

PX 17

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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

)
This document relates to all)
actions.)
_____)

VIDEOTAPED DEPOSITION OF JENNIFER LENNON
30(B)(6) ON BEHALF OF BANK OF AMERICA
Los Angeles, California
Friday, February 23, 2024
Volume I

Stenographically Reported By:
Melissa M. Villagran, RPR
CSR No. 12543
Job No. 6459992
PAGES 1 - 326

Videotaped deposition of JENNIFER LENNON,
Volume I, taken on behalf of Plaintiffs at 601 South
Figueroa Street, 41st Floor, Los Angeles,
California, beginning at 9:22 a.m. and ending at
6:02 p.m. on Friday, February 23, 2024, before
Melissa M. Villagran, RPR, Certified Shorthand
Reporter No. 12543.

1 APPEARANCES :

2
3 For Plaintiffs:

4 COTCHETTE PITRE & McCARTHY

5 BY: BRIAN DANITZ

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1 APPEARANCES: (Continued)

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3 For Plaintiffs:

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14 For Individual Plaintiffs:

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1 APPEARANCES (continued) :

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3 For Defendant Bank of America NA:

4 GOODWIN PROCTOR

5 BY: MATTHEW RIFFEE

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13
14 Videographer:

15 Steven Togami

16
17 Also Present:

18 Amanda Lavs

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20
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1 Los Angeles, California; Friday, February 23, 2024

2 9:22 a.m.

3

4 THE VIDEOGRAPHER: We are on the record at

5 9:22 a.m. on February 23, 2024.

09:22:43

6 Please note that the microphones are
7 sensitive and may pick up whispers, private
8 conversations, and cellular interference.

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

09:23:00

12 This is Media Unit No. 1 of the
13 video-recorded 30(b)(6) deposition of defendant Bank
14 of America, N.A., regarding certain topics through
15 Jennifer Lennon, taken by counsel for the plaintiffs
16 In Re Bank of America California Unemployment
17 Benefits Litigation filed in the United States
18 District Court for the Southern District of
19 California, Case No. 3:21-MD-02992-LAB-MSB.

09:23:16

20 This deposition is being held at Goodwin
21 Procter located at 601 South Figueroa Street,
22 Los Angeles, California 90017.

09:23:43

23 My name is Steven Togami from the firm
24 Veritext Legal Solutions, and I am the videographer.

25 The court reporter is Melissa Villagran from the

09:24:01

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1 firm Veritext Legal Solutions.

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

4 If there are any objections to proceeding,
5 please state them at the time of your appearance. 09:24:15

6 At this time, will counsel and all present
7 please state their appearances and affiliations for
8 the record, starting with the noticing party.

9 MR. DANITZ: Good morning.

10 Brian Danitz of Cotchett Pitre & McCarthy for 09:24:33
11 the plaintiffs.

12 MS. CHAN: Connie Chan of Altshuler Berzon
13 LLP for the class plaintiffs.

14 MR. RIFFEE: Good morning.

15 Matt Riffée of Goodwin Procter for Bank of 09:24:40
16 America.

17 THE VIDEOGRAPHER: Thank you.

18 Counsel on Zoom, could you please state your
19 appearance.

20 MR. SHAY: Yes. Good morning. 09:24:51

21 Daniel Shay representing the individual
22 plaintiffs. We've also got Joshua Swigart. He may
23 or may not be on the line, but he's here as well.
24 And then Ilana -- I forget how to say her last name,
25 but she's here as well for the individual 09:25:04

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1 plaintiffs.

2 MS. MCCORKLE: Good morning.

3 You also have Virginia Selden McCorkle from
4 Goodwin on behalf of the defendant.

5 THE VIDEOGRAPHER: Thank you. 09:25:19

6 Can we please have the oath.

7 COURT REPORTER: Please raise your right
8 hand.

9 Do you solemnly swear that the testimony you
10 are about to give will be the truth, the whole
11 truth, and nothing but the truth, so help you God?

12 THE DEPONENT: I do.

13

14 JENNIFER LENNON,
15 having been administered an oath, was examined and
16 testified as follows:

17

18 EXAMINATION

19 BY MR. DANITZ:

20 Q Good morning, Ms. Lennon. 09:25:36

21 A Good morning.

22 Q Please state and spell your name for the
23 record.

24 A Jennifer Lennon, J-e-n-n-i-f-e-r,

25 L-e-n-n-o-n. 09:25:48

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1 Q Thank you.

