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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION,

)
)
)
)
) CASE NO.
) 3:21-MD-02992-GPC-
) MSB

THIS DOCUMENT RELATES TO ALL
ACTION

REMOTE VIDEOTAPED DEPOSITION OF WILLIAM J. FOX
THURSDAY, FEBRUARY 13, 2025

JOB NO.: 10157865

REPORTED BY HEIDI FUEHRER, CSR 14145

William J. Fox

In Re Bank of America CA Unemployment Benefits Litigation

1 VIDEOTAPED DEPOSITION OF WILLIAM J. FOX, TAKEN ON BEHALF
2 OF THE PLAINTIFFS, AT 9:01 A.M., THURSDAY,
3 FEBRUARY 13, 2025, AT CHARLOTTE, NORTH CAROLINA, BEFORE
4 HEIDI FUEHRER, CSR NUMBER 14145.

5
6 APPEARANCES OF COUNSEL:

7
8 FOR THE PLAINTIFFS AND THE PROPOSED CLASS:

9 ALTSHULER BERZON LLP

10 BY: CONNIE K. CHAN, ATTORNEY AT LAW

---AND---

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13 CCHAN@ALTBER.COM

14 ---AND---

15 COTCHETT, PITRE & MCCARTHY, LLP

16 BY: BRIAN DANITZ, ATTORNEY AT LAW

---AND---

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William J. Fox

In Re Bank of America CA Unemployment Benefits Litigation

1 APPEARANCES OF COUNSEL (CONTINUED) :

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3 FOR THE INDIVIDUAL PLAINTIFFS:

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26 ALSO PRESENT:

27 SPENCER BENVENISTE, VIDEOGRAPHER
28
29
30

1 CHARLOTTE, NORTH CAROLINA;

2 THURSDAY, FEBRUARY 13, 2025, 9:01 A.M.

3
4 (Prior to the deposition commencing,
5 all counsel stipulated to waive the
6 reporter read on and read off pursuant
7 to Federal Rule 30.)
8
9

10 THE VIDEOGRAPHER: We are now on the record.
11 Today's date is February 13, 2025, and the time is 9:01
12 Pacific time. This is the remote video deposition of
13 William Fox via Zoom videoconference being taken in the
14 matter of the Bank of America Unemployment Benefits
15 Litigation. My name is Spencer Benveniste appearing for
16 Aptus Court Reporting located at 401 West A Street,
17 suite 1680 in San Diego, California 92101. I am the
18 official videographer, and this is the only authorized
19 video recording of this deposition. The audio and video
20 recording will take place at all time unless all counsel
21 agree to go off the record.

22 Will counsel please identify yourselves and
23 state who you represent, after which, the court
24 reporter, Heidi Fuehrer, will swear in the witness.

25 MS. CHAN: Connie Chan of Altshuler Berzon on

William J. Fox

In Re Bank of America CA Unemployment Benefits Litigation

1 behalf of the class plaintiffs, and with me today is my
2 colleague Colin Jones.

3 MS. ROSE-SMITH: Sabrina Rose-Smith on behalf
4 of Bank of America and the witness, and with me today is
5 my colleague Jackie Odum, and, also, I believe online my
6 other colleague Bayly Buck.

7 THE COURT REPORTER: And then just for the
8 record, my name is Heidi Fuehrer, and my license number
9 is 14145.

10

11

WILLIAM J. FOX,

12

HAVING BEEN FIRST DULY SWORN BY THE REPORTER,

13

WAS EXAMINED AND TESTIFIED AS FOLLOWS:

14

15

EXAMINATION

16

BY MS. CHAN:

17

Q Okay. Thank you very much, Mr. Fox. I
18 appreciate you being here today.

19

A Sure.

20

Q I asked you before we started, but have you
21 been deposed before?

22

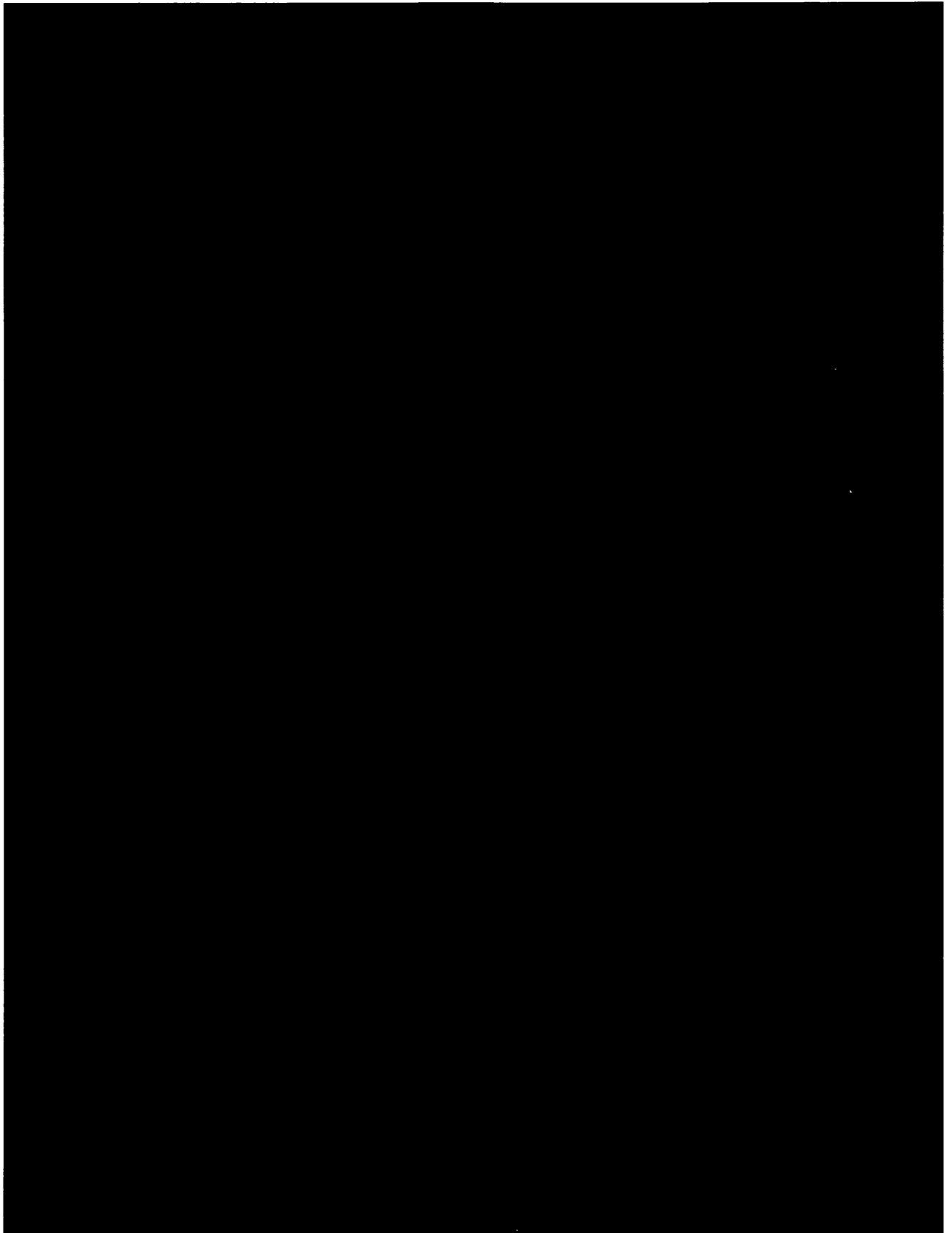
A Just one other time in an, associated with
23 the bank action.

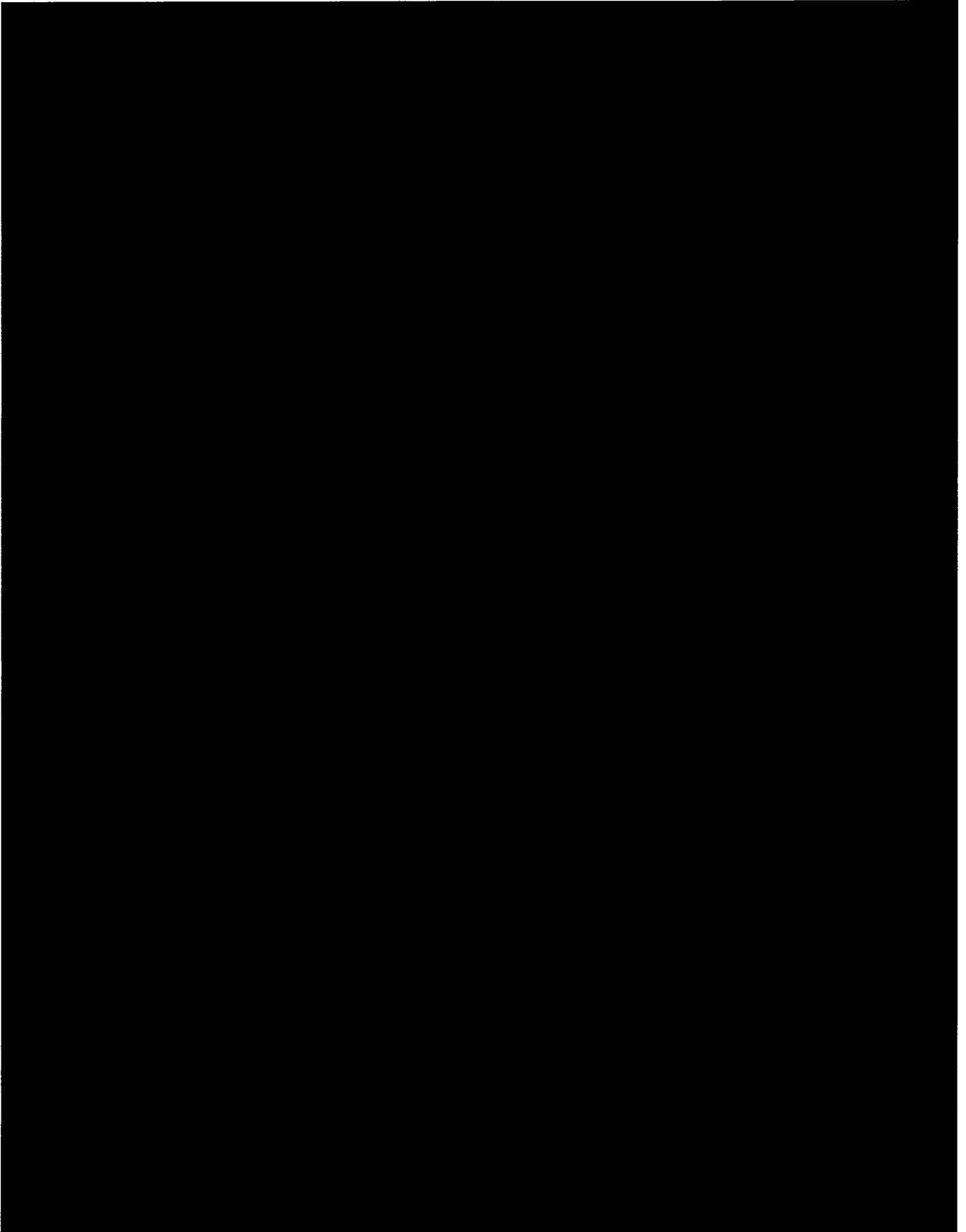
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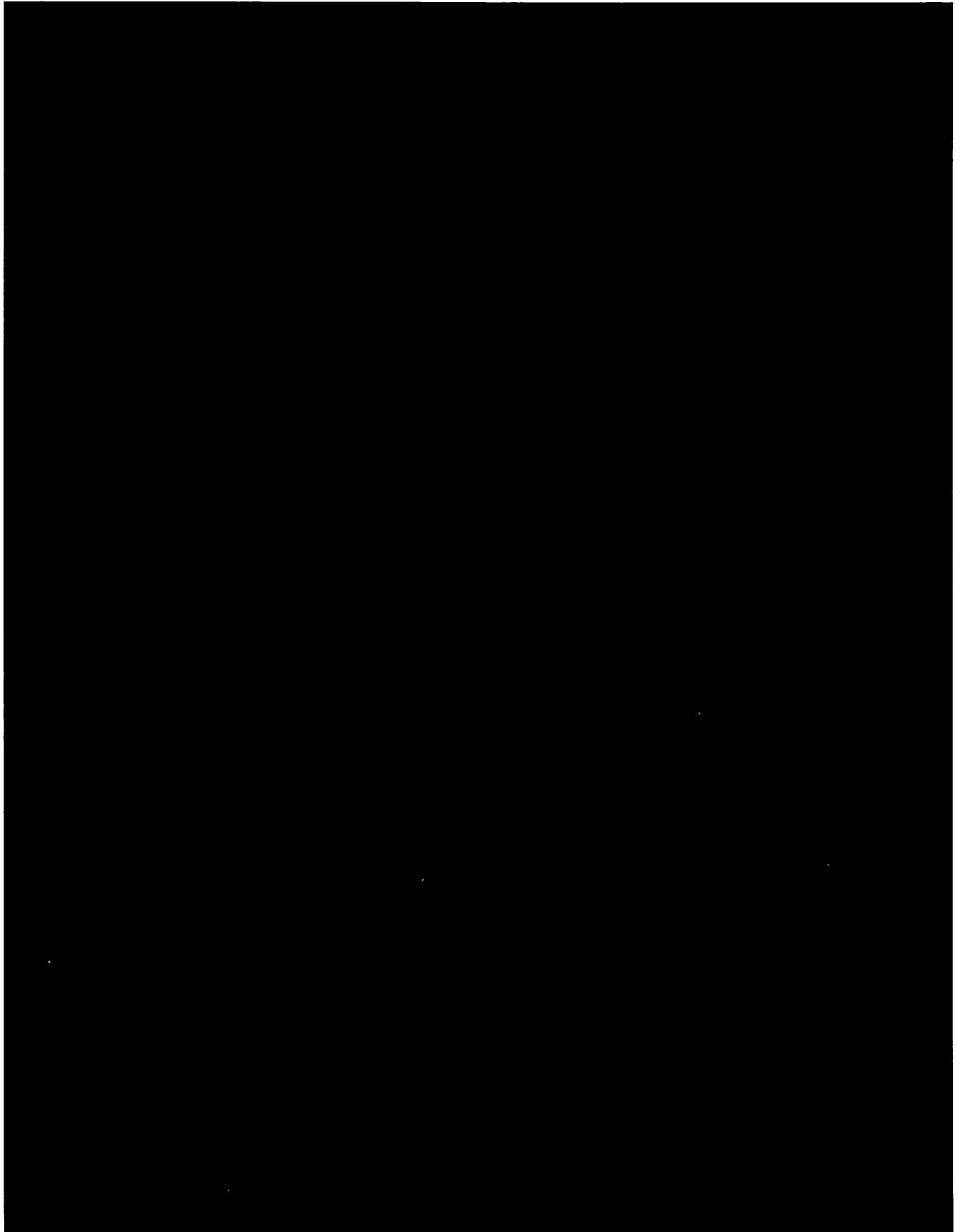
Q And you were --

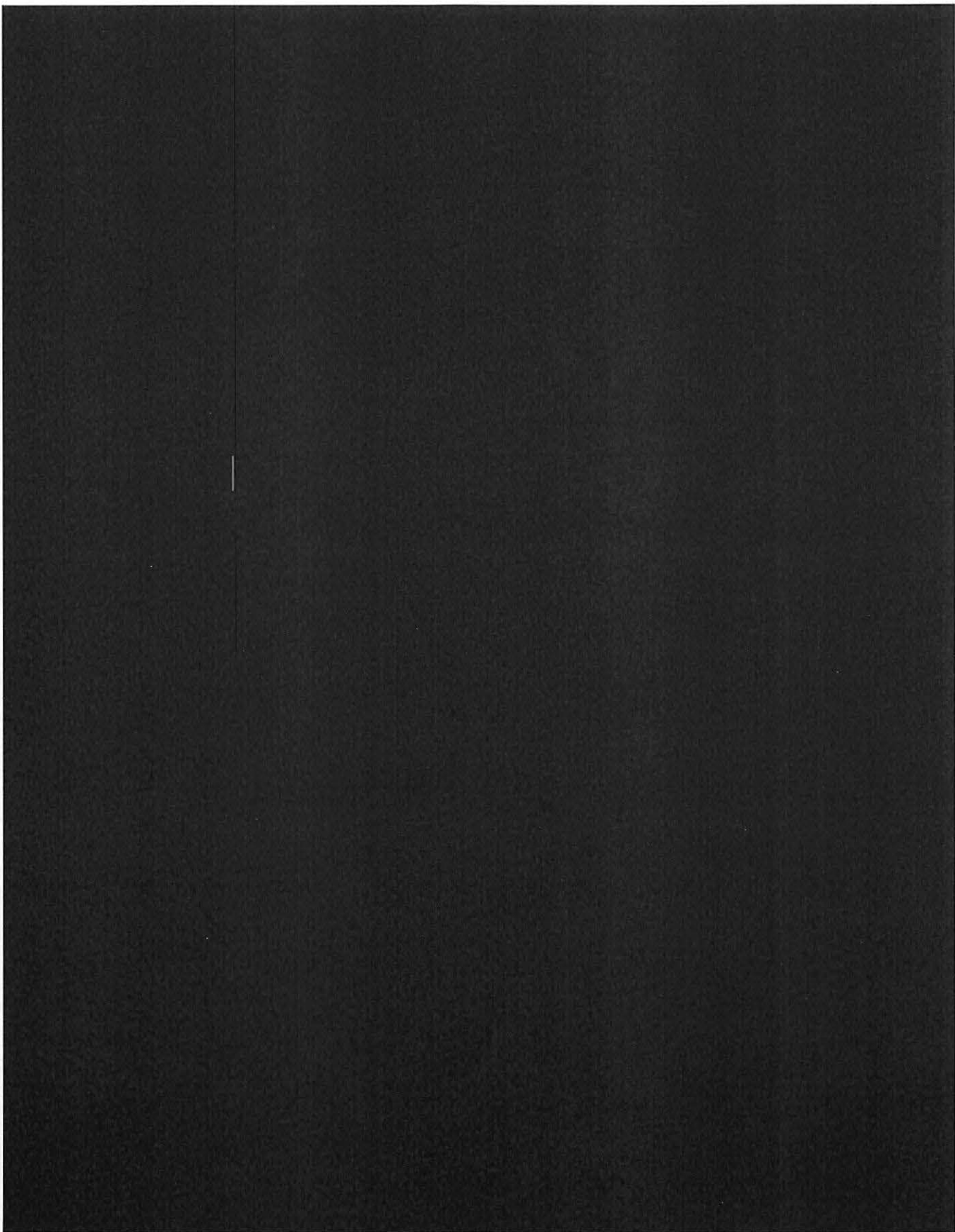
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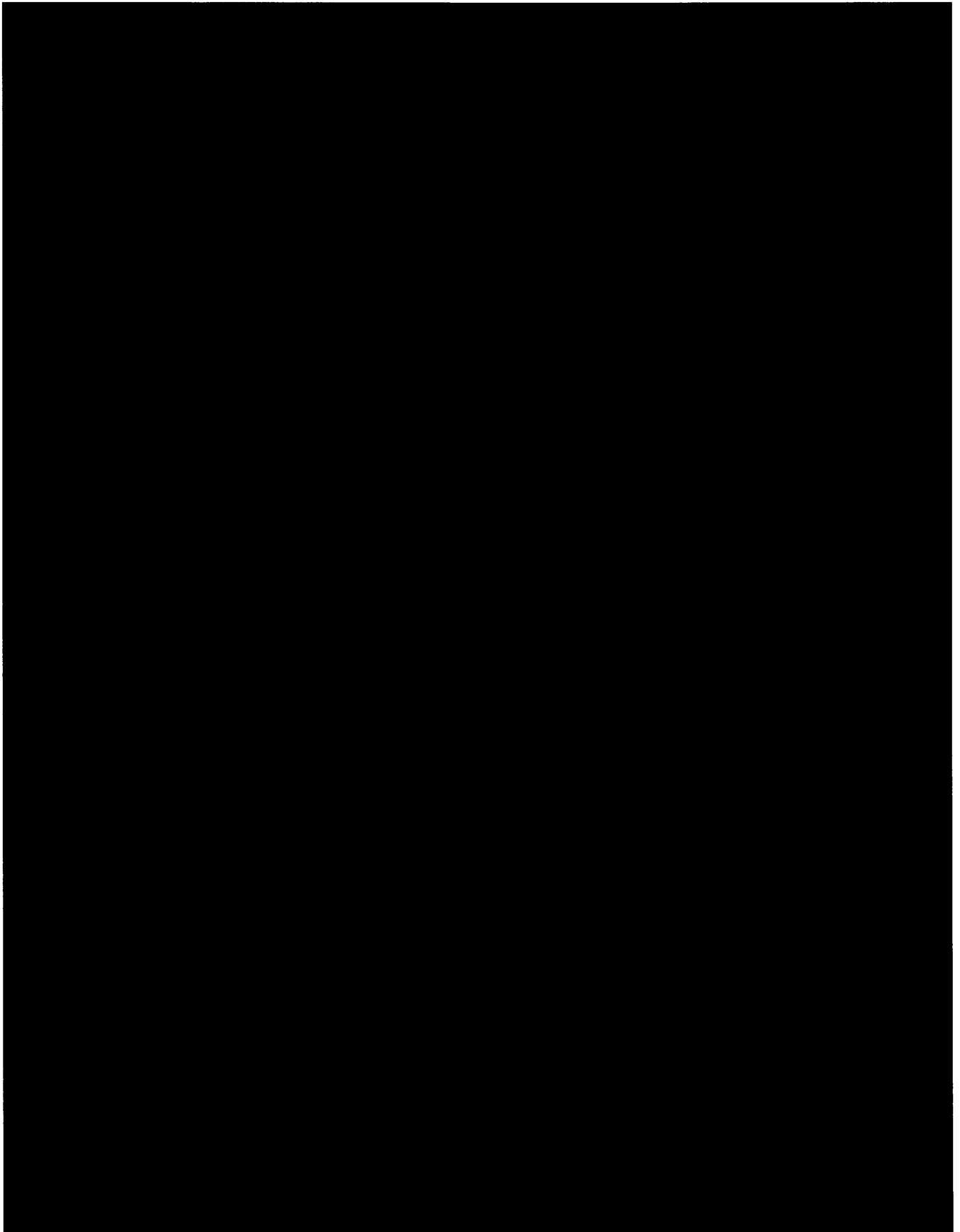
A But other than that, no.

