

PX 24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE BANK OF AMERICA)
CALIFORNIA UNEMPLOYMENT)
BENEFITS LITIGATION)

) Case Number:
) 3:21:MD-02992-GPC-MSB

_____)
)
) THIS DOCUMENT RELATES TO)
) ACTIONS)
)

CONFIDENTIAL TRANSCRIPT

VIDEOCONFERENCE VIDEOTAPED DEPOSITION OF:

JENNIFER EHRESMAN

WEDNESDAY, FEBRUARY 19, 2025

REPORTED BY: MARCI TIEL, CSR No. 12791

Job No. 10157866

Jennifer Ehresman Confidential
In Re Bank of America CA Unemployment Benefits Litigation

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA

3 IN RE BANK OF AMERICA)
4 CALIFORNIA UNEMPLOYMENT)
5 BENEFITS LITIGATION)
6) Case Number:
7) 3:21:MD-02992-GPC-MSB
8)
9)
10)
11)
12)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

BE IT REMEMBERED that, pursuant to Notice of Taking Deposition, and on Wednesday, February 19, 2025, commencing at the hour of 9:37 a.m. and ending at the hour of 12:16 p.m., before me, MARCI TIEL, a Certified Shorthand Reporter of the State of California, appeared via videoconference

JENNIFER EHRESMAN,

produced as a witness in said action, who, being first duly sworn by the Certified Shorthand Reporter, via videoconference, was thereupon examined as a witness in said cause.

Jennifer Ehresman Confidential
In Re Bank of America CA Unemployment Benefits Litigation

R E M O T E A P P E A R A N C E S

FOR PLAINTIFFS AND THE PROPOSED CLASS:

ALTSHULER BERSON, LLP
177 Post Street, Suite 300
San Francisco, California 91408
415.421.7151
By: CONNIE K. CHAN
Attorney at Law
cchan@altber.com

COTCHETT, PITRE & MCCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, California 94010
650.697.6000
By: VASTI S. MONTIEL
BRIAN DANITZ
Attorneys at Law
vmontiel@cpmlegal.com
bdanitz@cpmlegal.com

FOR THE INDIVIDUAL PLAINTIFFS:

SWIGART LAW GROUP, APC
2221 Camino Del Rio S, Suite 308
San Diego, California 92108
866.219.3343
By: JOSHUA B. SWIGART
Attorney at Law
josh@swigartlawgroup.com

SHAY LEGAL, APC
2221 Camino Del Rio S, Suite 308
San Diego, California 92108
619-222-7429
BY: DANIEL SHAY
Attorney at Law
Dan@shaylegal.com

Confidential
Jennifer Ehresman In Re Bank of America CA Unemployment Benefits Litigation

1 REMOTE APPEARANCES (Continued.)

2
3 FOR THE DEFENDANT AND THE WITNESS:

4 GOODWIN PROCTOR, LLP
5 1900 N Street, N.W.
6 Washington, D.C. 20036
7 202.346.4029
8 By: MATTHEW RIFFEE
9 ANGELICA RANKINS
10 NGHIA JONES
11 Attorneys at Law
12 mriffee@goodwinlaw.com
13 arankins@goodwinlaw.com
14 nghiajones@goodwinlaw.com

15 GOODWIN PROCTOR, LLP
16 620 Eighth Avenue
17 New York, New York 10018
18 212.813.8800
19 BY: ANNE BAYLY BUCK
20 Attorney at Law
21 abuck@goodwinlaw.com

22 Also Present:

23 COLE HOLLAND - Videographer
24
25

Jennifer Ehresman Confidential
In Re Bank of America CA Unemployment Benefits Litigation

1 WEDNESDAY, FEBRUARY 19, 2025

2
3 THE VIDEOGRAPHER: We are now on the
4 record. Today's date is February 19th, 2025, and the
5 time is 9:37 a.m.

6 This is the remote, video deposition of
7 Jennifer Ehresman via Zoom videoconference being
8 taken in the matter of In Re Bank of America
9 California Unemployment Benefits Litigation on behalf
10 of the plaintiff. This is pending in the United
11 States District Court, Southern District of
12 California. This is case number
13 3:21-md-02992-GPC-MSB.

14 The witness is appearing remotely from
15 Philadelphia, Pennsylvania.

16 My name is Cole Holland appearing for
17 Aptus Court Reporting located at 401 West A Street,
18 Suite 1680, San Diego, California 92101. I am the
19 official videographer, and this is the only
20 authorized video recording of this deposition. The
21 audio and video recording will take place at all
22 times unless all counsel agree to go off the record.

23 Will counsel please identify yourselves
24 and state whom you represent starting with the
25 noticing attorney?

Jennifer Ehresman Confidential
In Re Bank of America CA Unemployment Benefits Litigation

1 MS. CHAN: Connie Chan of Altshuler
2 Berzon on behalf of the plaintiffs, and with me today
3 is Vasti Montiel with Cotchett, Pitre & McCarthy also
4 on behalf of plaintiffs.

5 MR. RIFFEE: Matthew Riffie here on
6 behalf of Bank of America, and with me is Angelica
7 Rankins also of Goodwin Proctor on behalf of Bank of
8 America.

9 THE VIDEOGRAPHER: The court reporter
10 today is Marci Tiel, and she may now swear in or
11 affirm the deponent.

12 THE REPORTER: My name is Marci Tiel,
13 Certified Shorthand Reporter Number 12791.

14 Please raise your right hand.
15

16 JENNIFER EHRESMAN,
17 was called as a witness, and after having been first
18 duly sworn, testified as follows:
19

20 EXAMINATION

21 BY MS. CHAN:

22 Q. Thank you. Good morning, Ms. Ehresman. Have
23 you been deposed before?

24 A. Yes.

25 Q. When?

Jennifer Ehresman Confidential
In Re Bank of America CA Unemployment Benefits Litigation

- 1 A. Not recently.
- 2 Q. Was that in connection with your employment
3 with the bank?
- 4 A. No.
- 5 Q. Have you ever been deposed as a bank -- in
6 your capacity as a bank employee?
- 7 A. Not recently. Not that I recall.
- 8 Q. Not that you recall or not recently?
- 9 A. Neither.
- 10 Q. Okay. What was the matter that you were
11 deposed about?
- 12 A. It was an employee matter.
- 13 Q. Okay. You understand that you are testifying
14 under oath and under penalty of perjury today, the
15 same as if you were in court?
- 16 A. Yes.
- 17 Q. What, if anything, did you do to prepare for
18 today's deposition?
- 19 A. I had a couple meetings with Matthew and
20 Angelica.
- 21 Q. Were any non-lawyers present at those
22 meetings?
- 23 A. No.
- 24 Q. How many times did you meet with Mr. Riffie
25 and Ms. Rankins?

Jennifer Ehresman Confidential
In Re Bank of America CA Unemployment Benefits Litigation

1 A. Two times.

2 Q. When did you meet with them?

3 A. Once via phone and yesterday in Philadelphia.

4 Q. Did you speak with anybody else about this
5 deposition?

6 A. No.

7 Q. Have you spoken to anyone else about this
8 case?

9 A. No.

10 MR. RIFFEE: Objection. Form.

11 BY MS. CHAN:

12 Q. Have you spoken to anyone who has already had
13 their deposition taken in this case about their
14 deposition testimony?

15 A. No.

16 Q. Have you reviewed any prior deposition
17 testimony in this case?

18 A. No.

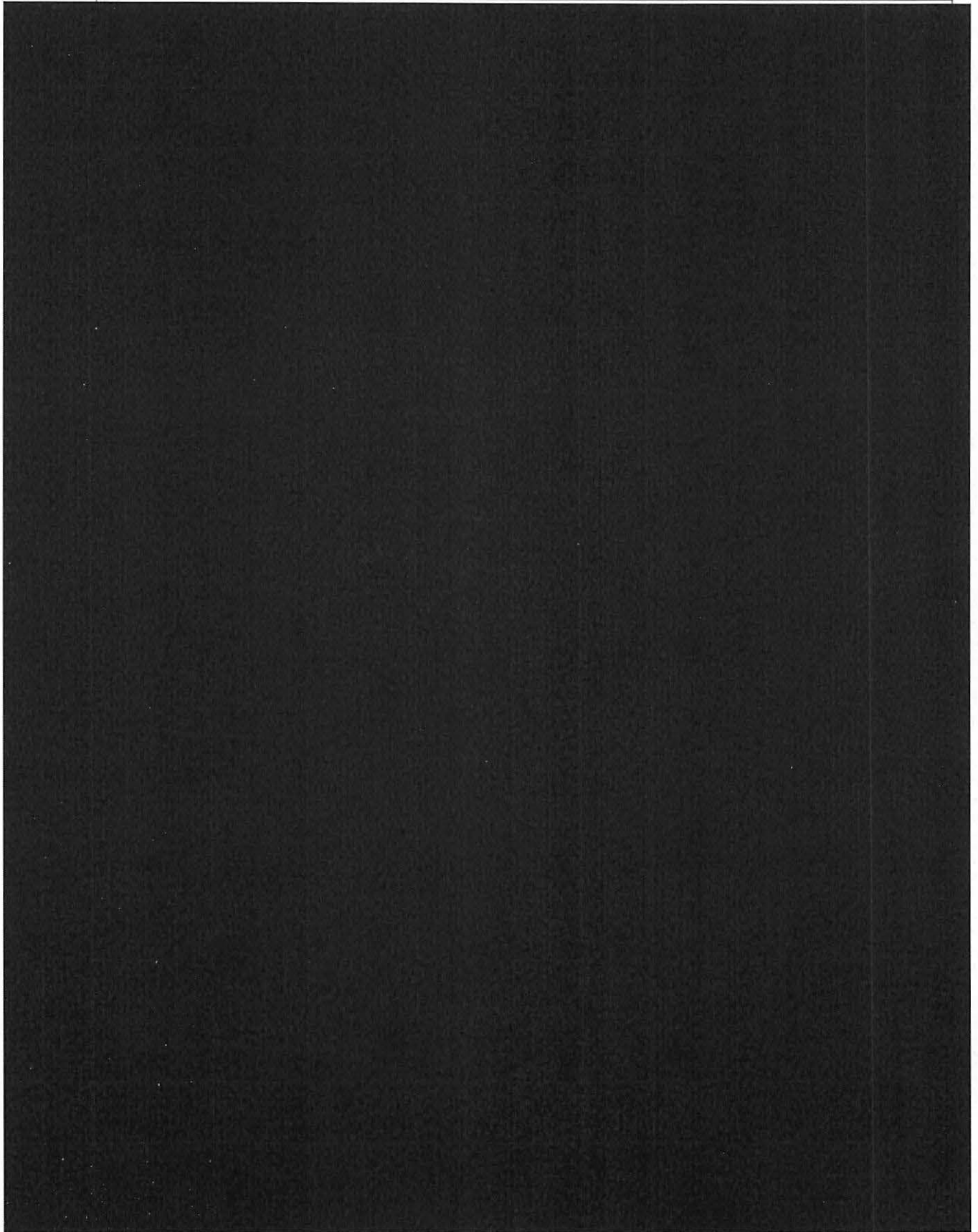
19 Q. Did you review any documents in preparation
20 for today?

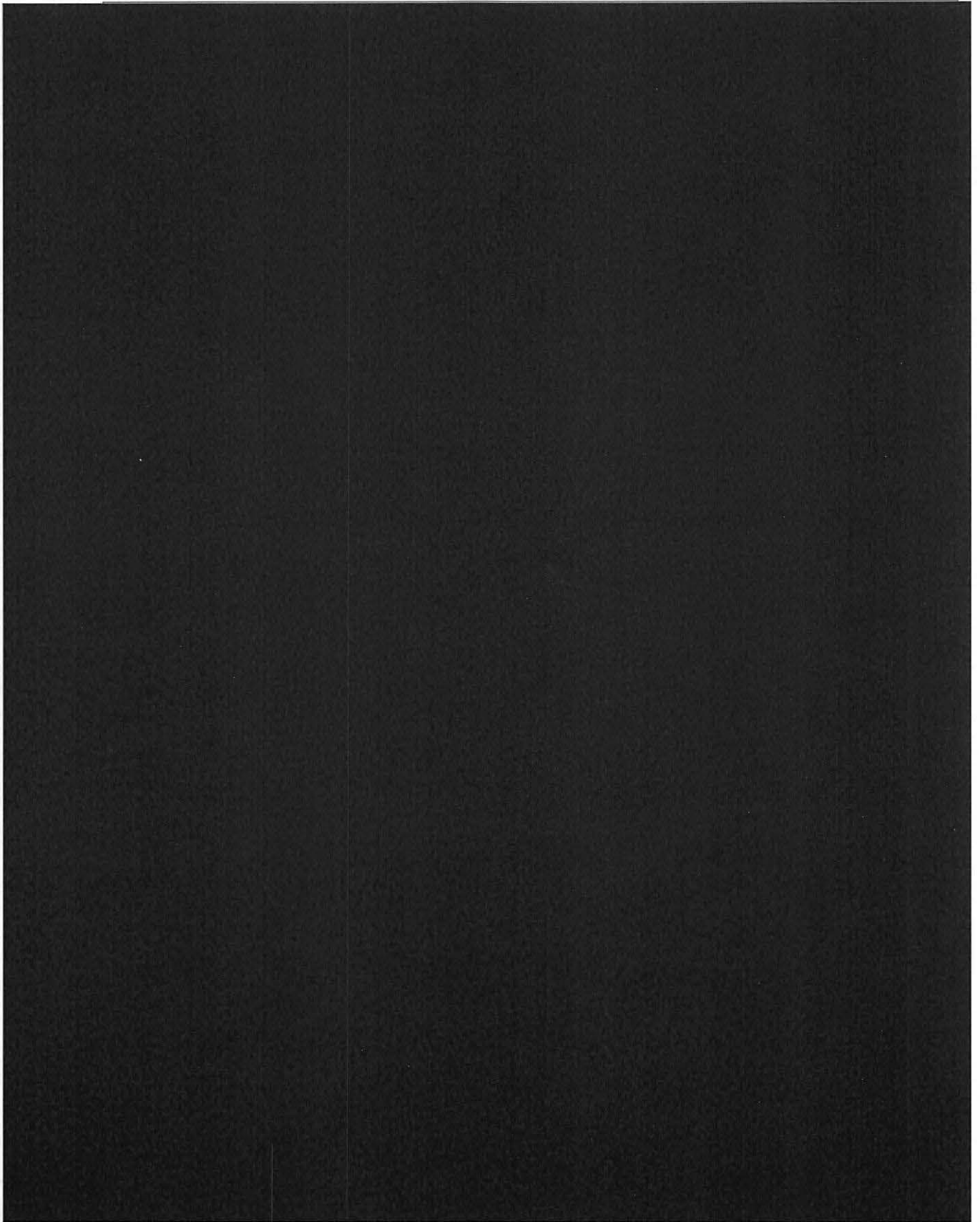
21 A. I reviewed a couple emails.

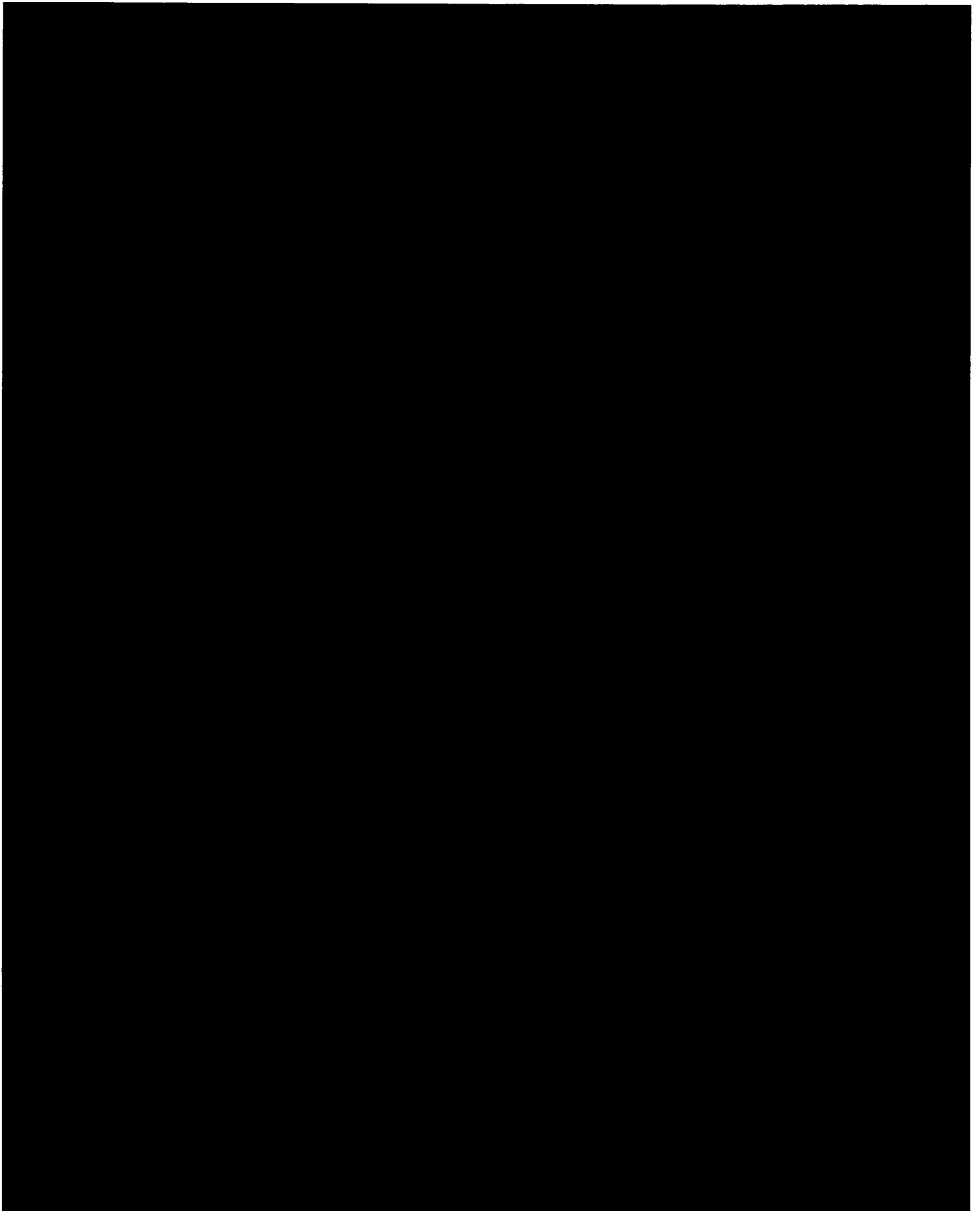
22 Q. Were those emails that your attorneys
23 provided you?

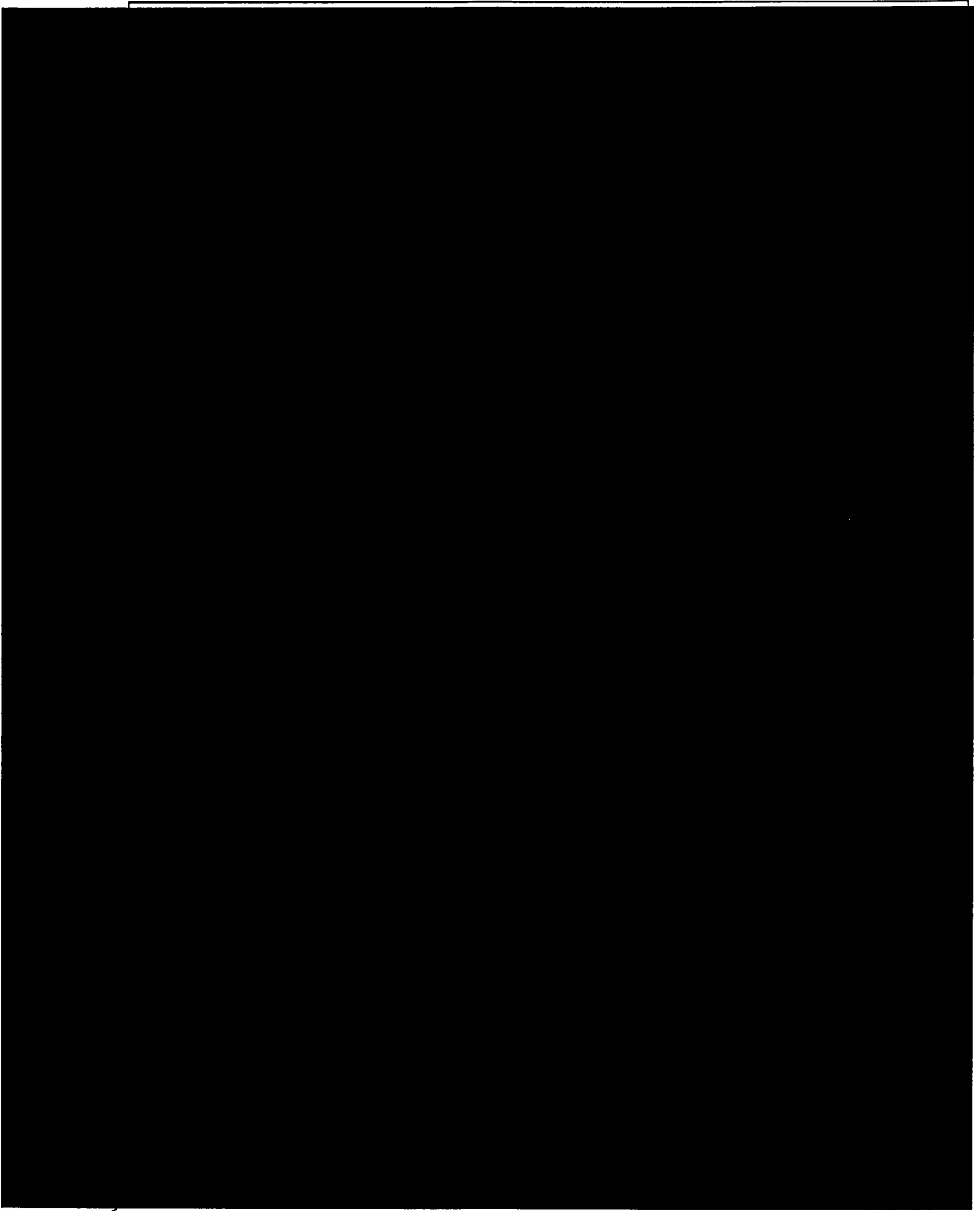
24 A. Yes.

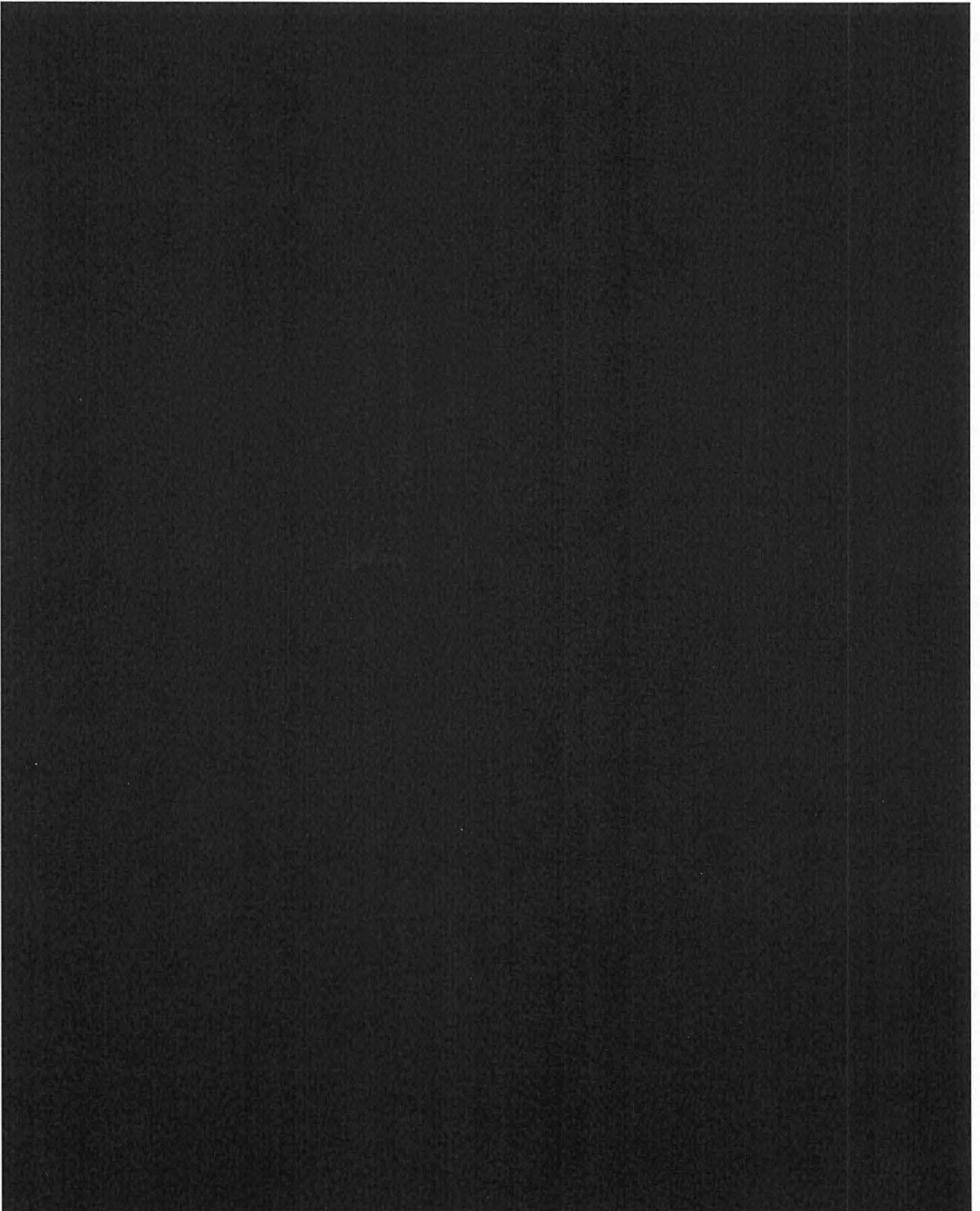
25 Q. Did you review any other documents beyond