2 And you're an employee of Bank of America?

3 A Yes.

4 Q And what is your current title?

5 A Senior vice president, product and state 09:25:55
6 liaison.

7 Q Thank you.

8 And you've been designated as a corporate
9 representative for purposes of this deposition; is
10 that correct? 09:26:06

11 A That's correct.

12 Q All right. Let's -- I'll show you the
13 exhibit premarked as 128.

14 (Exhibit 128 was marked for
15 identification and is attached 09:26:17
16 hereto.)

17 BY MR. DANITZ:

18 Q Take a look at that.

19 Exhibit 128 is the Revised Notice of
20 Deposition of Defendant Bank of America. 09:26:23

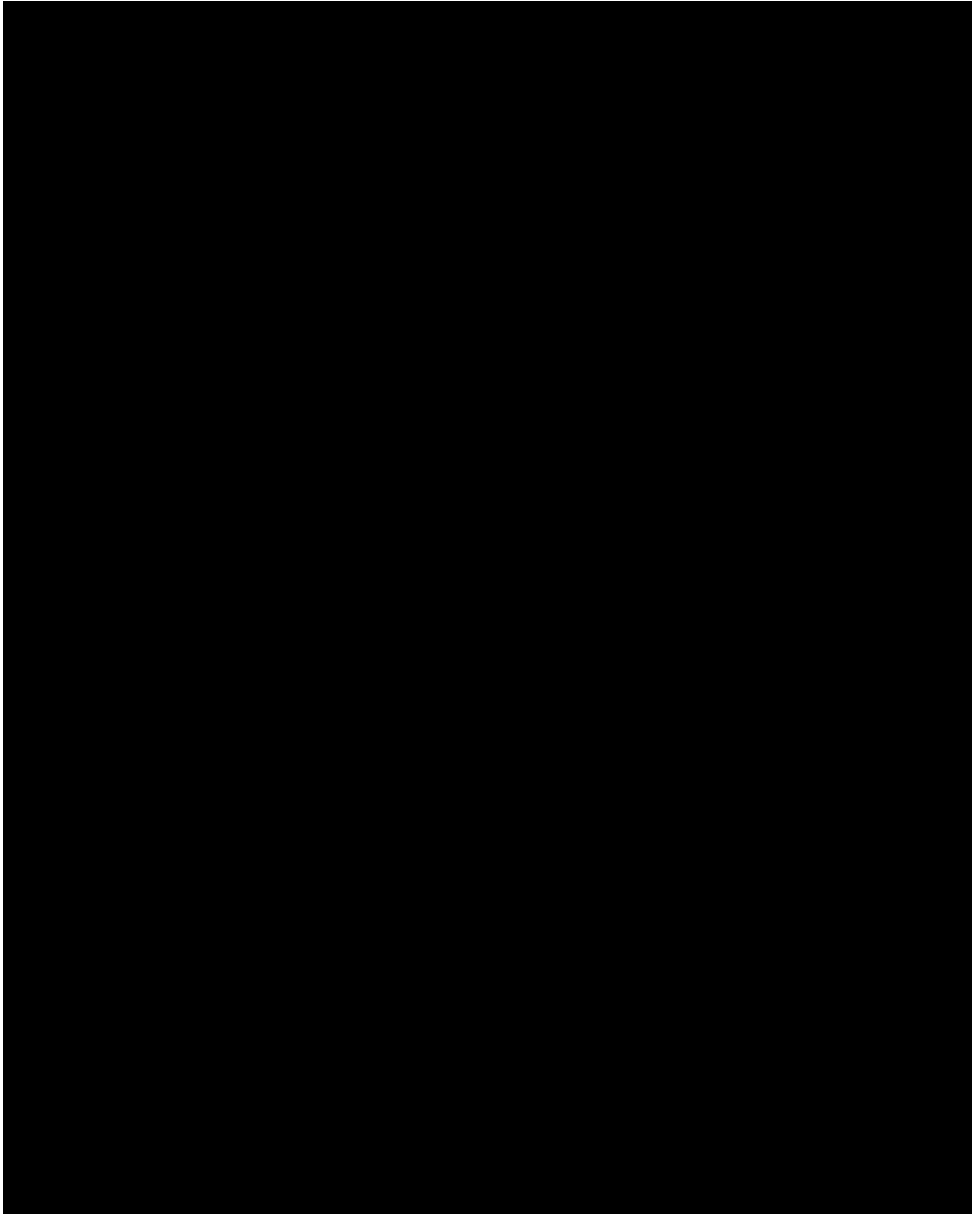
21 Have you seen this document?

