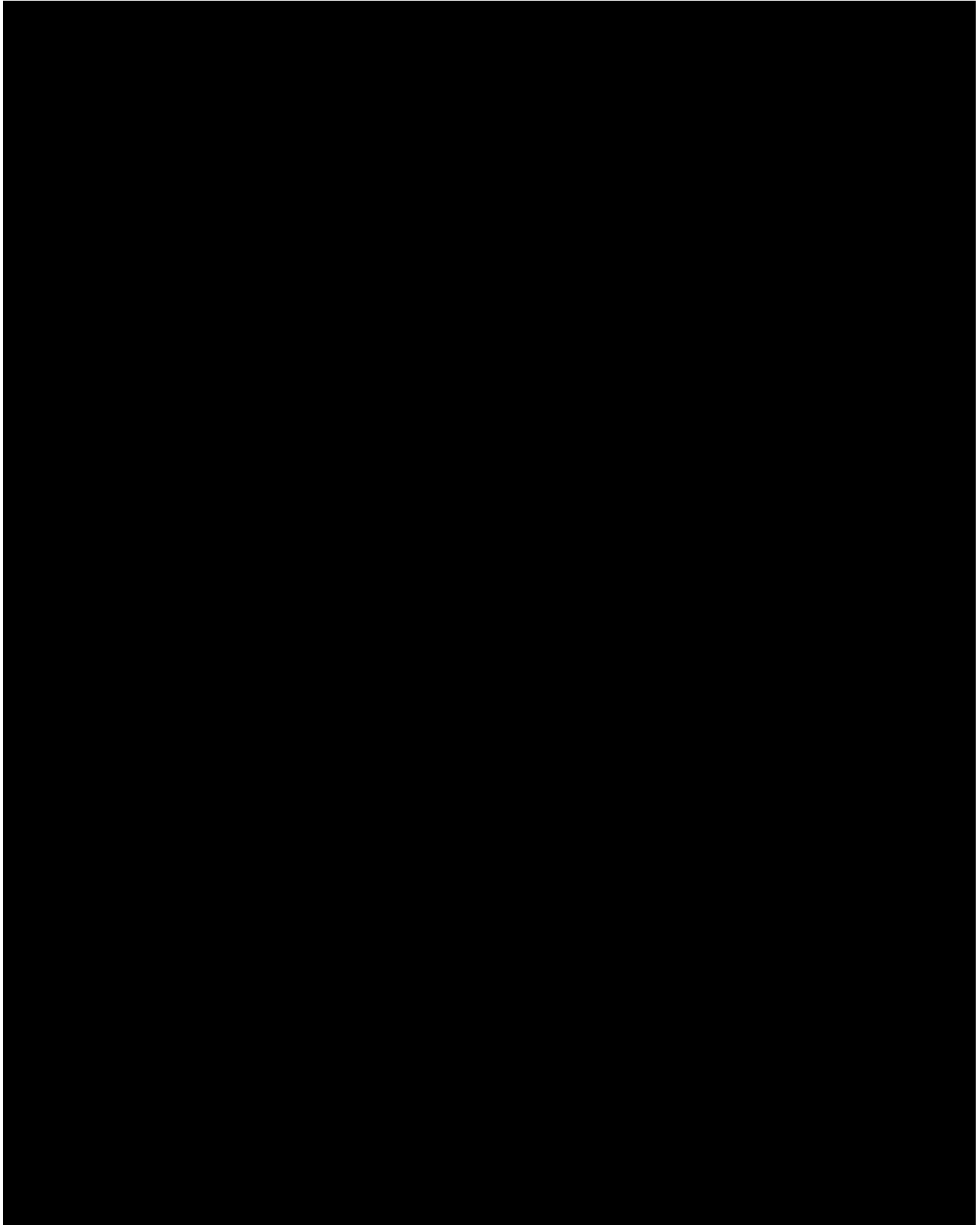


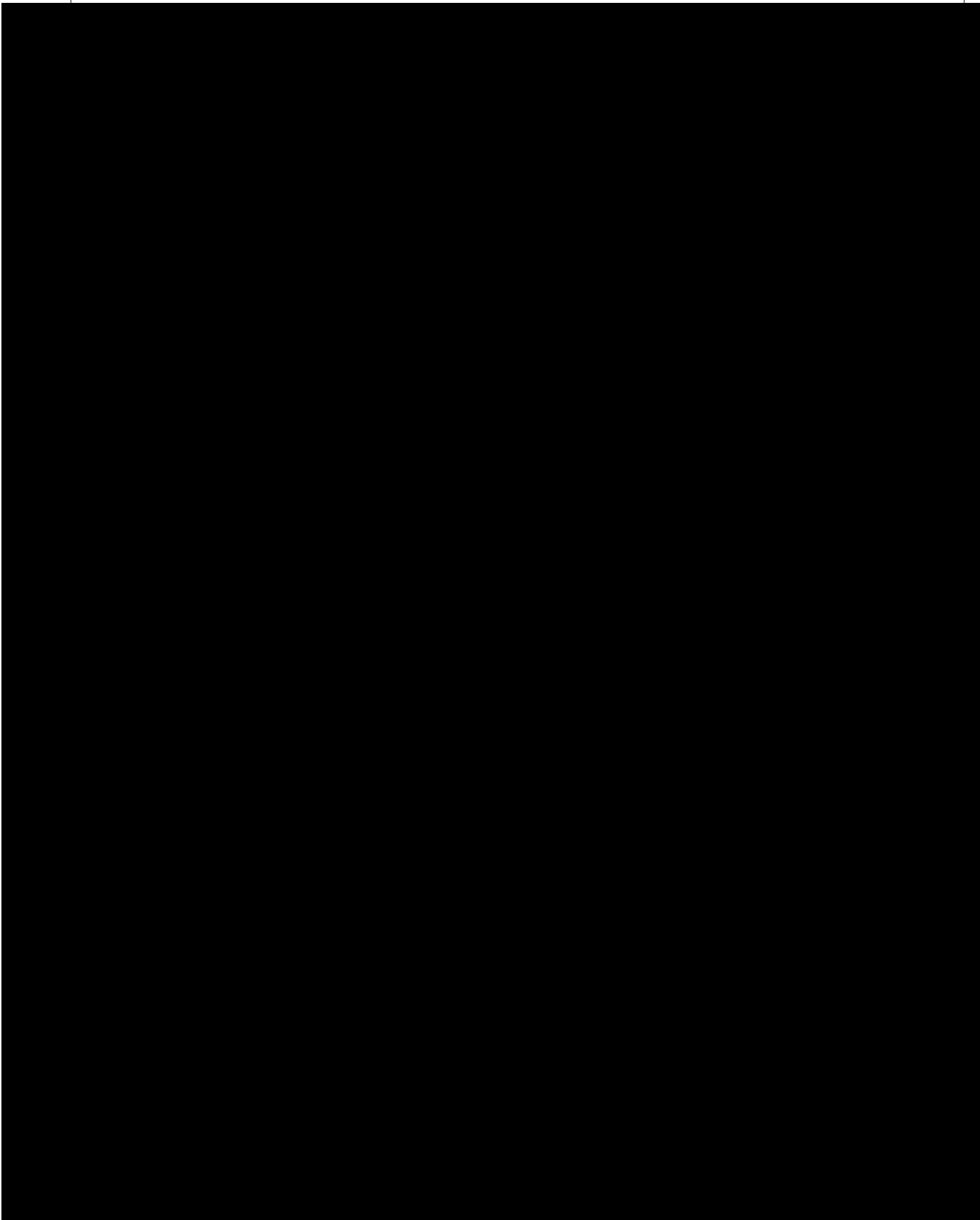












C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, LAURIE A. COLLINS, a Registered Professional Reporter and Notary Public within and for the State of New York, do hereby certify:

That WILLIAM GOLDEN, 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 the 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 27th day of February 2024.