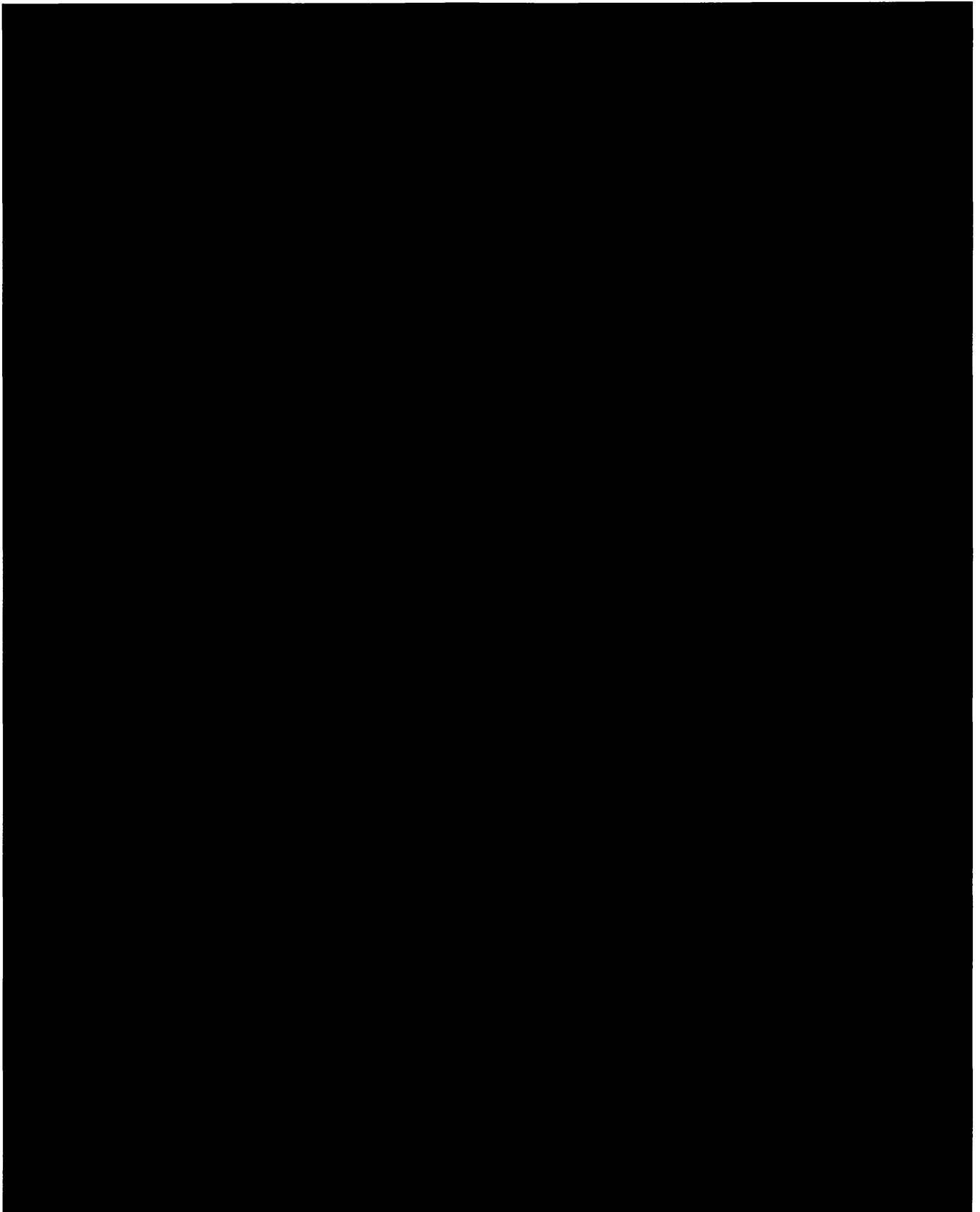


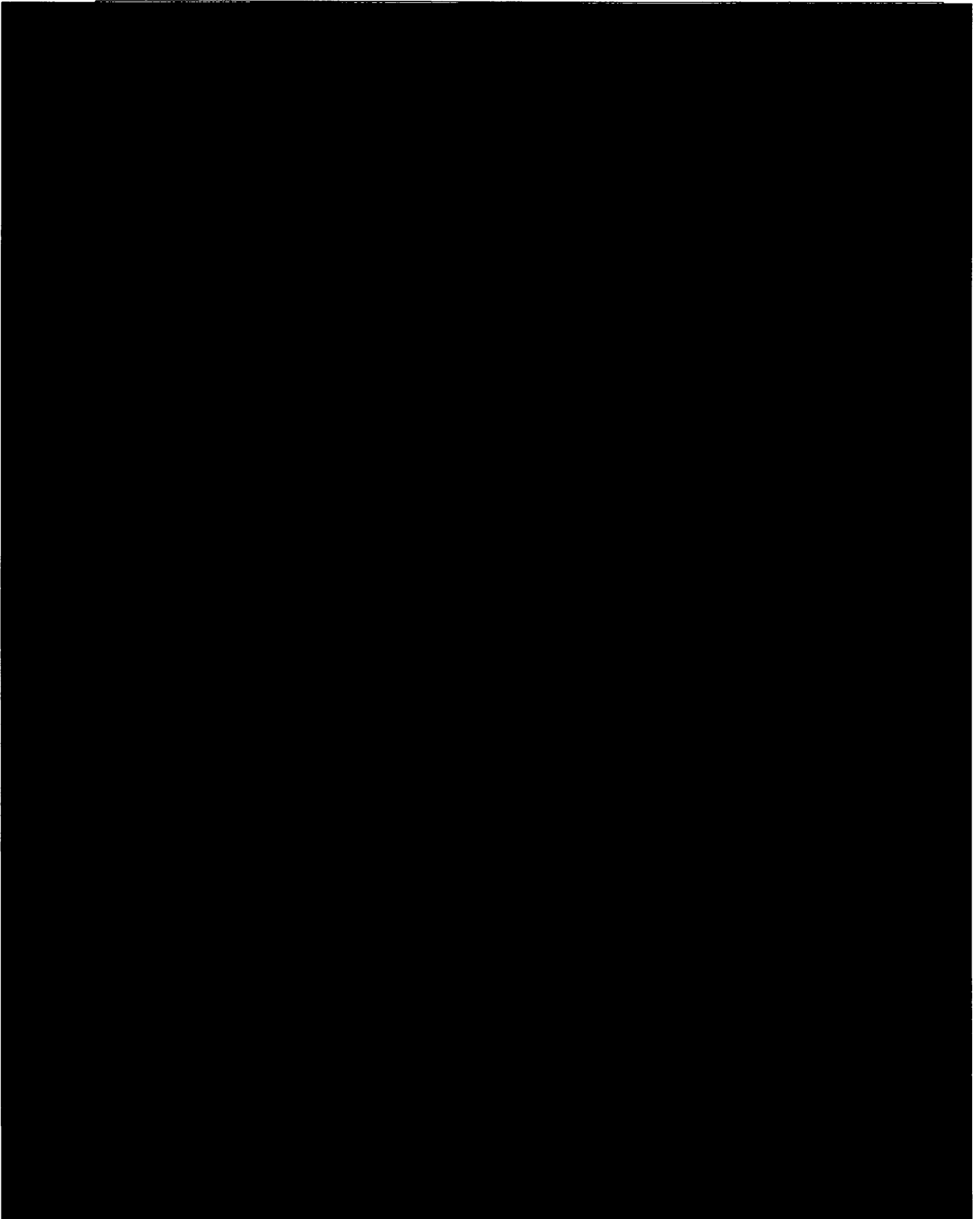




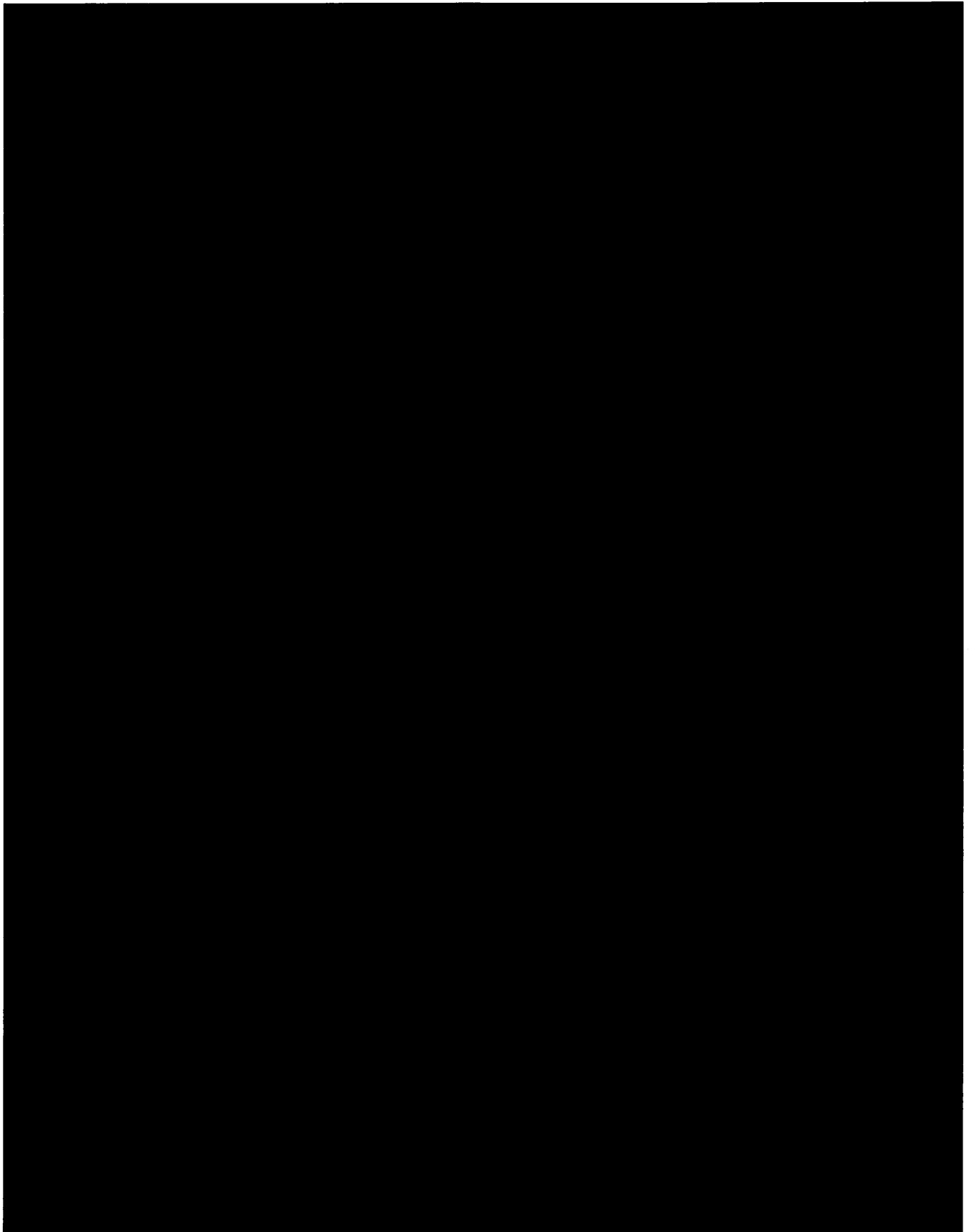


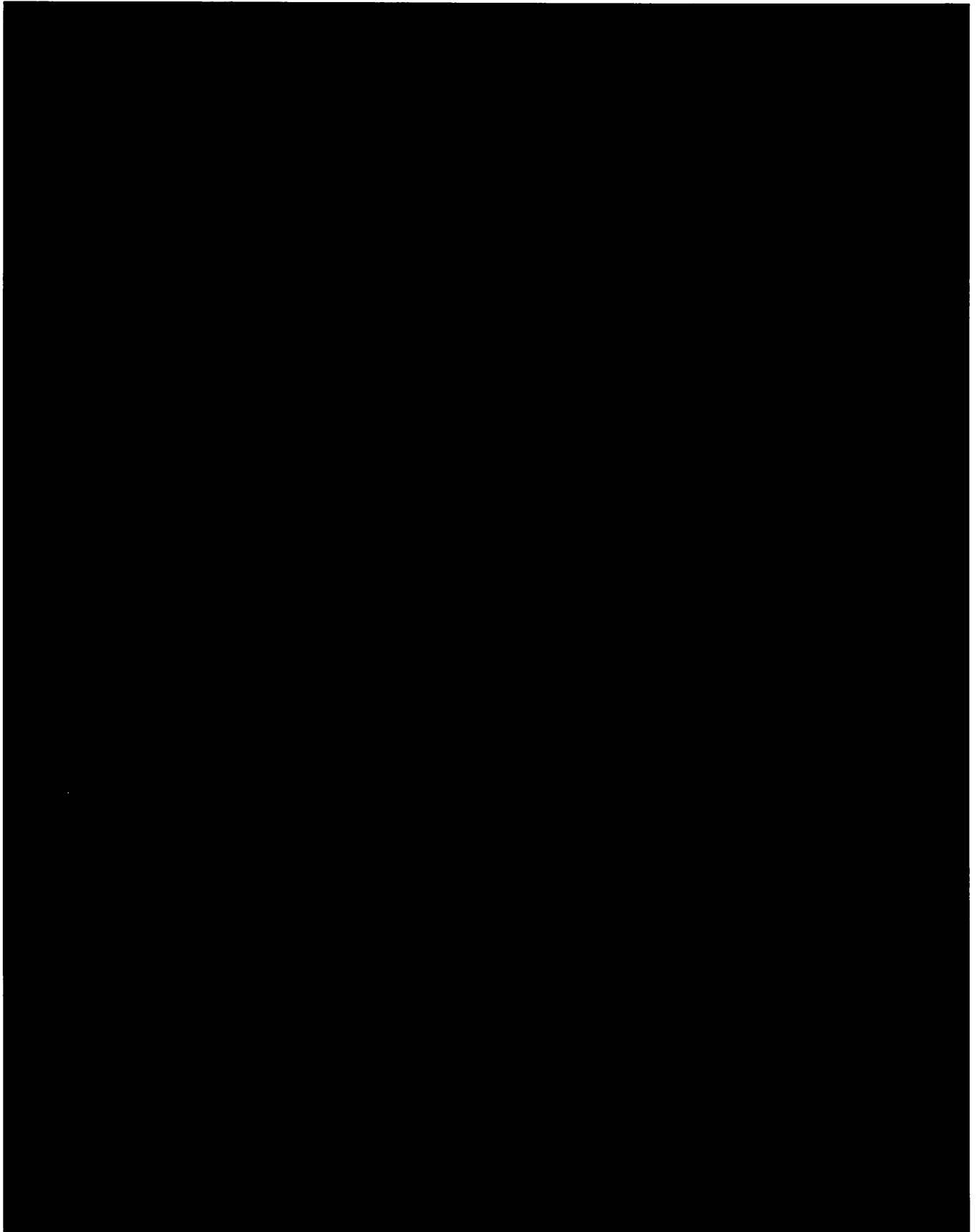


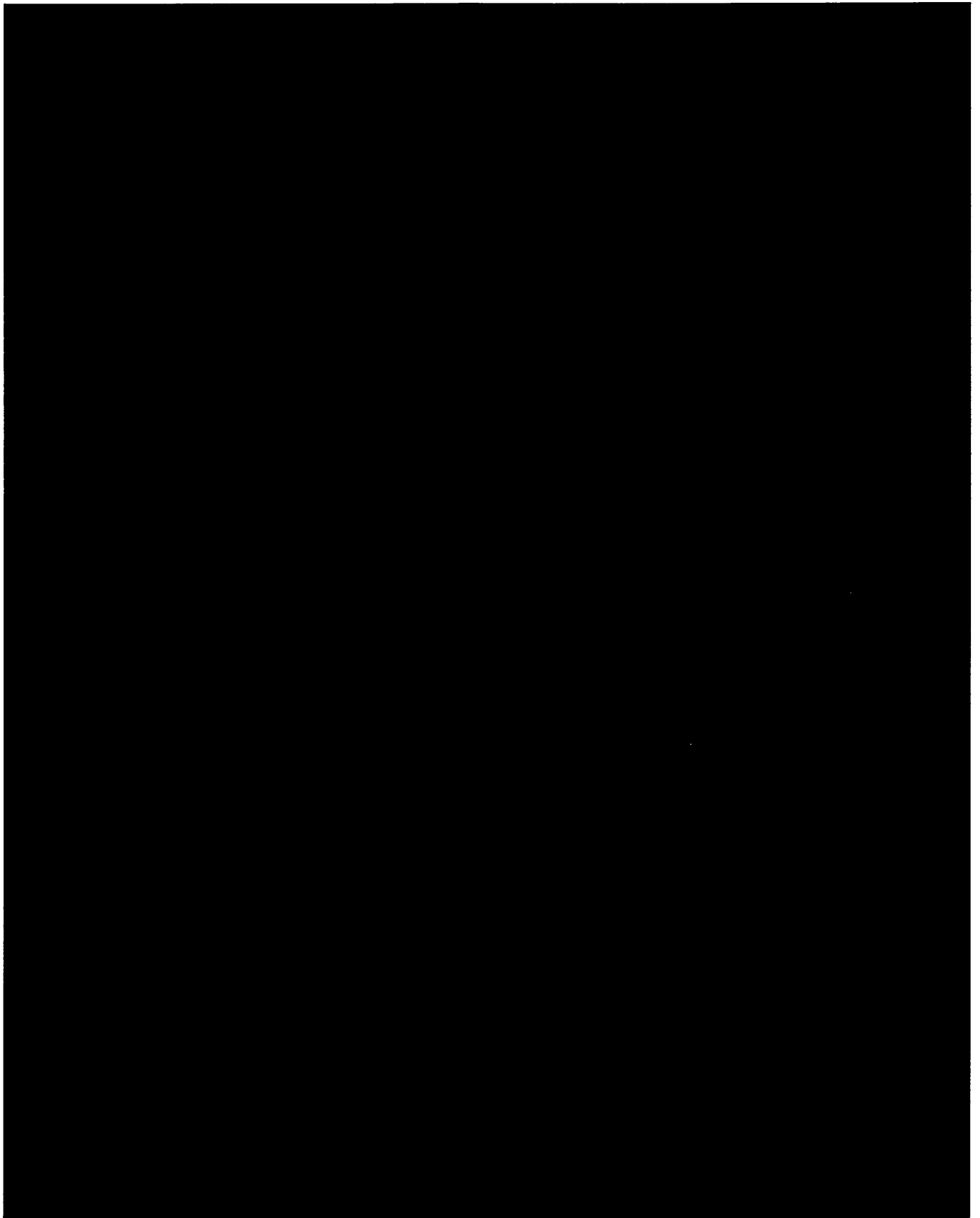


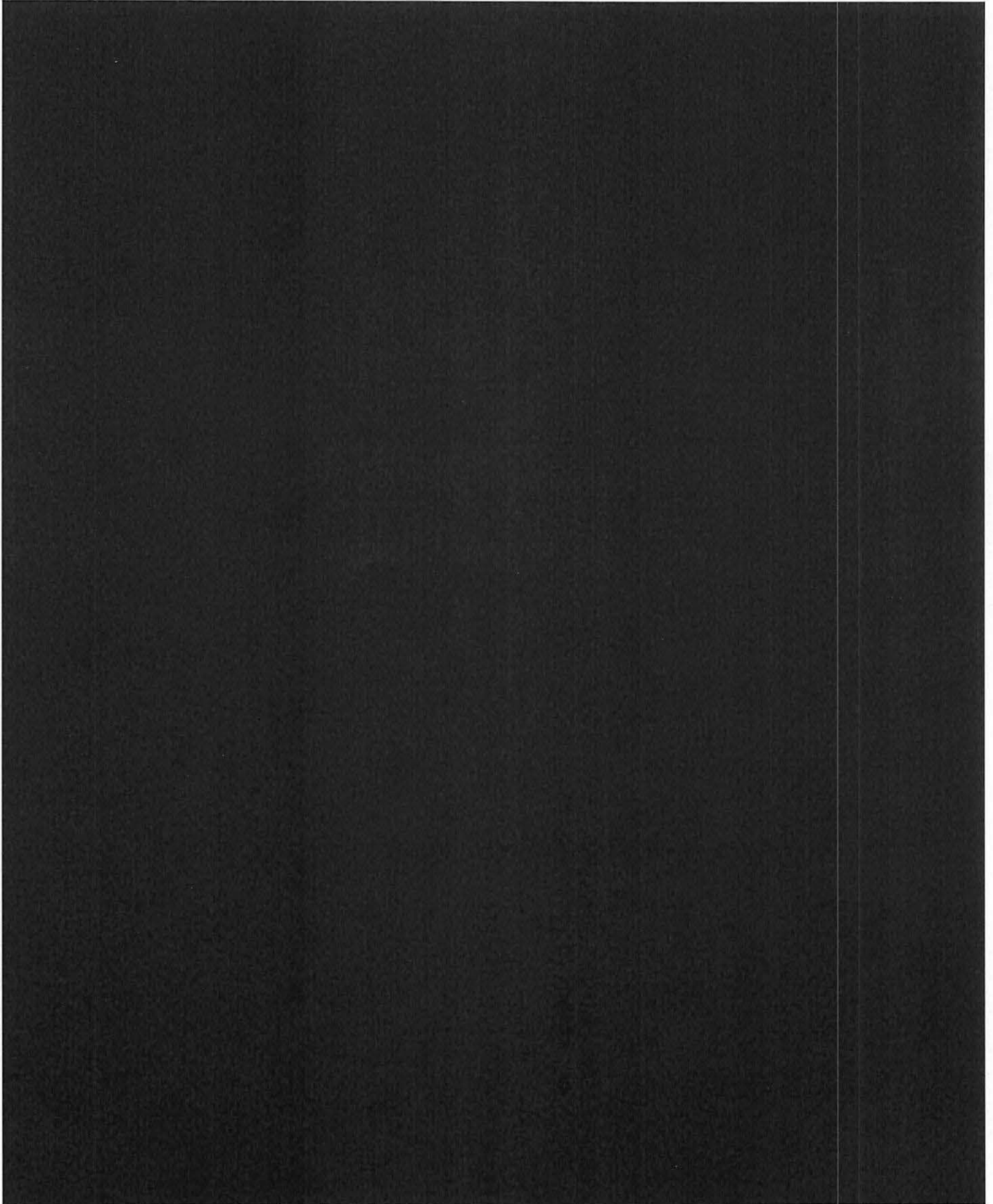


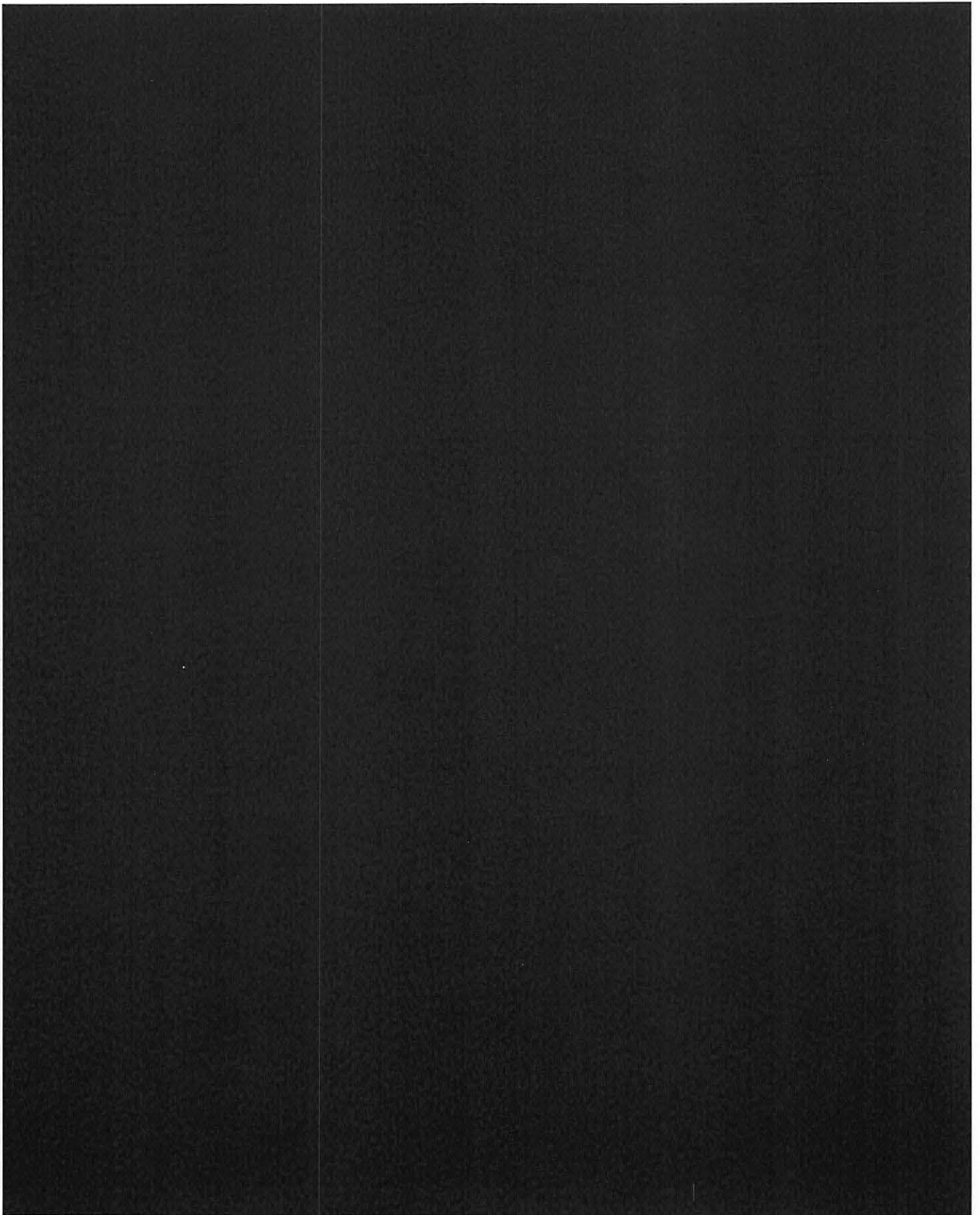
A thin, diagonal line extends from the bottom-left corner of the black redaction box towards the bottom-left corner of the page.

