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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
ACTIONS

REMOTE VIDEOTAPED DEPOSITION OF MELISSA RAMIREZ
TUESDAY, FEBRUARY 11, 2025

JOB NO.: 10157864

REPORTED BY HEIDI FUEHRER, CSR 14145

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 VIDEOTAPED DEPOSITION OF MELISSA RAMIREZ, TAKEN ON
2 BEHALF OF THE PLAINTIFFS, AT 9:35 A.M., TUESDAY,
3 FEBRUARY 11, 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---
11 COLIN C. JONES, ATTORNEY AT LAW
177 POST STREET
12 SUITE 300
SAN FRANCISCO, CALIFORNIA 94108
13 415-362-8064
CCHAN@ALTBER.COM

14 ---AND---

15 COTCHETT, PITRE & MCCARTHY, LLP
16 BY: BRIAN DANITZ, ATTORNEY AT LAW
---AND---
17 KARIN B. SWOPE, ATTORNEY AT LAW
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18 SUITE 200
BURLINGAME, CALIFORNIA 94010
19 650-697-6000
BDANITZ@CPMLEGAL.COM

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 APPEARANCES OF COUNSEL (CONTINUED) :

2
3 FOR THE INDIVIDUAL PLAINTIFFS:

4 SWIGART LAW GROUP, APC
5 BY: JOSHUA B. SWIGART, ATTORNEY AT LAW
6 ---AND---
7 ILANA PLATKIEWICZ, ATTORNEY AT LAW
8 2221 CAMINO DEL RIO S
9 SUITE 308
10 SAN DIEGO, CALIFORNIA 92108
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14 ---AND---

15 SHAY LEGAL, APC
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22

23 FOR THE DEFENDANT:

24 GOODWIN PROCTER, LLP
25 BY: LINDSAY E. HOYLE, ATTORNEY AT LAW
---AND---
ANNE BAYLY BUCK, ATTORNEY AT LAW
620 EIGHTH AVENUE
NEW YORK, NEW YORK 10018
212-813-8800
LHOYLE@GOODWINLAW.COM

26 ALSO PRESENT:

MARISA RAMOS, VIDEOGRAPHER

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 CHARLOTTE, NORTH CAROLINA;

2 TUESDAY, FEBRUARY 11, 2025, 9:35 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: Good morning. We are on the
11 record. The time is 9:35 a.m. Pacific time on
12 February 11, 2025. This begins the remote video
13 recorded deposition of Melissa Ramirez taken in the
14 matter In Re Bank of America California Unemployment
15 Benefits Litigation filed before the United States
16 District Court, Southern District of California, case
17 number of which is 3:21-md-02992-GPC-MSB. This
18 deposition is being held virtually, and the witness is
19 located in Charlotte, North Carolina. Throughout the
20 deposition I will be using Pacific time to read us on
21 and off the record.

22 My name is Marisa Ramos. I'm the videographer
23 today. The court reporter is Heidi Fuehrer, and we are
24 both here representing Aptus Court Reporting located at
25 401 West A Street, suite 1680, San Diego, California.

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 Please note that audio and video recording will continue
2 to take place unless all parties agree to go off the
3 record. Microphones are sensitive so I ask if there are
4 any electronic devices around you that make noise, such
5 as notifications, that you please place those on silent
6 or away from the microphones as that my interfere with
7 the deposition audio.

8 Counsel, would you please state your appearance
9 and affiliations for the record, after which, the court
10 reporter will issue a statement and swear in the
11 witness.

12 MS. CHAN: Good morning. Connie Chan for class
13 plaintiffs.

14 MS. HOYLE: Lindsay Hoyle and Bayly Buck from
15 Goodwin Procter on behalf of defendant Bank of America.

16 THE COURT REPORTER: Just for the record, my
17 name is Heidi Fuehrer, and my license number is 14145.

18
19 MELISSA RAMIREZ,
20 HAVING BEEN FIRST DULY SWORN BY THE REPORTER,
21 WAS EXAMINED AND TESTIFIED AS FOLLOWS:

22
23 EXAMINATION

24 BY MS. CHAN:

25 Q Thank you. Good morning, Ms. Ramirez. Thank

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 you again for being here. As I said earlier, my name is
2 Connie Chan. I'm one of the counsel for plaintiffs.