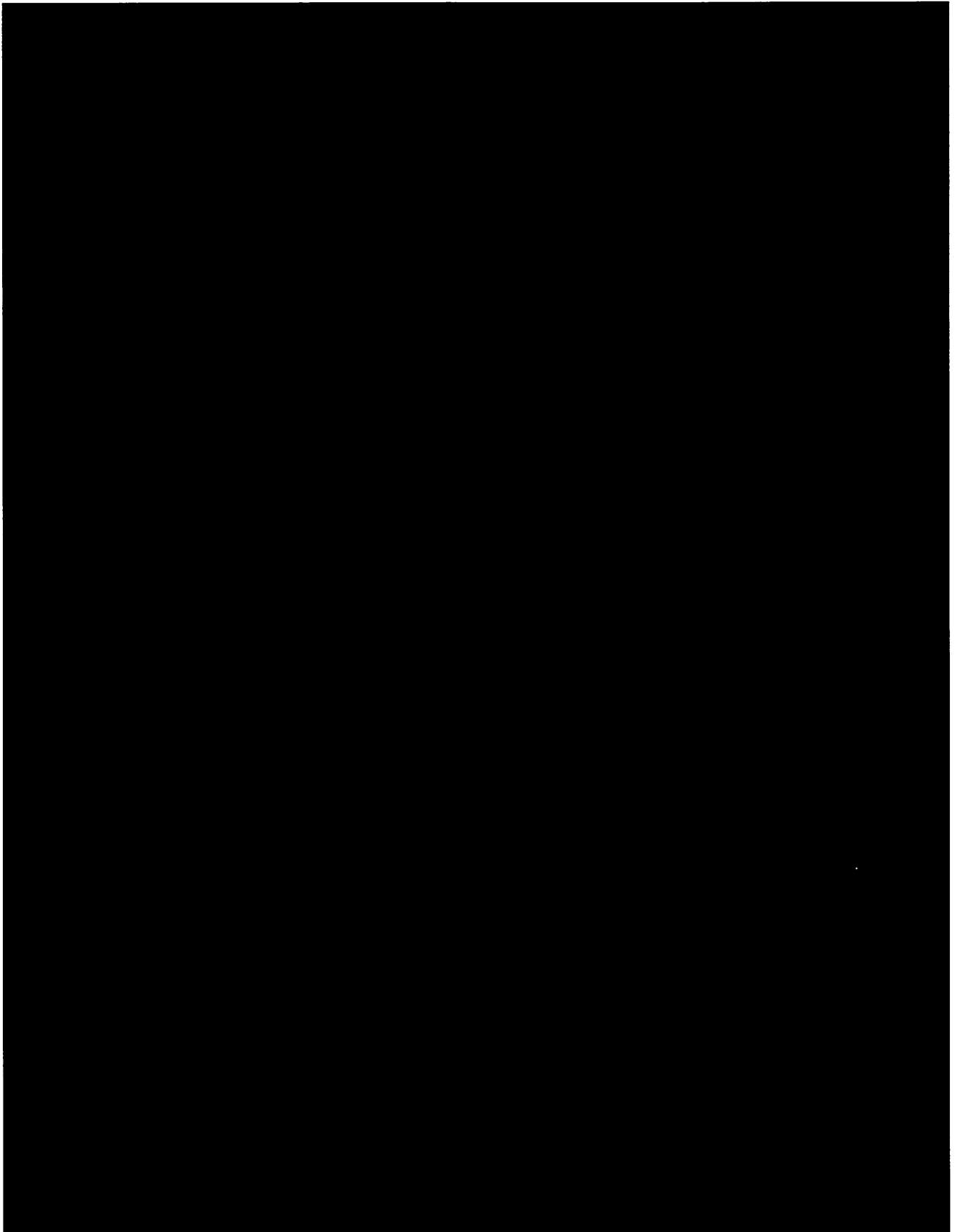


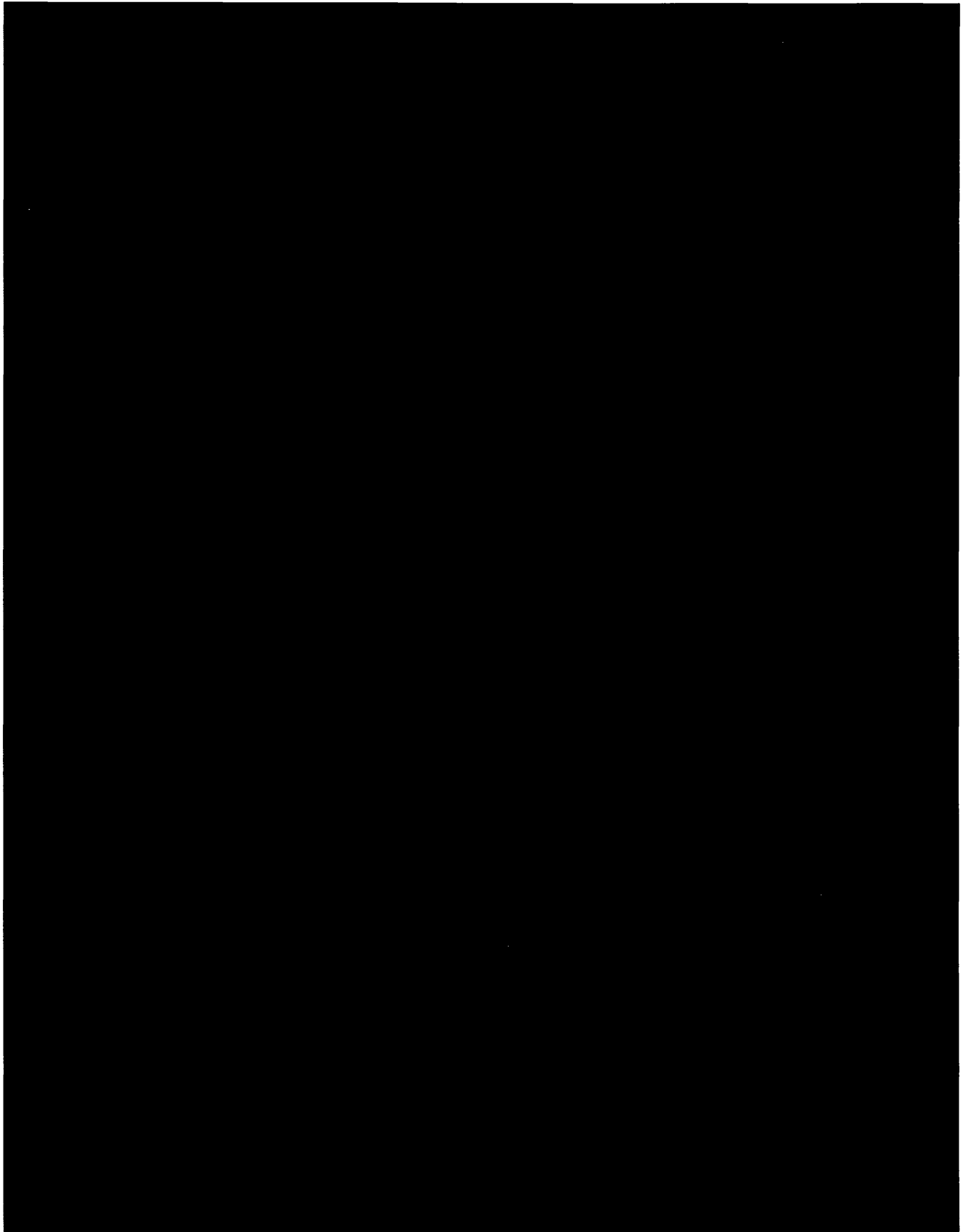


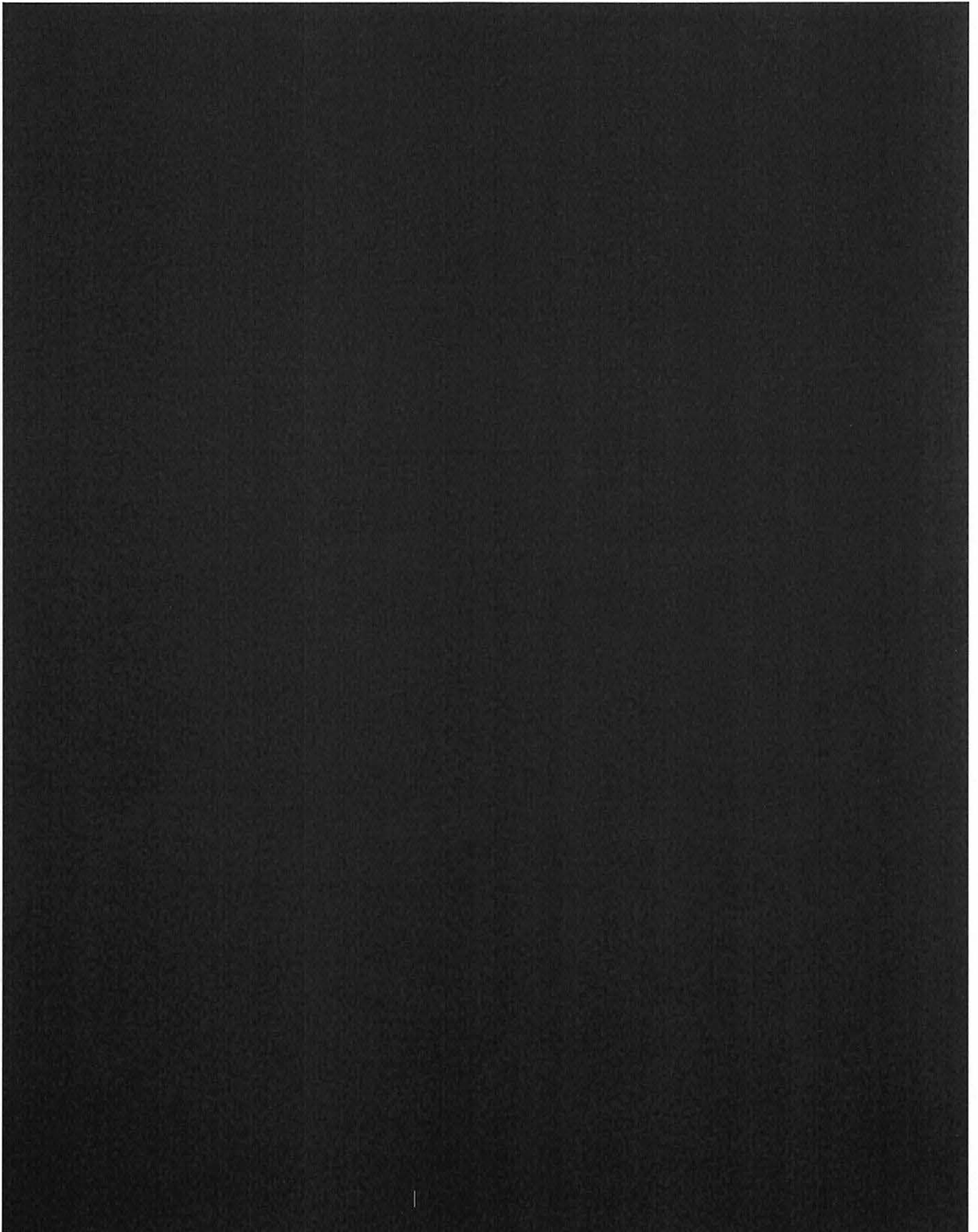


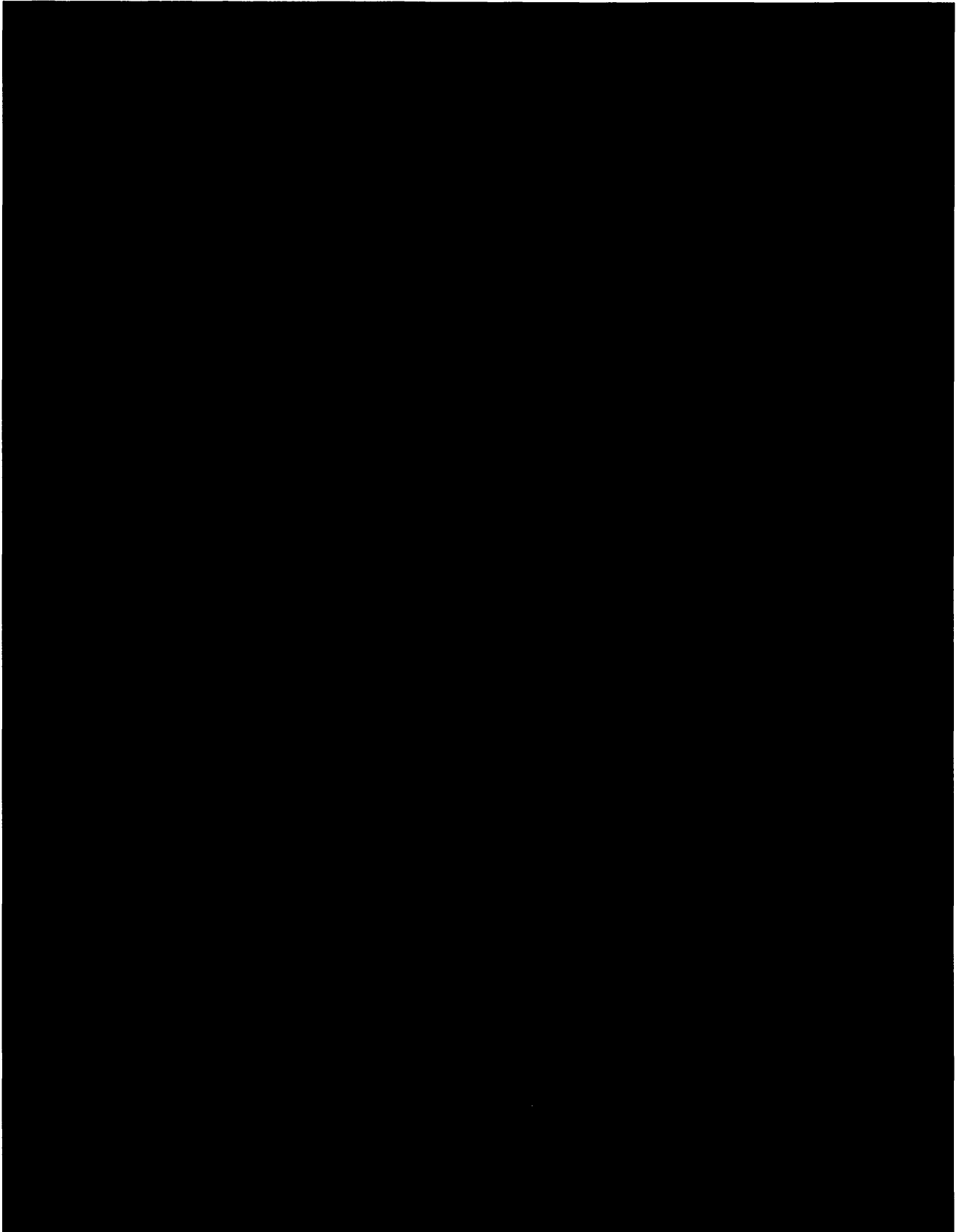


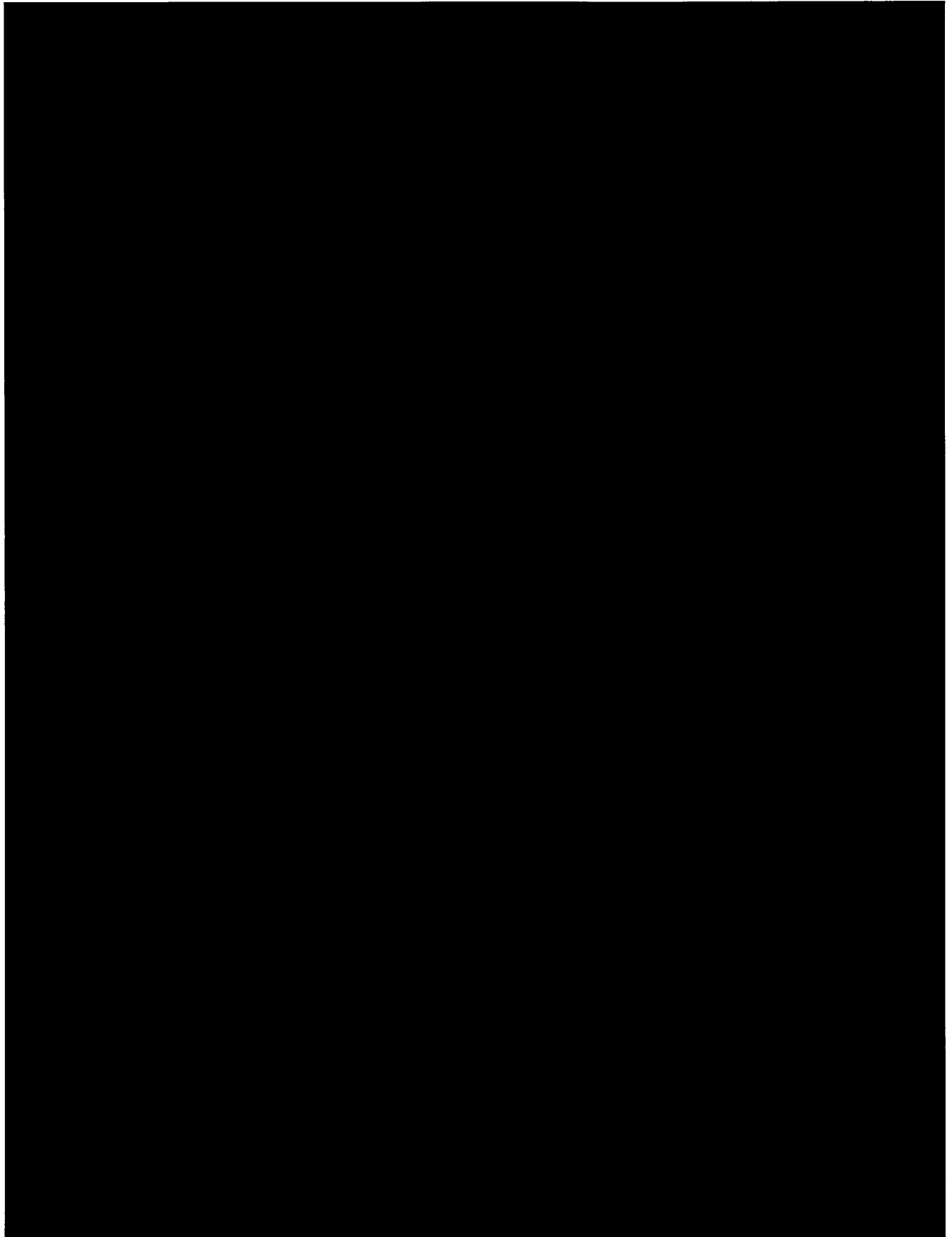


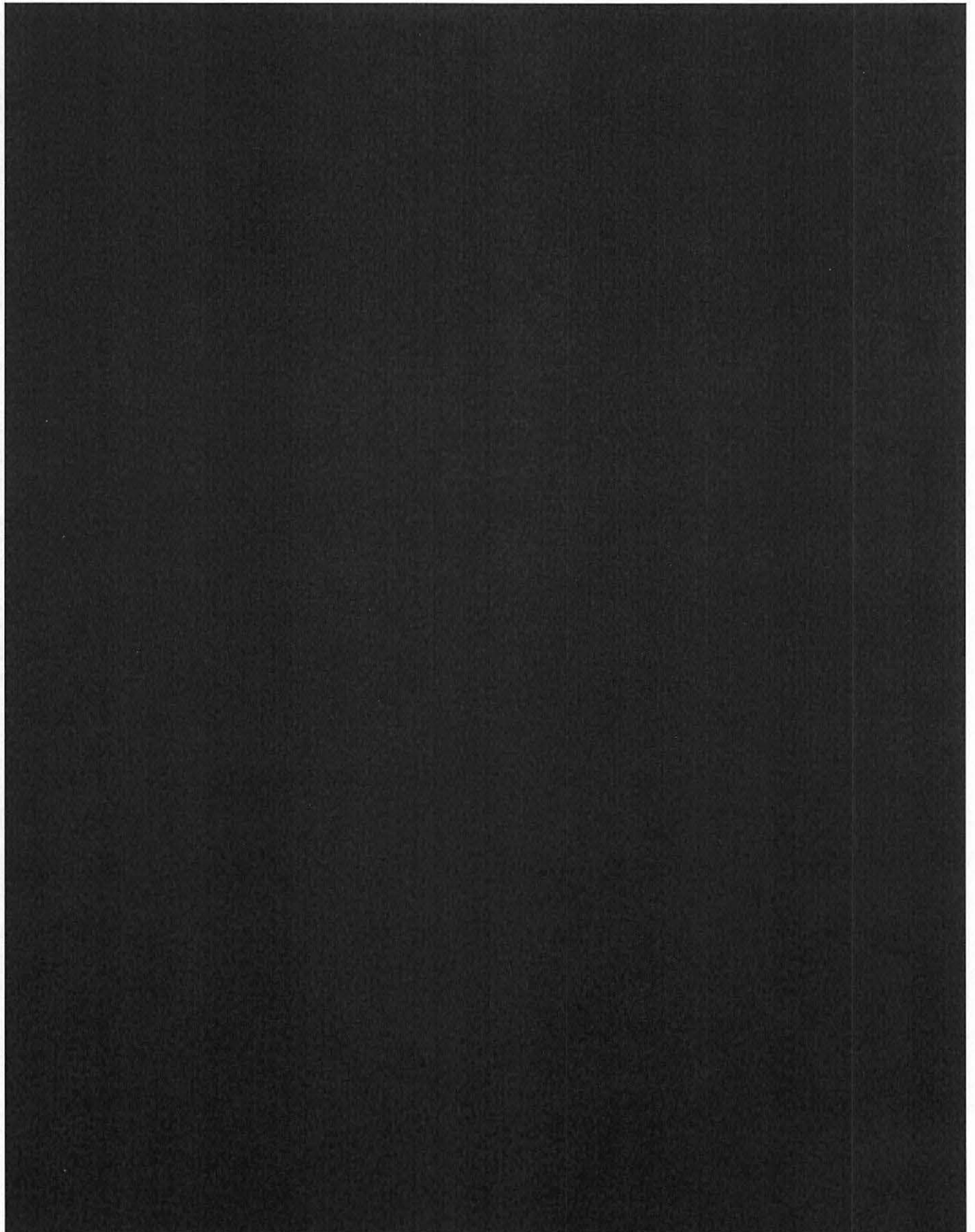


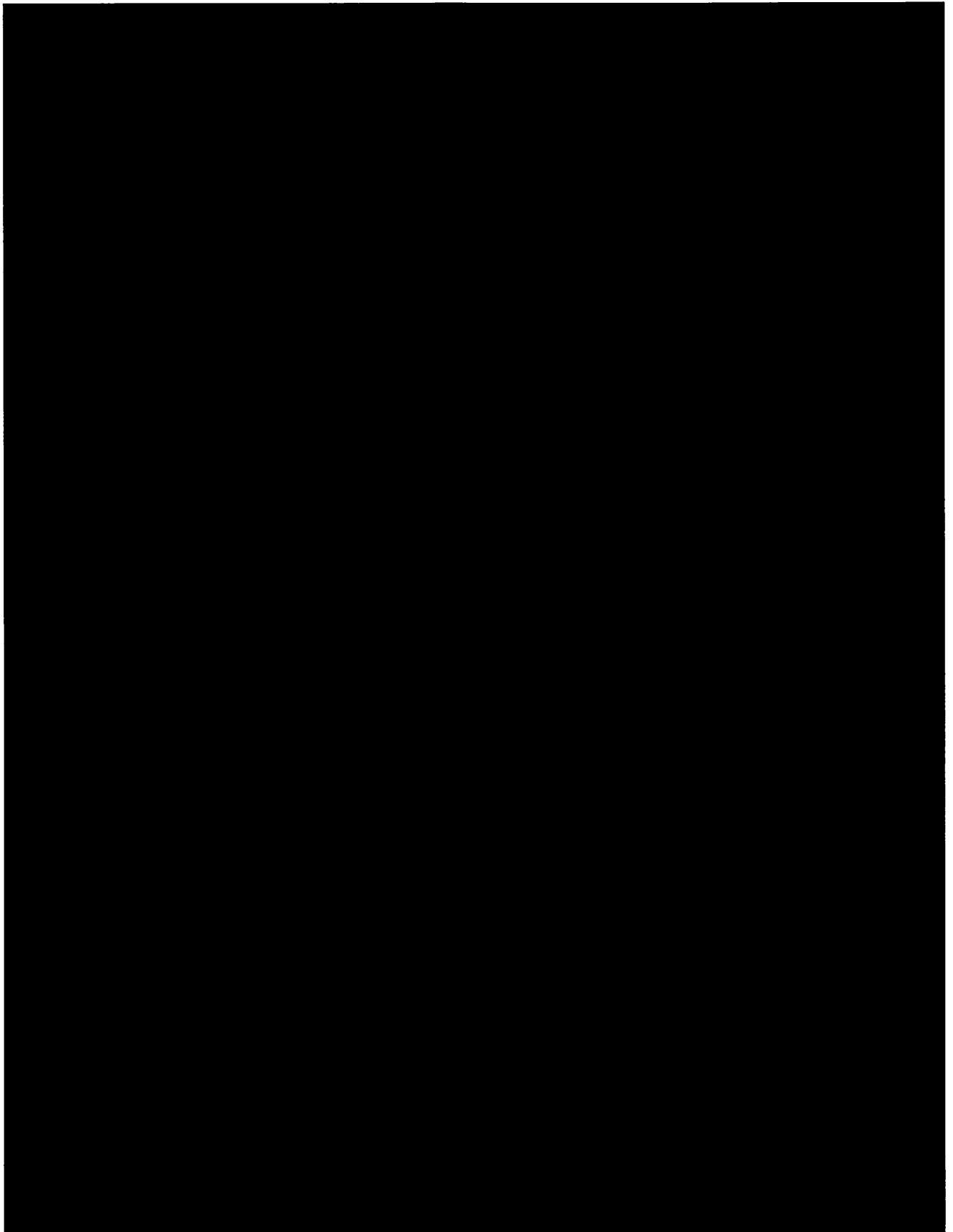


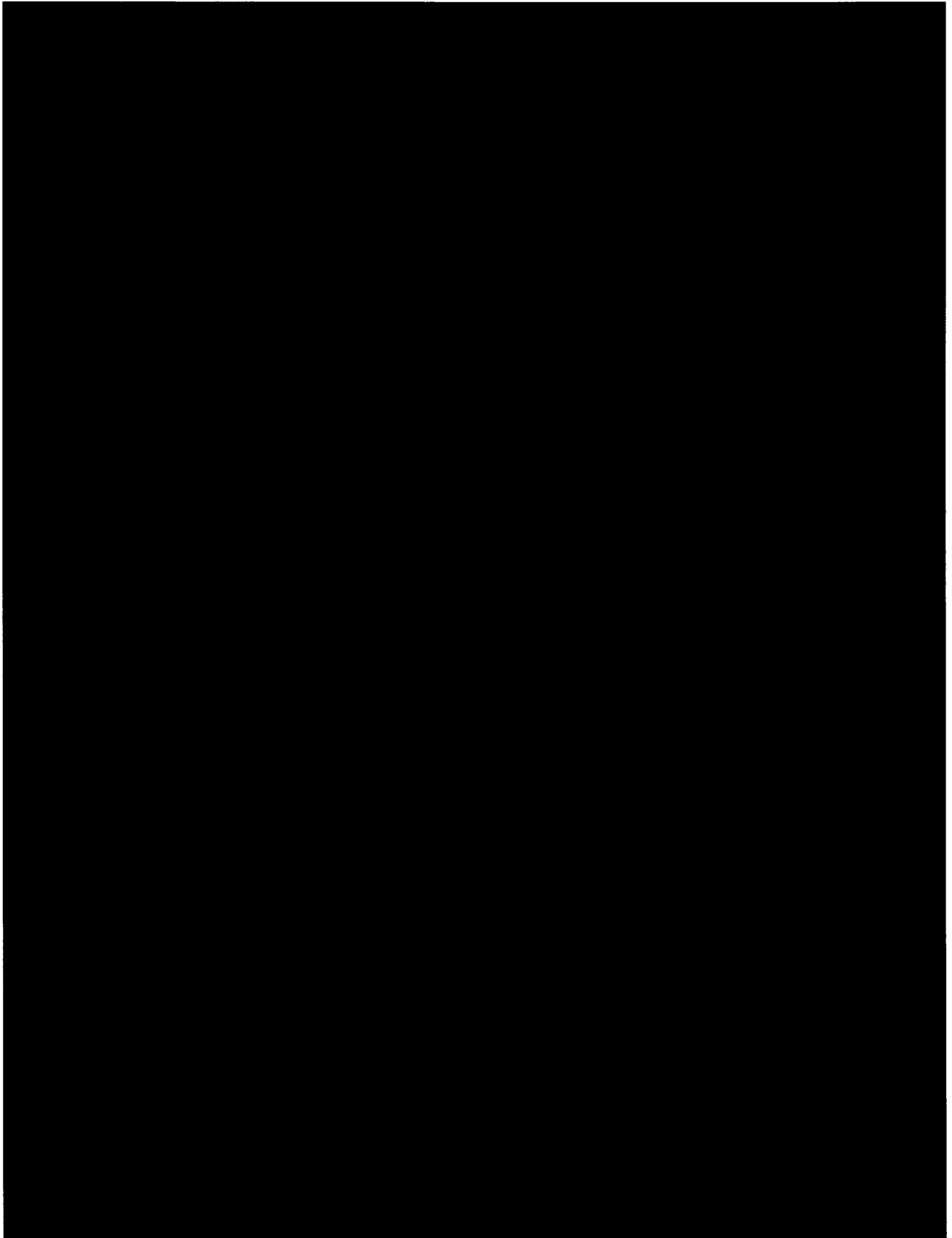


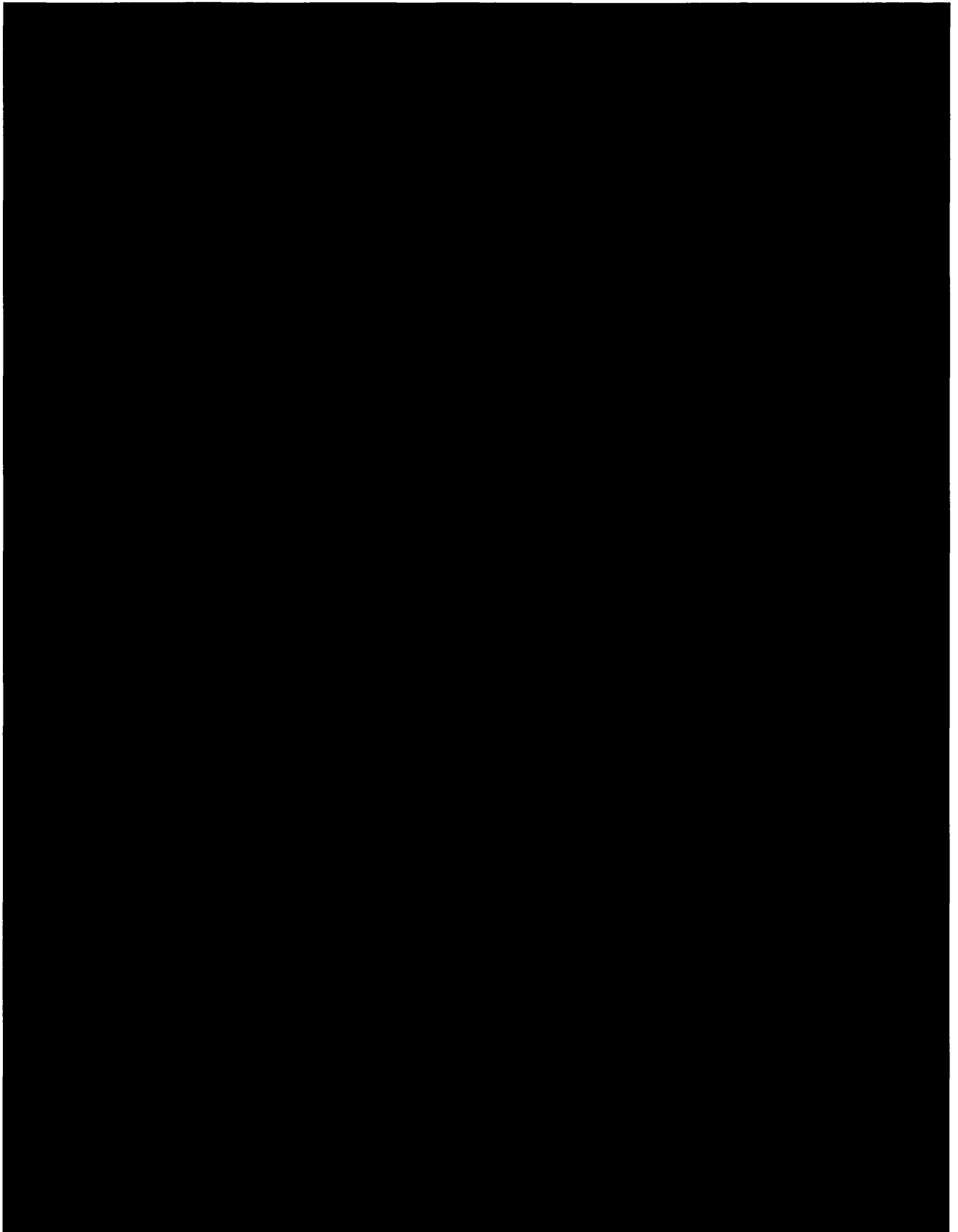