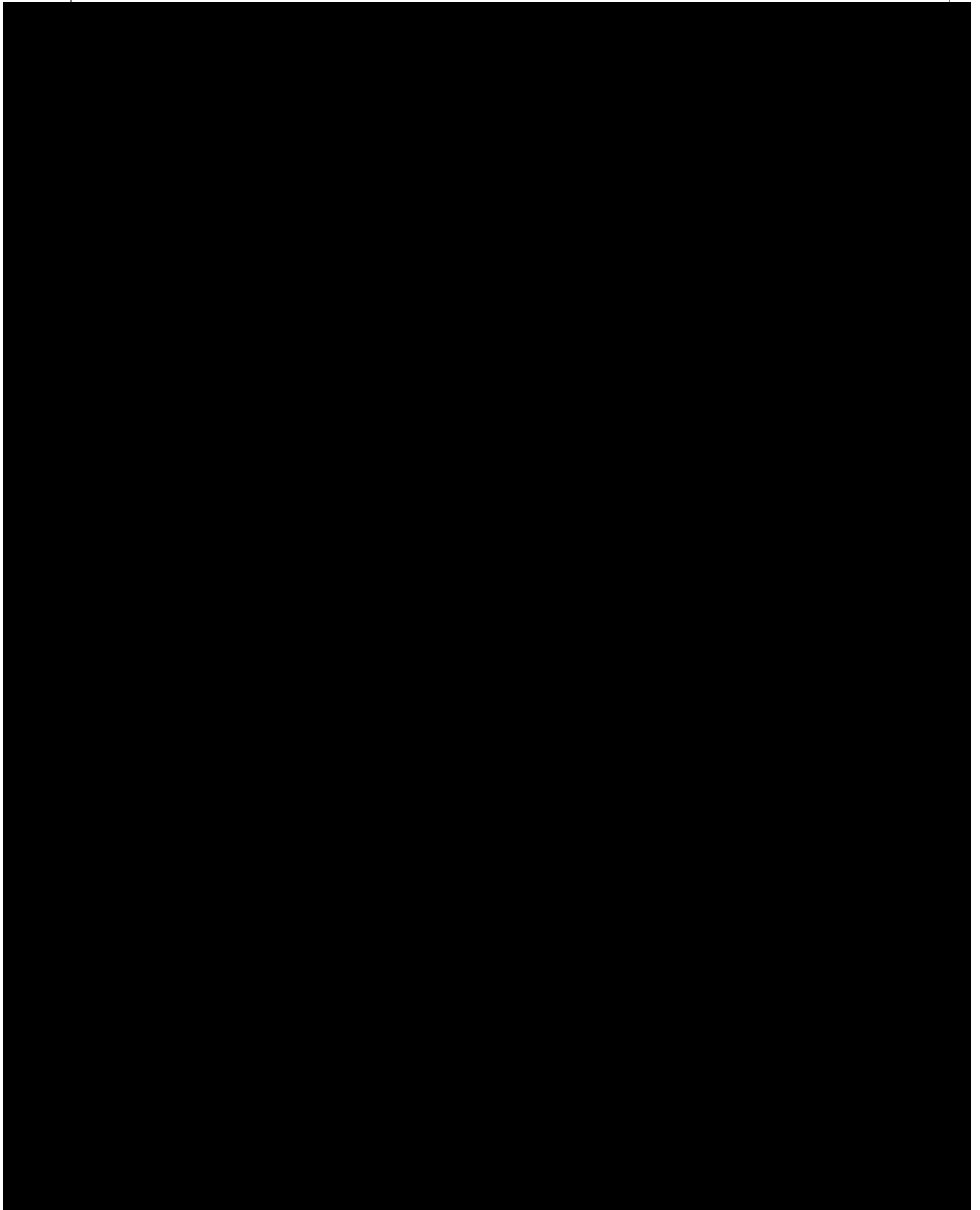
22 A I have.