3 Have you had any prior names?

4 A Yes, Melissa Gargagliano.

5 Q And when did you change your name from Melissa
6 Gargagliano to Melissa Ramirez?

7 A After divorce, I'm trying -- do you need the
8 exact date of when I filed or approximate date?

9 Q Just the year is fine.

10 A Let me think about it. I think the year
11 would have been 2022 or early 2023 when the divorce
12 was finalized.

13 Q Thank you.

14 A I could look at my driver's license if that
15 helps.

16 Q No, that's not necessary. Thank you. Have you
17 been deposed before?

18 A No.

19 Q You understand that you are testifying under
20 oath and under penalty of perjury today the same as if
21 you were in court?

22 A Correct, yes.

23 Q Thank you. What, if anything, did you do to
24 prepare for your deposition today?

25 A I spoke with Lindsay and got a lay of the

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 land on how it would work and the protocols, and that
2 it would be videotaped, and I saw the notice of
3 deposition, the one that you just put up. By the
4 way, it looks fine. I think I can use the technology
5 to look at documents you are going to share.

6 Q Great. And you said you met with Lindsay. Is
7 that your counsel Lindsay Hoyle?

8 A Yes.

9 Q Did you meet with anyone else in preparation
10 for your deposition today?

11 A Yes, Matt. Is his --

12 Q Matt Riffie?

13 A Riffie, yes, thank you.

14 Q Did you meet with anyone other than your
15 lawyers?

16 A No.

17 Q No non lawyers were present for your meetings
18 with your lawyers?

19 A That's correct.

20 Q Have you spoken to anyone who has already had
21 their deposition taken in this case about their
22 deposition testimony?

23 A Nope. No.

24 Q Have you spoken with William Matt Martin about
25 this case at all?

Melissa Ramirez

In Re Bank of America CA Unemployment Benefits Litigation

1 A No.

2 Q Have you spoken with any other bank employees
3 or former bank employees about this litigation?

4 A No.

5 Q What documents, if any, did you review to
6 prepare for your testimony today?

7 A Reviewed the notice of deposition to make
8 sure that it was accurate, and I guess the
9 statements, I think that was the notice of deposition
10 with regard to my statements, and talked mainly about
11 the protocol and the tutorials and such.

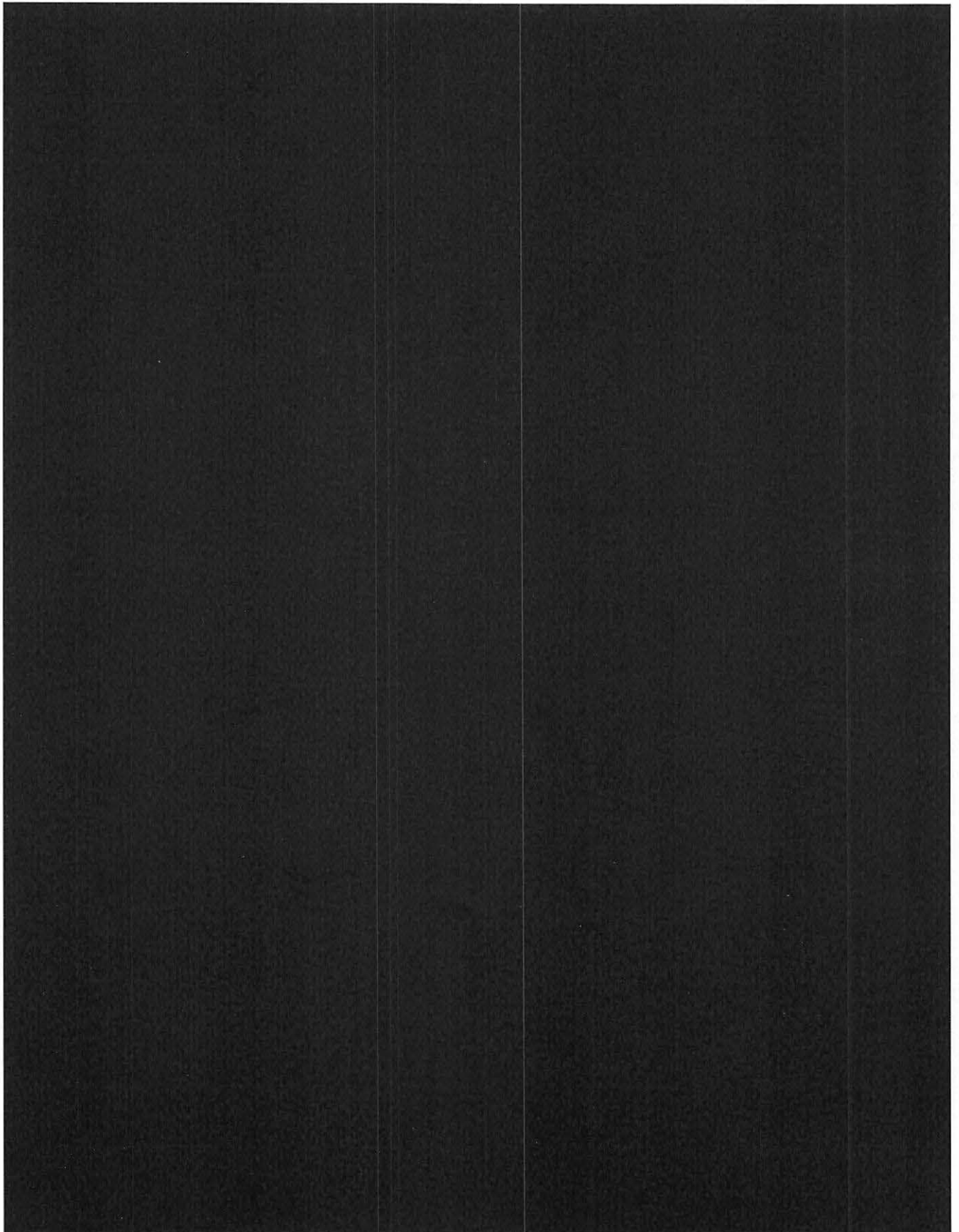
12 Q When you say with regard to your statements,
13 can you clarify what statements you are referring to?