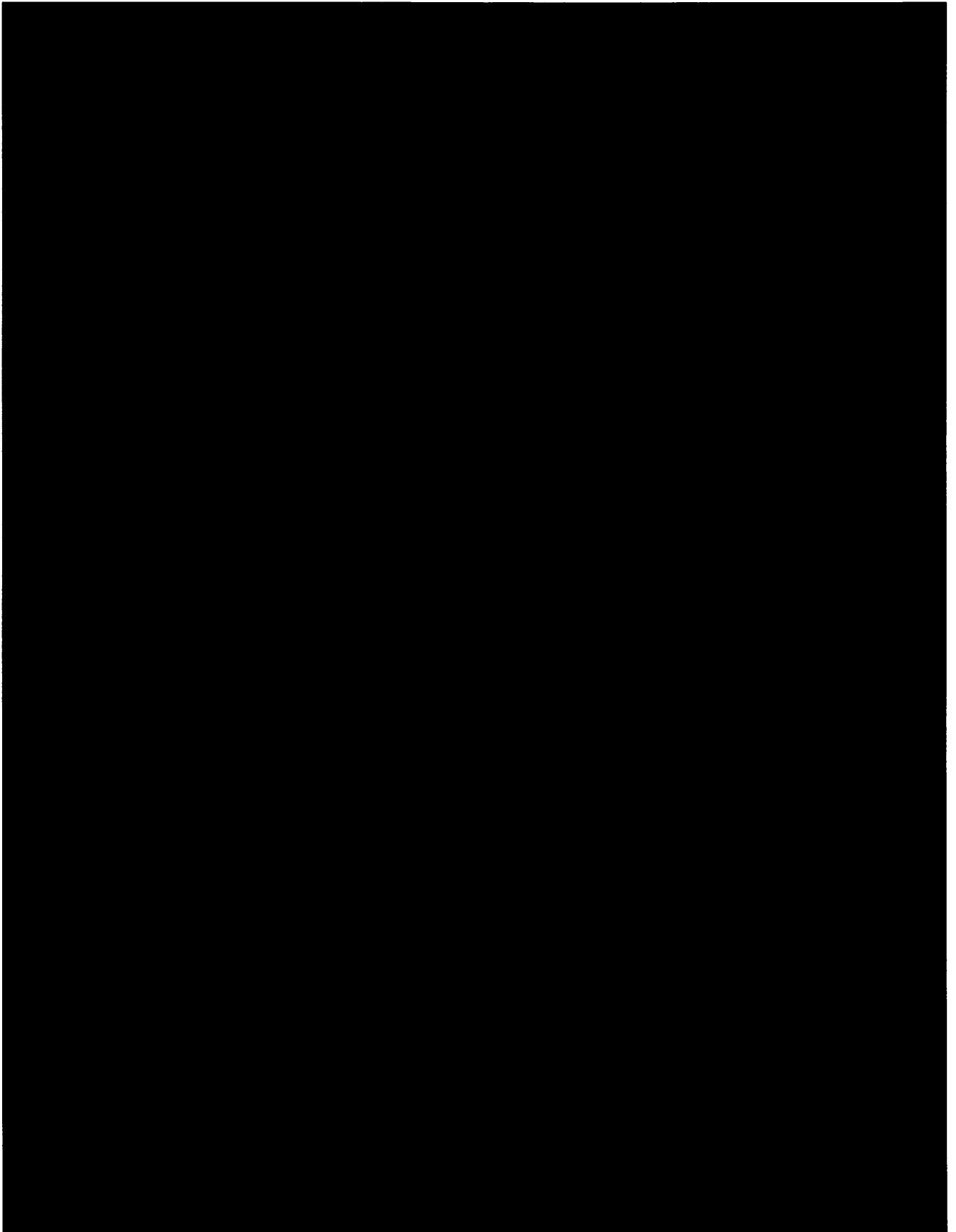


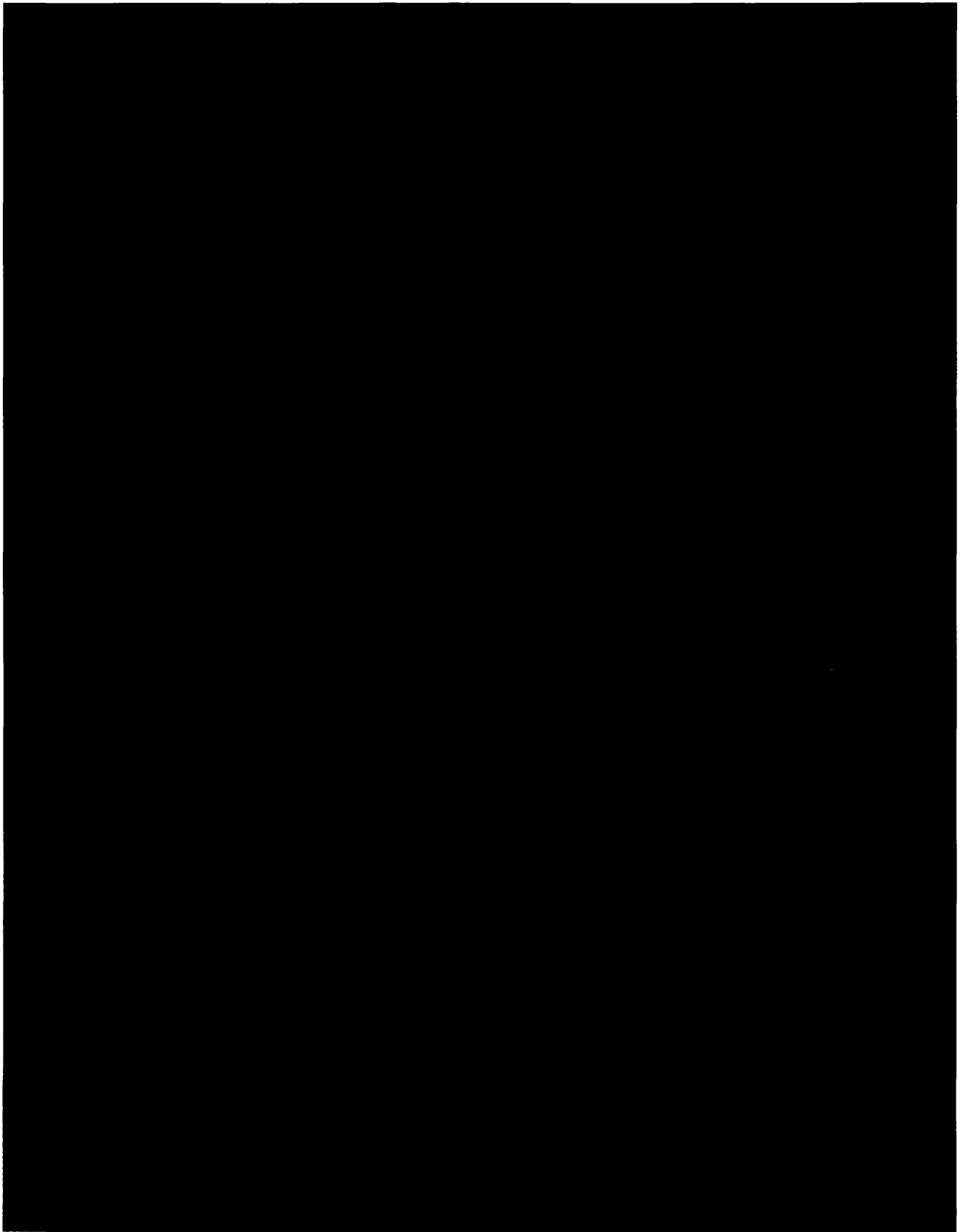


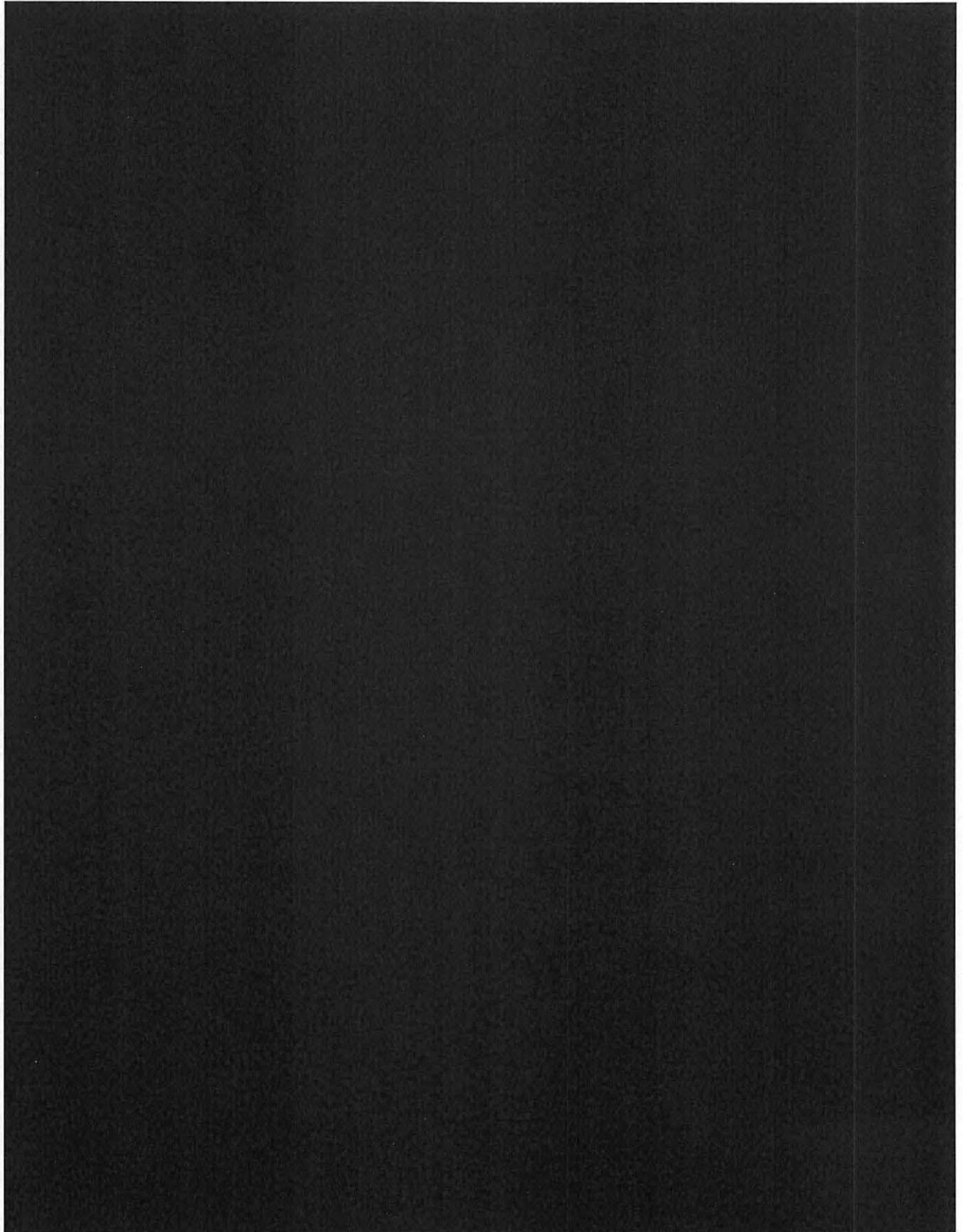


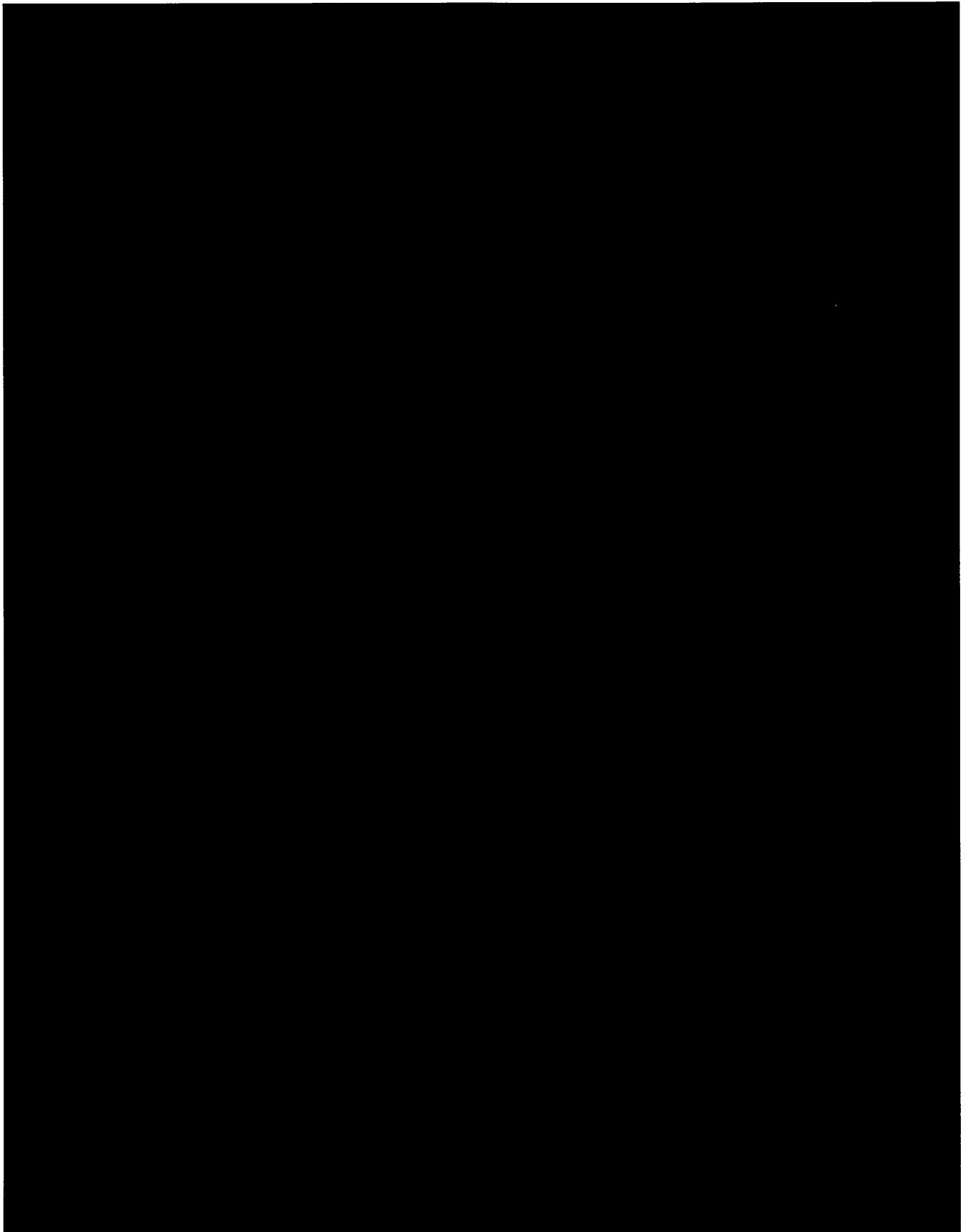


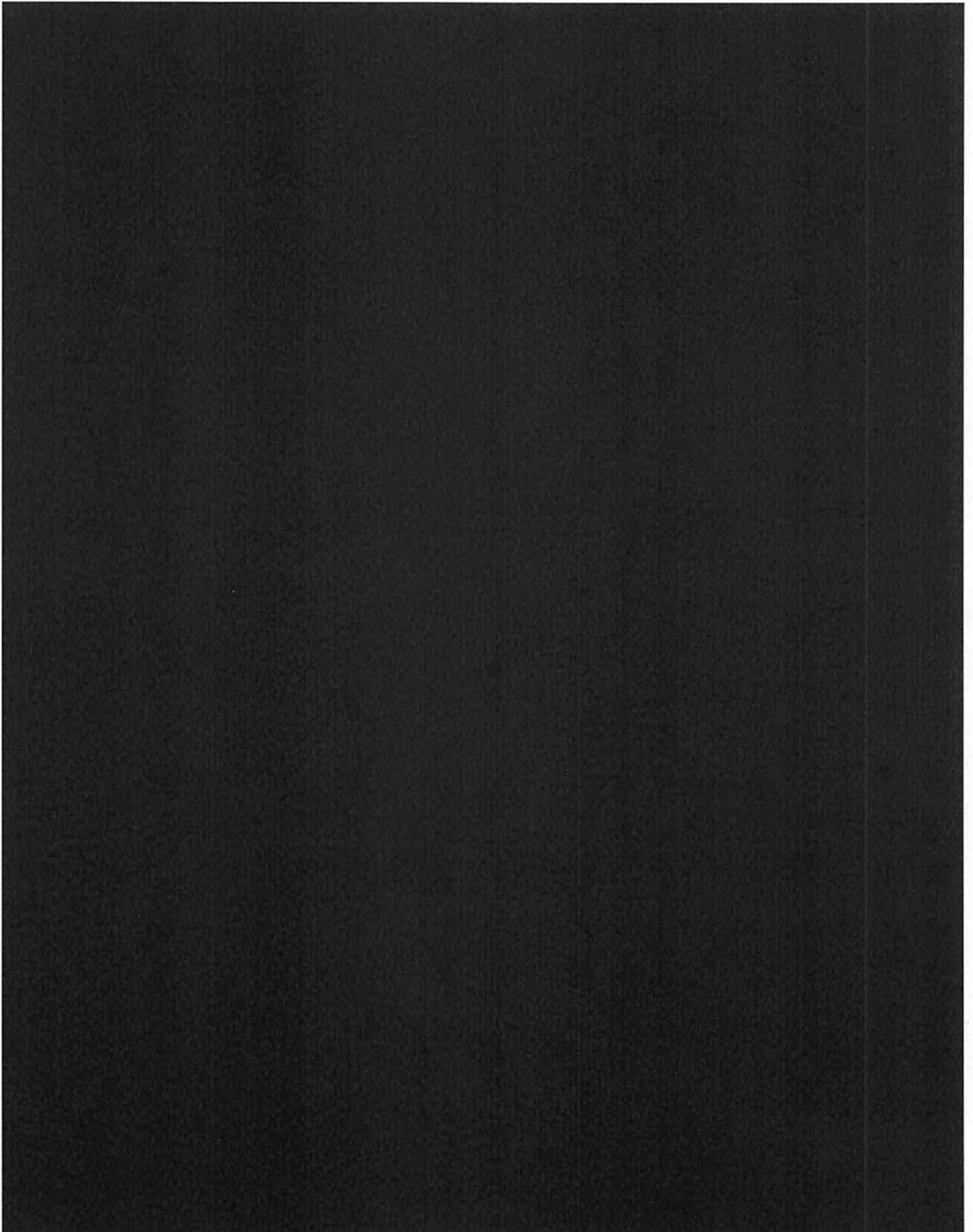


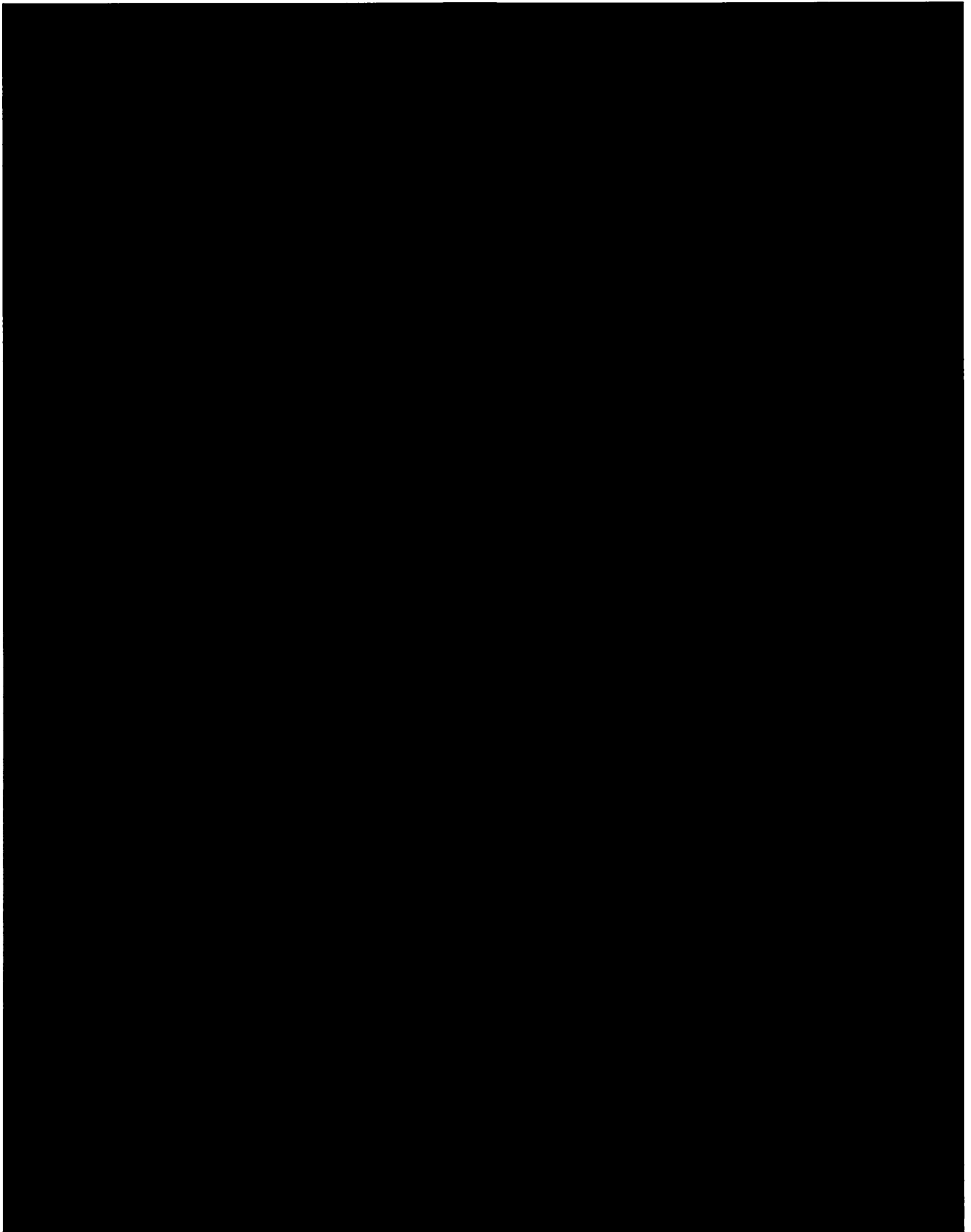


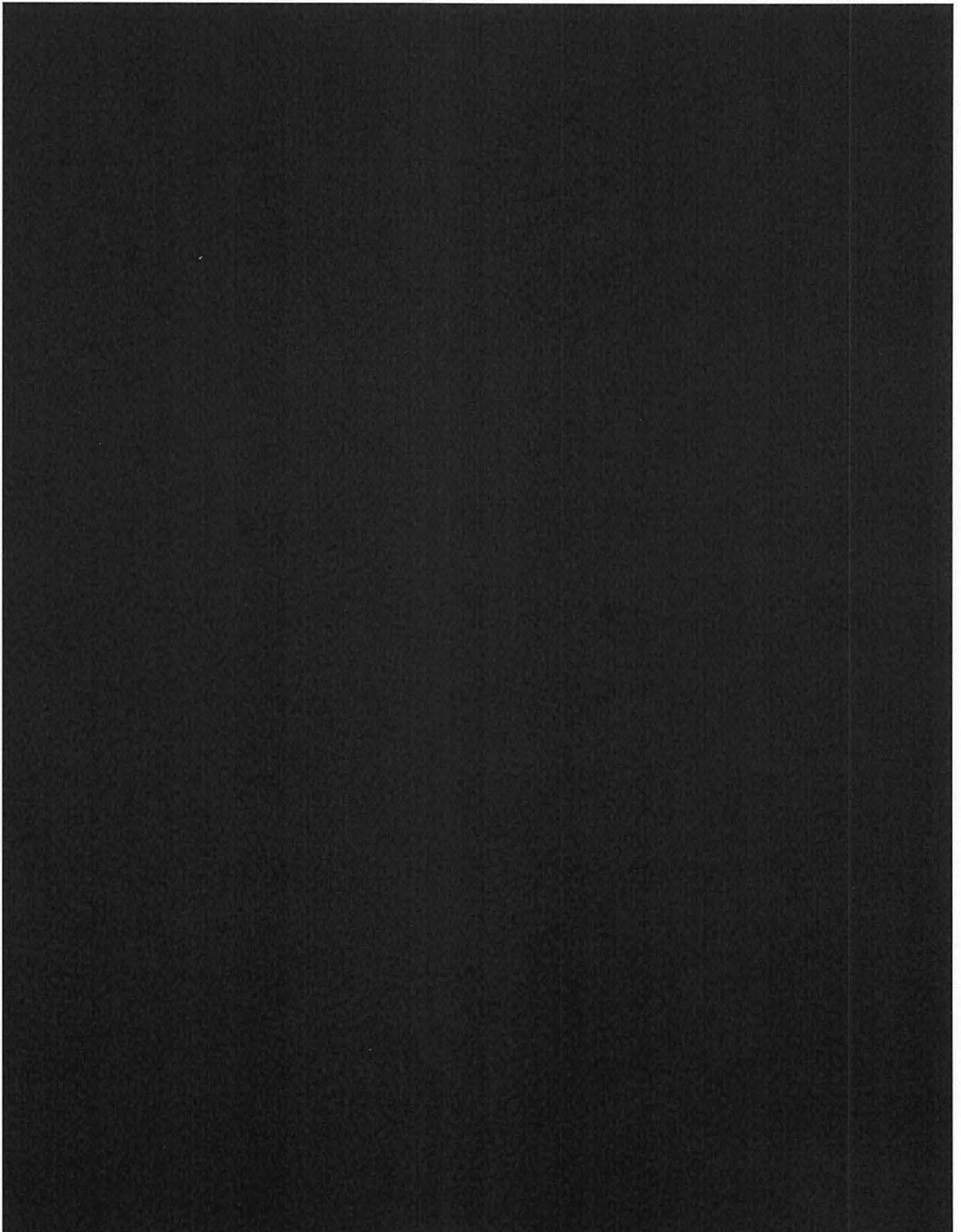


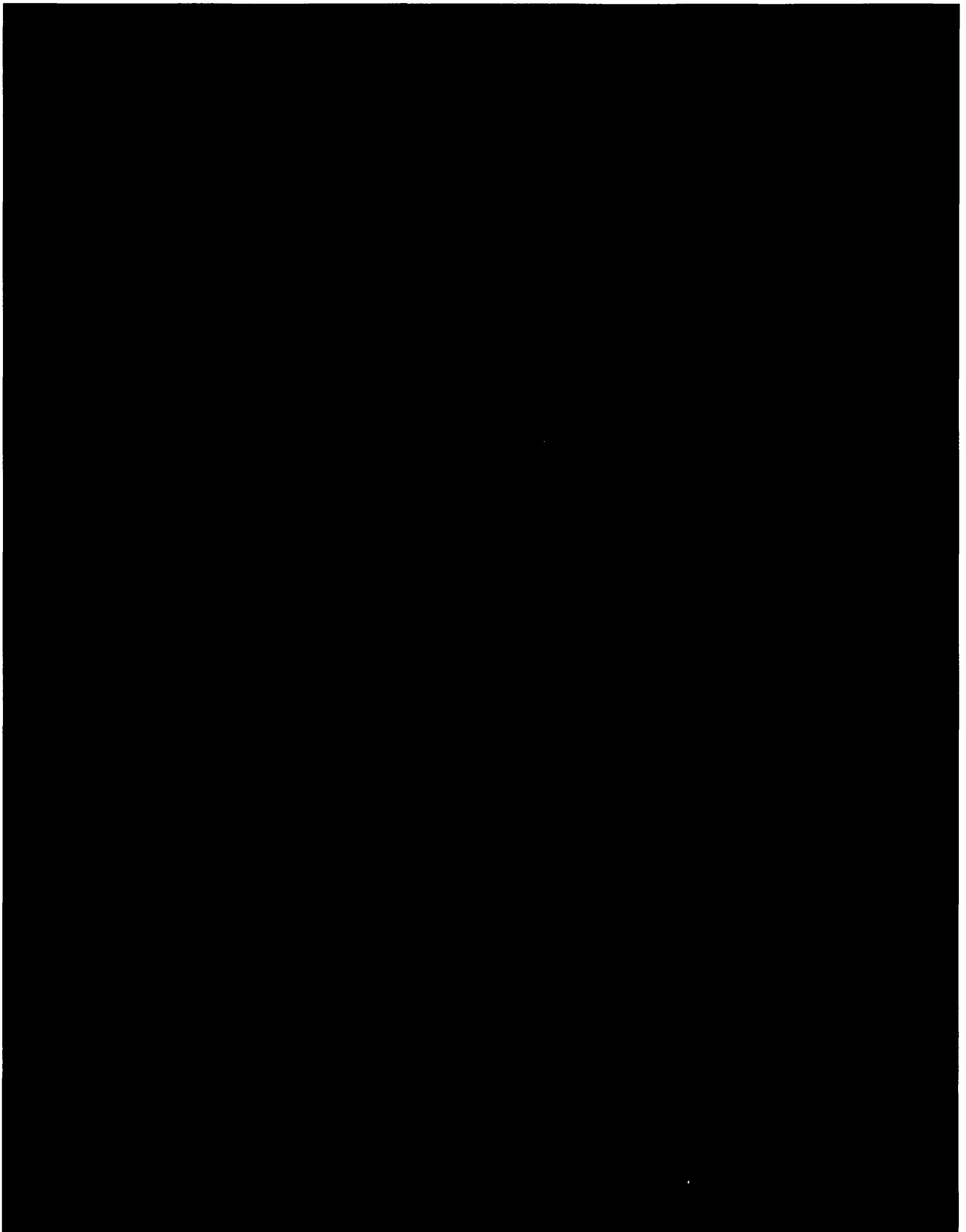