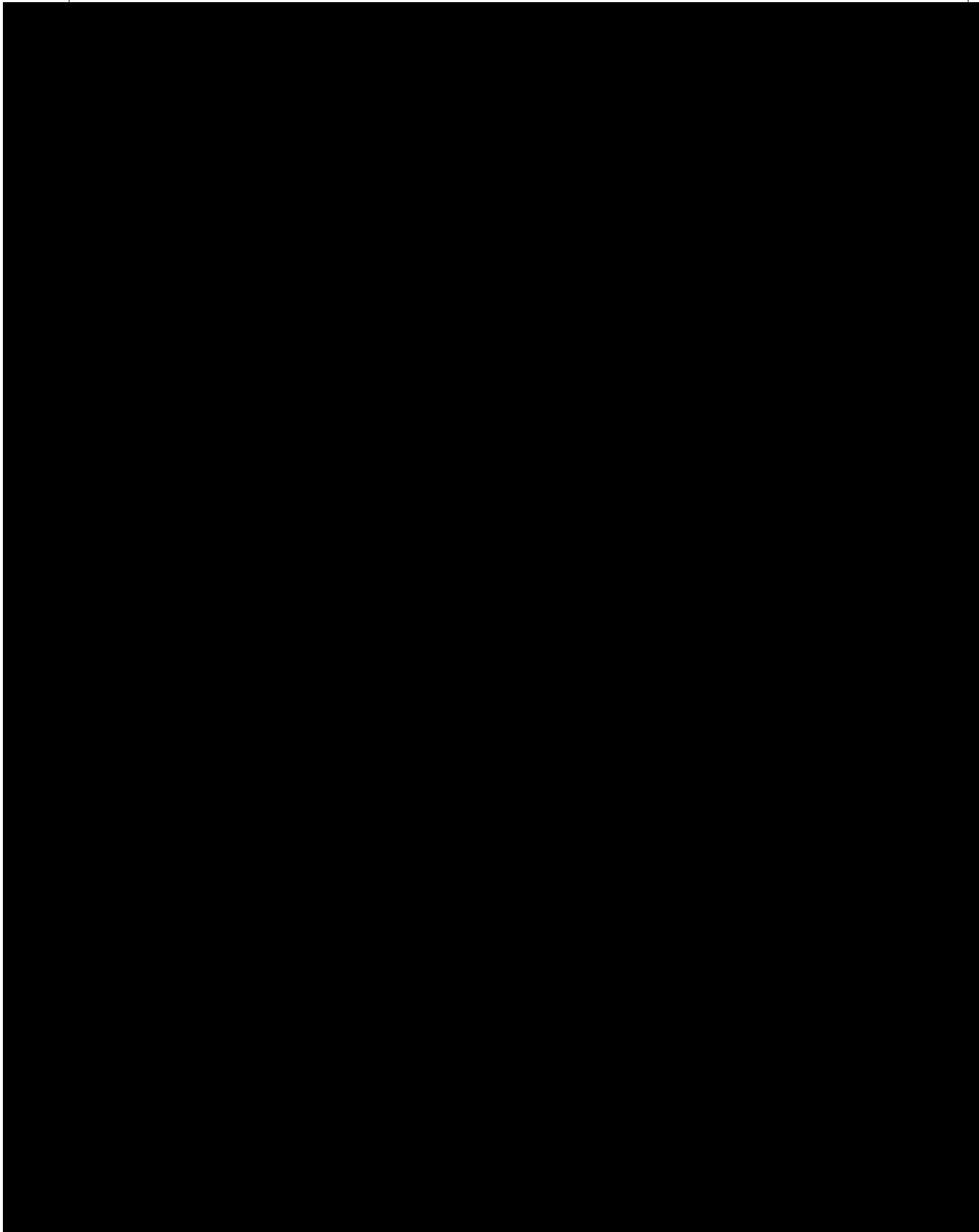
23 Q Thank you.