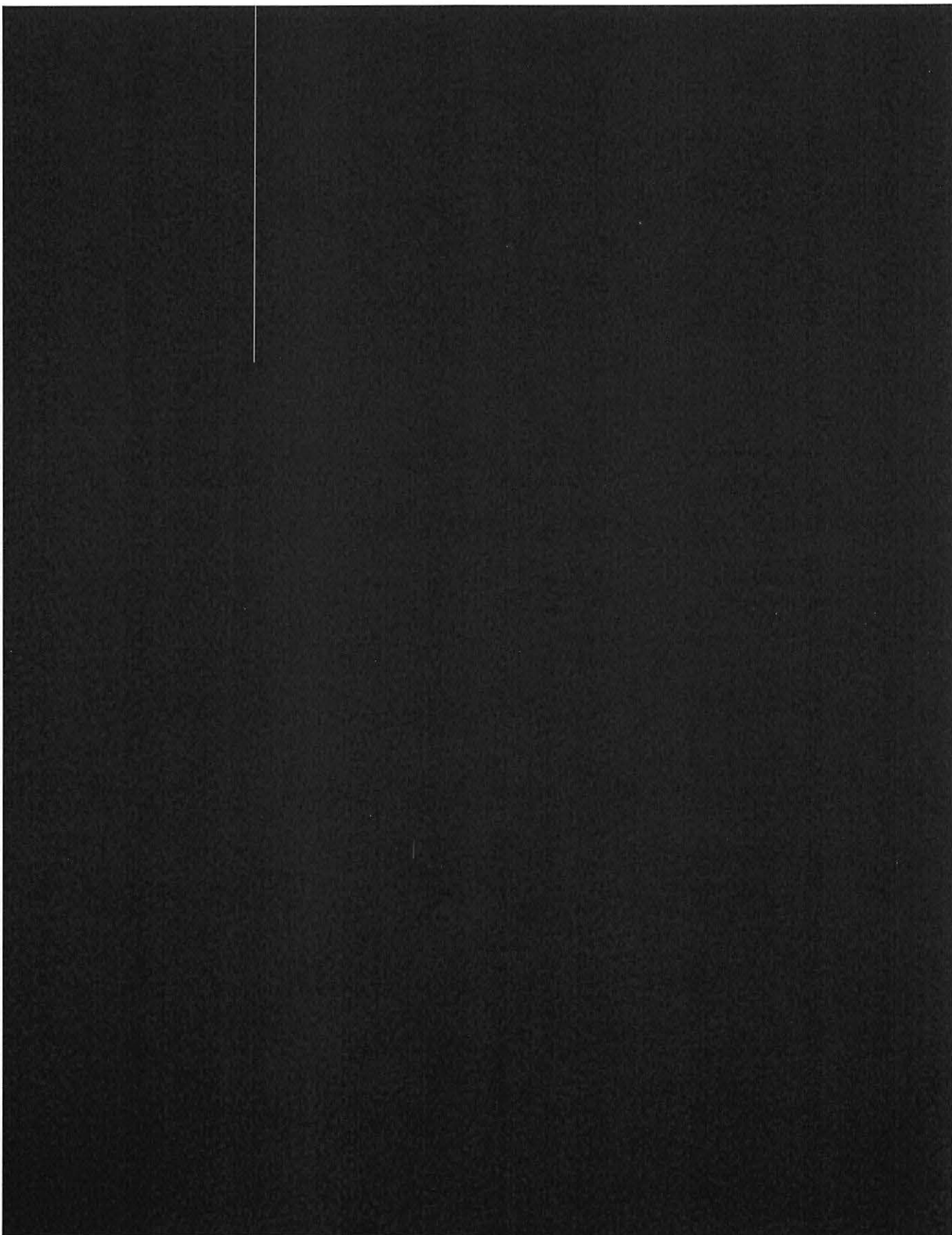
14 A That I had a particular role at a particular
15 time under Bank of America, and it had some other
16 statements on it.