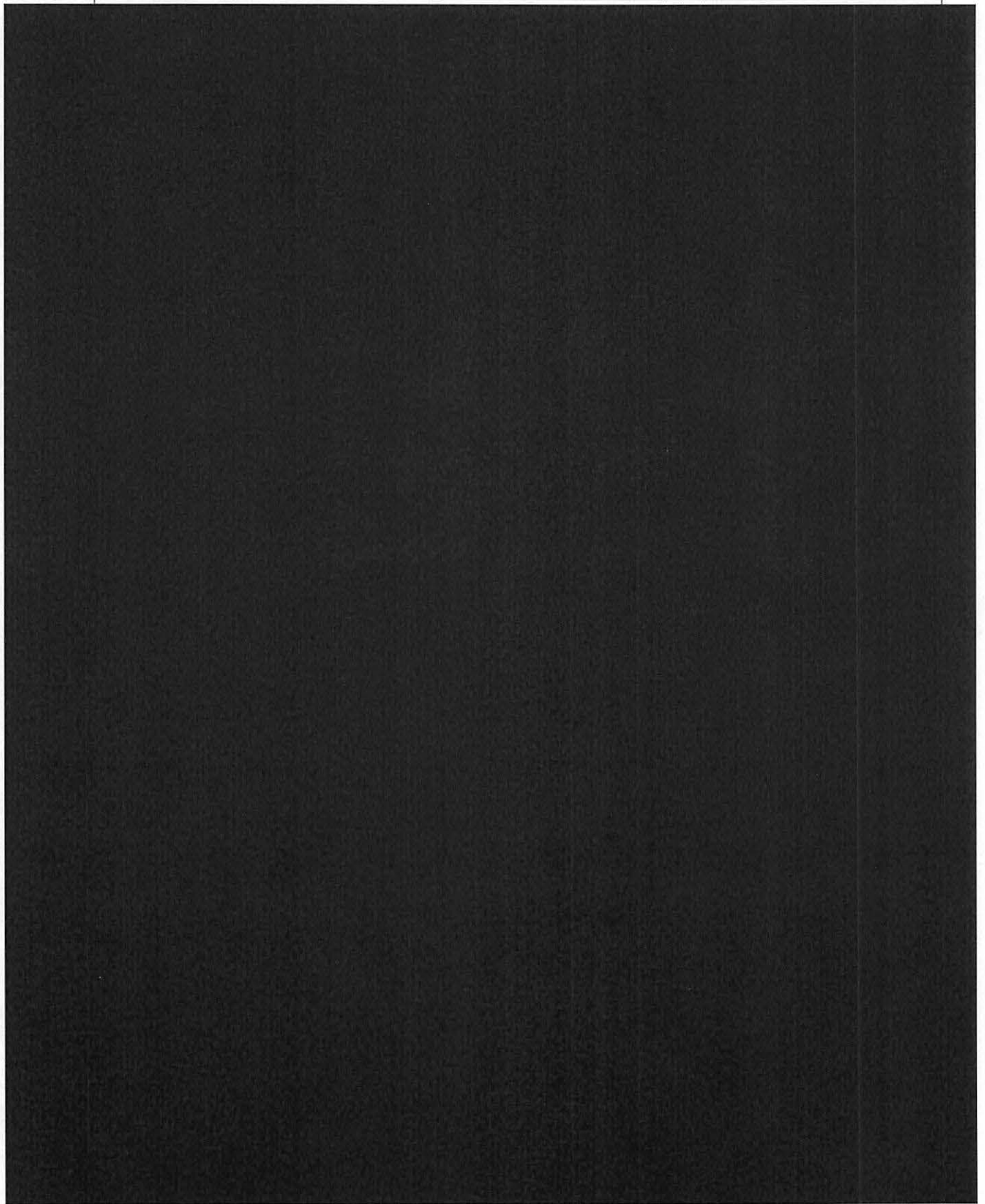


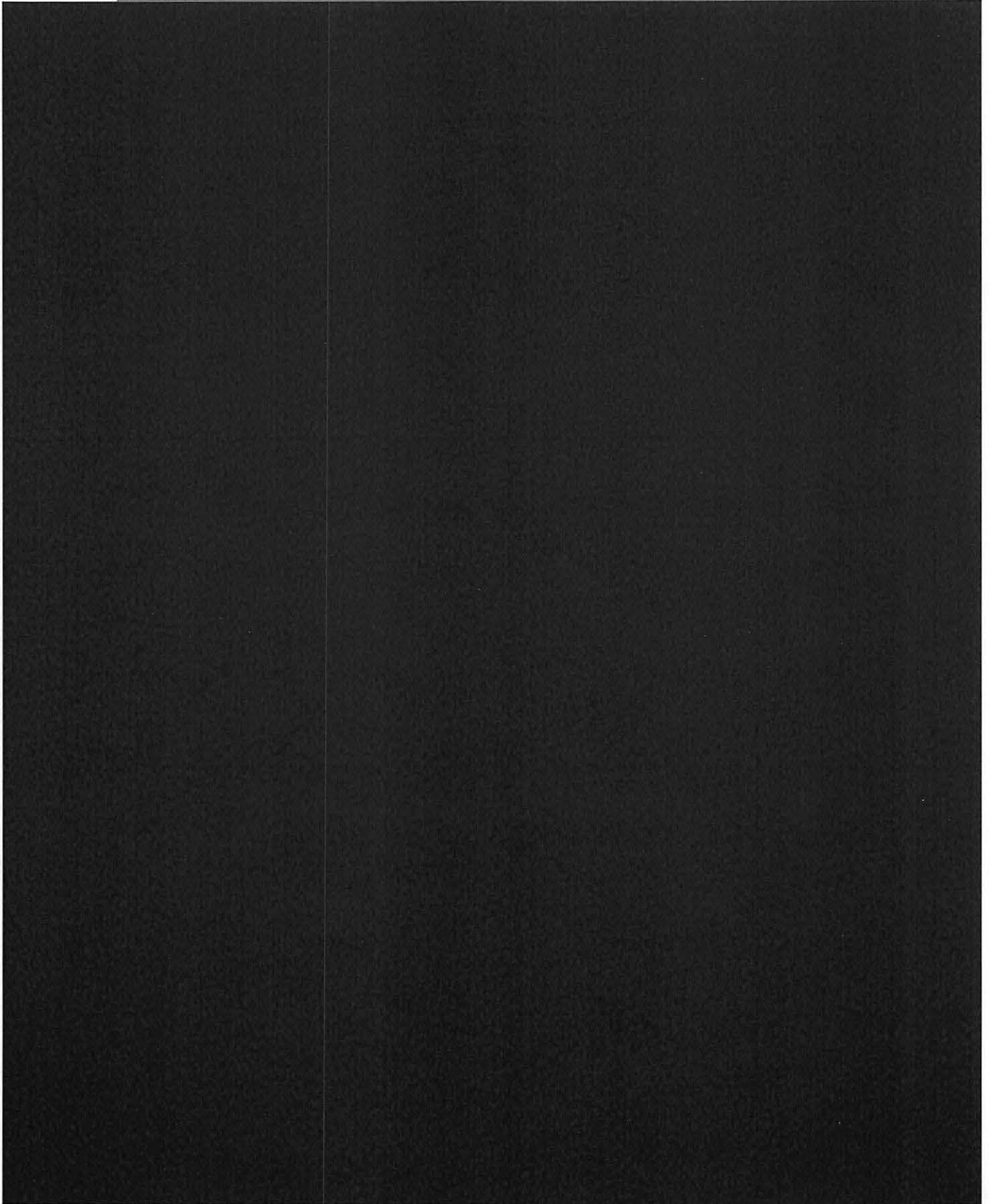


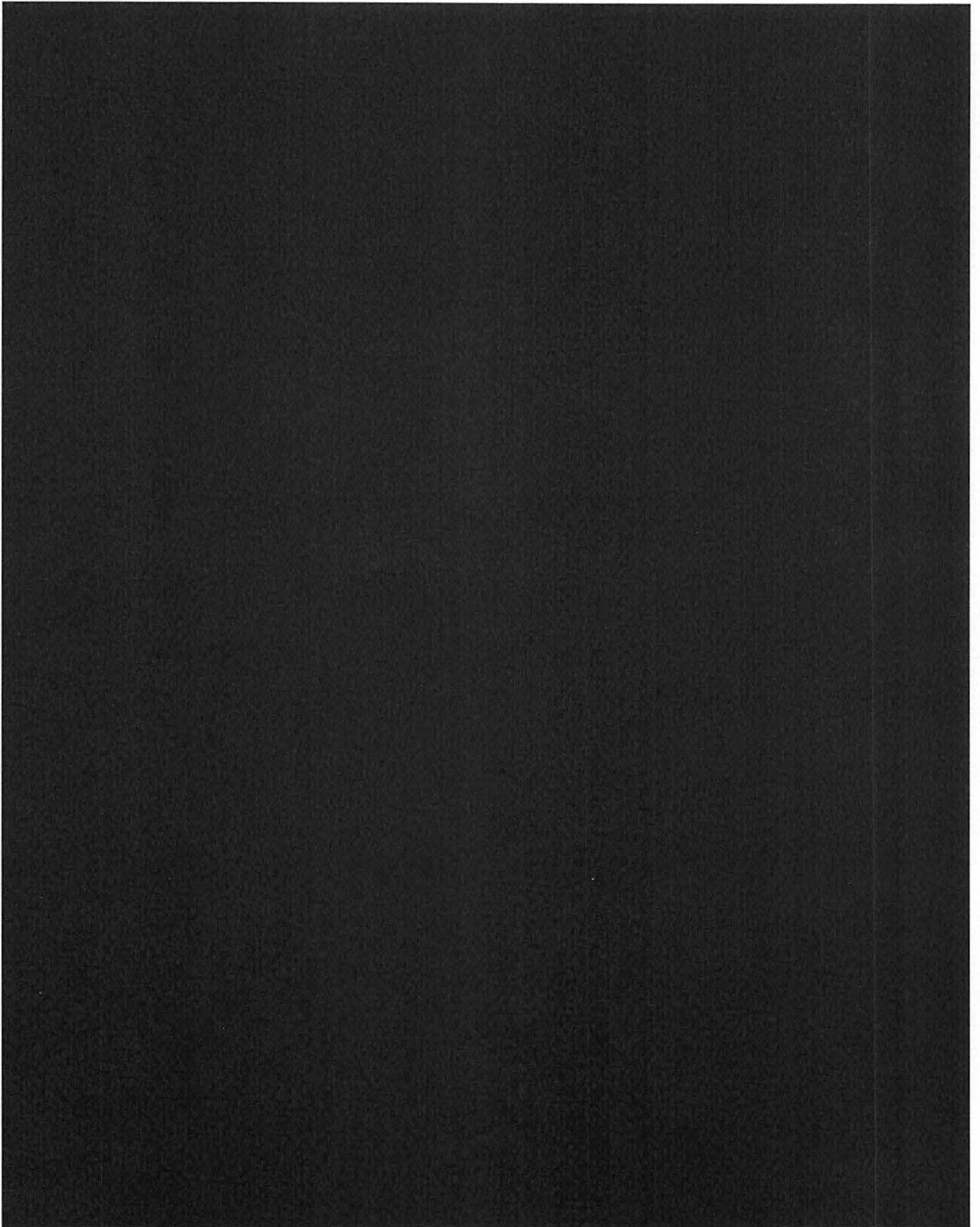


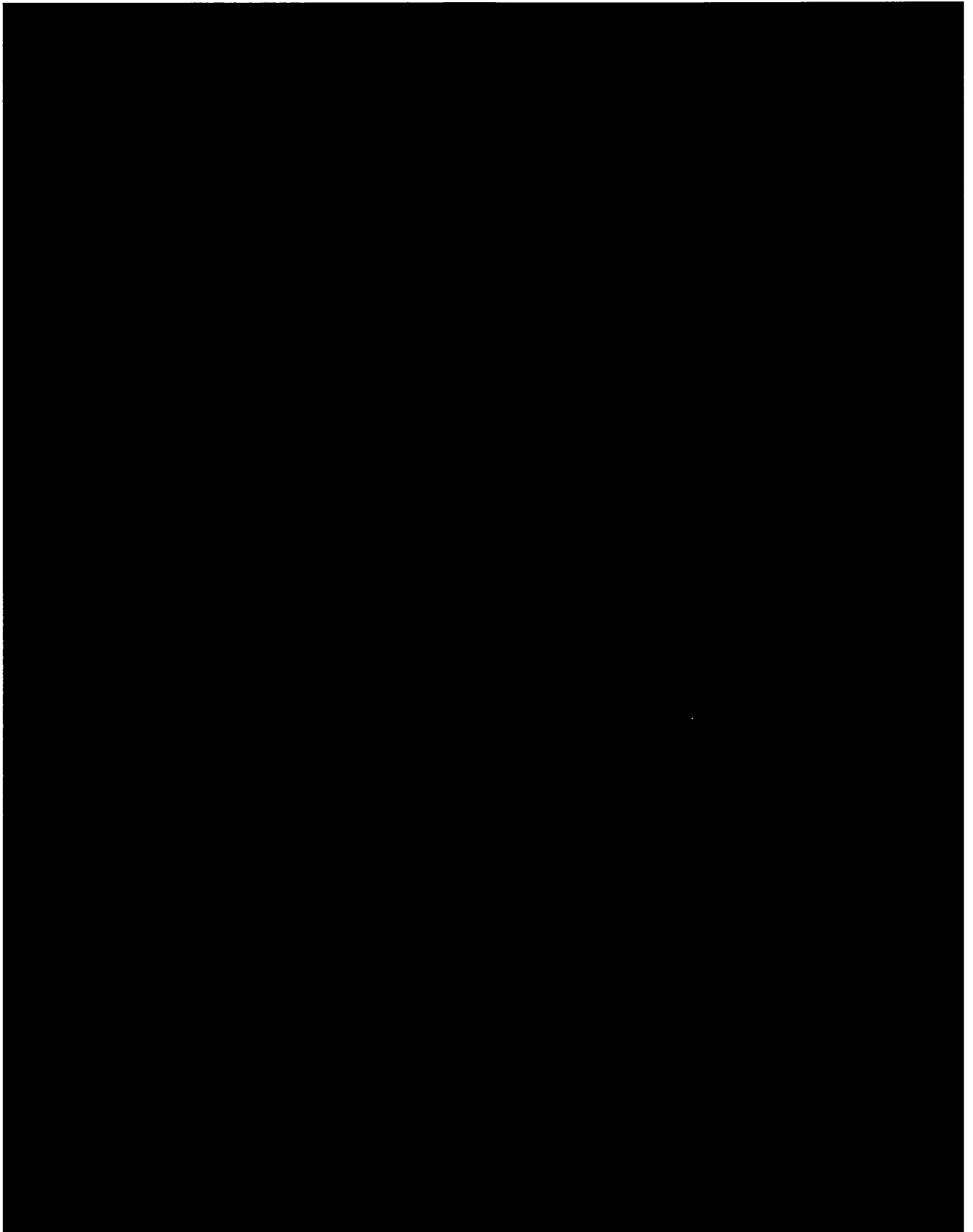


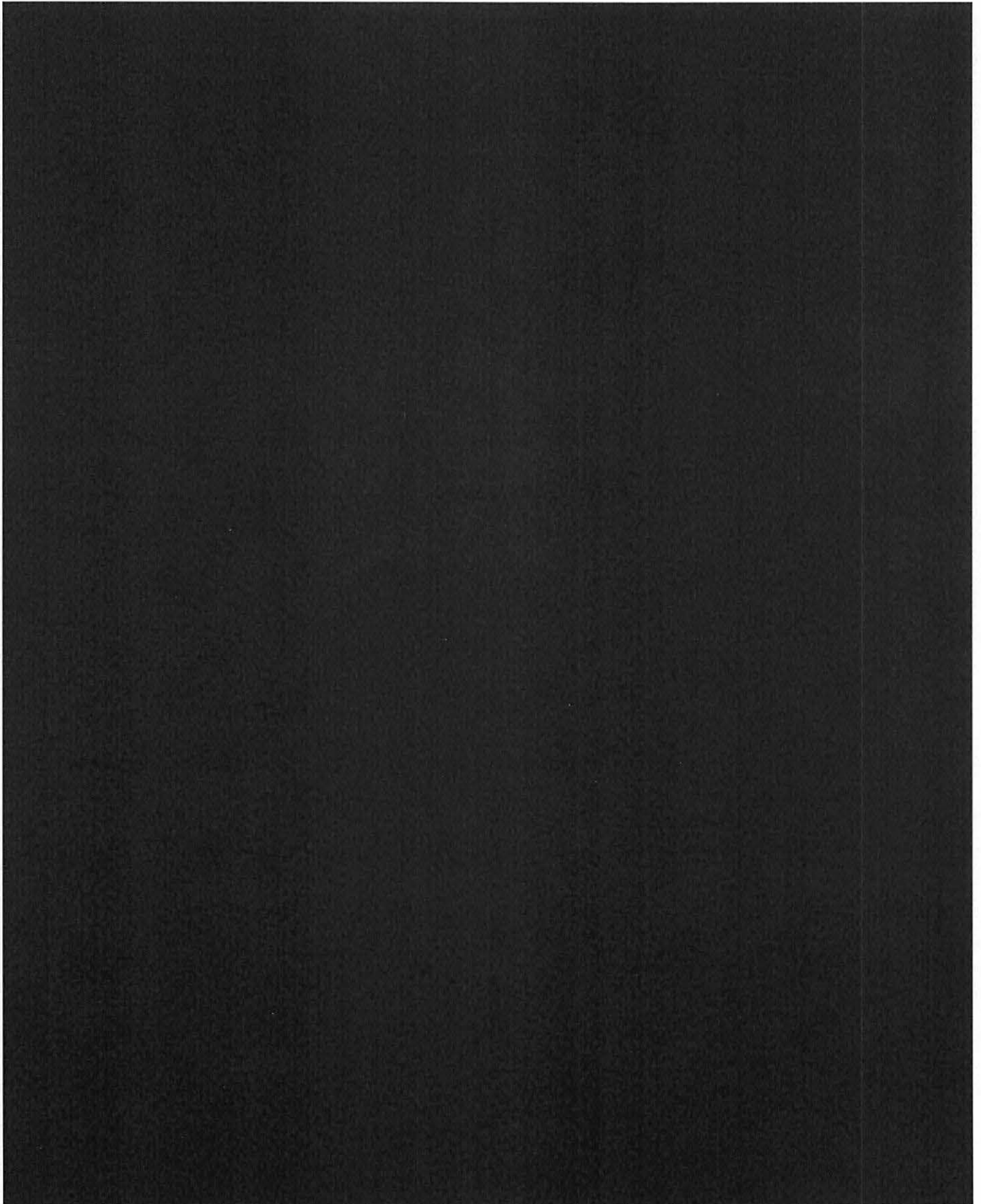


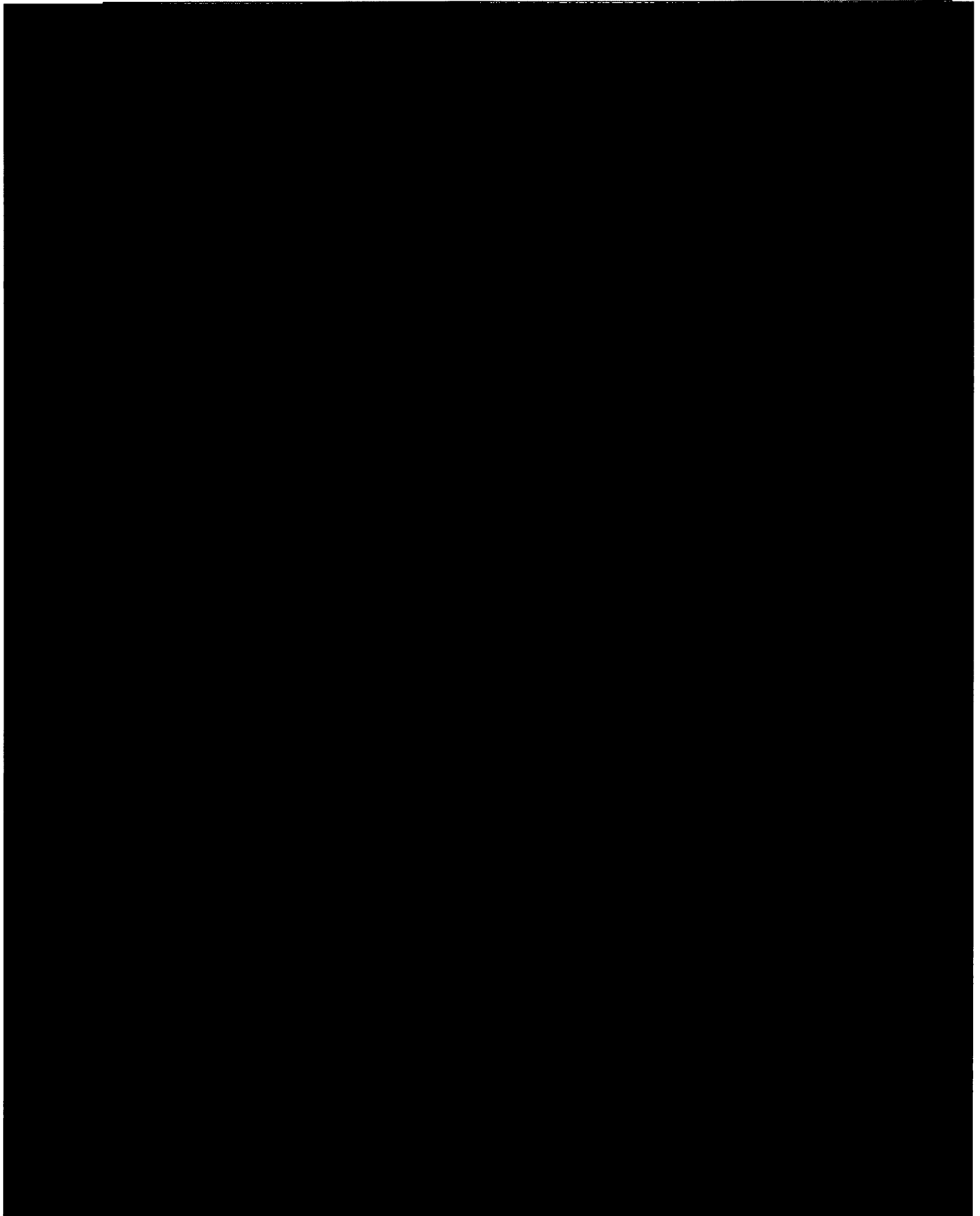




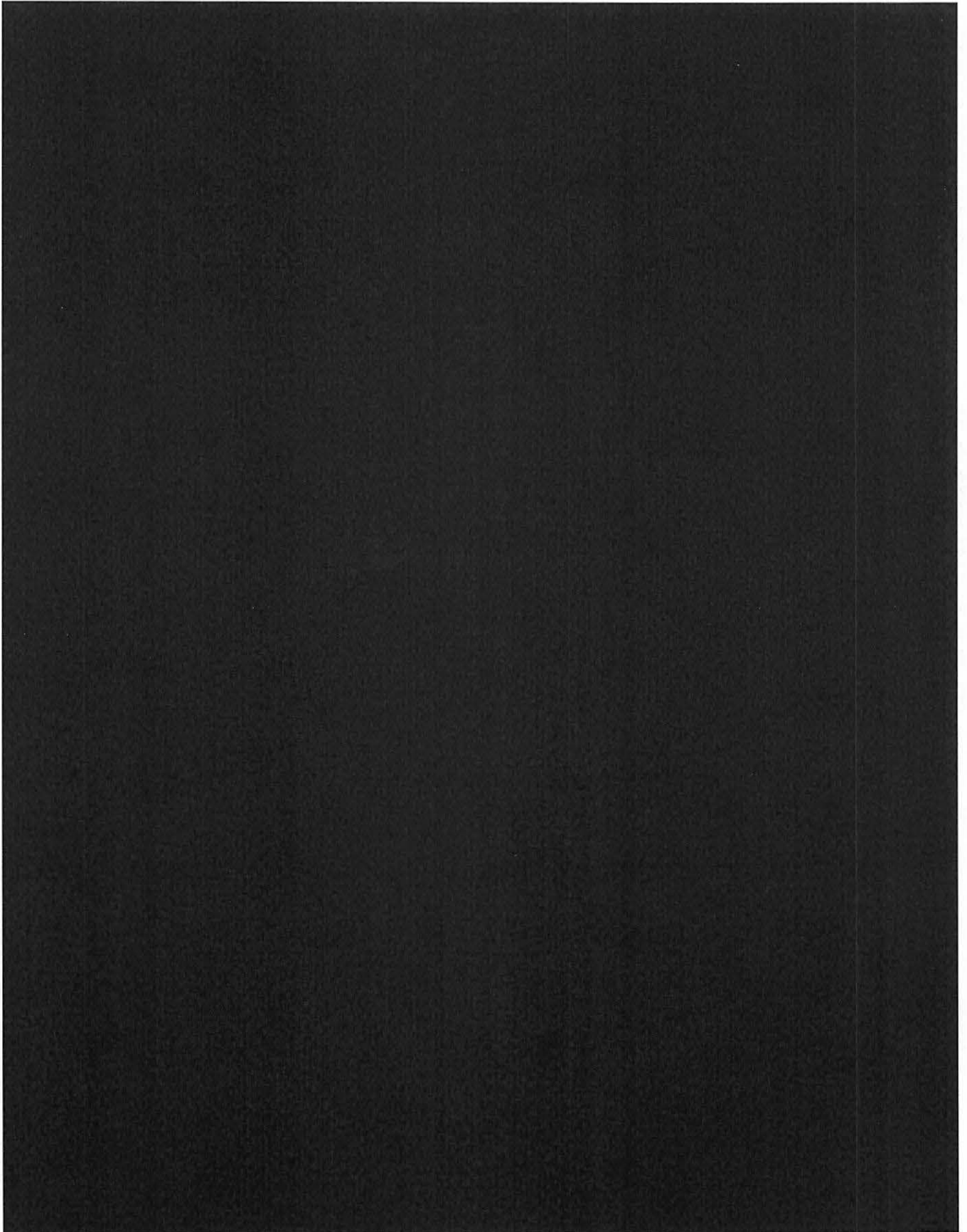