24 And you've been designated as the corporate
25 representative on a number of topics that are in 09:26:39

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, Registered
3 Professional Reporter, Certified Live Note Reporter,
4 do hereby certify:

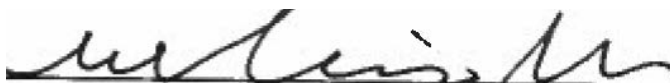
5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any witnesses in the foregoing proceedings,
8 prior to testifying, were duly sworn; that a record
9 of the proceedings was made by me using machine
10 shorthand which was thereafter transcribed under my
11 direction; that the foregoing transcript is a true
12 record of the testimony given.

13 Further, that if the foregoing pertains to
14 the original transcript of a deposition in a Federal
15 Case, before completion of the proceedings, review
16 of the transcript ☐ was ☒ was not requested.

17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22 Dated: March 1, 2024

23
24 

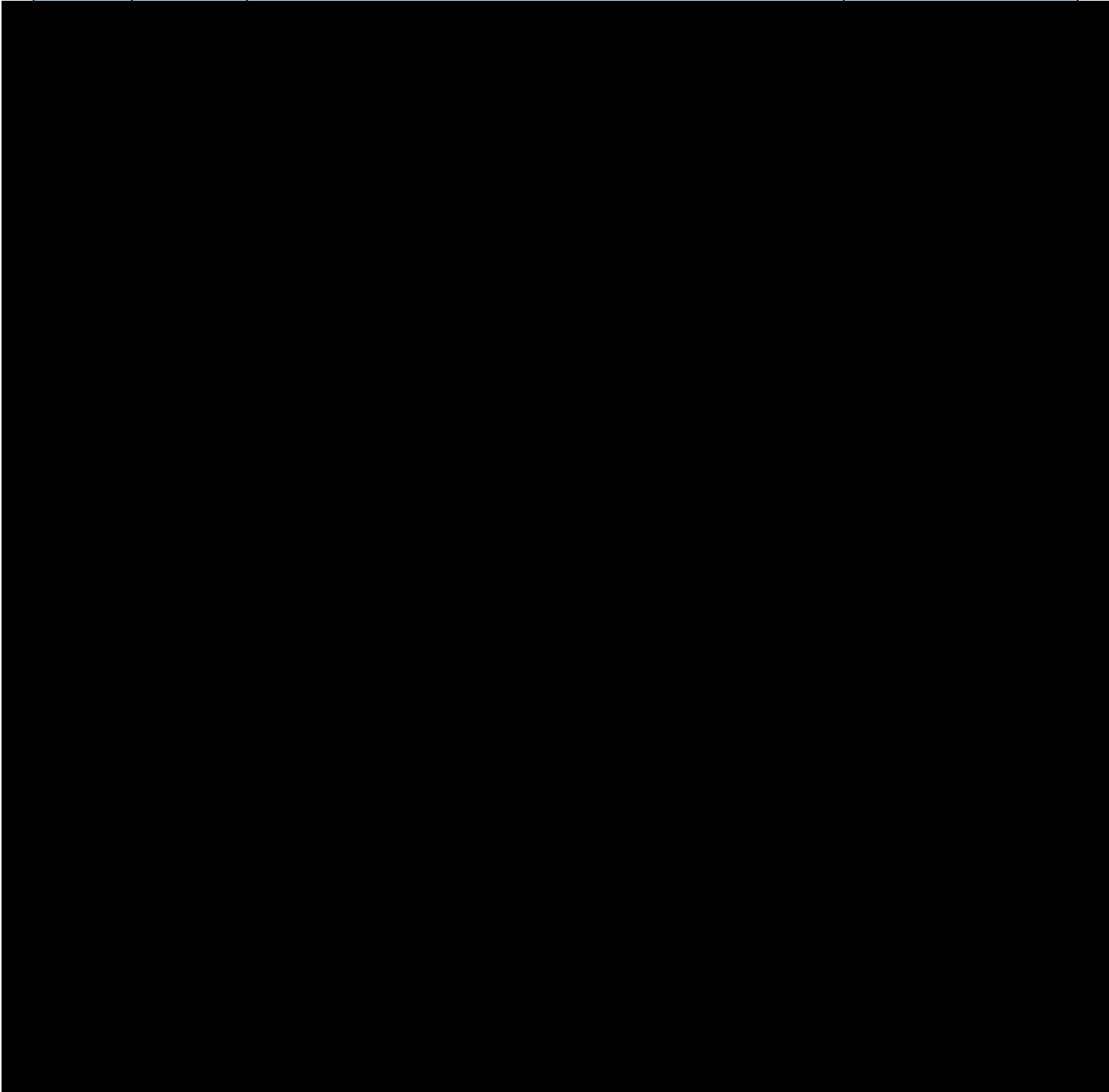
MELISSA M. VILLAGRAN

25 CSR No. 12543 RPR

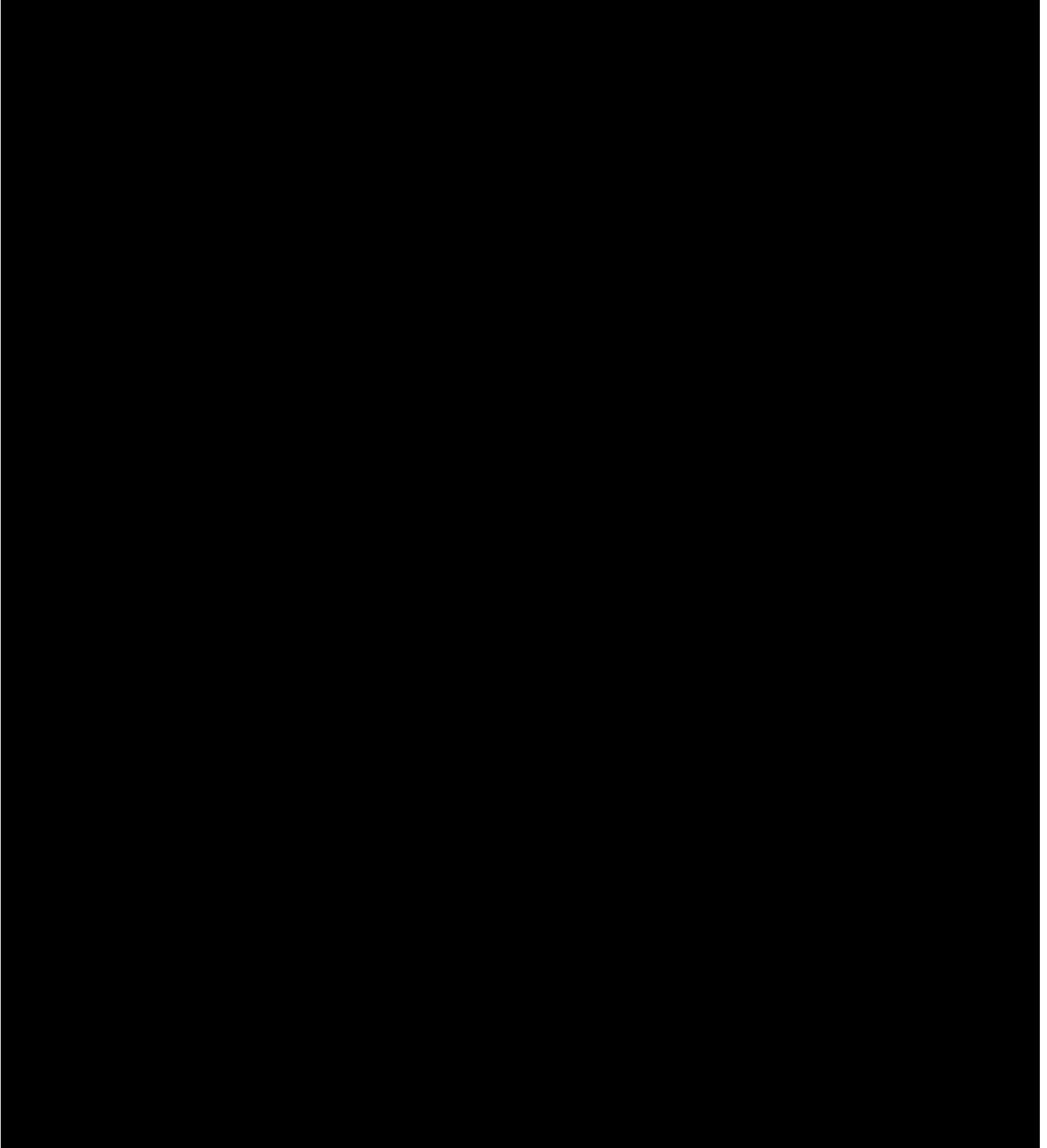
In re Bank of America California Unemployment Benefits Litigation
Case No. 3:21-MD-02992-LAB-MSB