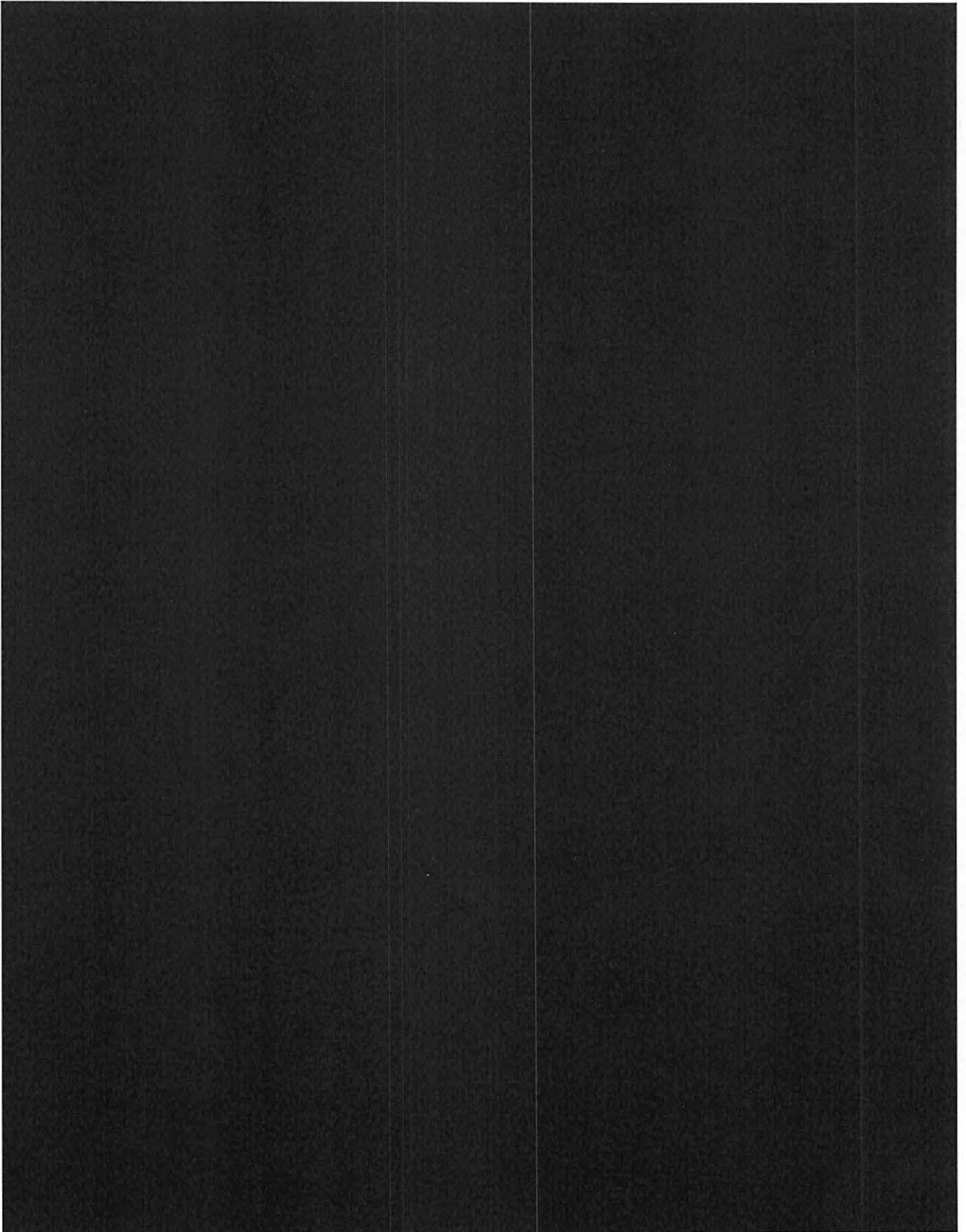
17 Q Are you referring to a declaration that you
18 submitted in this case?