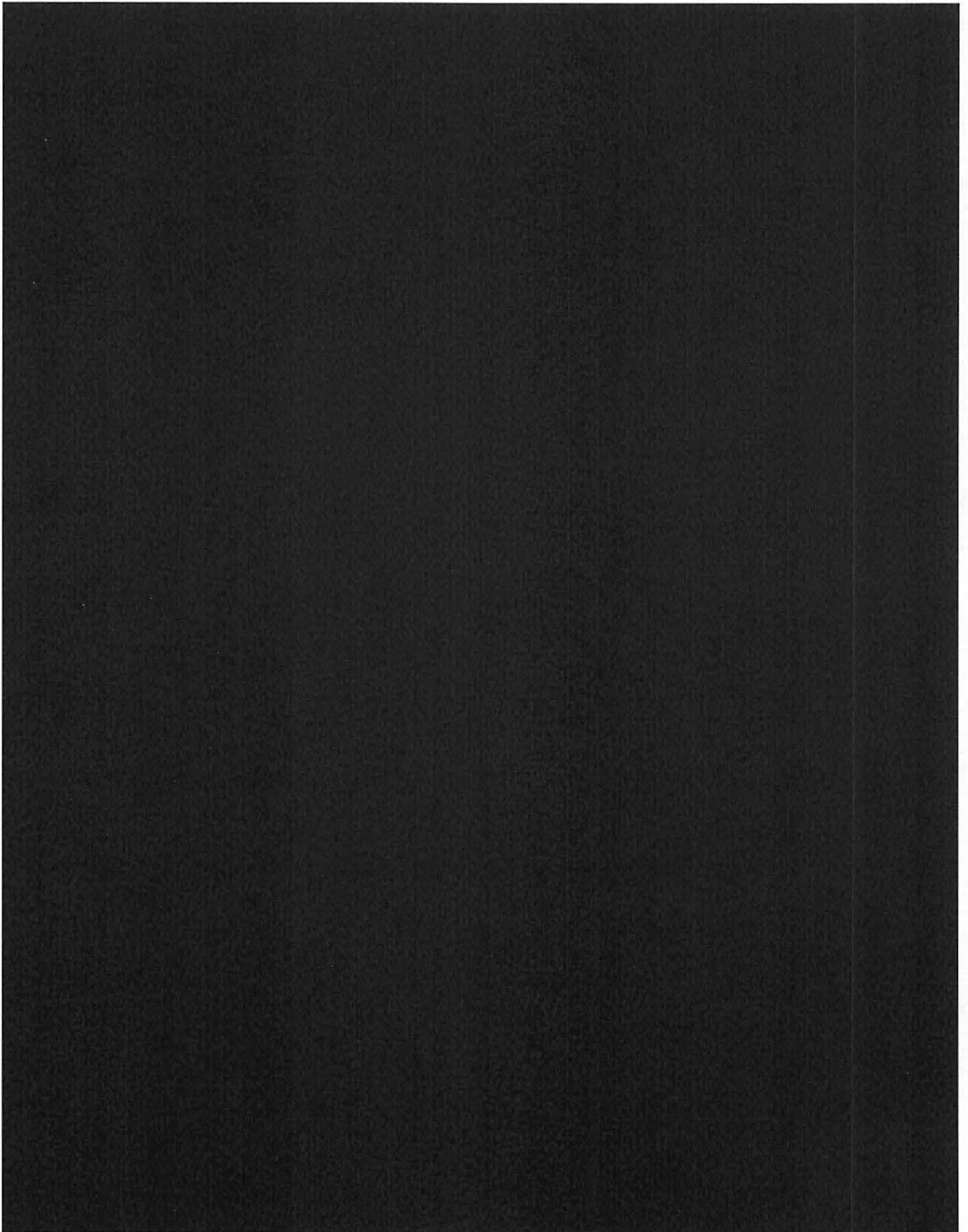


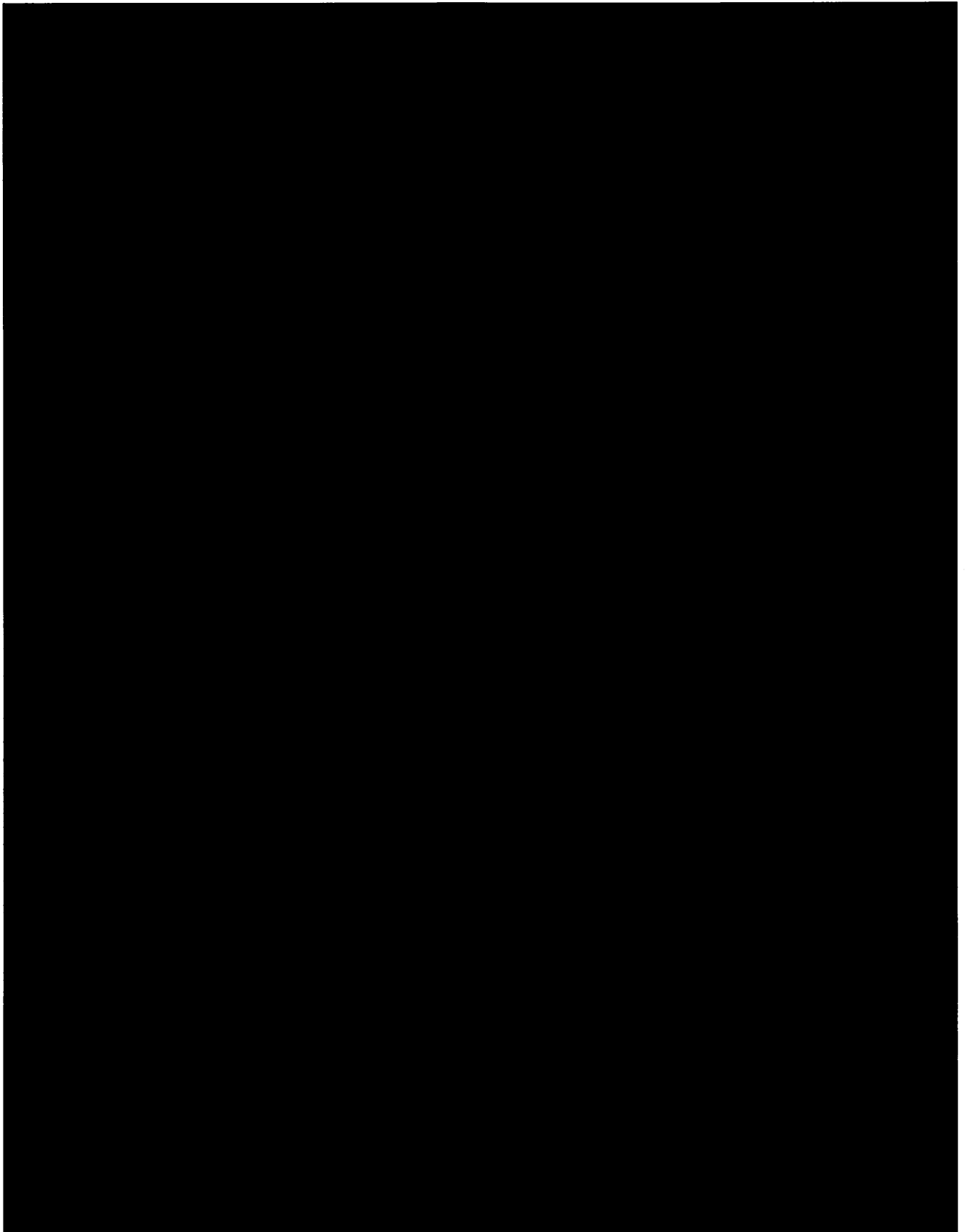


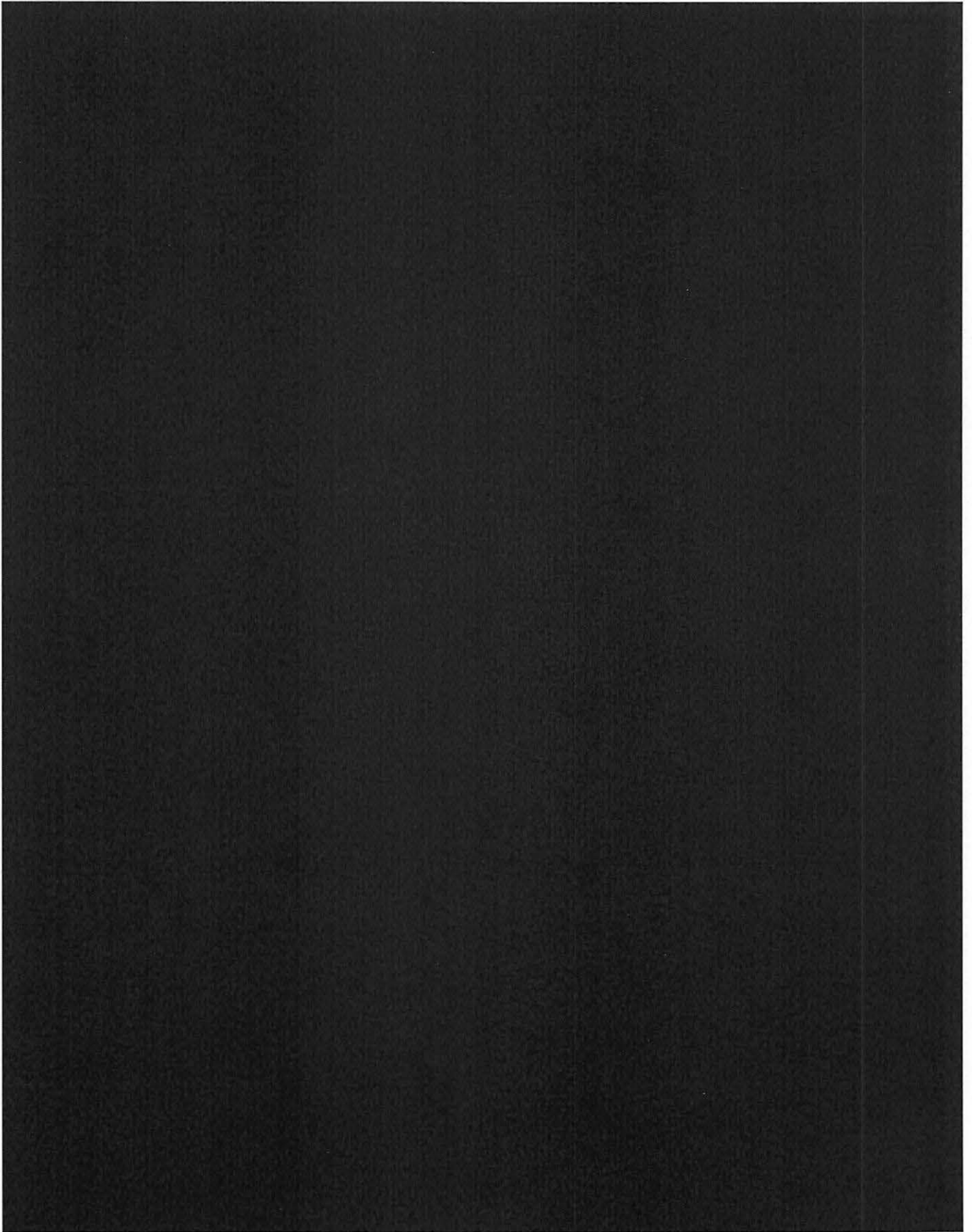


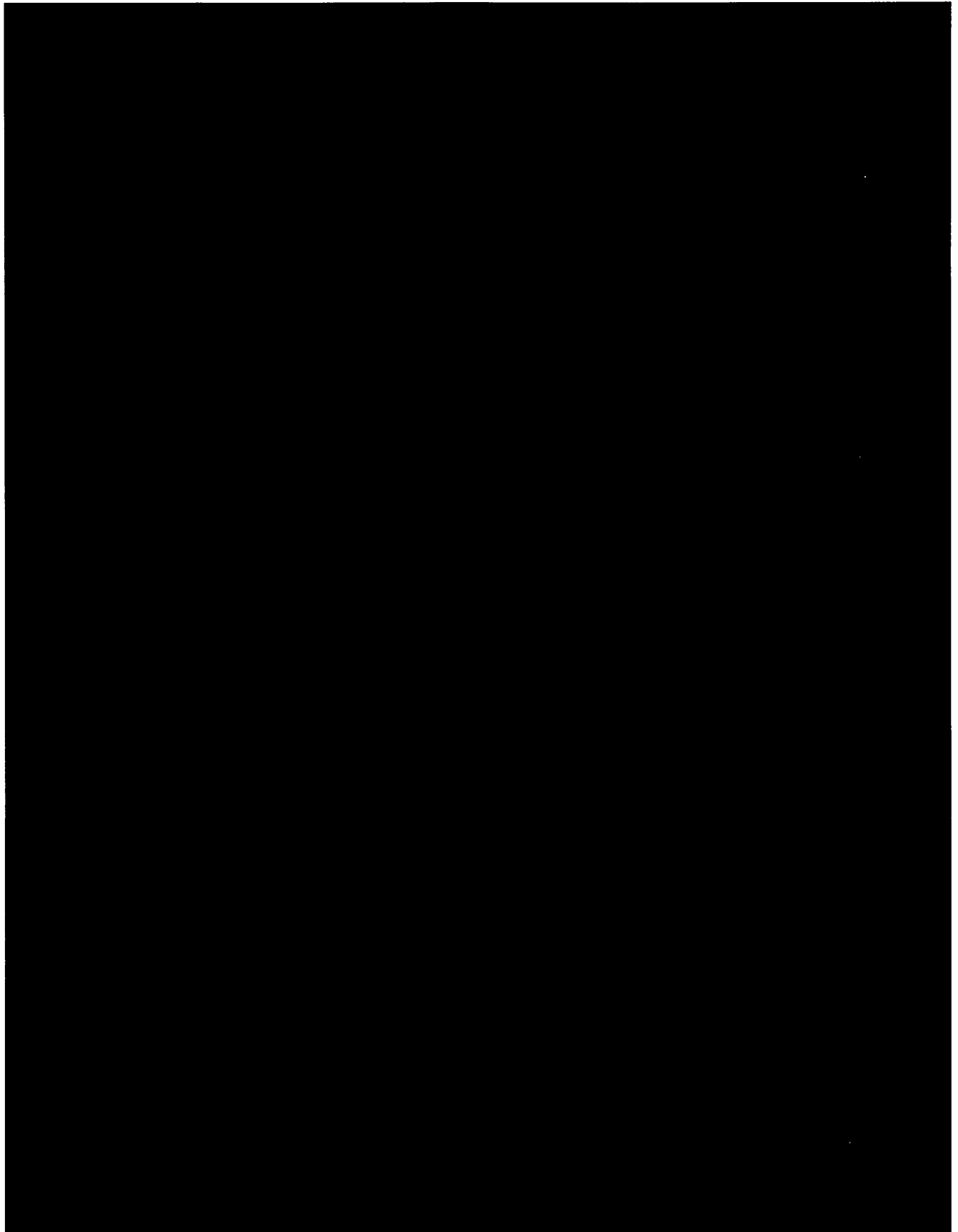


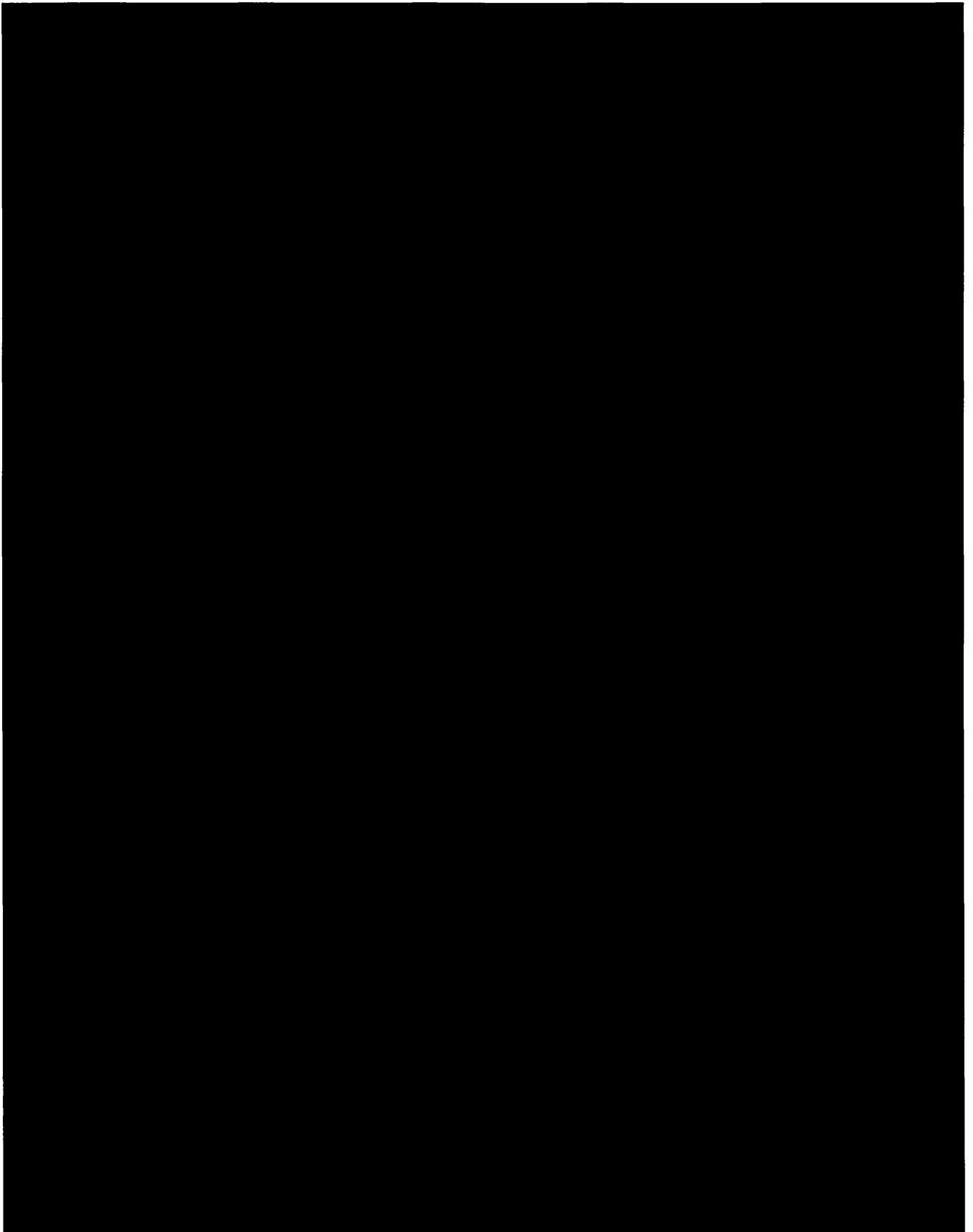


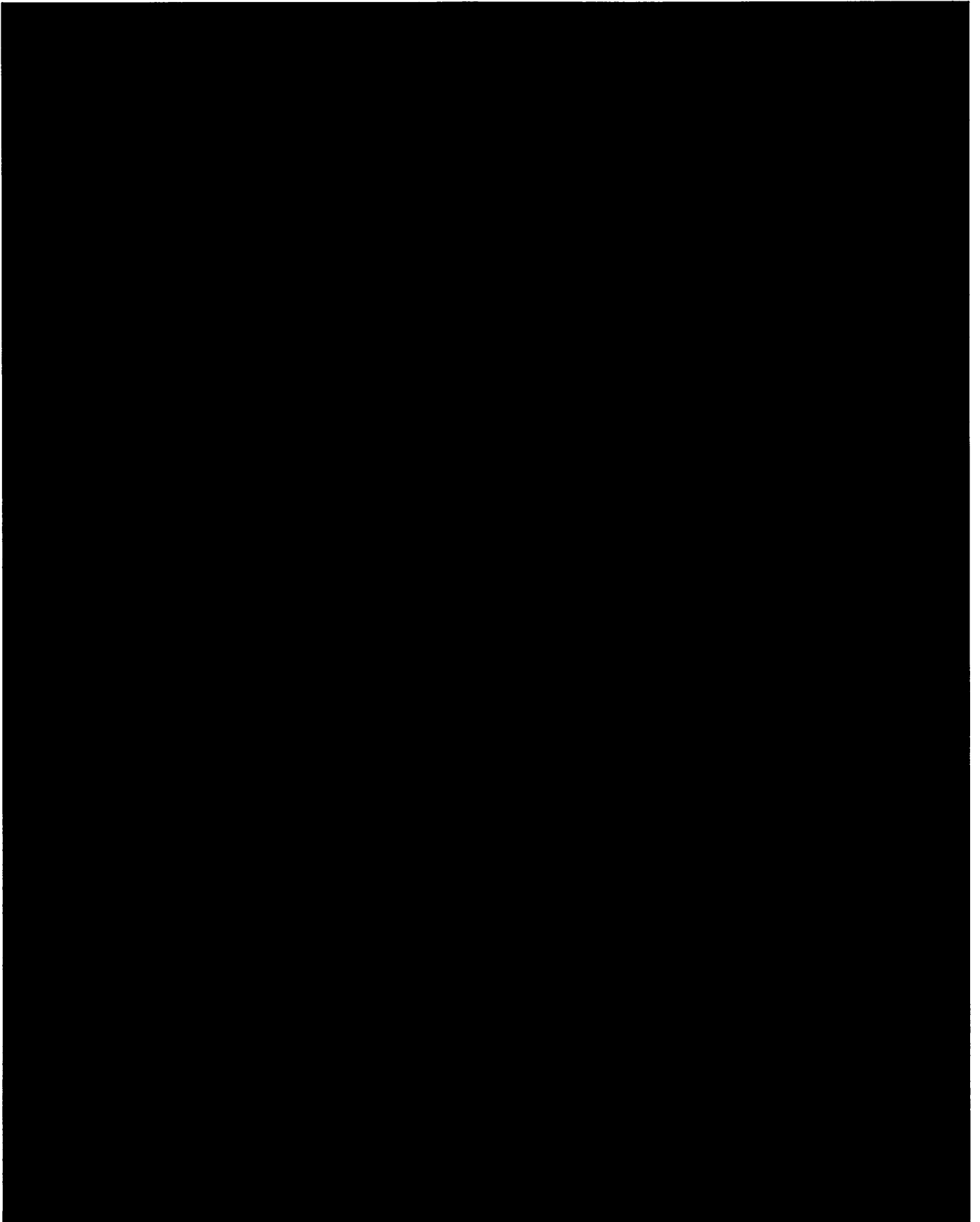


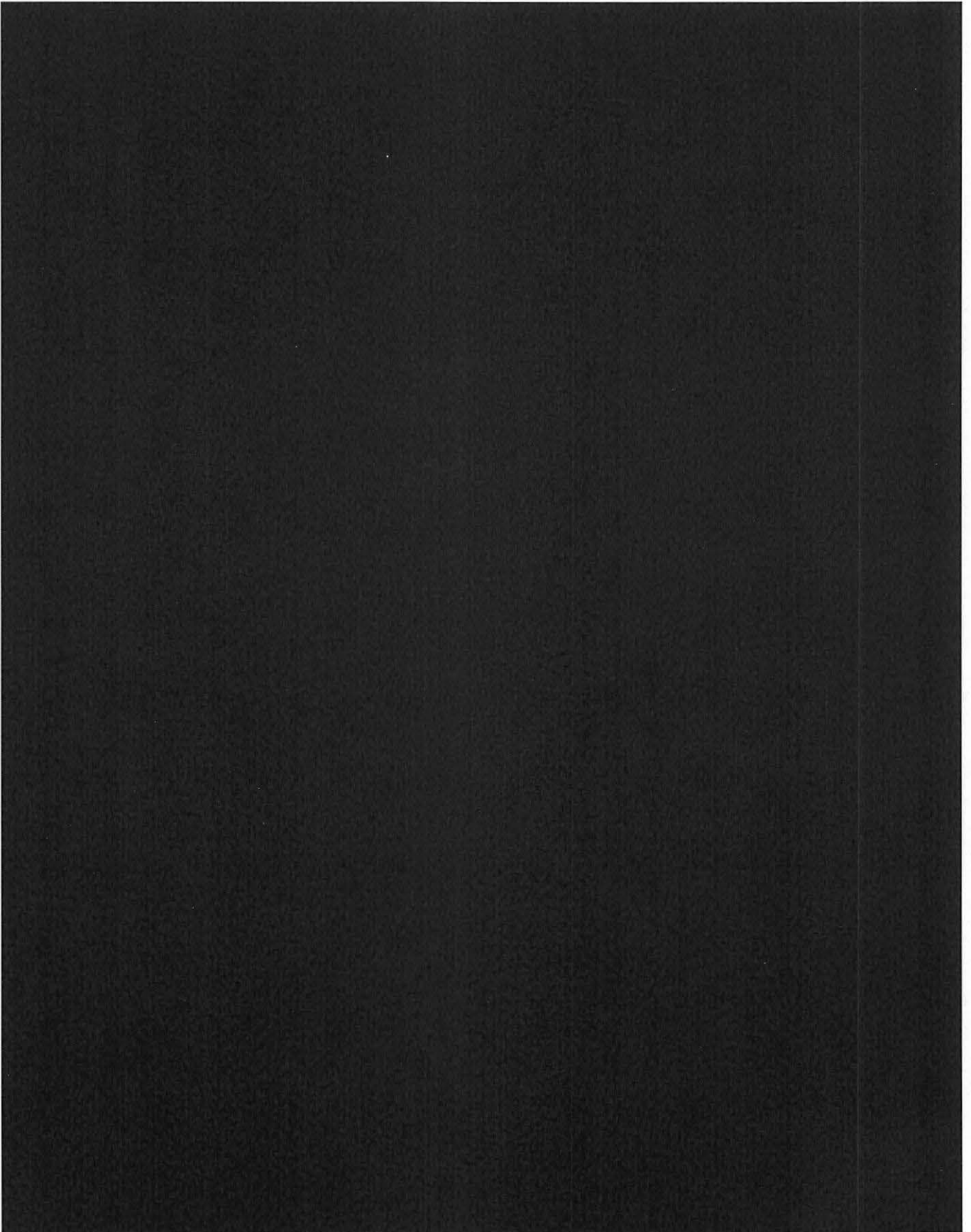


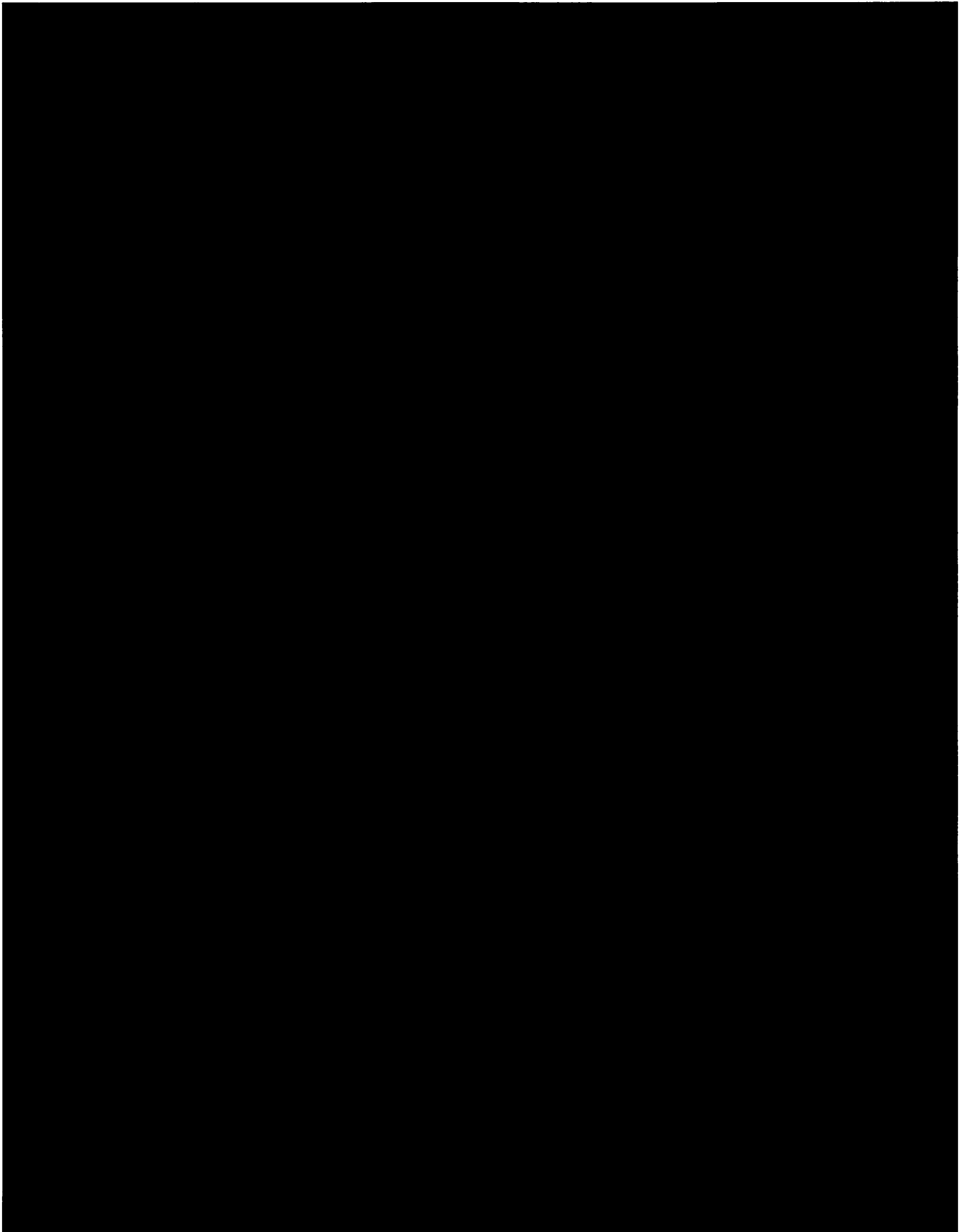


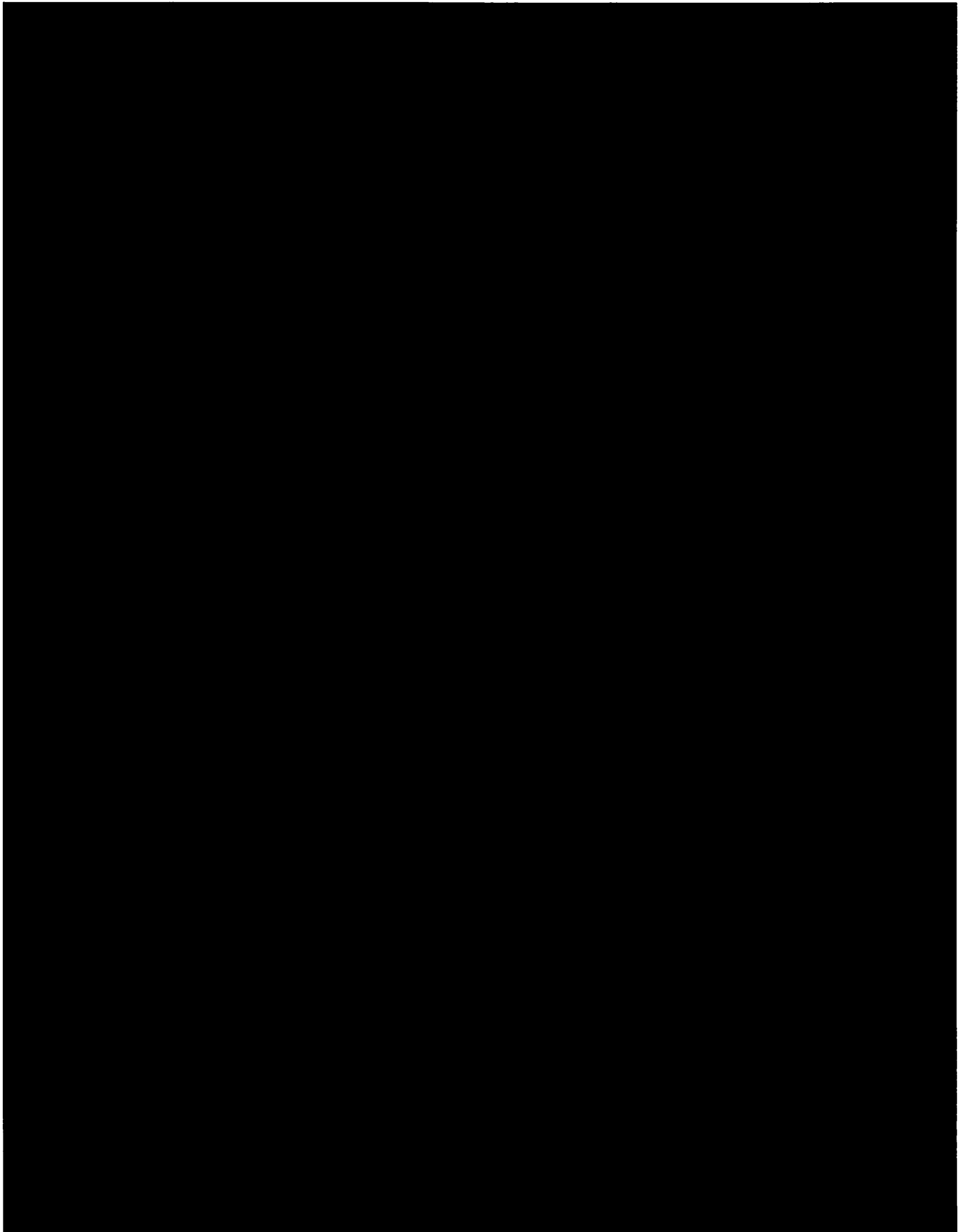