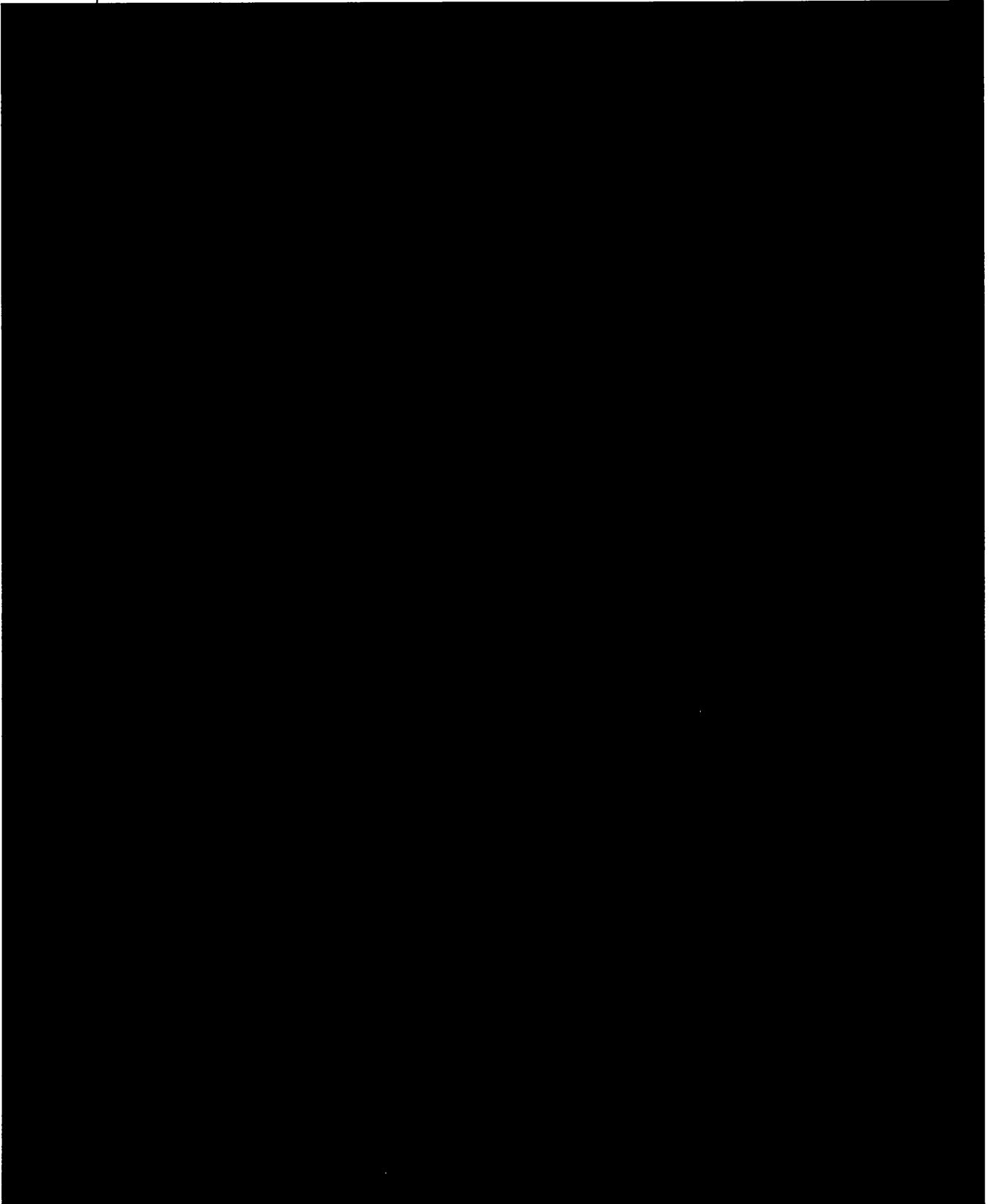


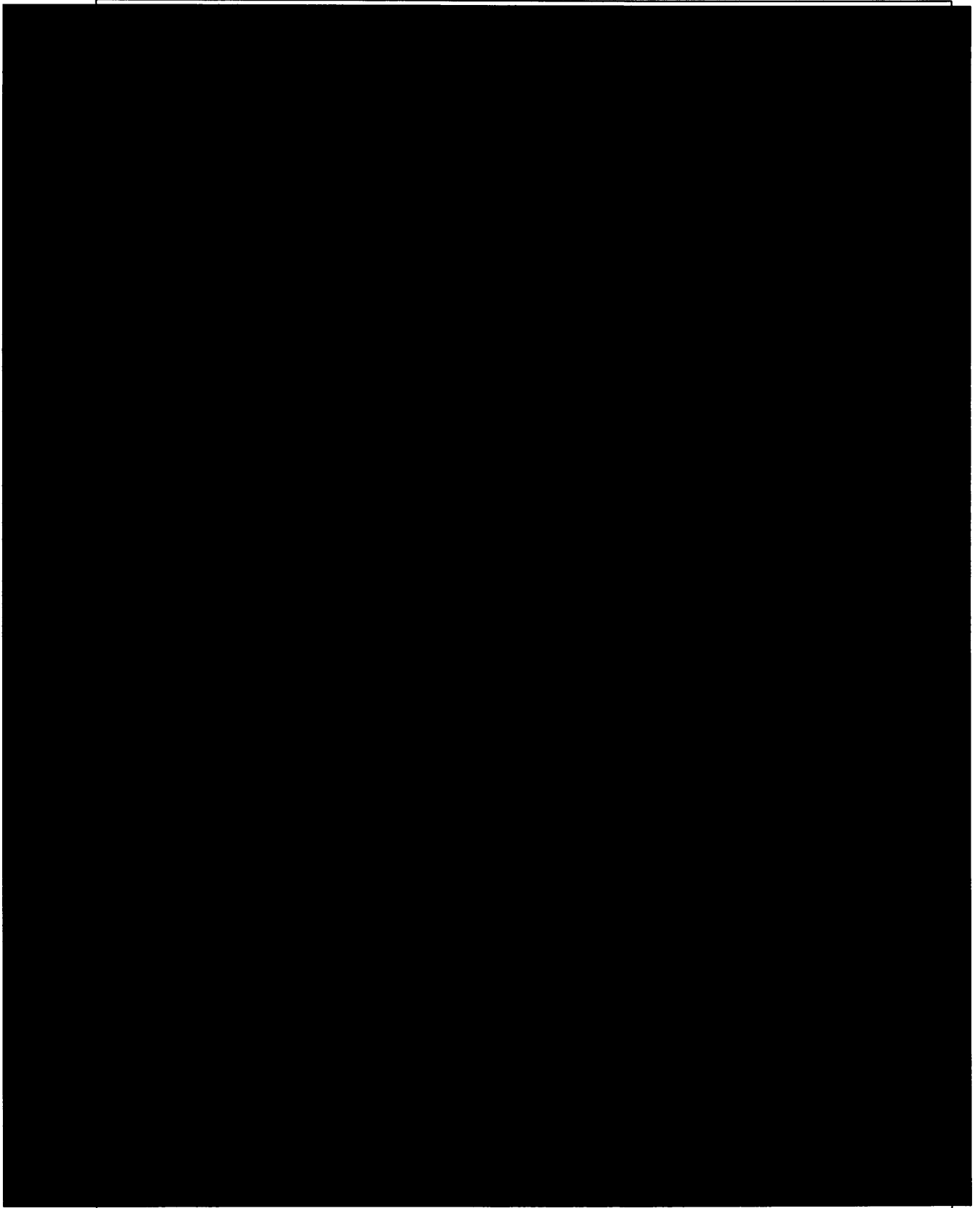


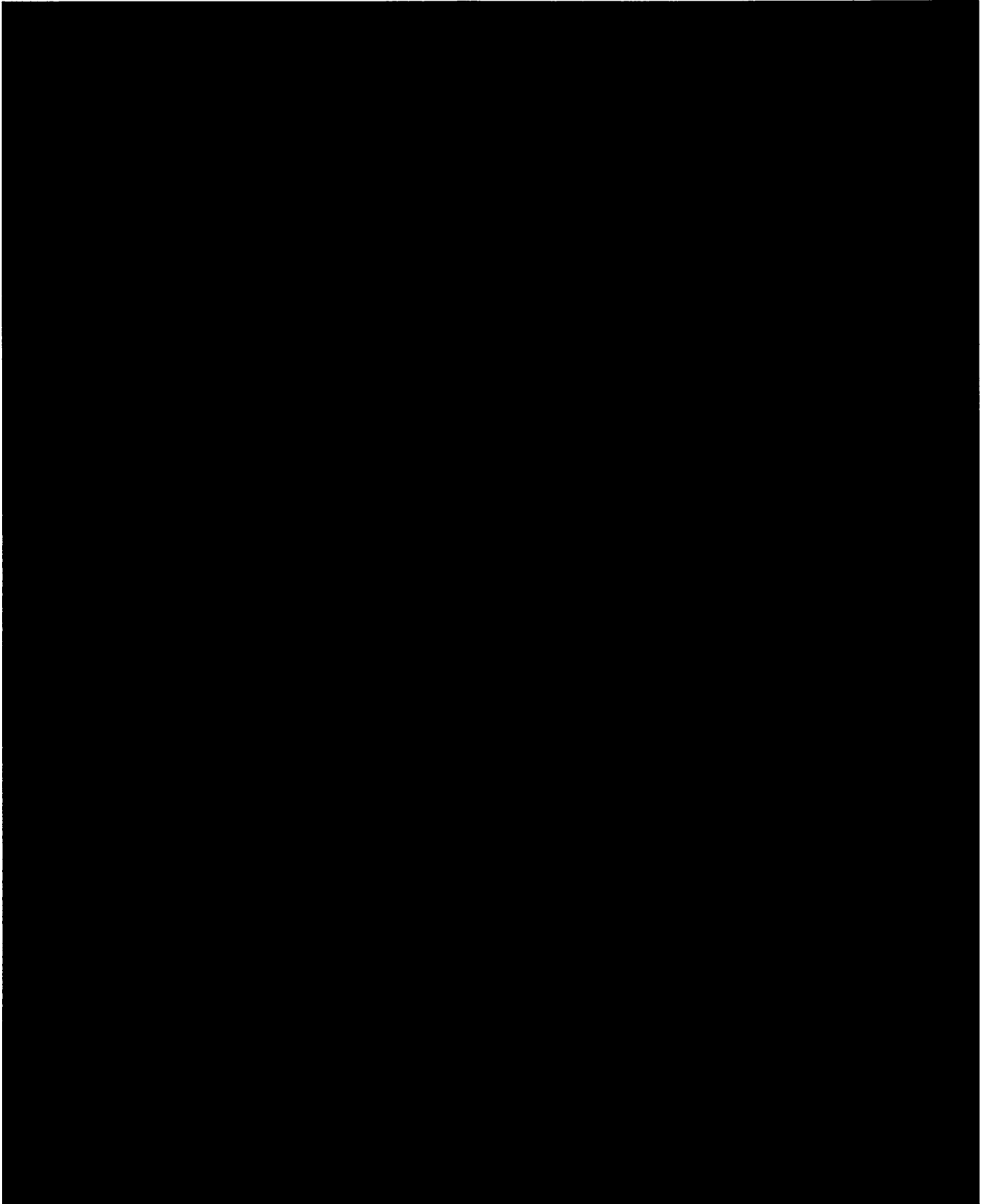


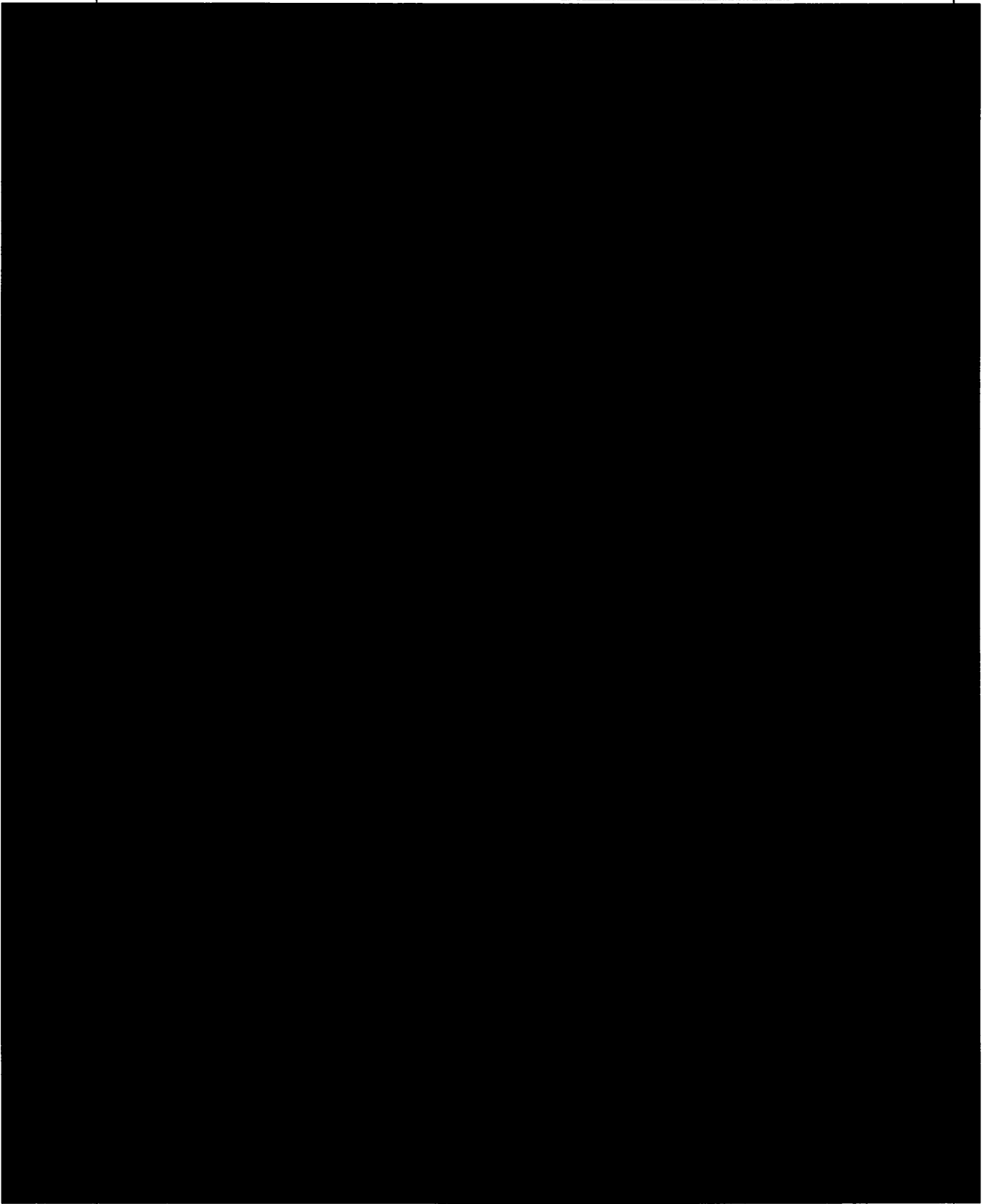
A thin, diagonal line is visible in the bottom left corner of the page, extending from the edge of the redacted area towards the bottom left margin.