Errata for Deposition of Jennifer Lennon, February 23, 2024

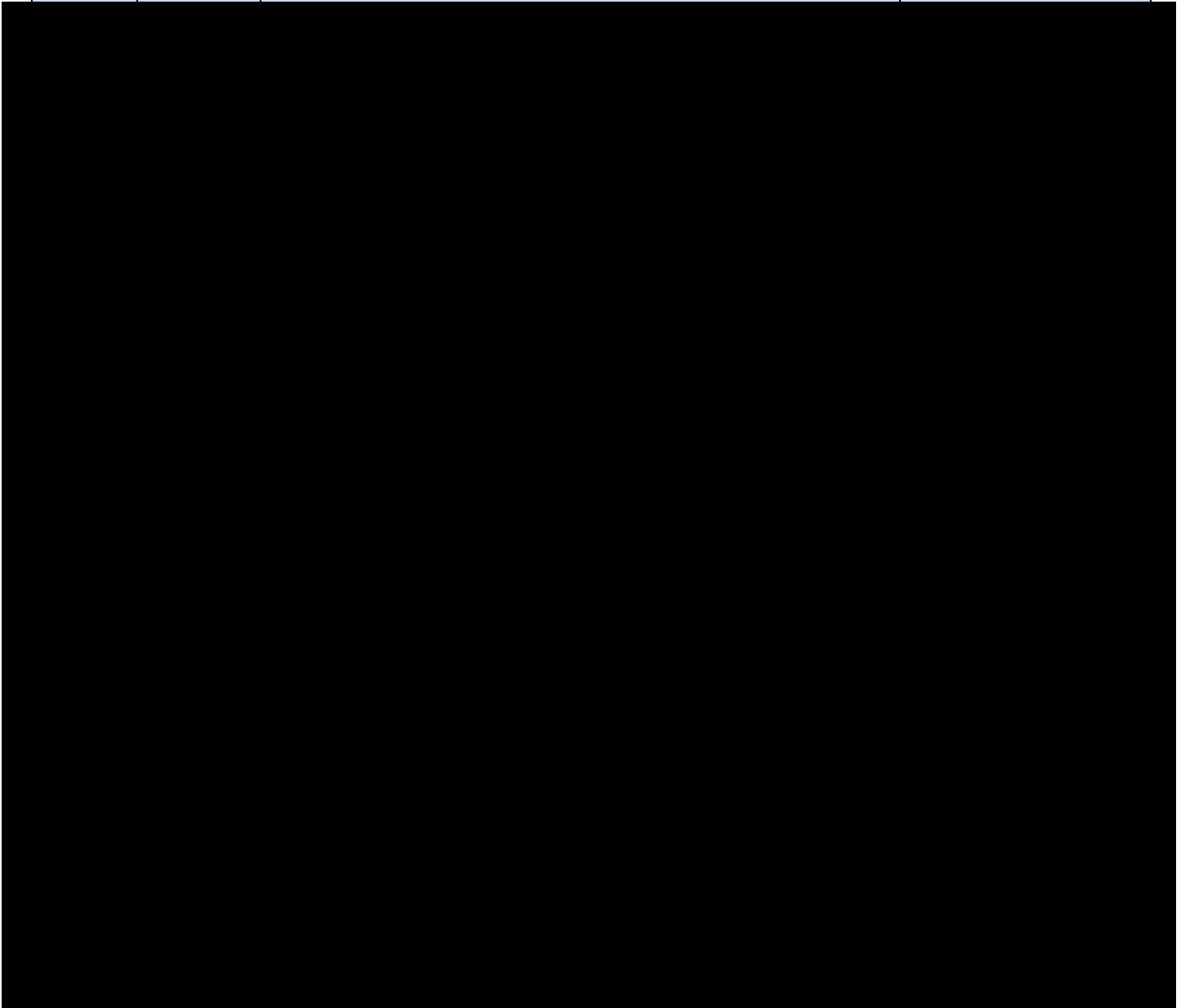
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In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. I have listed my changes on the above Errata Sheet, listing page and line numbers. I request that these changes be entered 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 1st day of April, 2024.



Jennifer Lennon