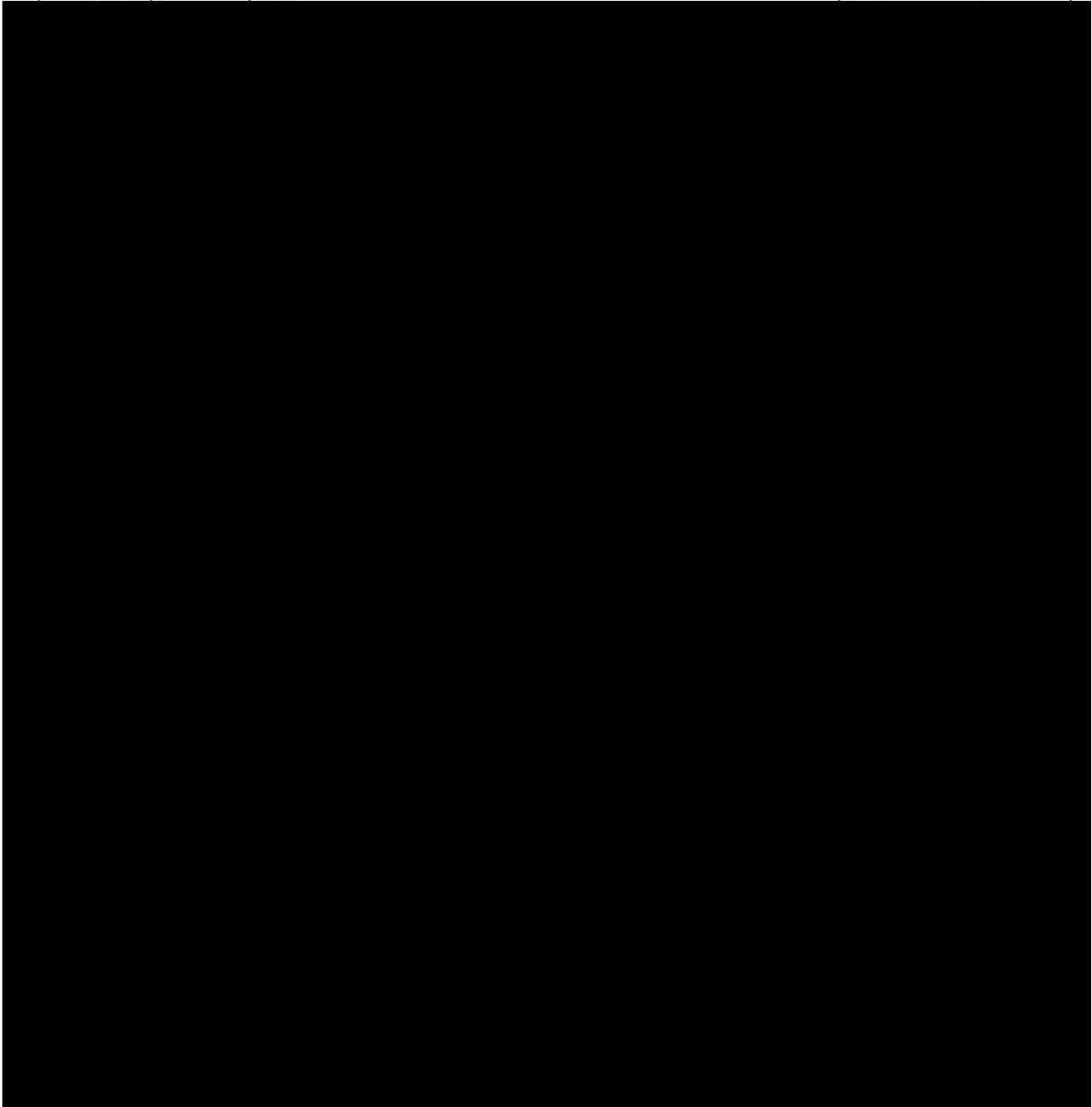


LAURIE A. COLLINS, RPR

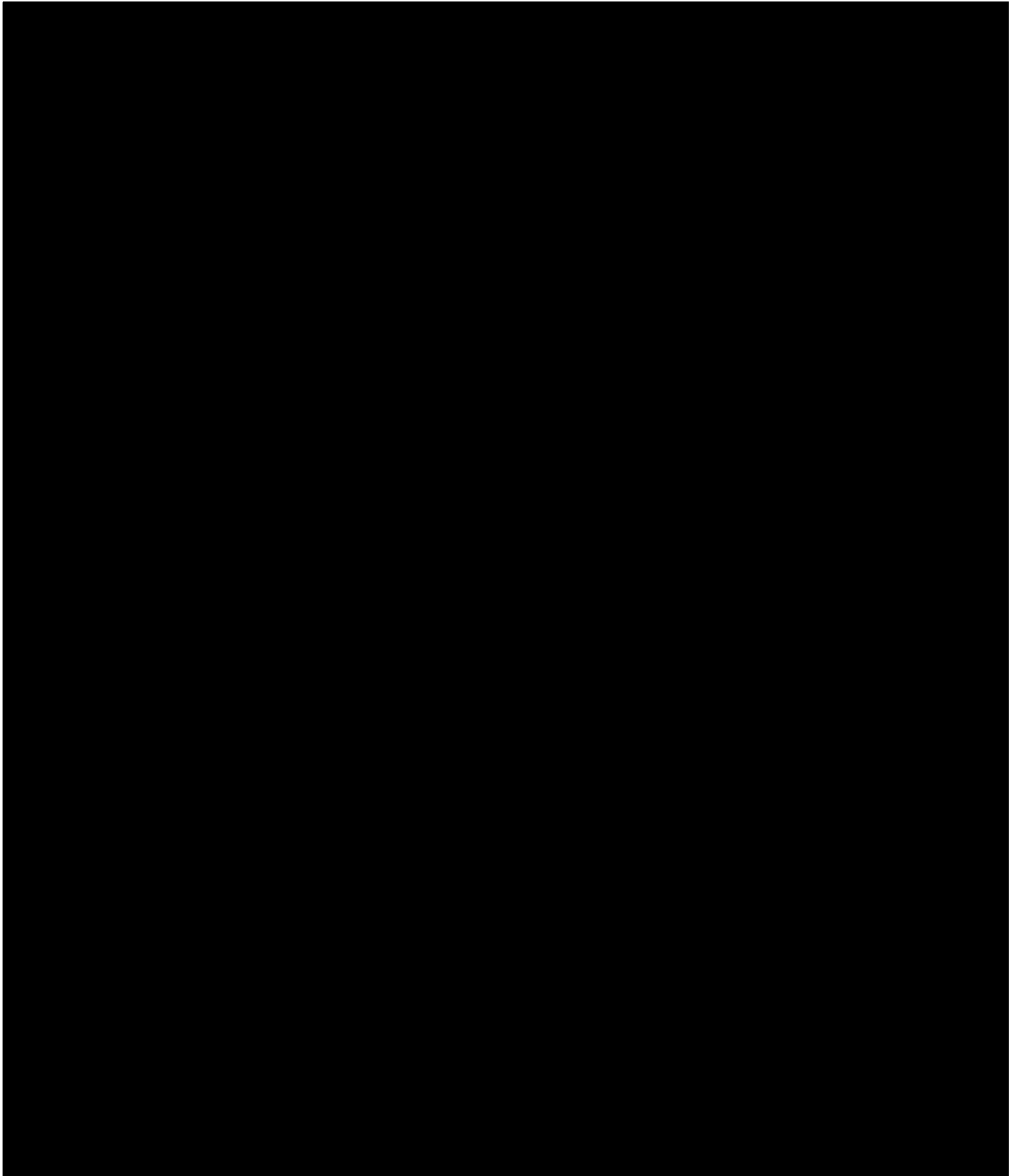
In re Bank of America California Unemployment Benefits Litigation
Case No. 3:21-MD-02992-LAB-MSB