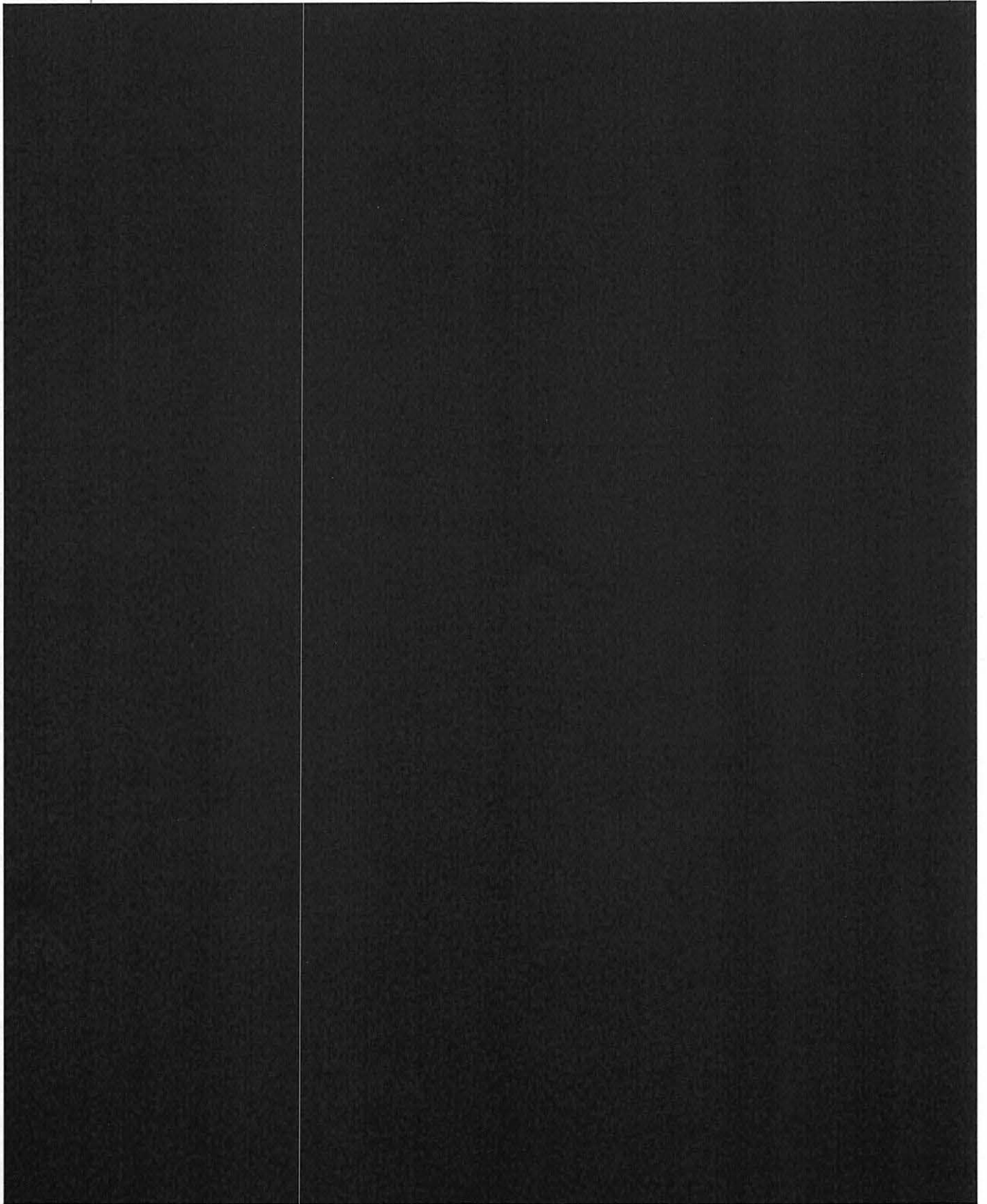


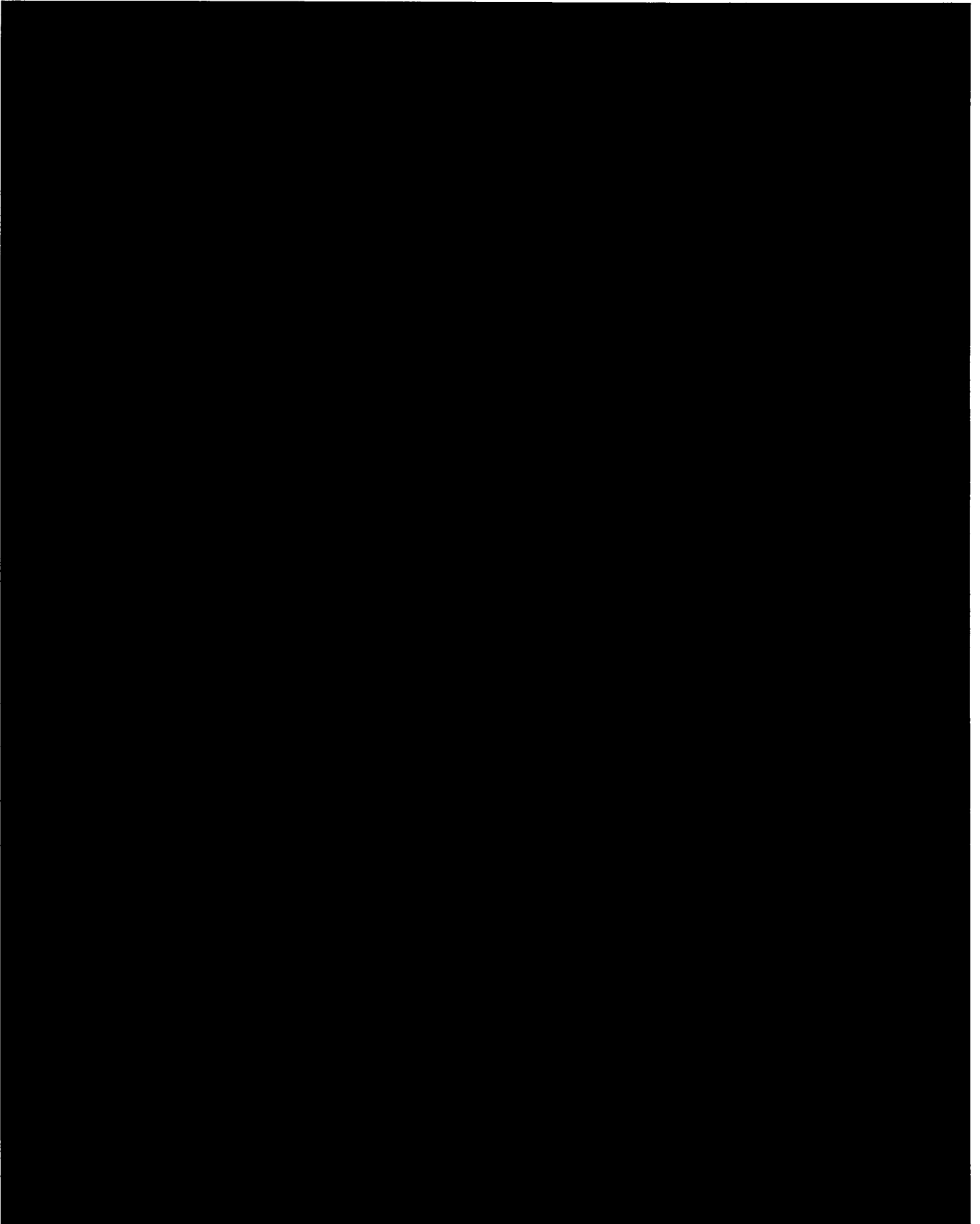


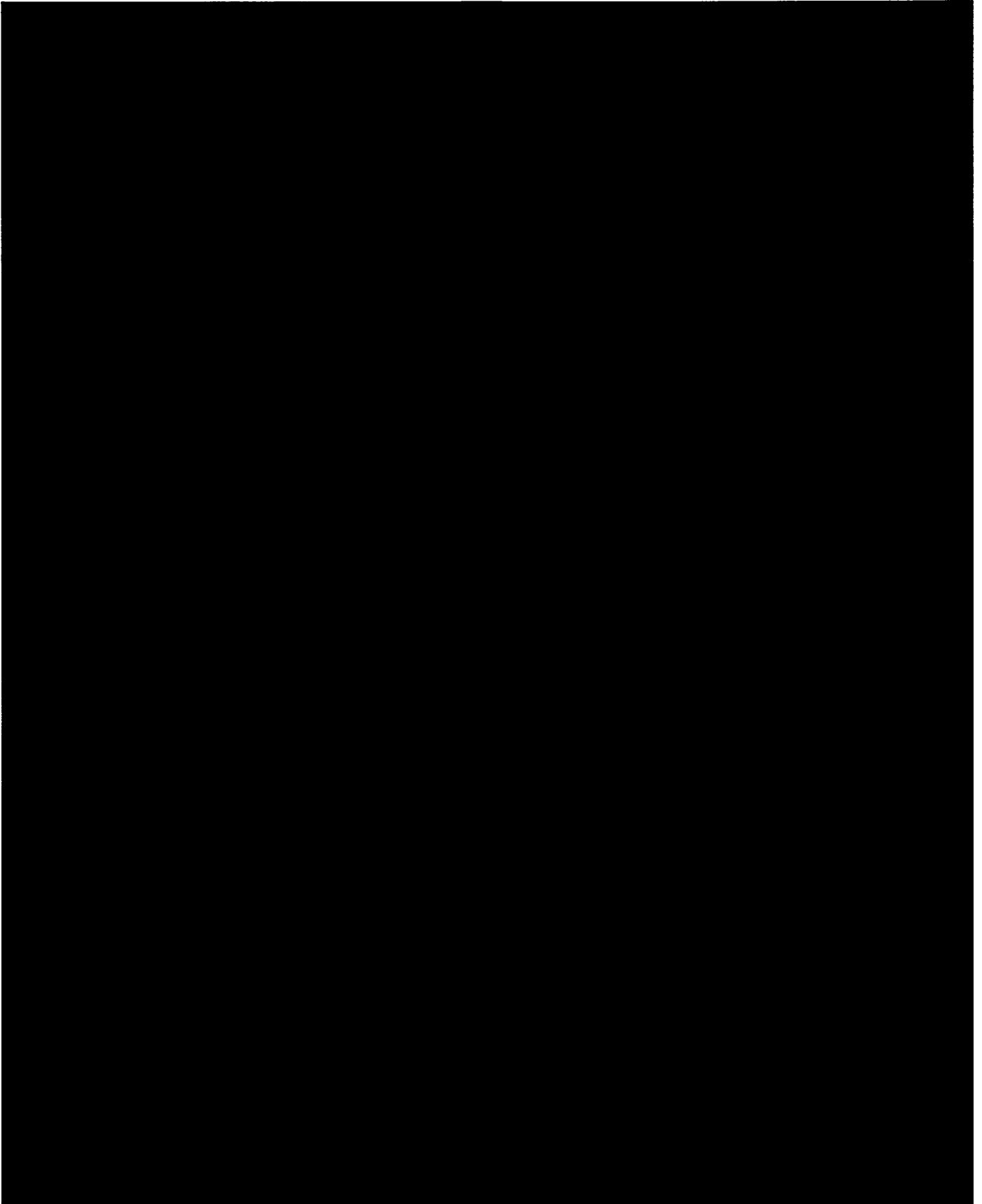


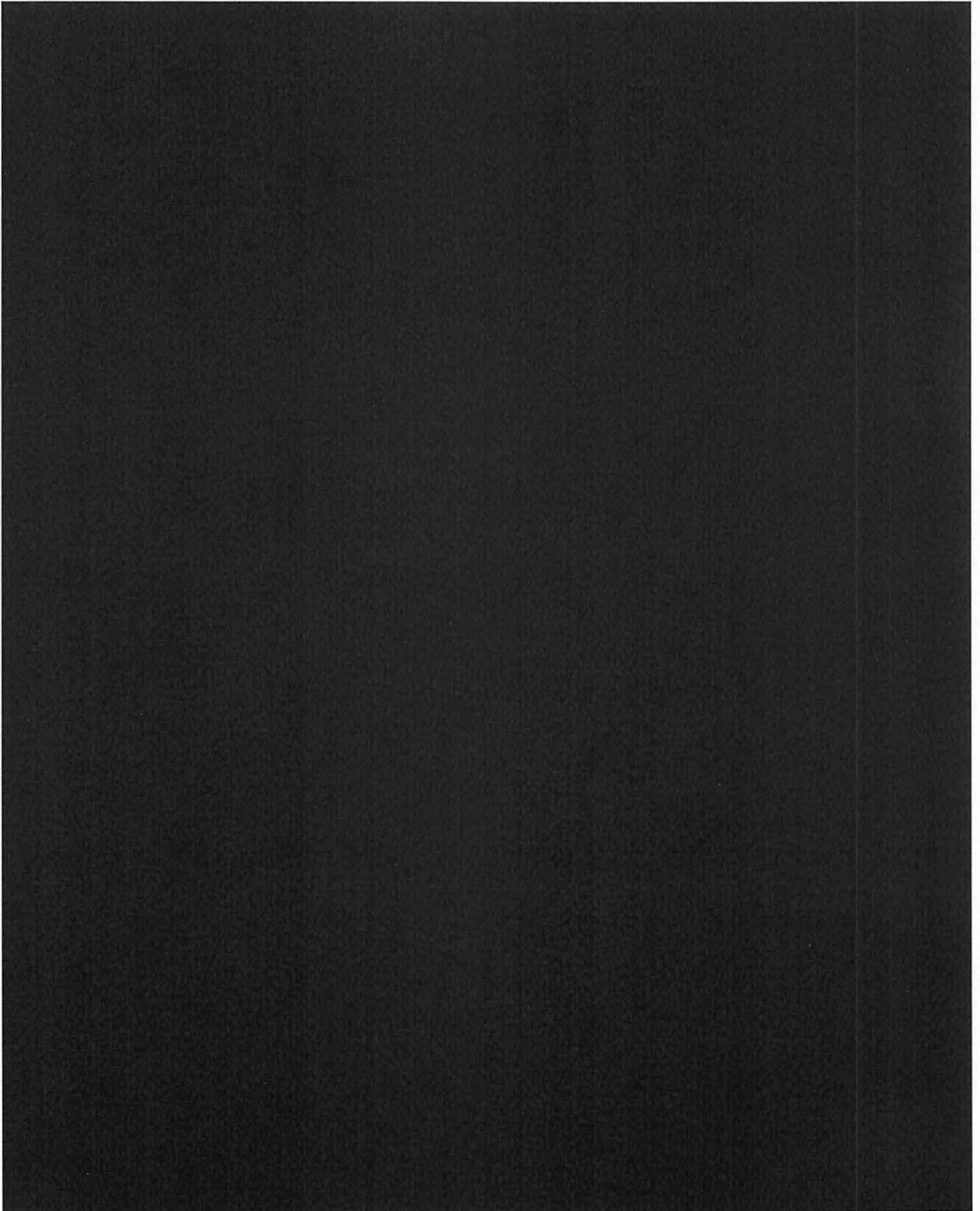


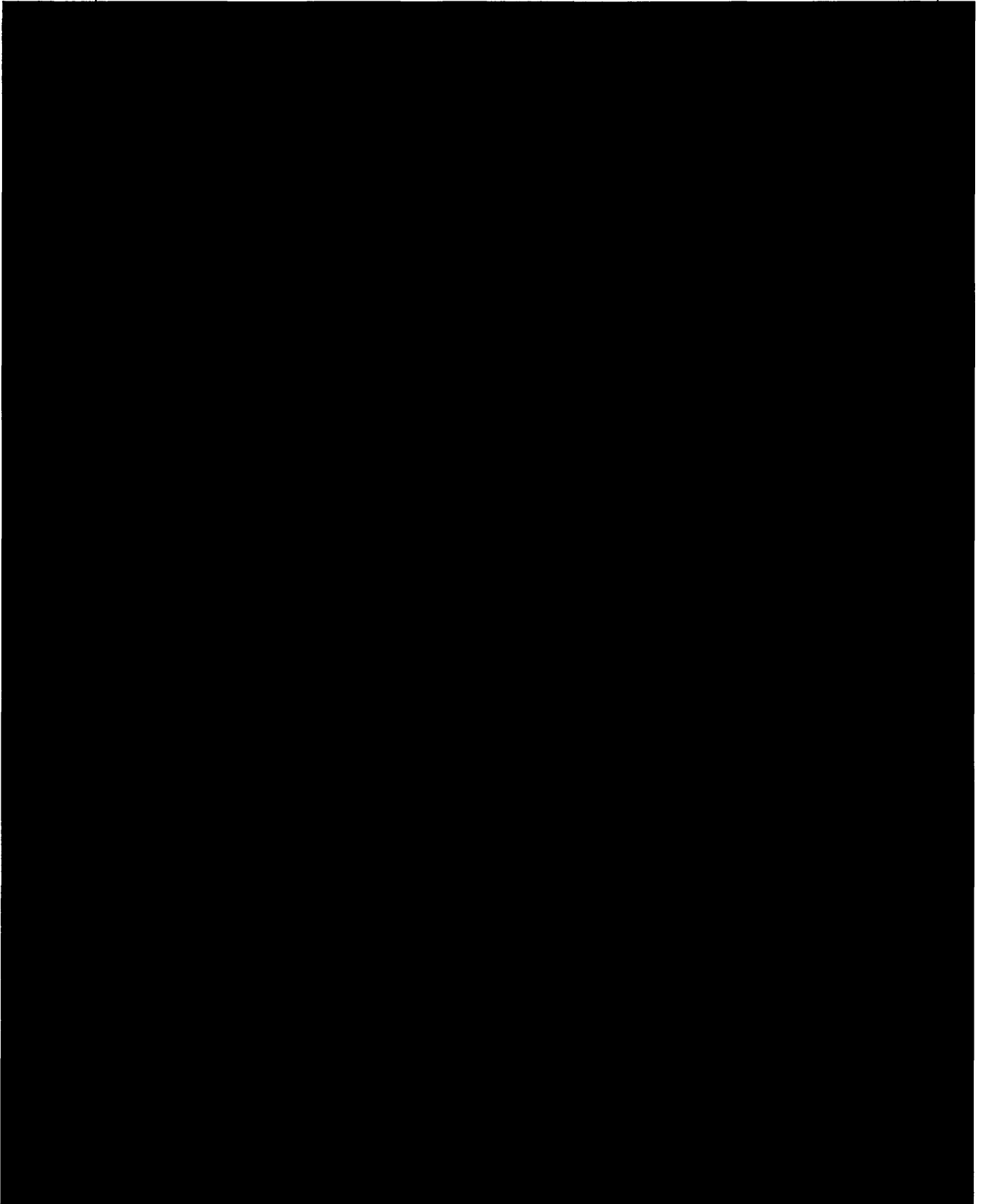


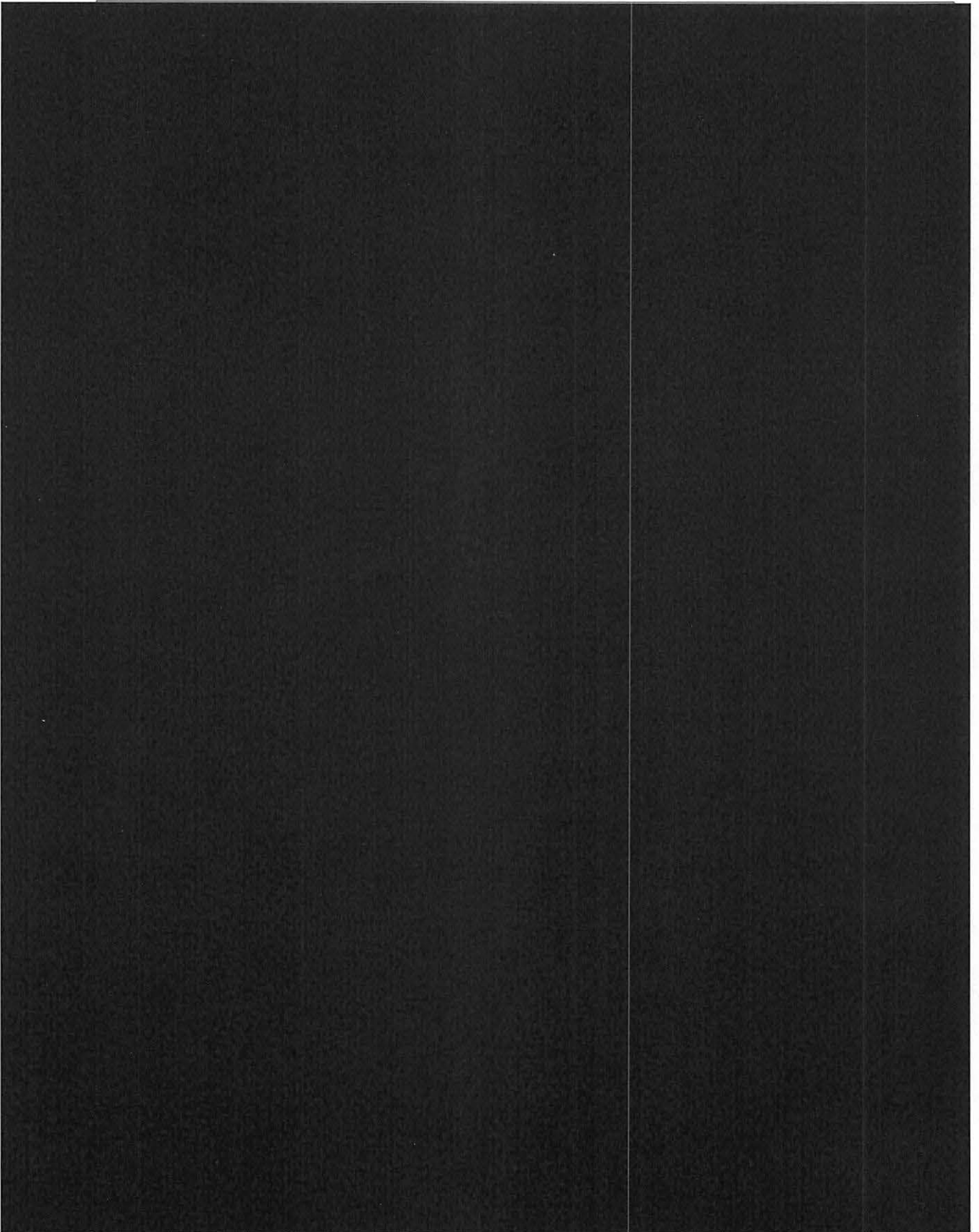


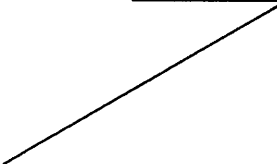
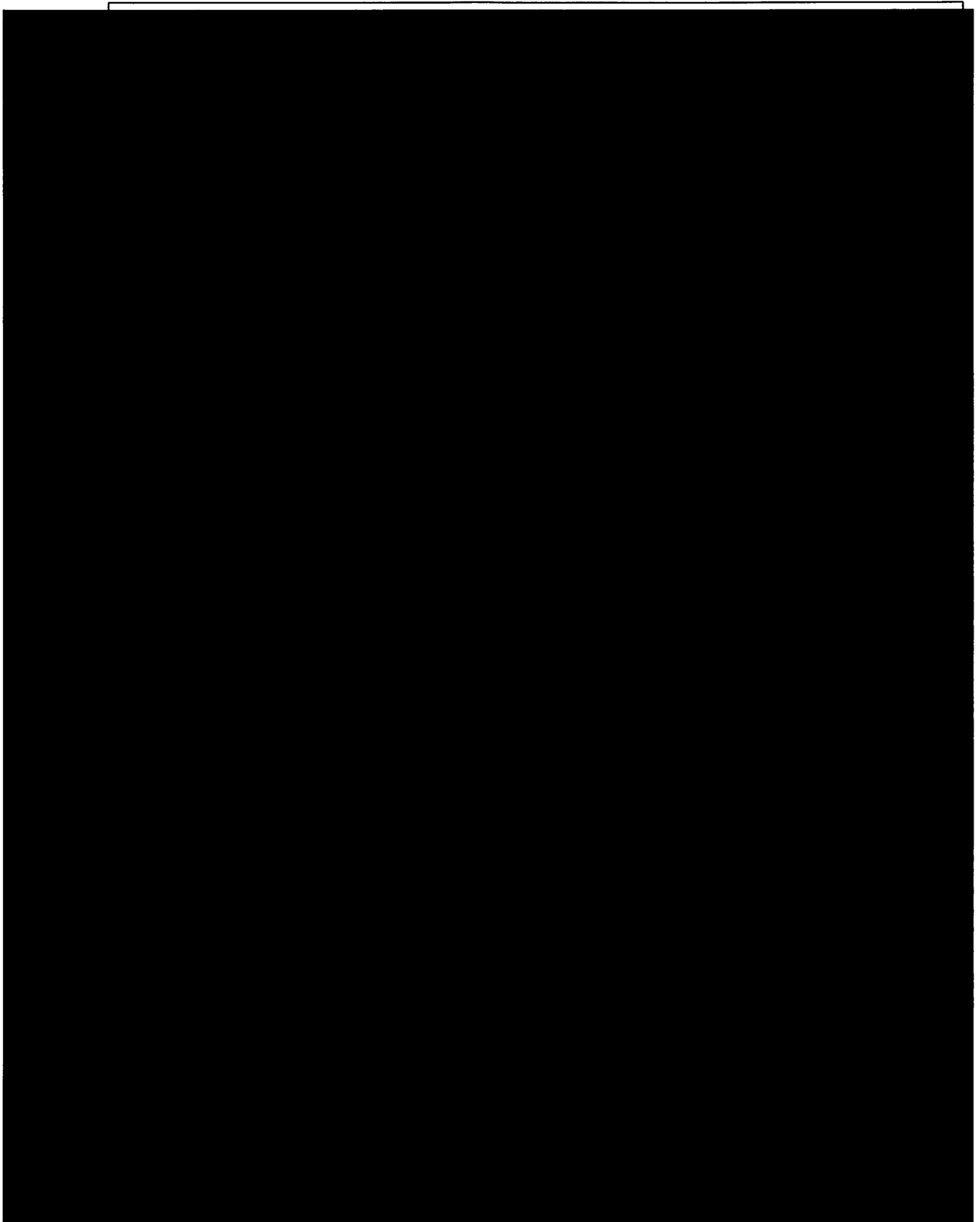