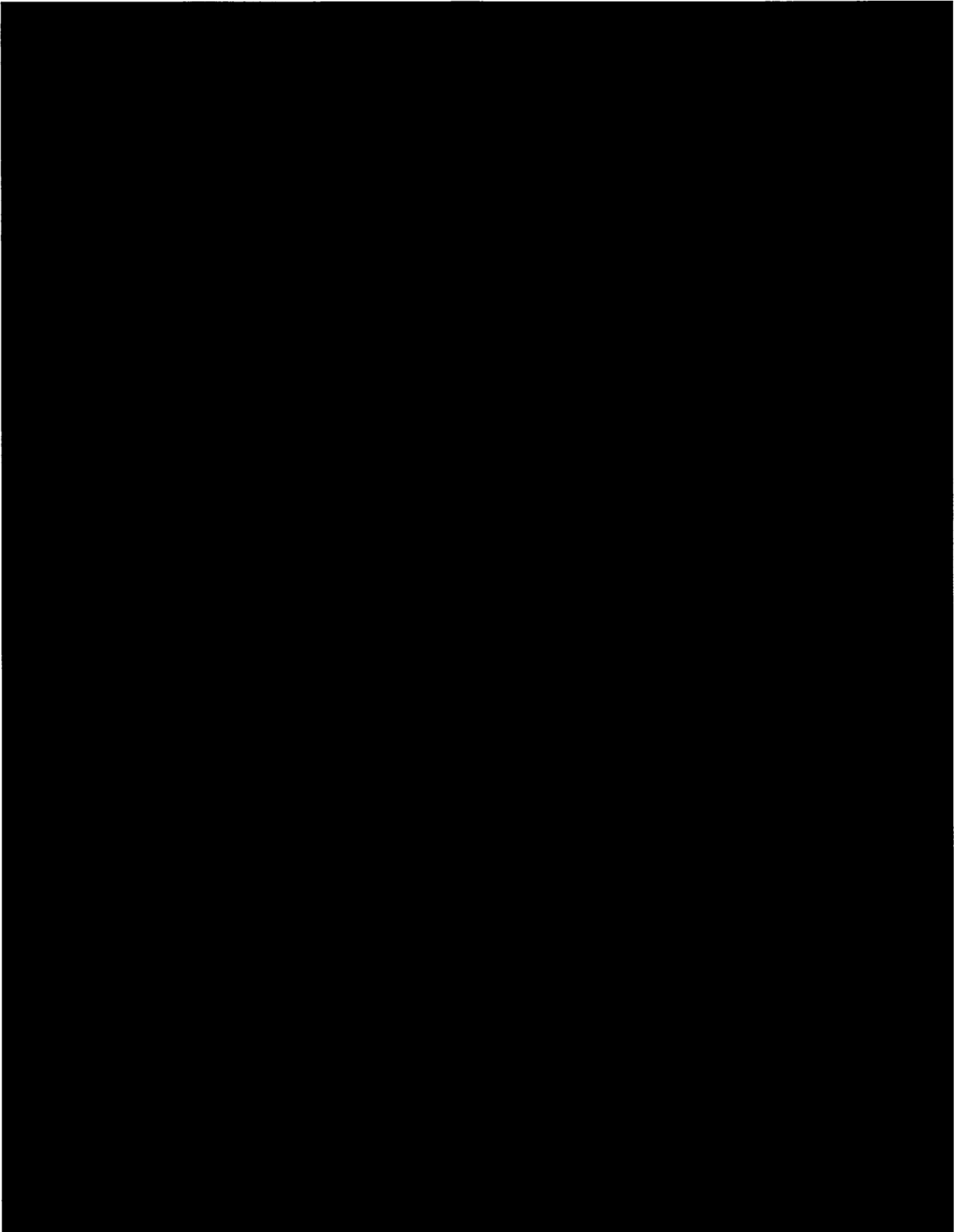


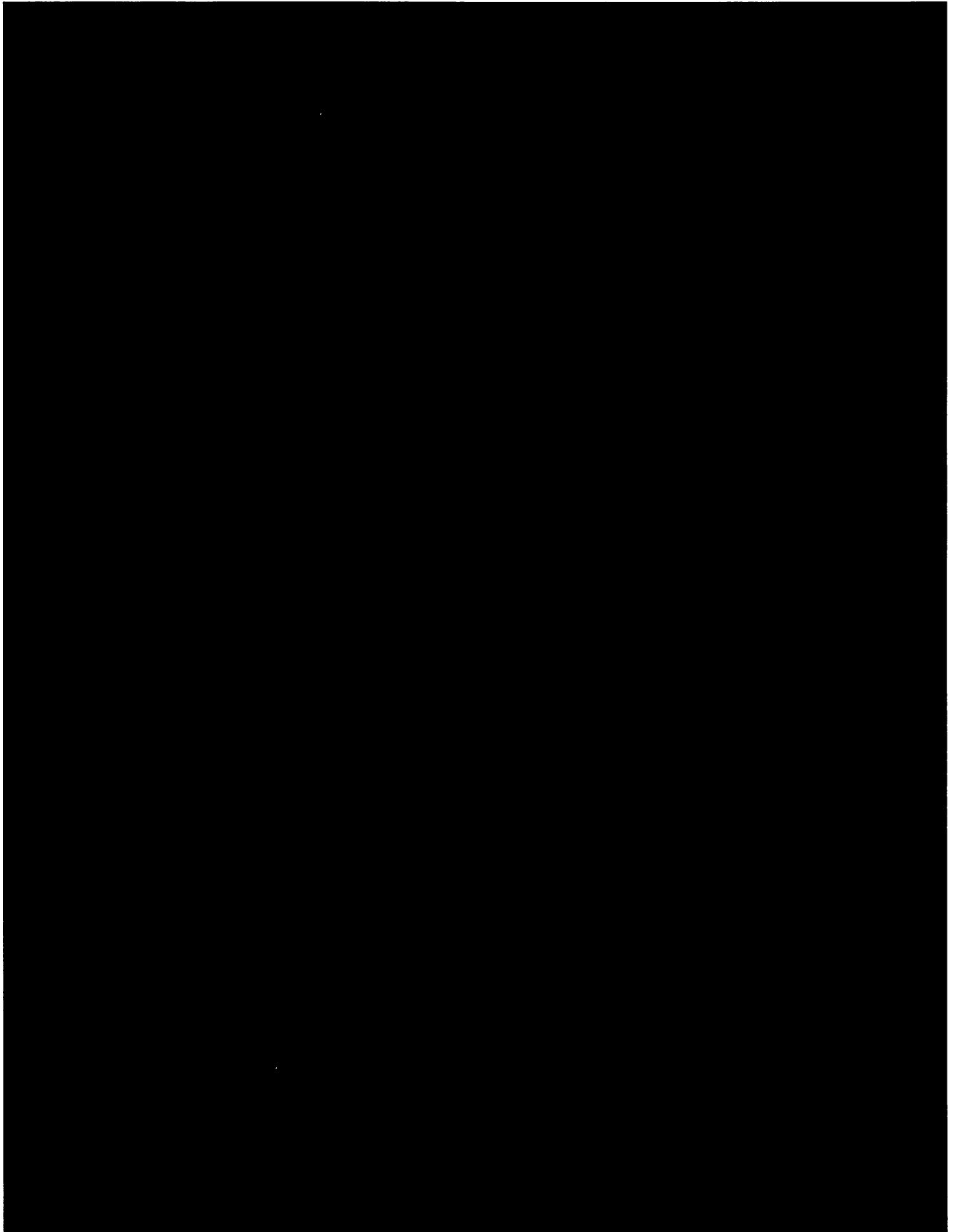


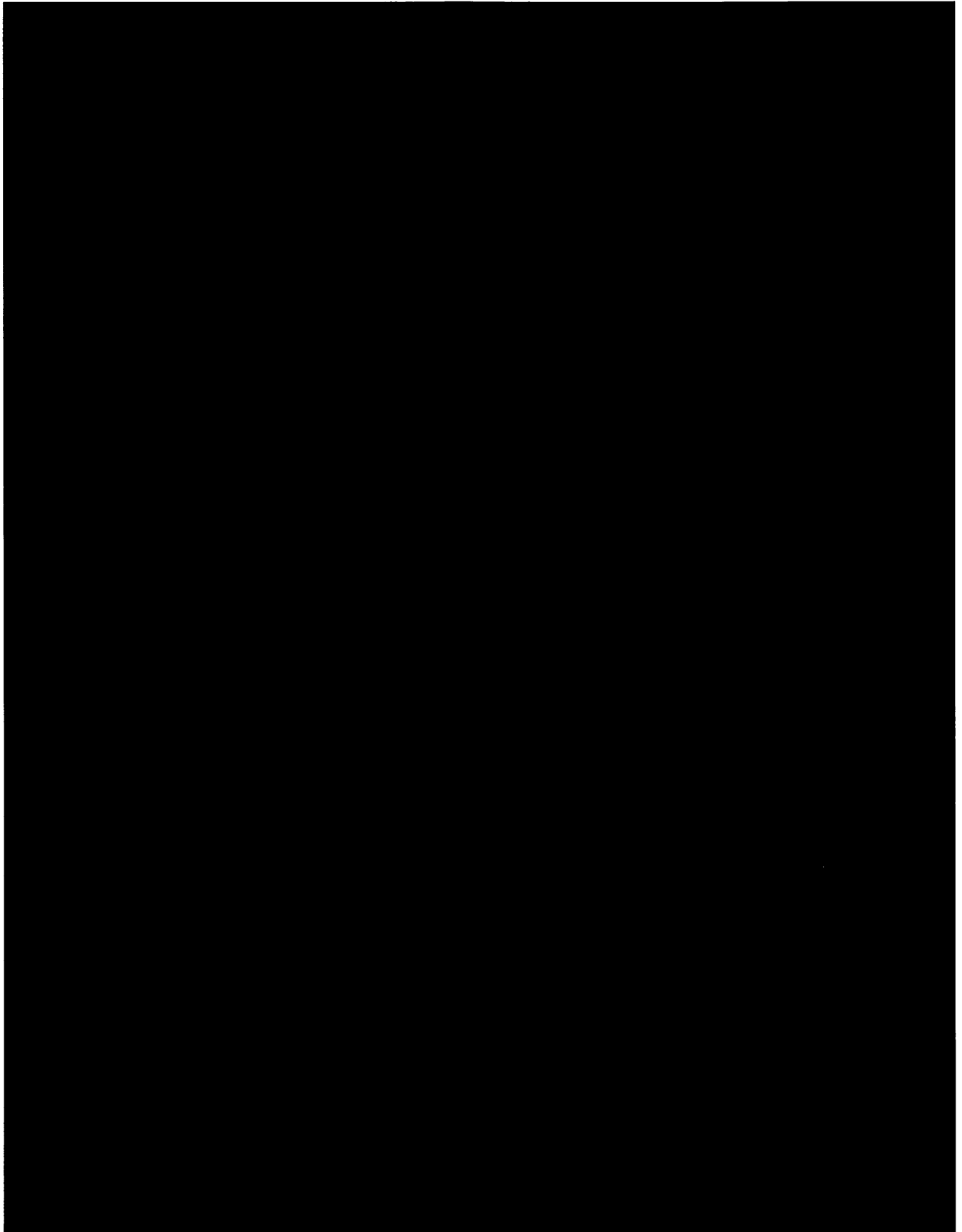


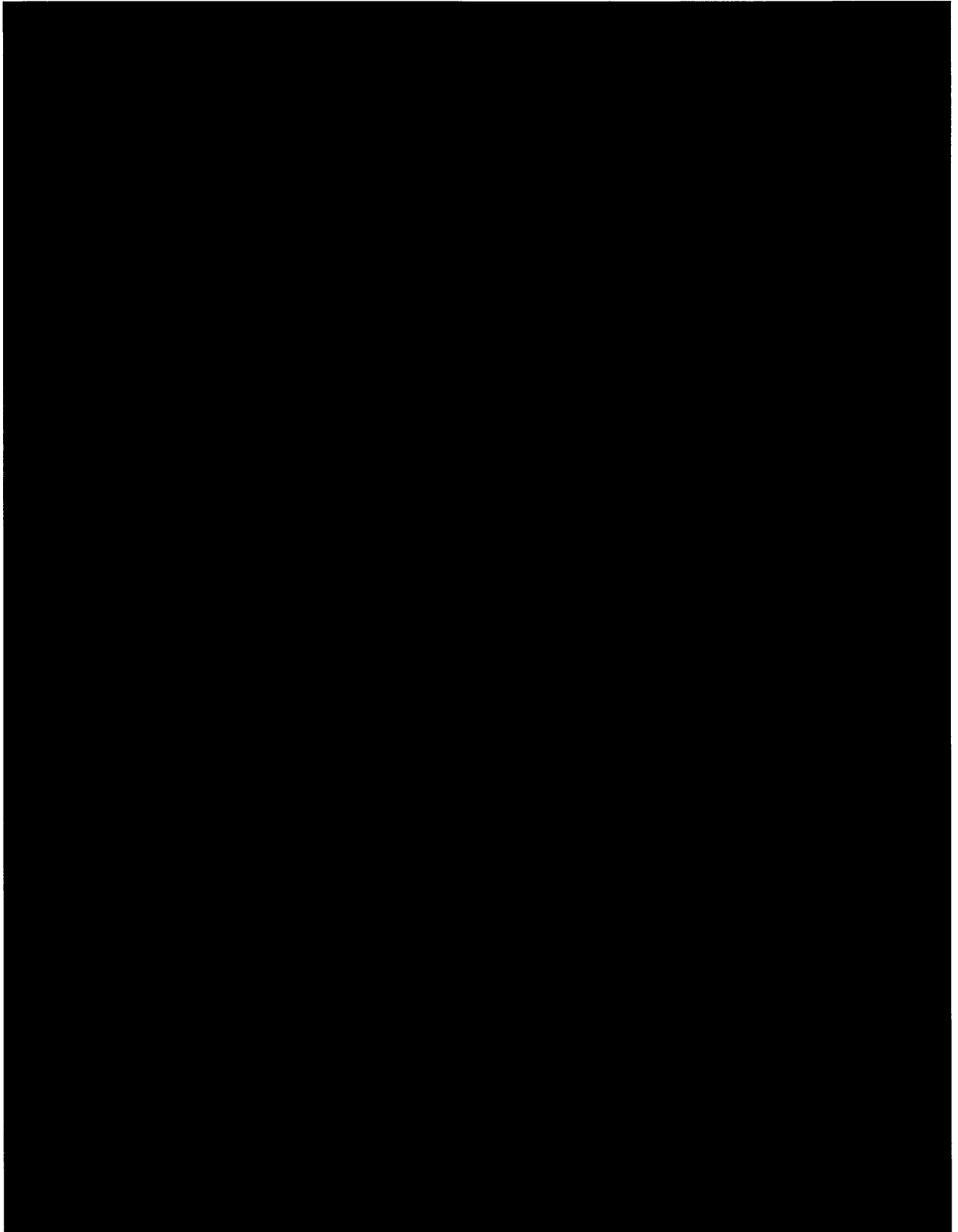


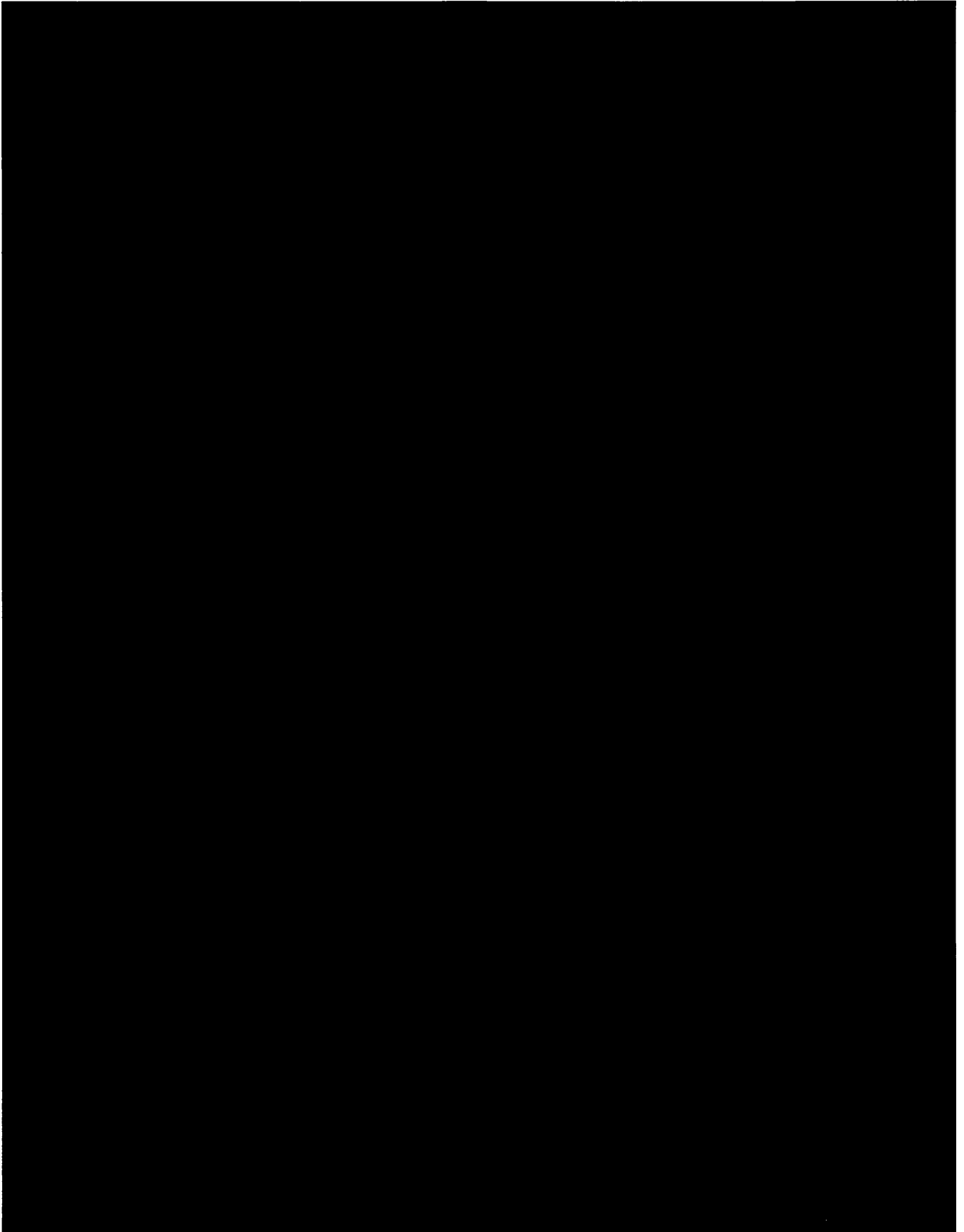


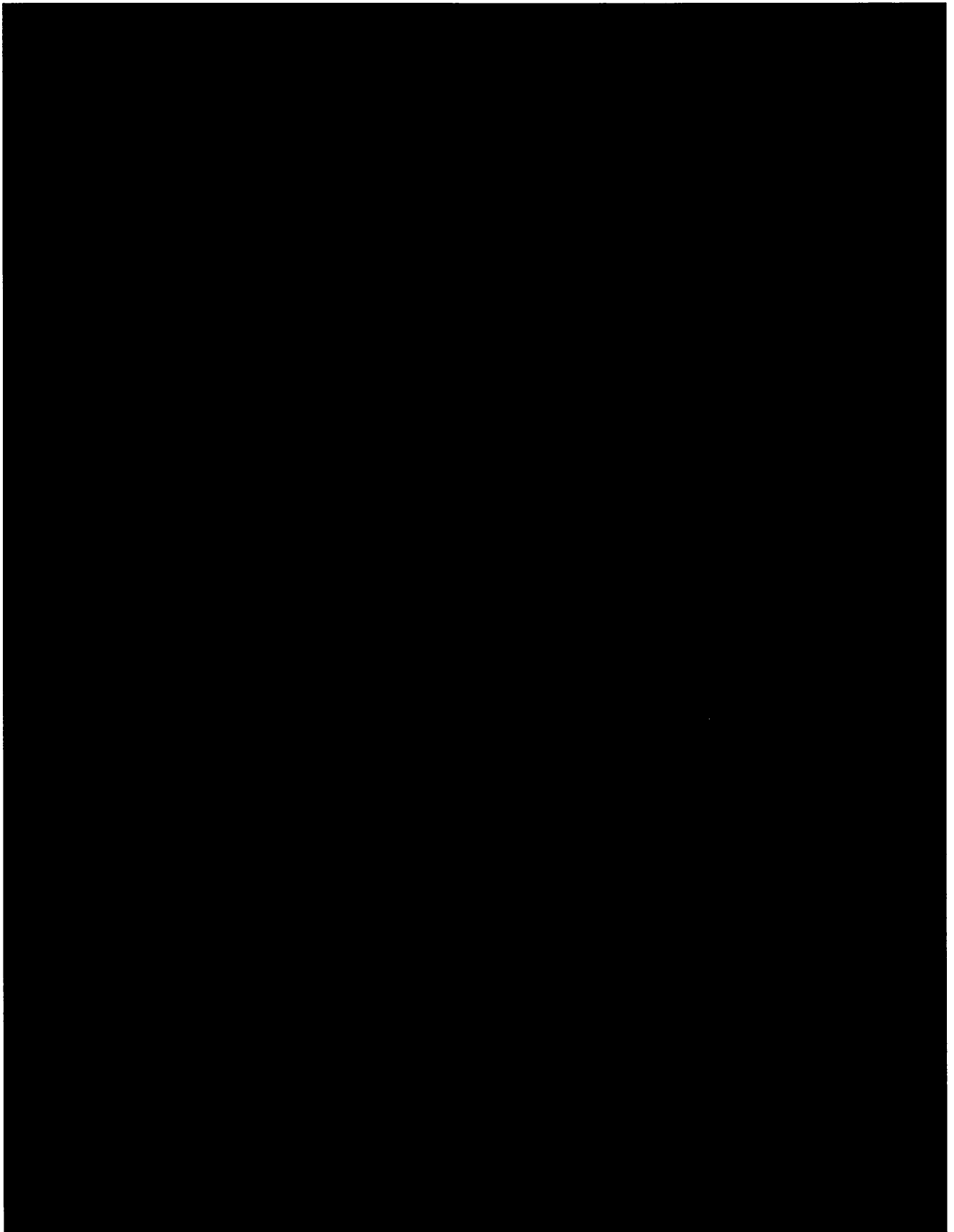


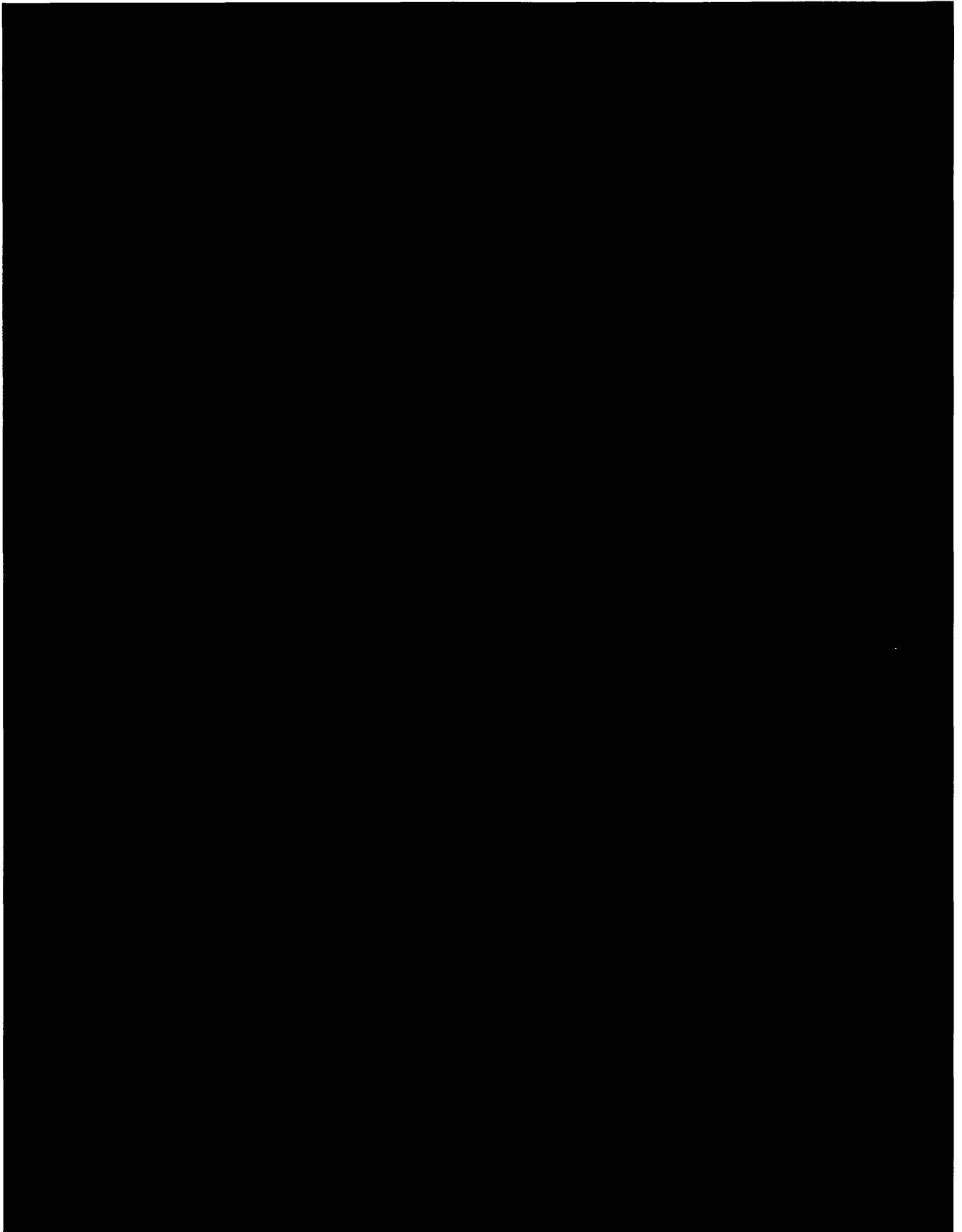


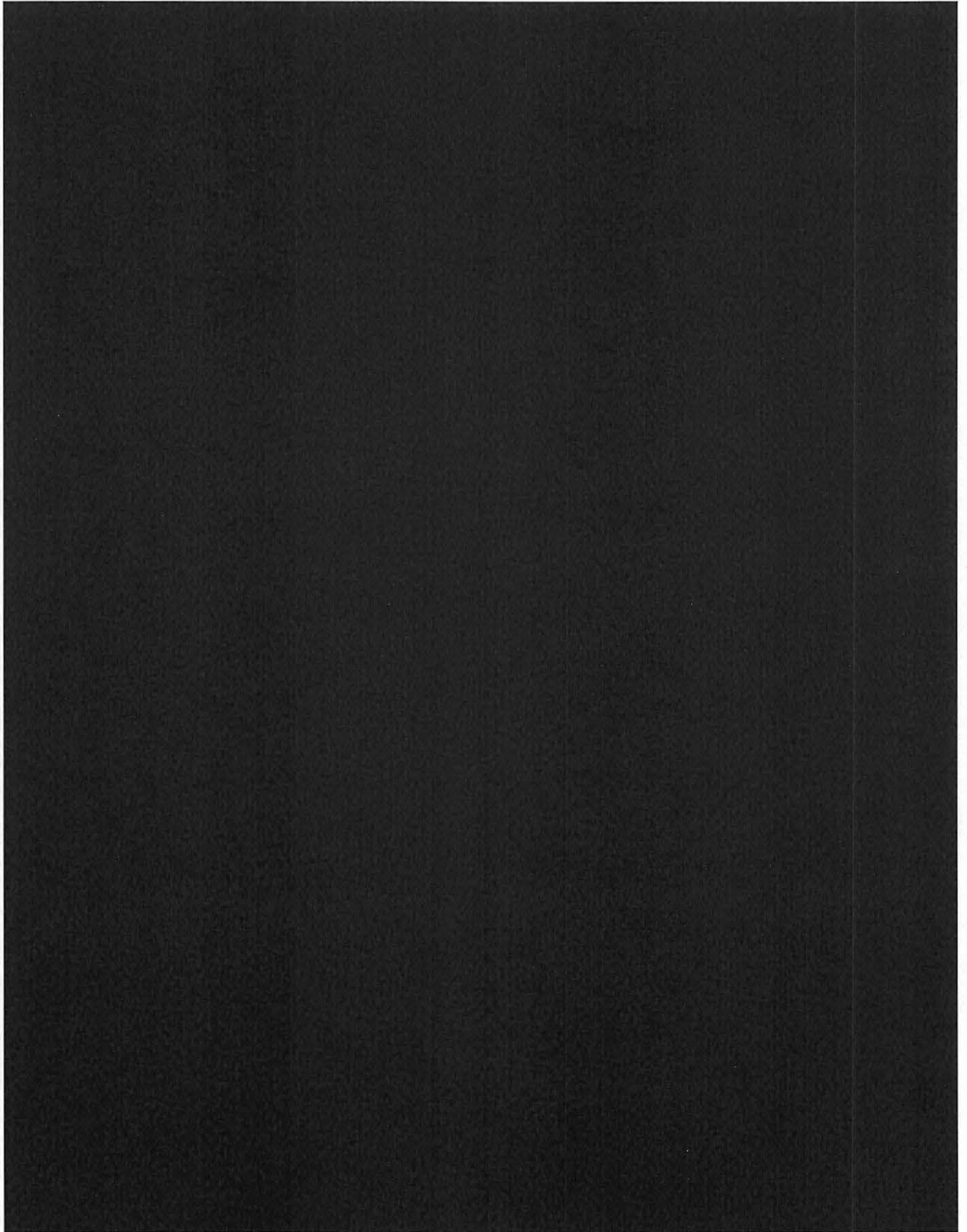