Errata for Deposition of William Golden, February 22, 2024

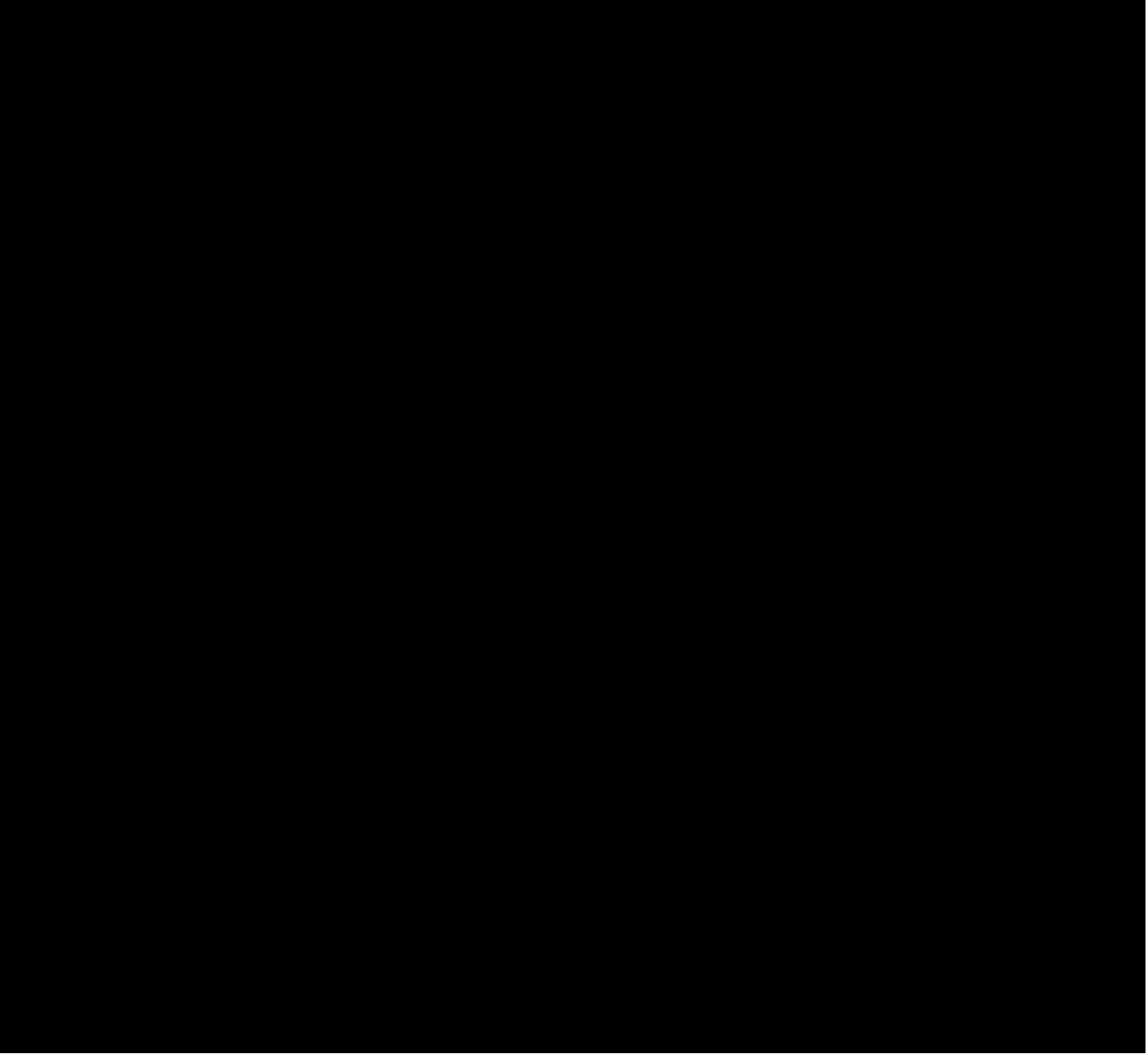
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A handwritten signature, likely "W.R.", is located in the bottom right corner of the page. The signature is written in dark ink and is somewhat stylized.



A handwritten signature or set of initials in the bottom right corner of the page, written in dark ink.



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 27th day of March,
2024.



William Golden