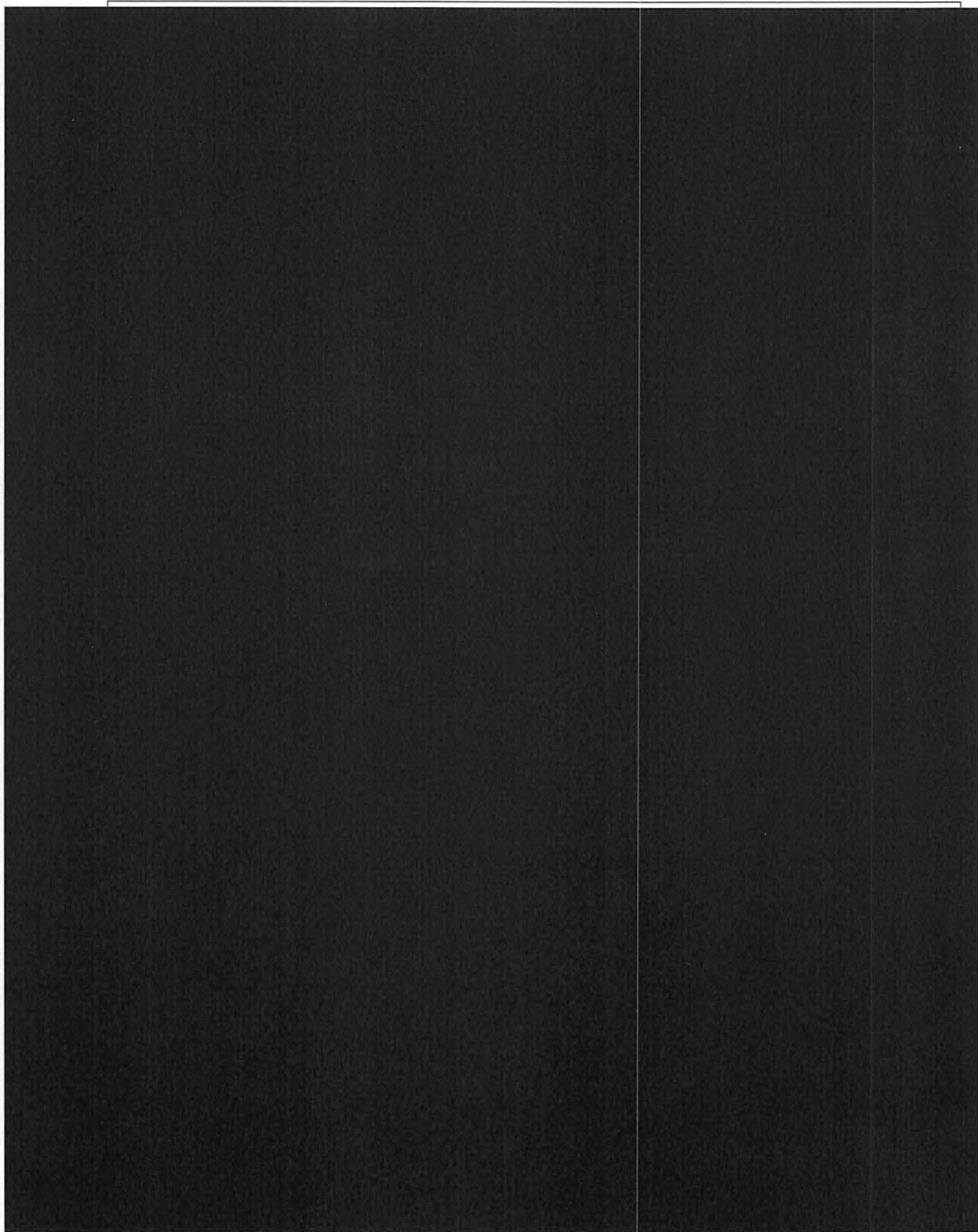


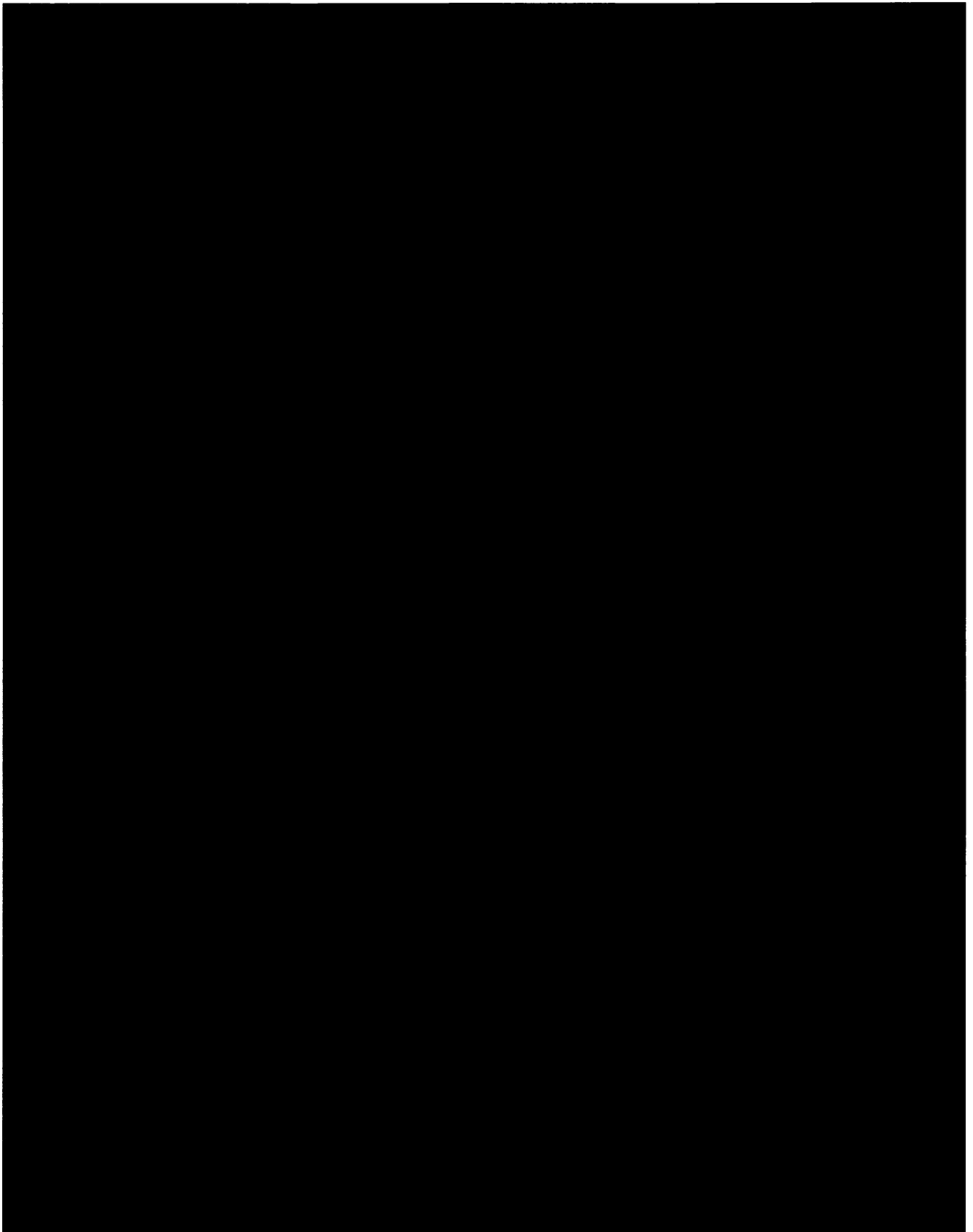


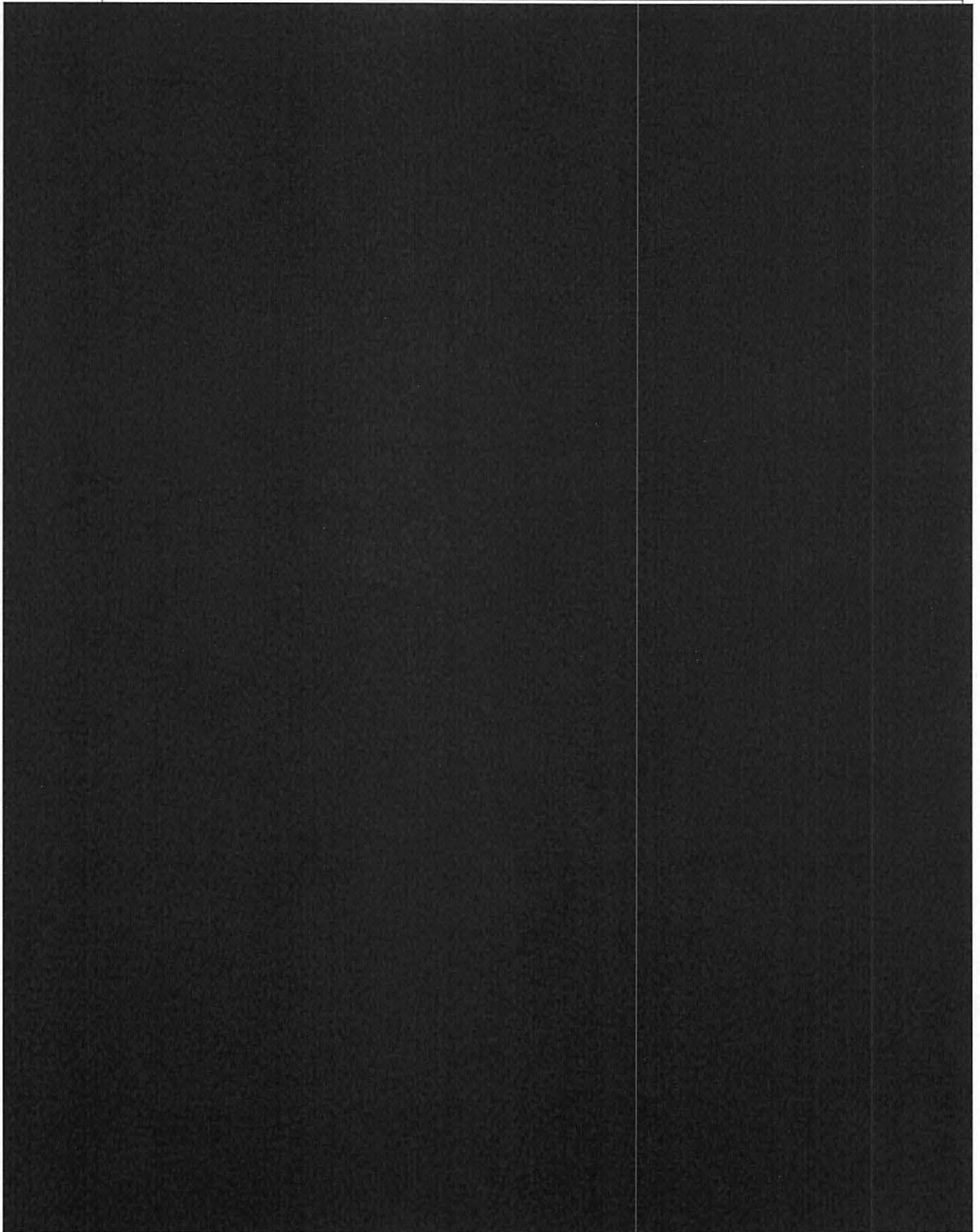


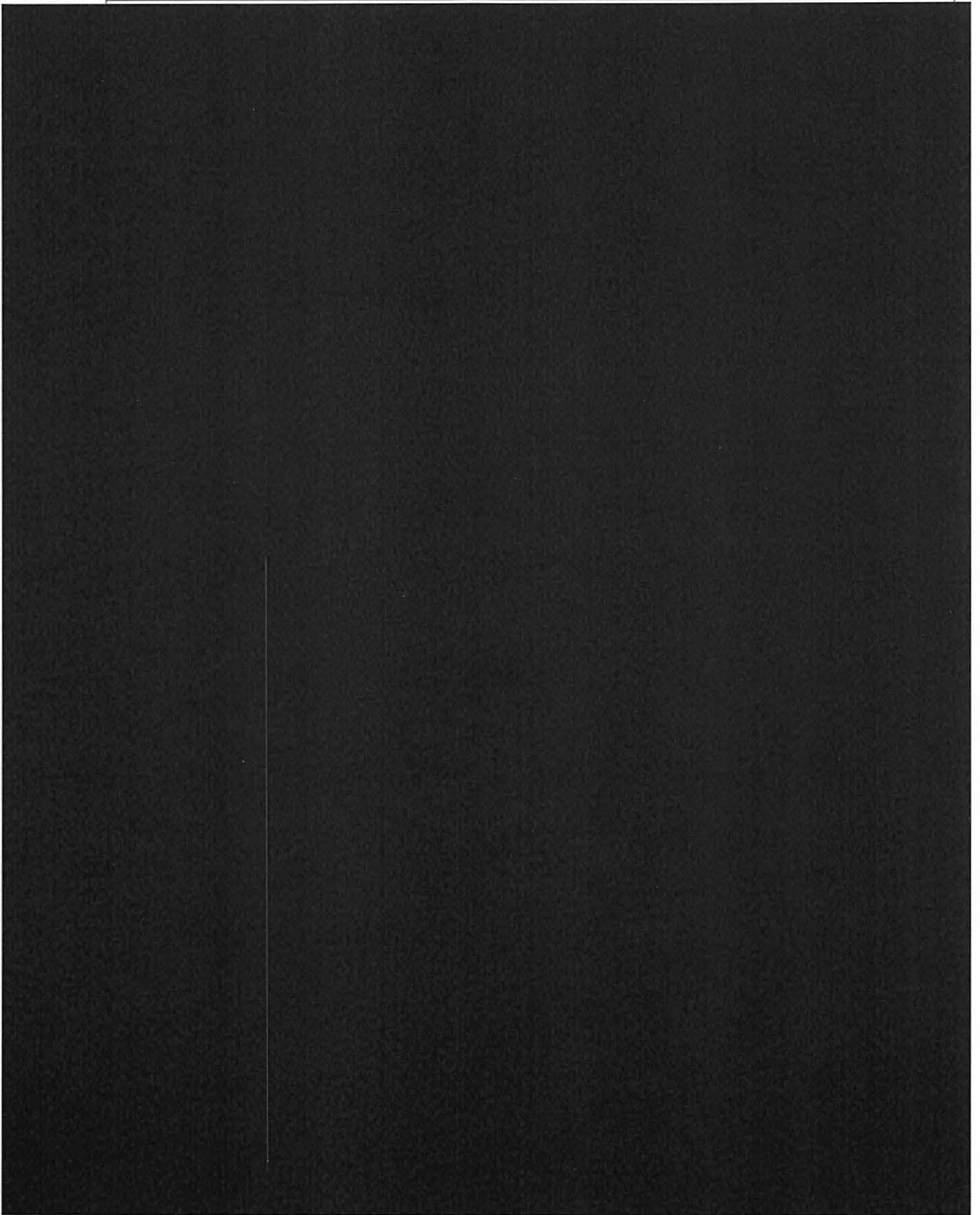


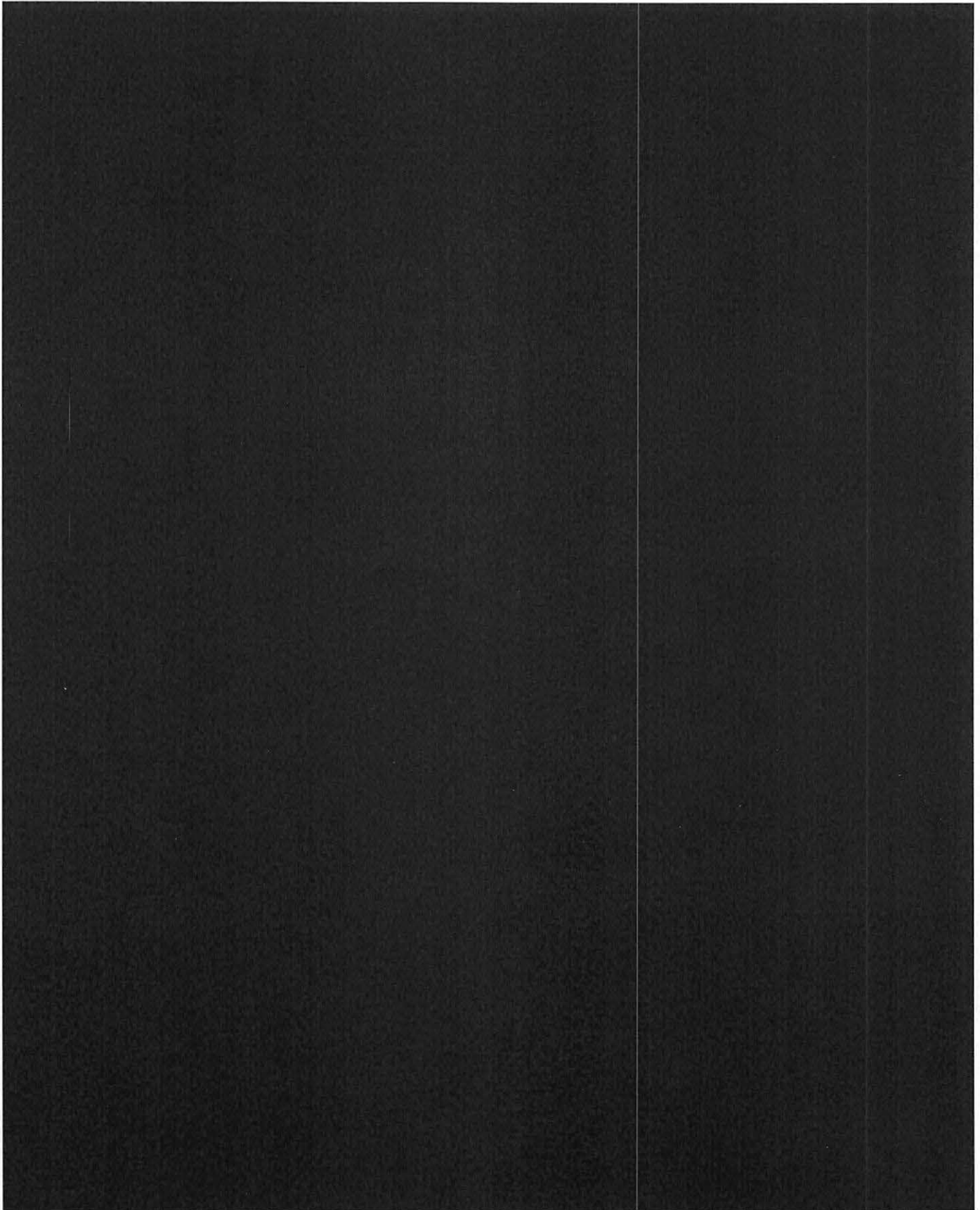


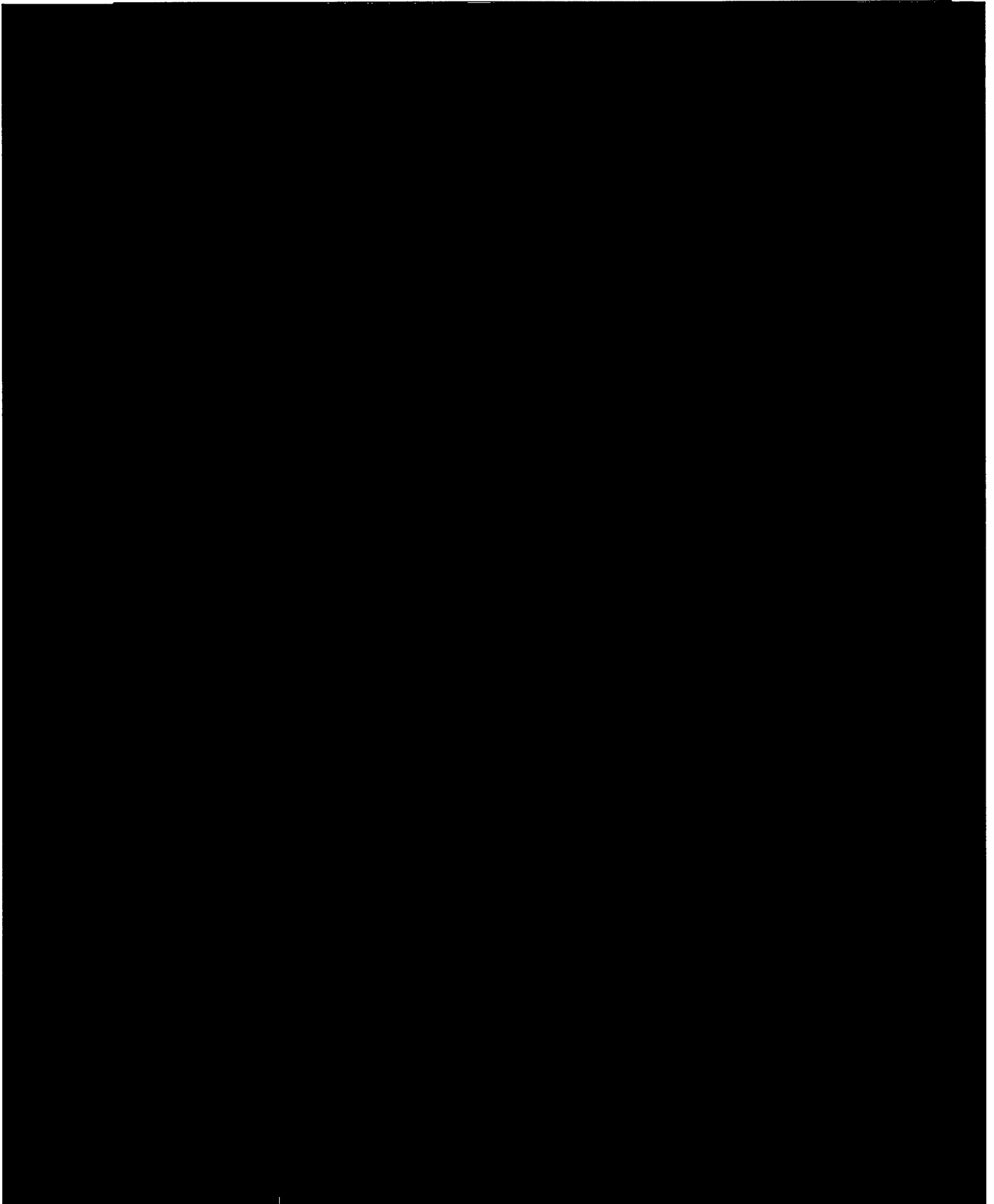




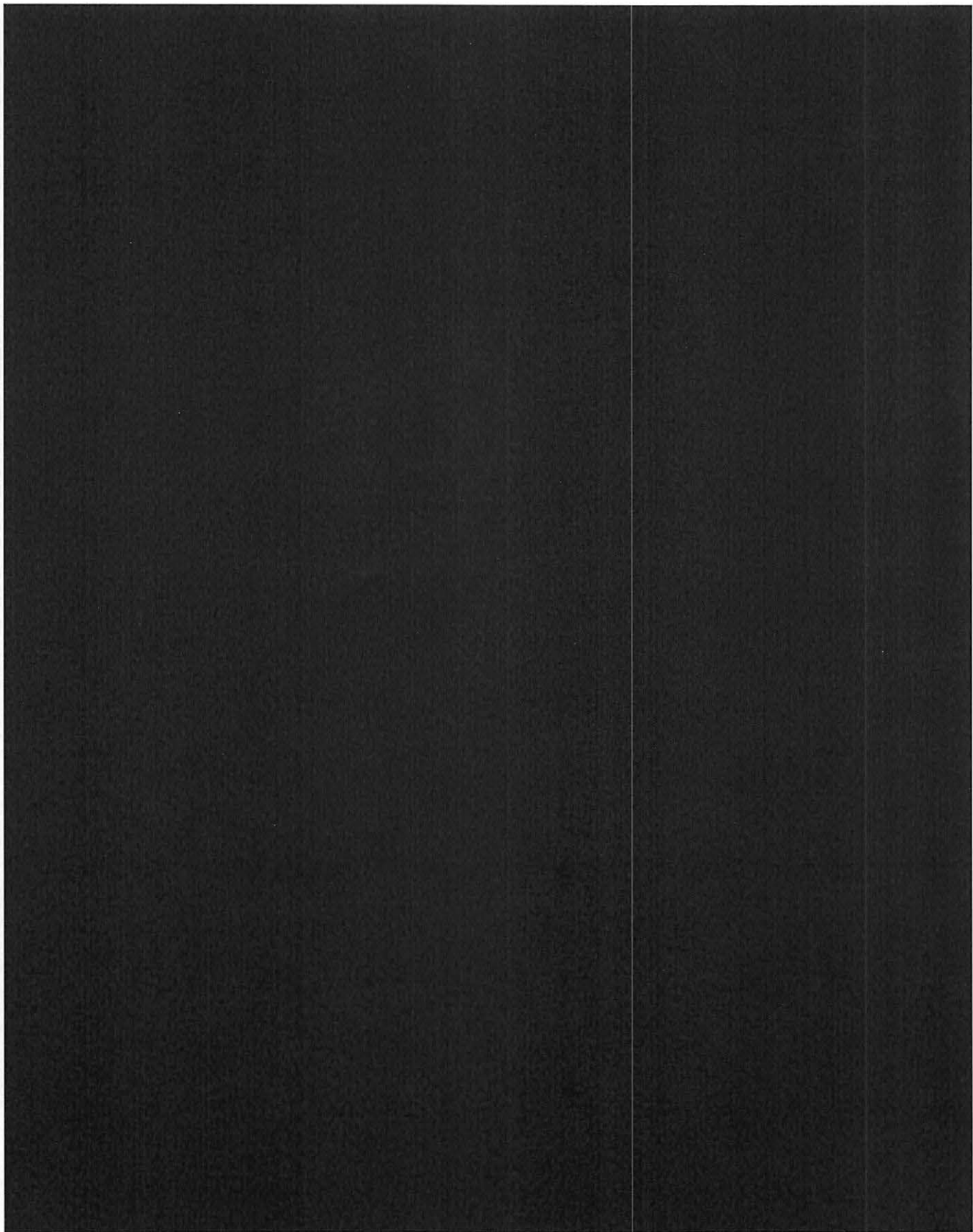


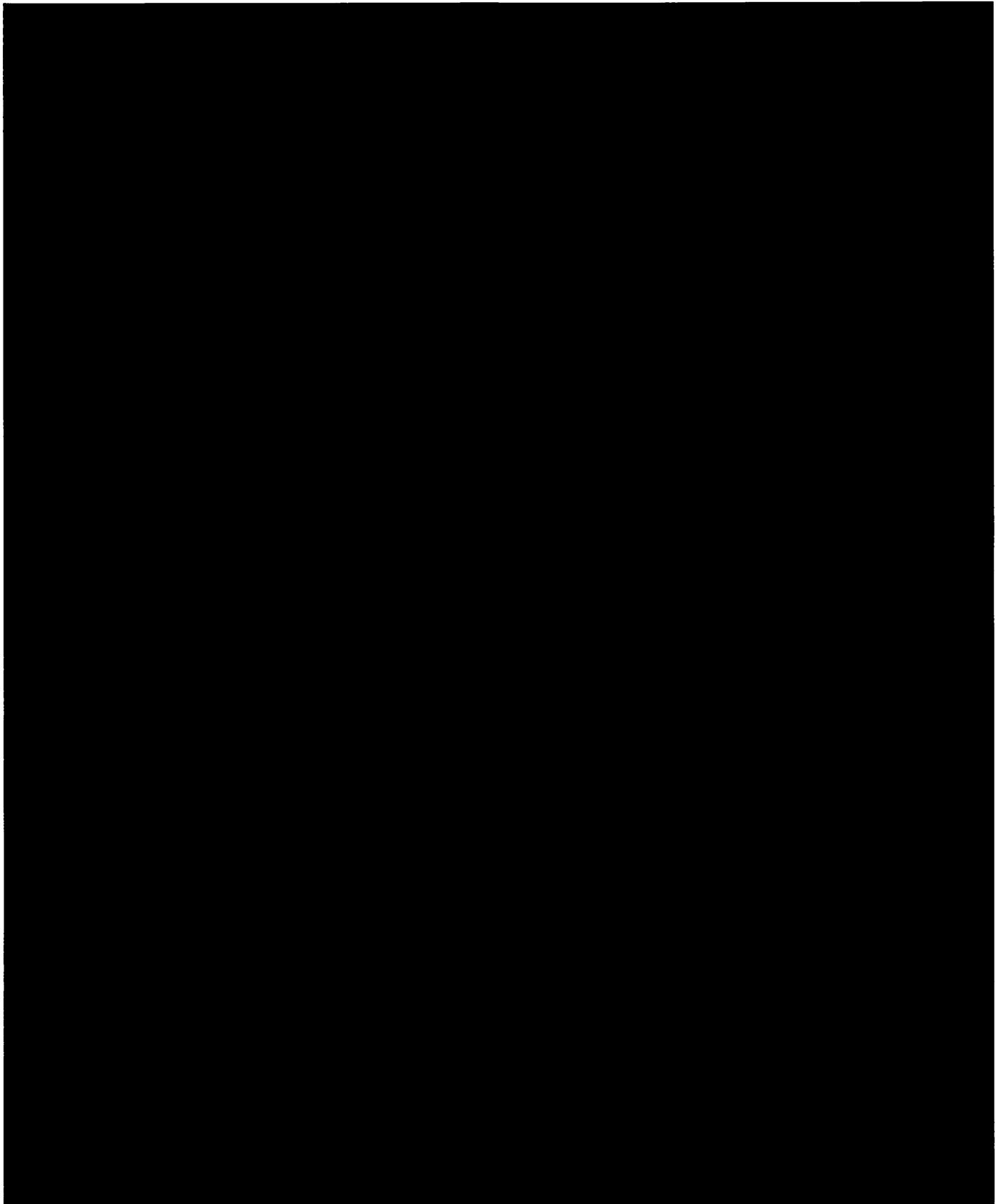


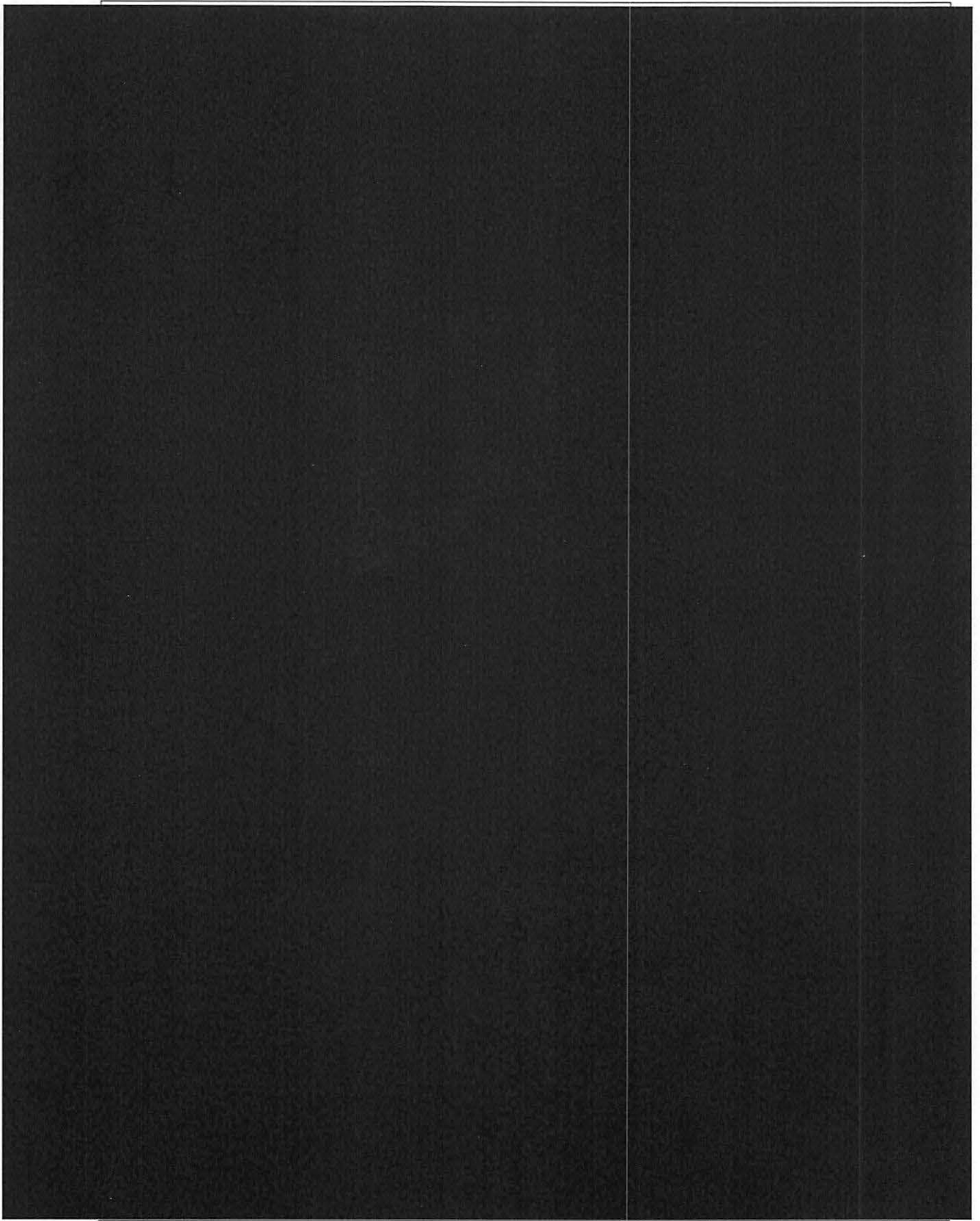


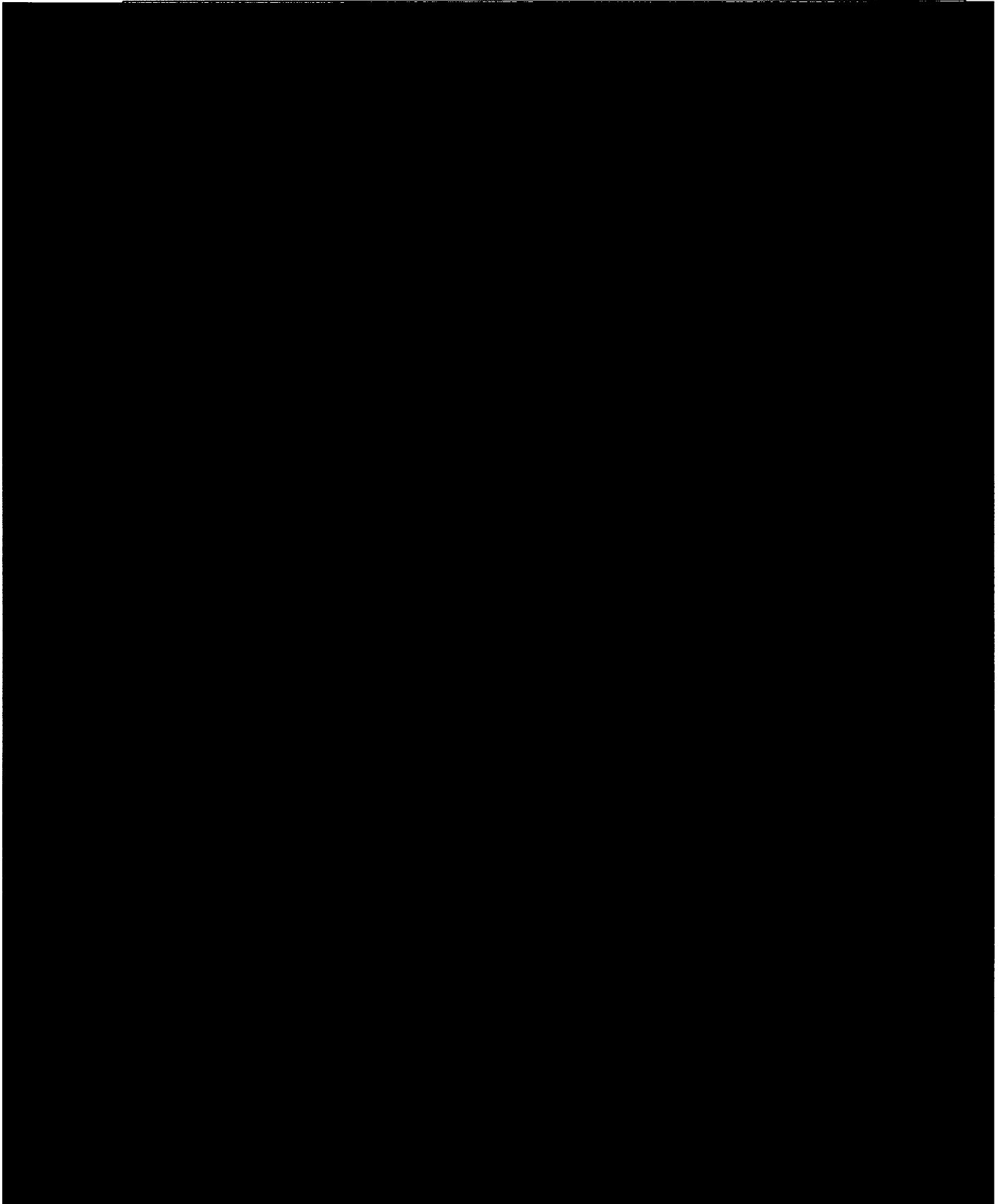


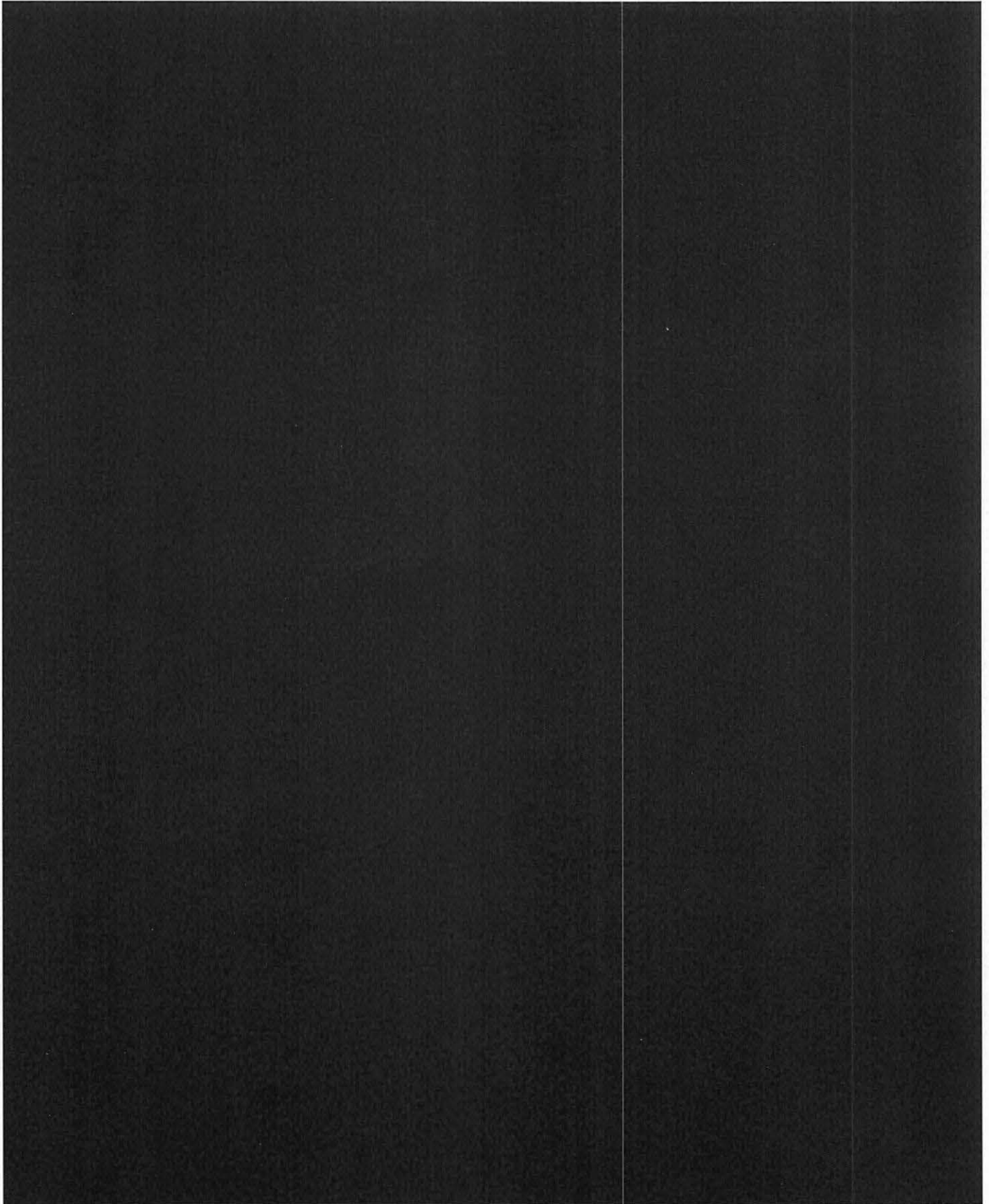
A thin, diagonal line extends from the bottom-left corner of the redacted area towards the bottom-left corner of the page.