1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.
3

4 I, HEIDI FUEHRER, CSR No. 14145, in and for the
5 State of California, do hereby certify:

6 That prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify to the truth, the whole truth, and nothing but
9 the truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct, and complete transcript
14 of said proceedings;

15 That if the foregoing pertains to the original
16 transcript of a deposition in a Federal Case, before
17 completion of the proceedings, review of the transcript
18 { } Was { X } was not required.

19 I further certify that I am not interested in
20 the event of the action.

21 Witness my hand this 26th day of February,
22 2025.

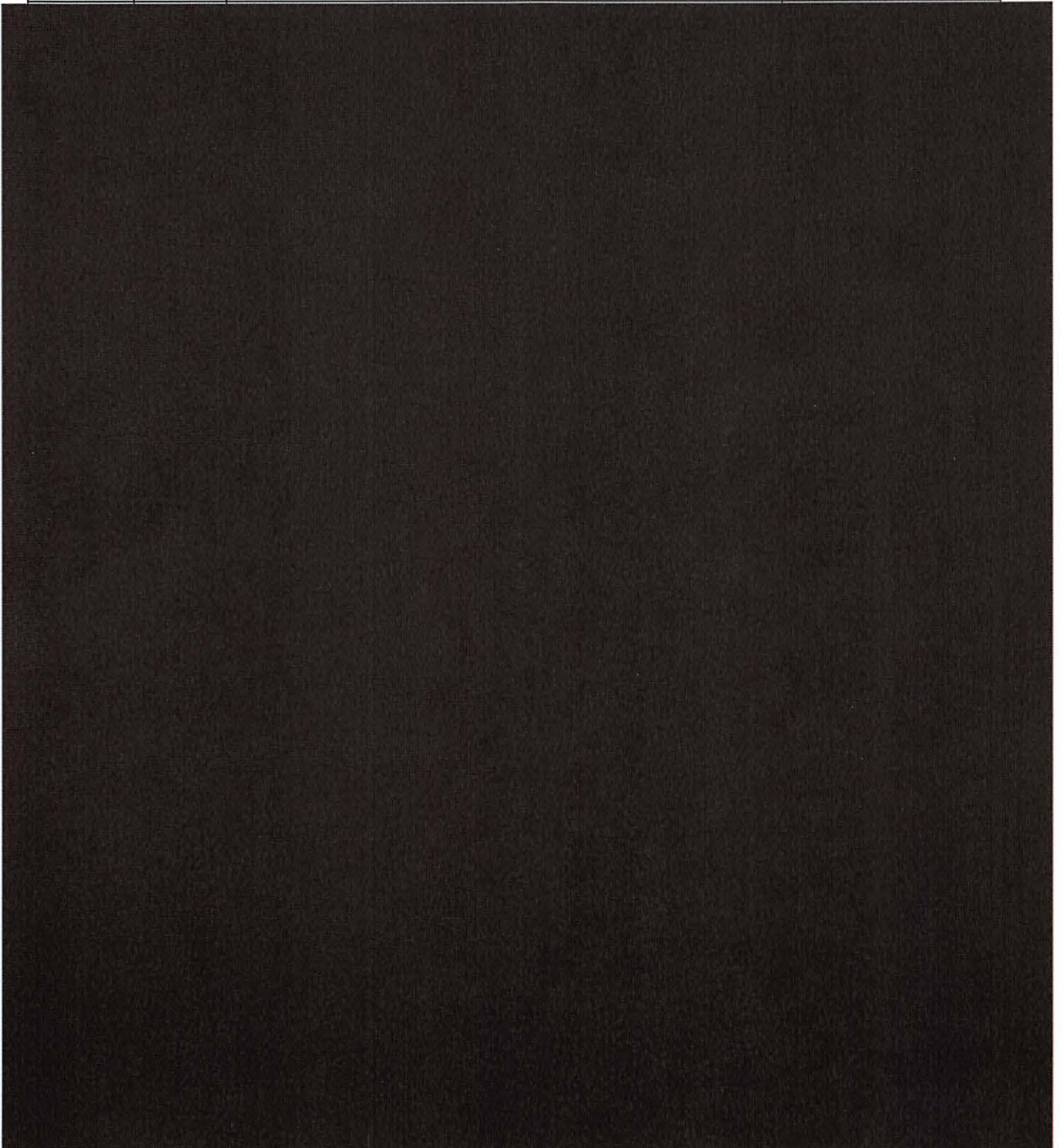
23 Heidi Fuehrer

24 Certified Shorthand Reporter
25 for the State of California

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

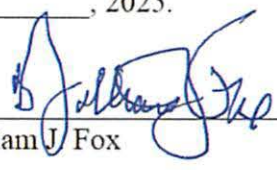
Errata for Deposition of William J. Fox, February 13, 2025

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 24th day of March, 2025.



William J. Fox