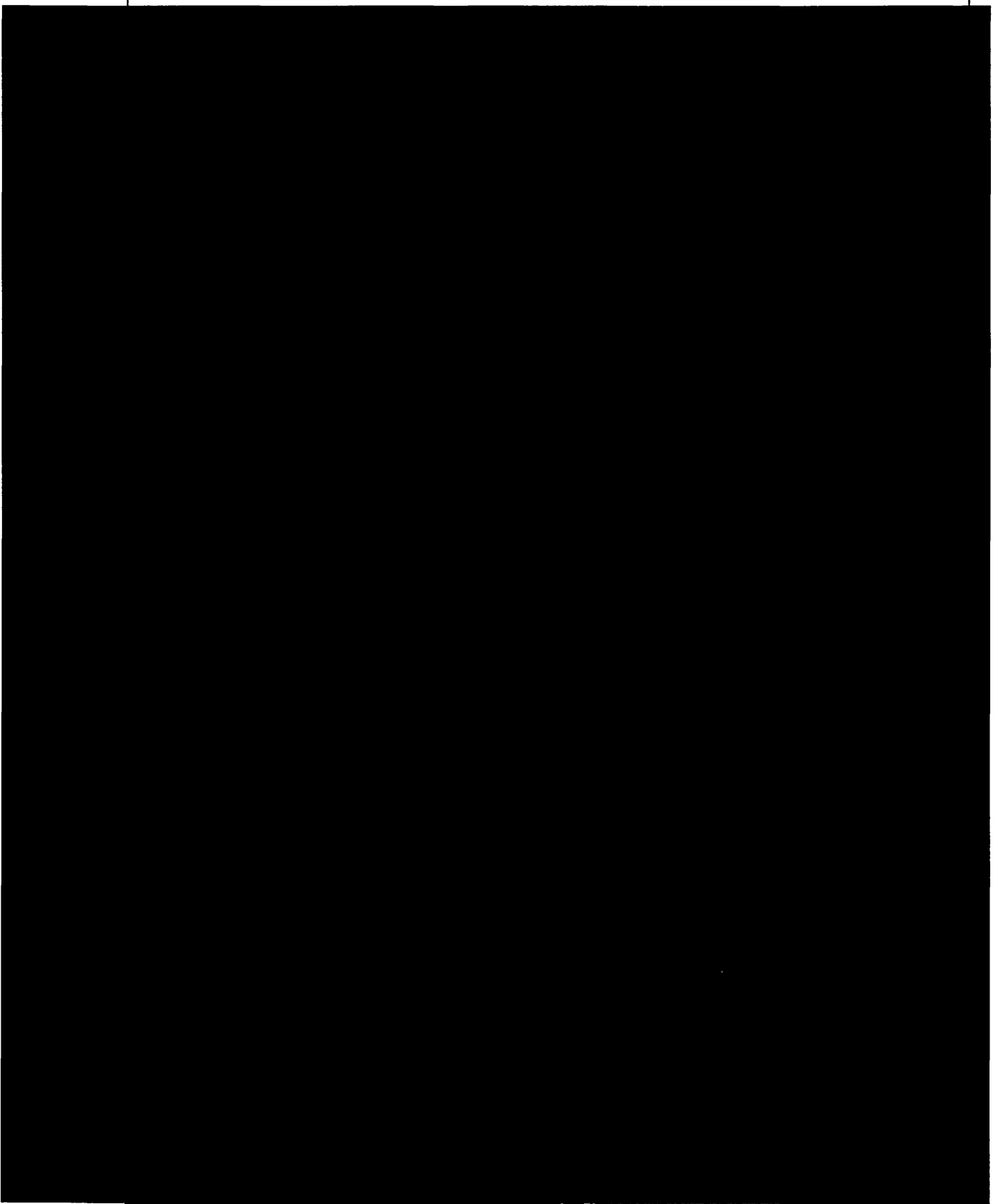


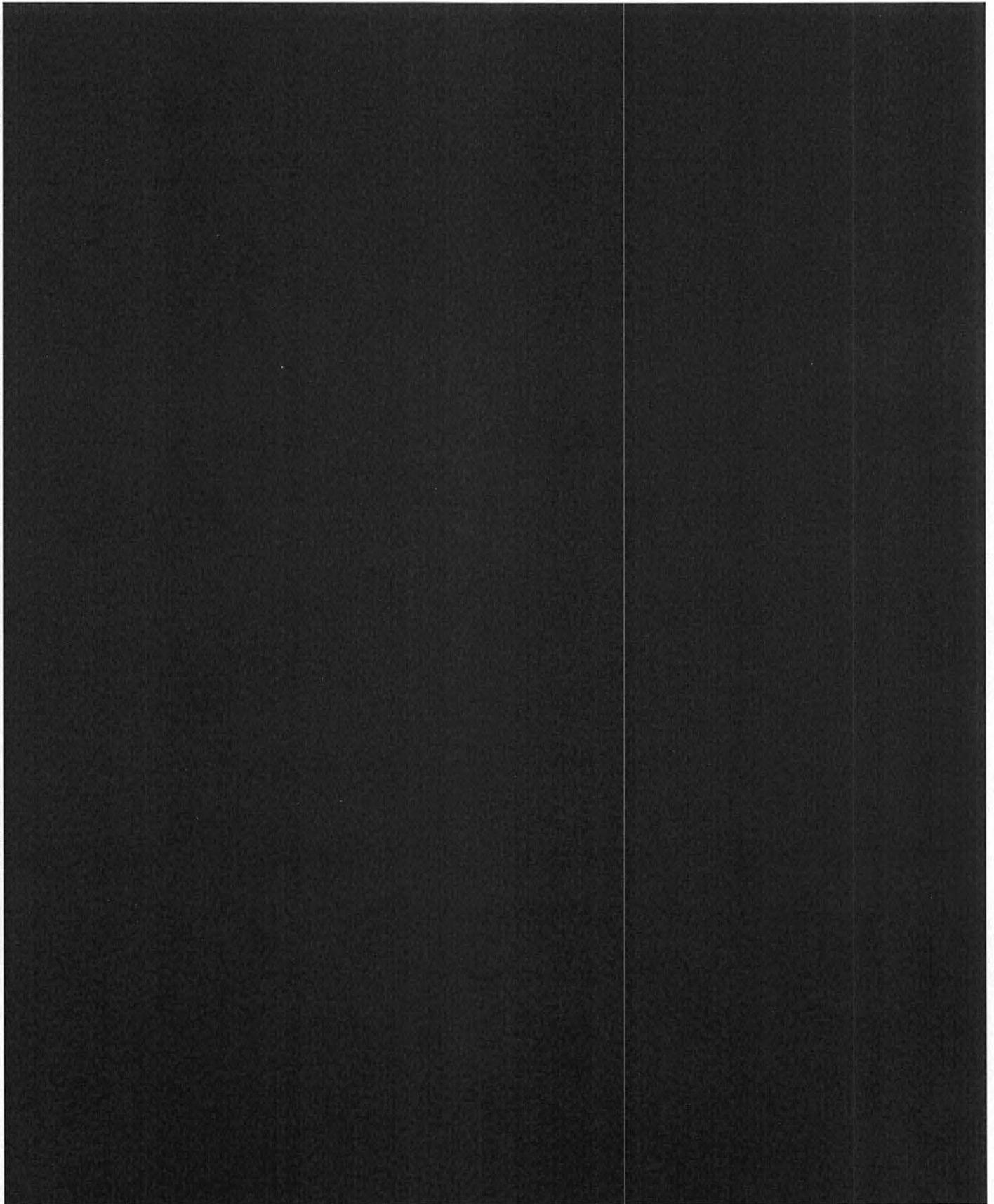


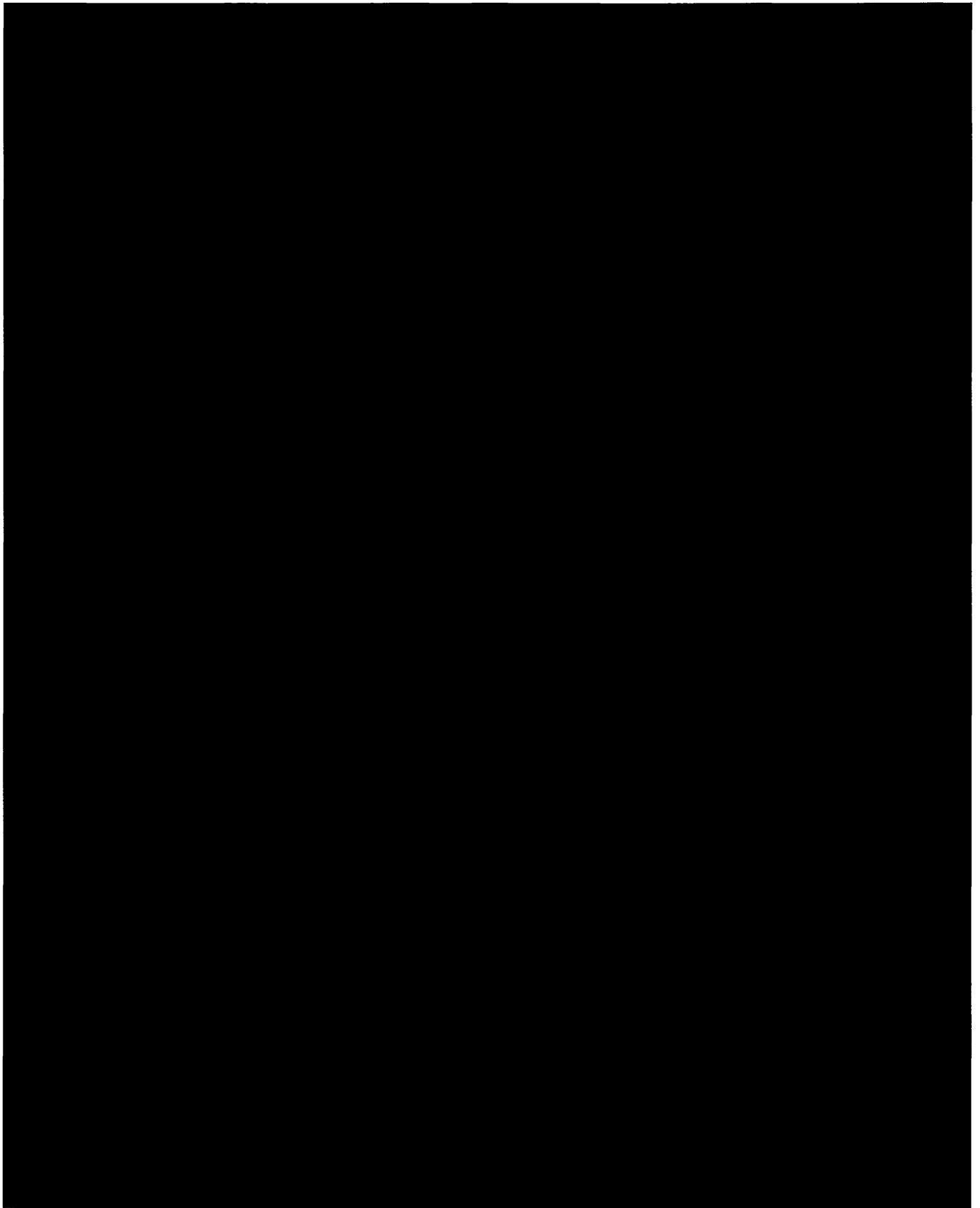


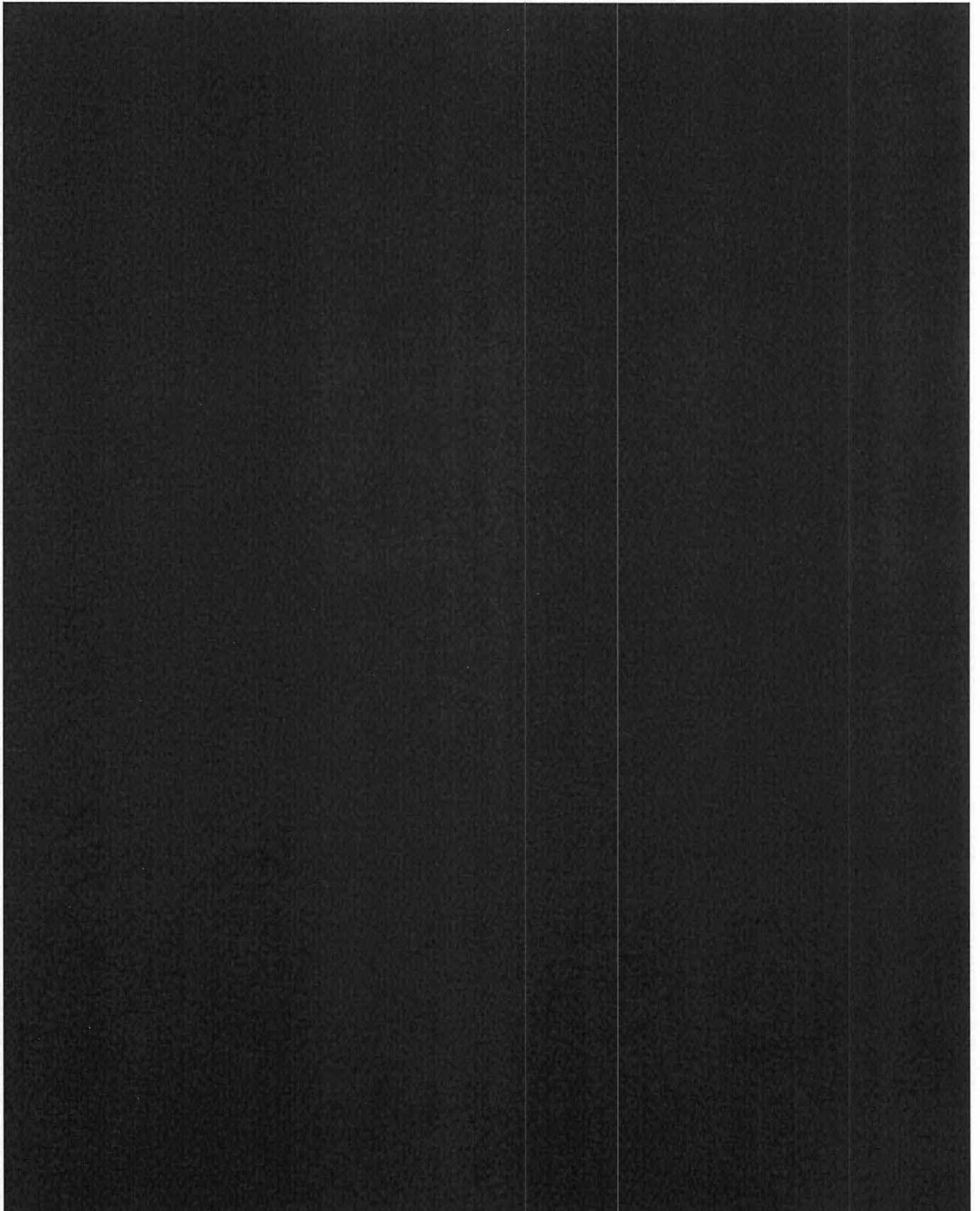


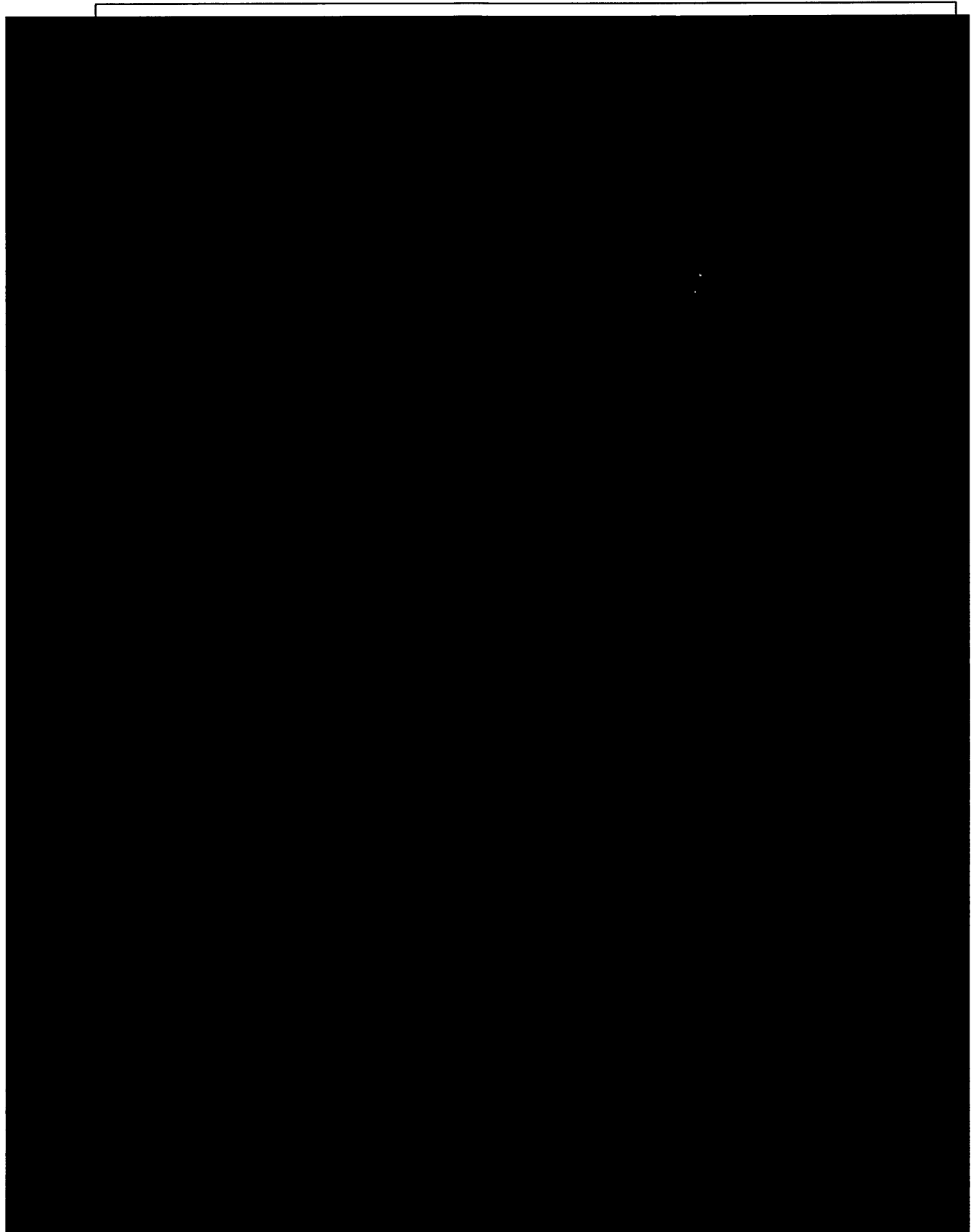


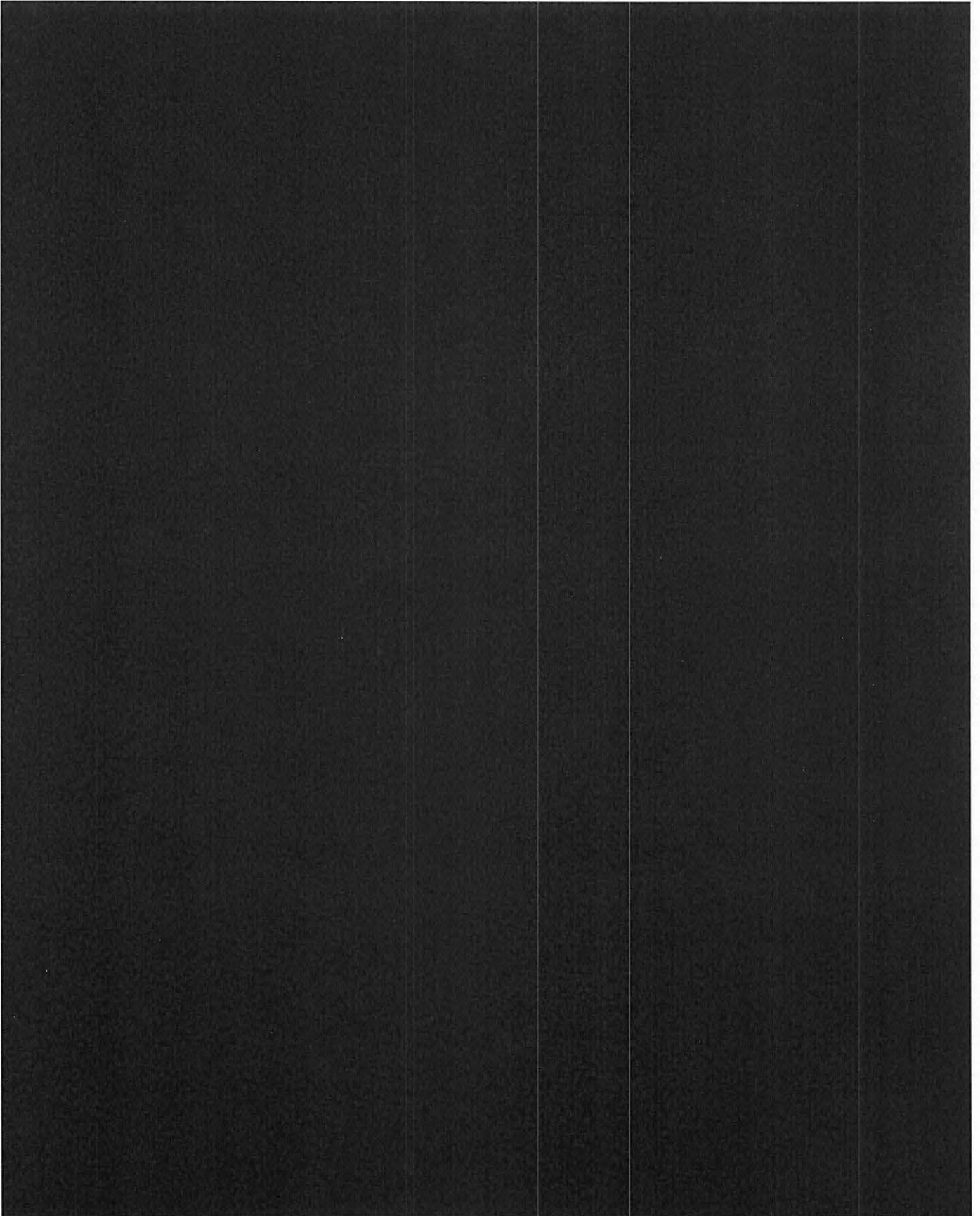


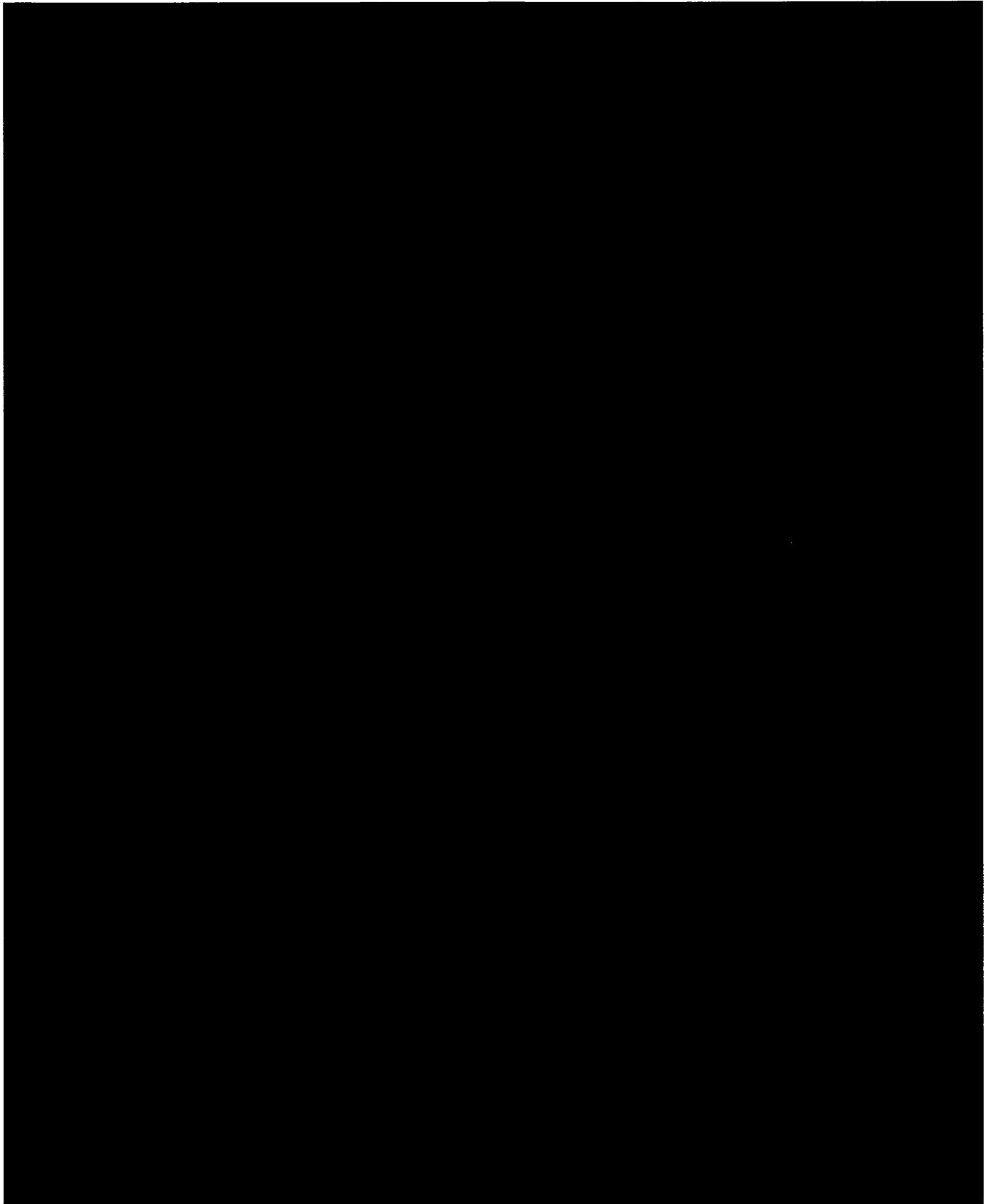


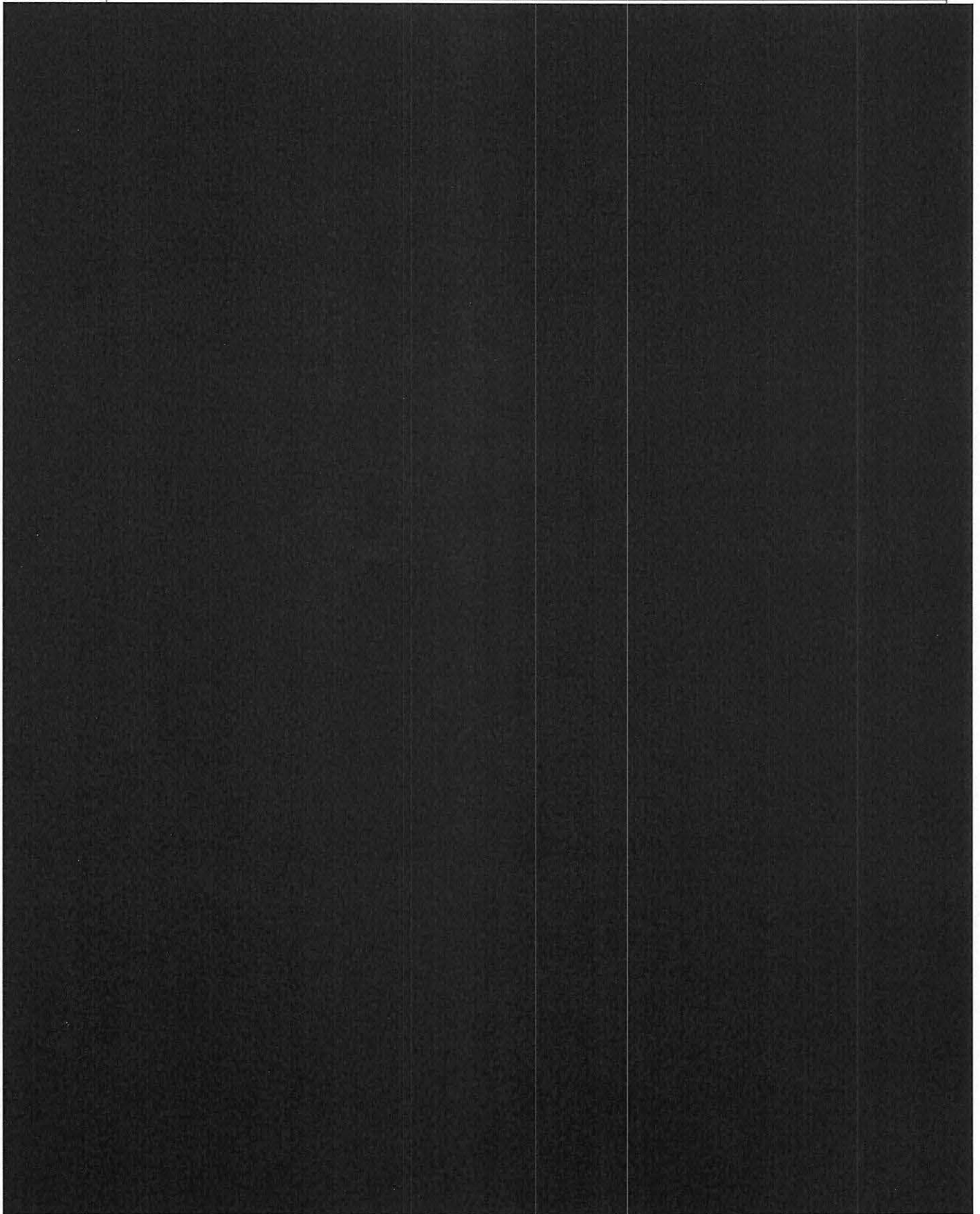


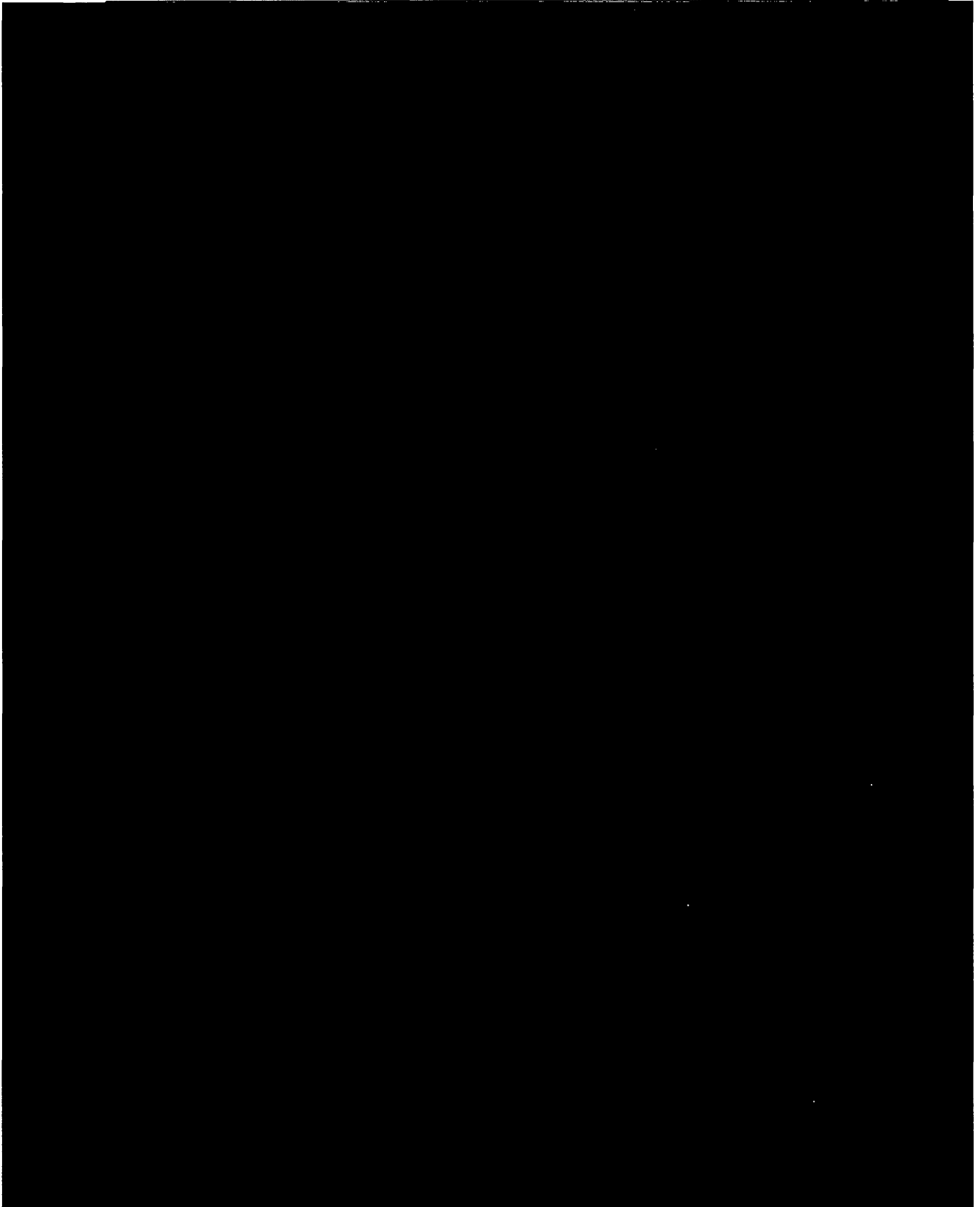


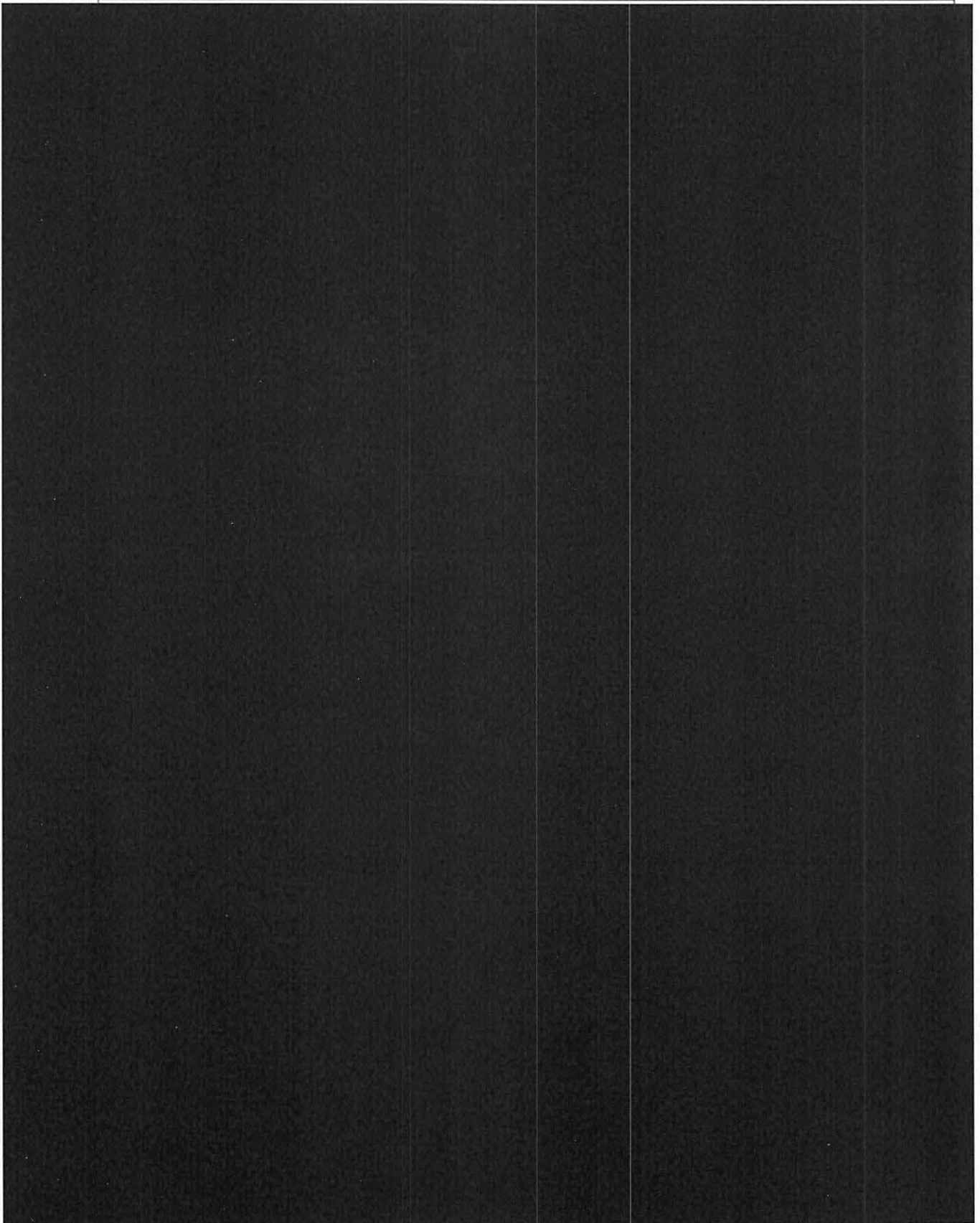


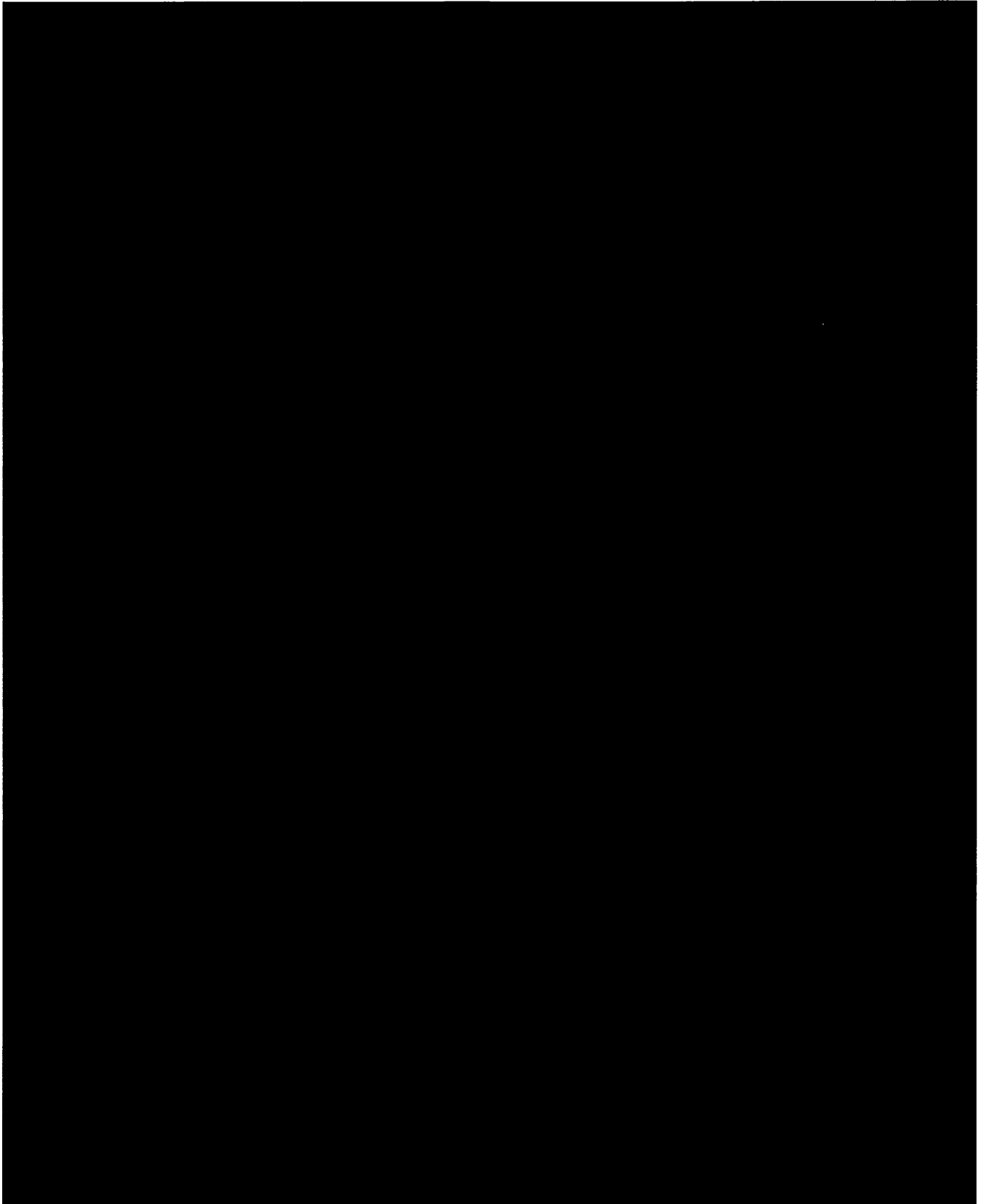


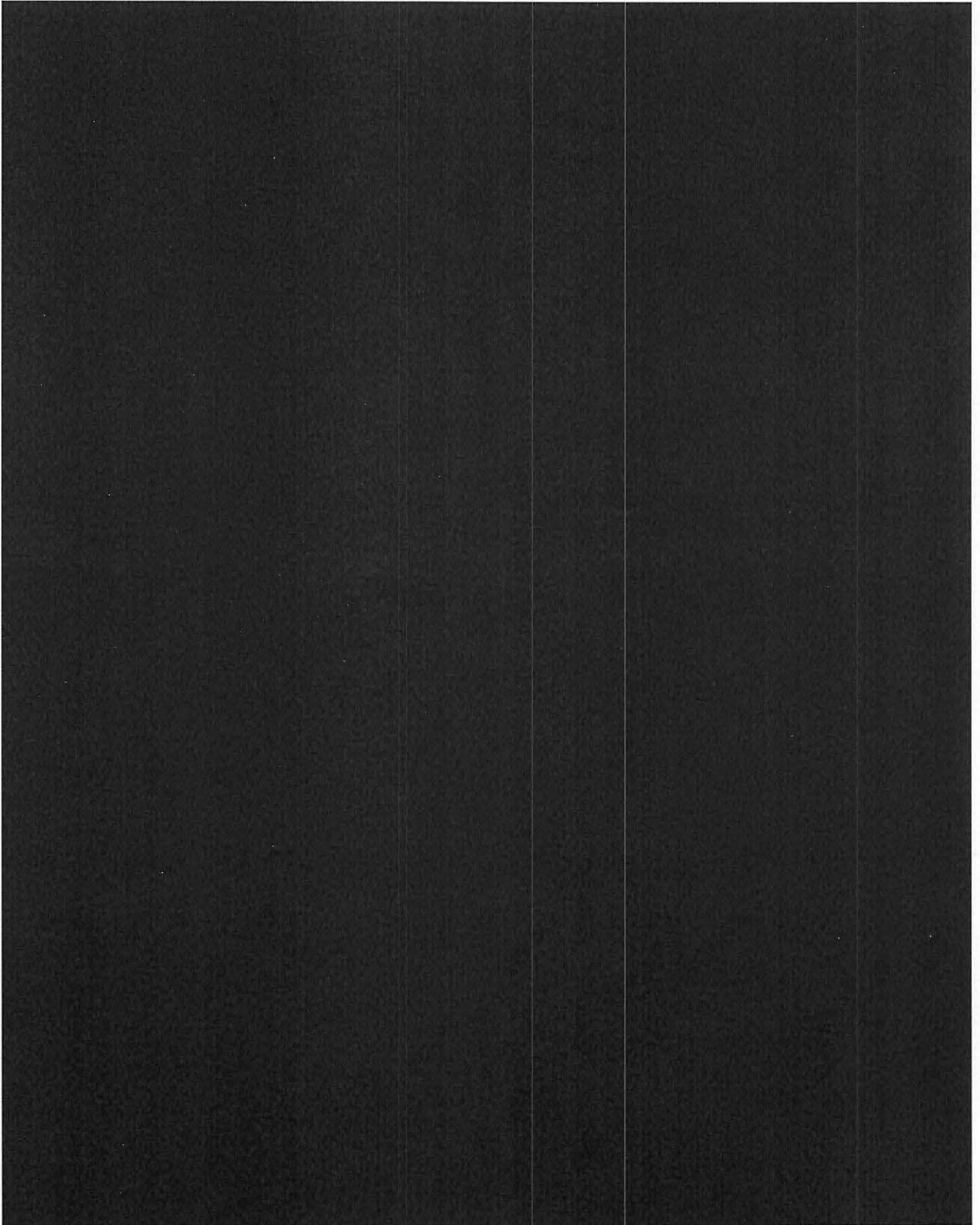


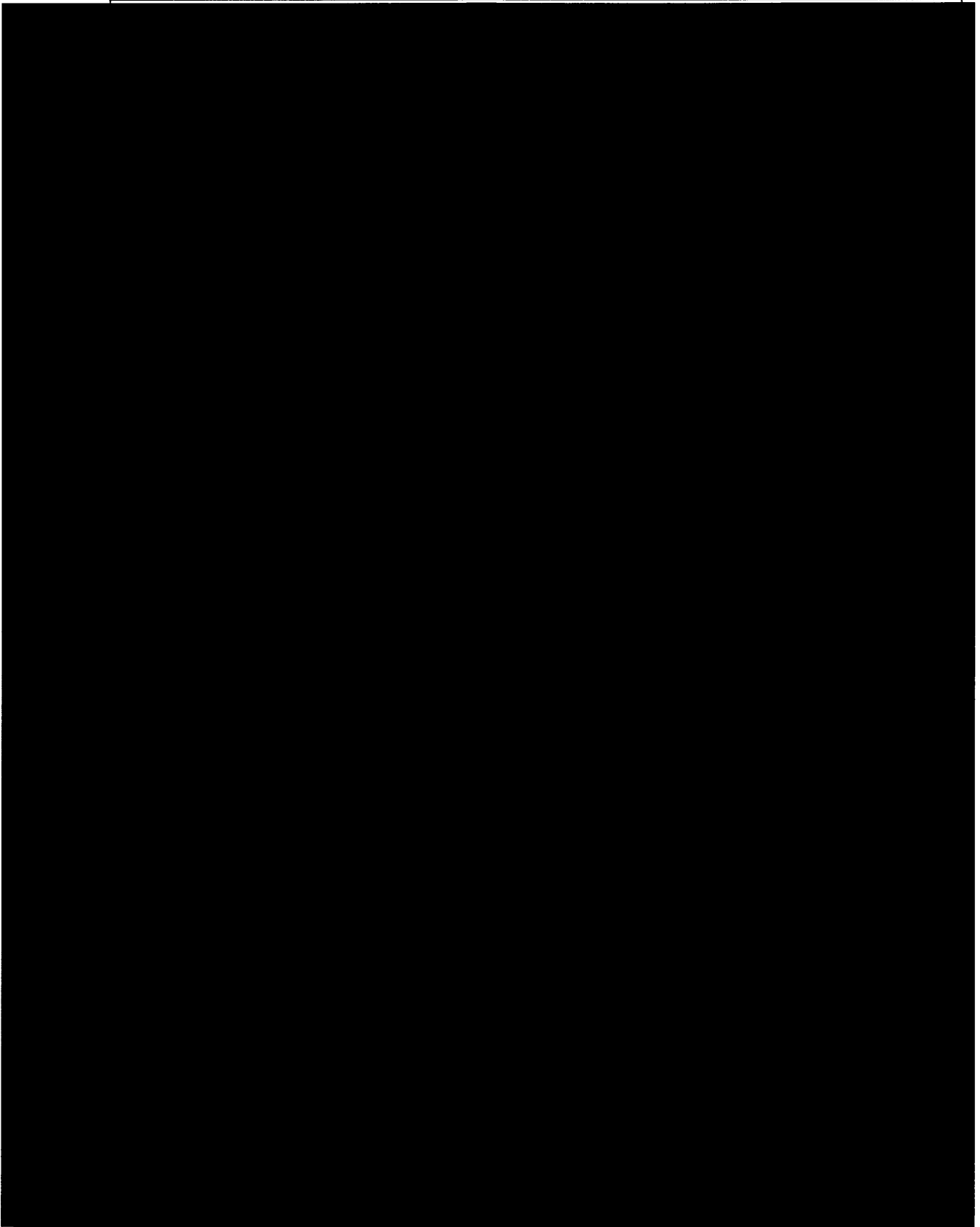


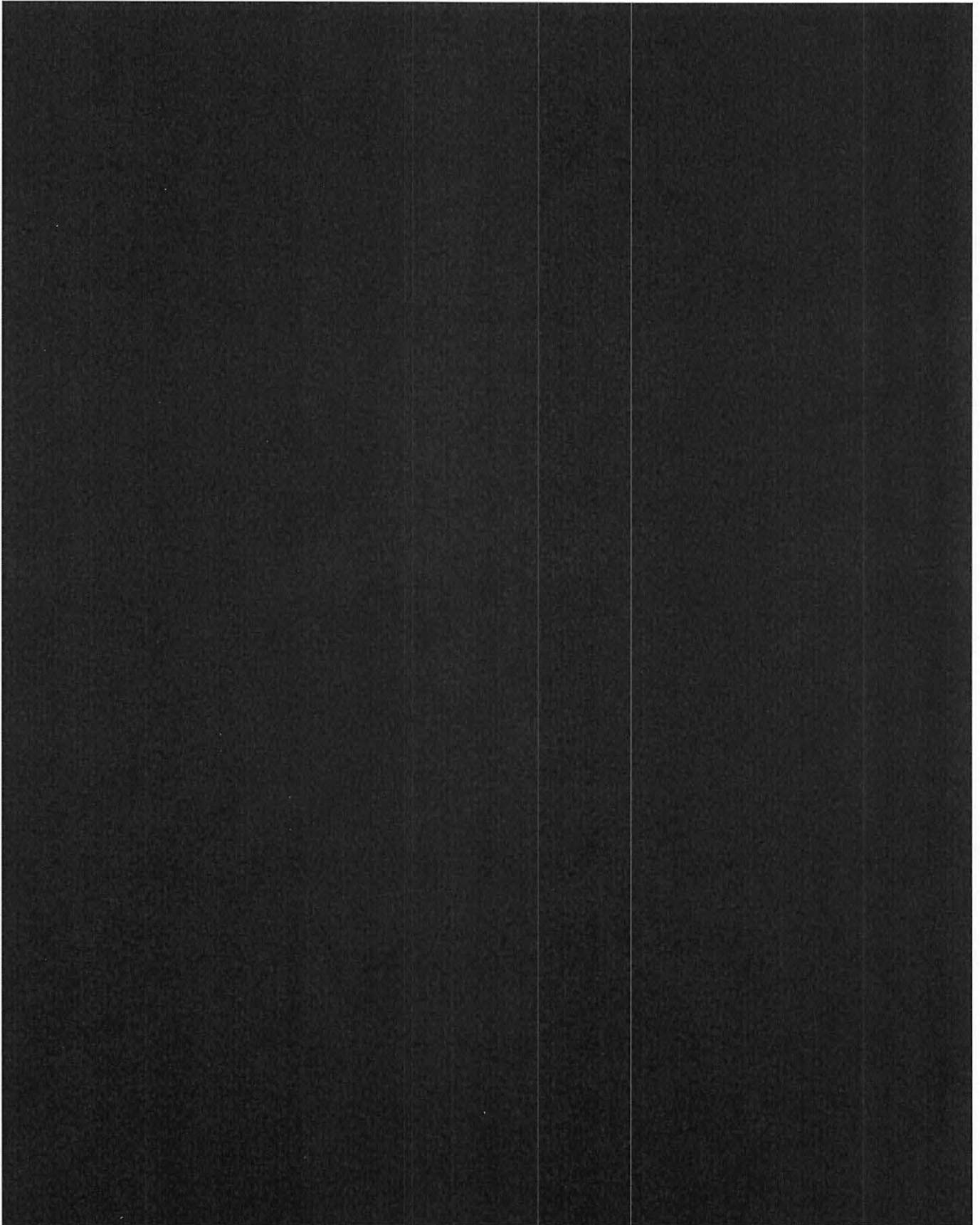


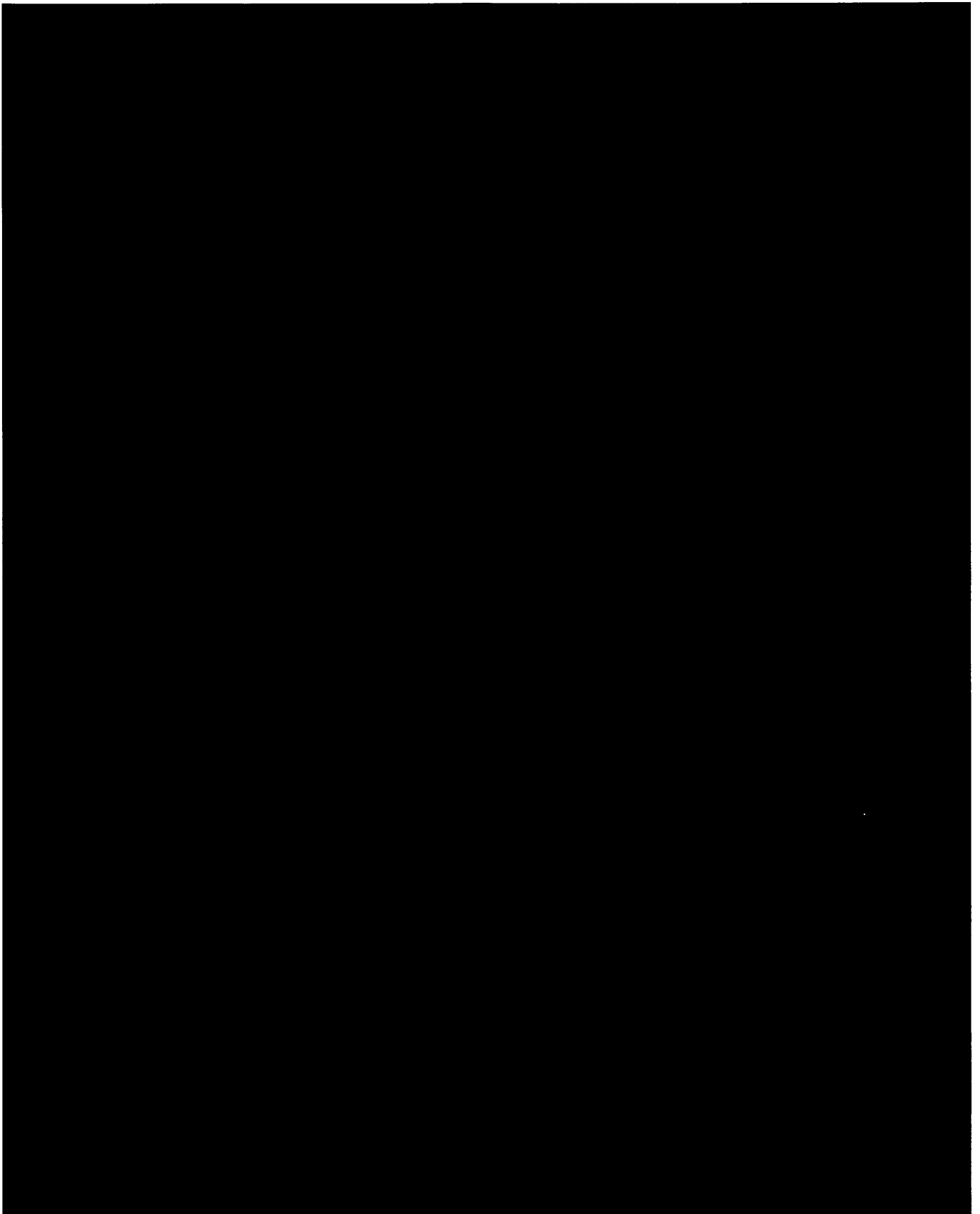










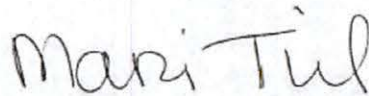


CERTIFICATE OF REPORTER

I, MARCI TIEL, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn, via videoconference, to tell the truth, the whole truth, and nothing but the truth in the within-titled cause; that said deposition is a true record and was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

I further certify that I am not of counsel or attorney for any of the parties to said deposition, nor in any way interested in the events of this cause, and that I am not related to any of the parties thereto.

Dated: March 1, 2025

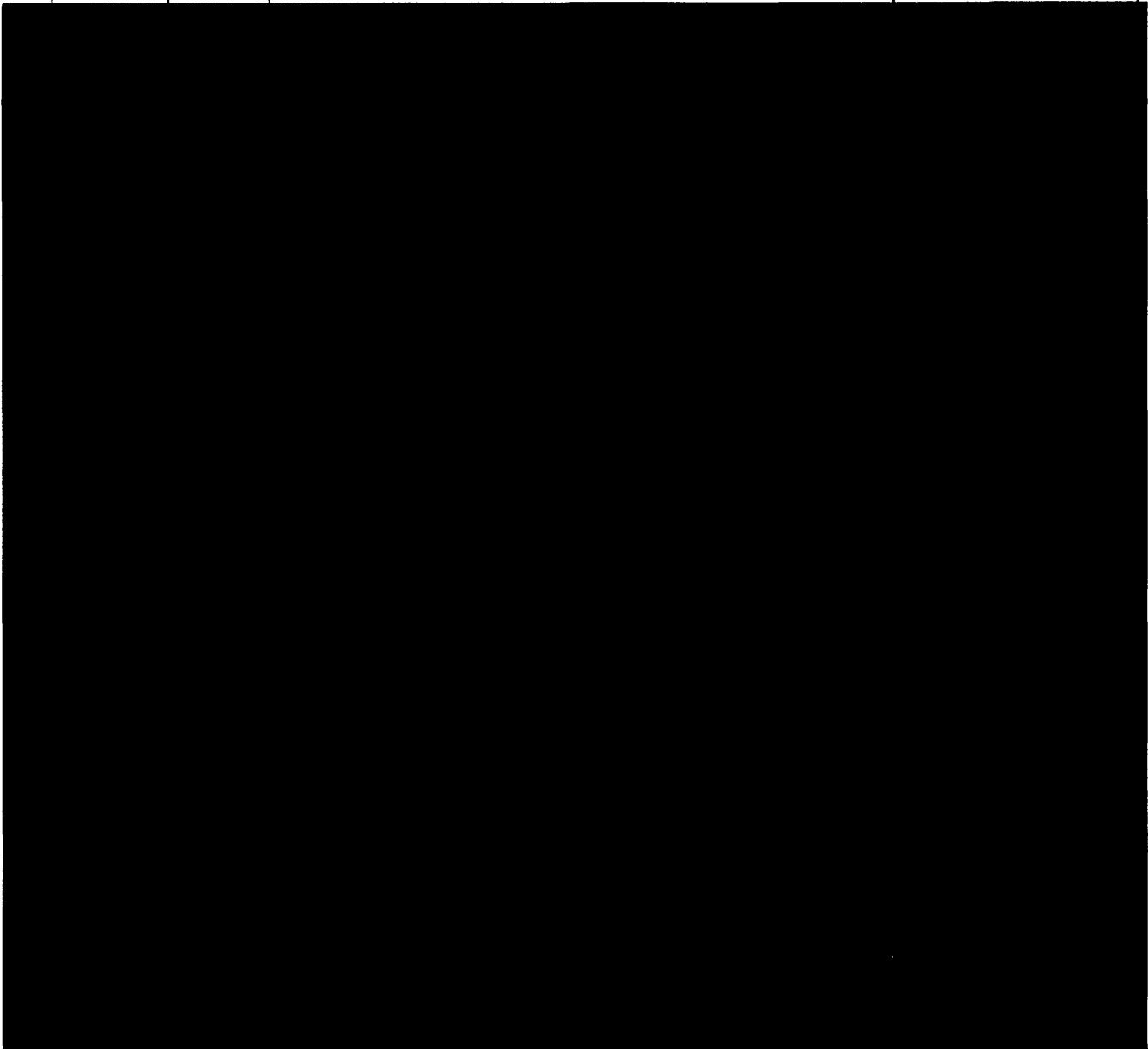


MARCI TIEL, CSR No. 12791

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

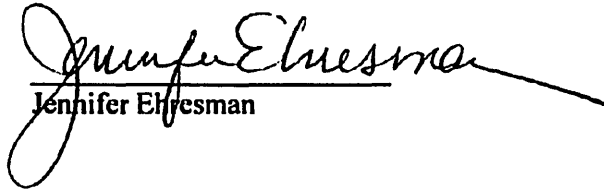
Errata for Deposition of Jennifer Ehresman, February 19, 2025

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 28 day of March, 2025.


Jennifer Ehresman