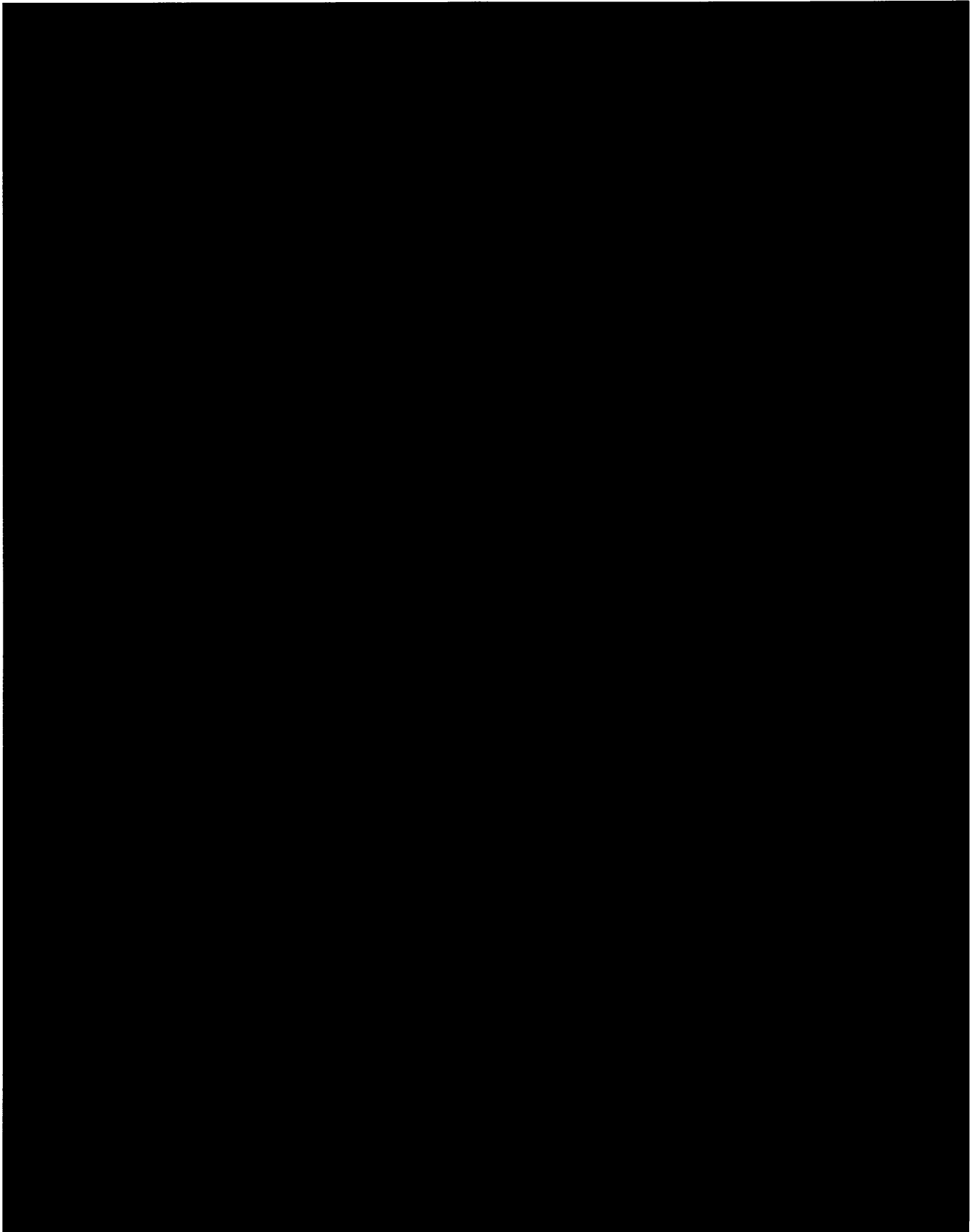
19 A That's what it is, yeah. Sorry, I'm not an
20 attorney. I don't know the legal -- I'm a banker,
21 but --

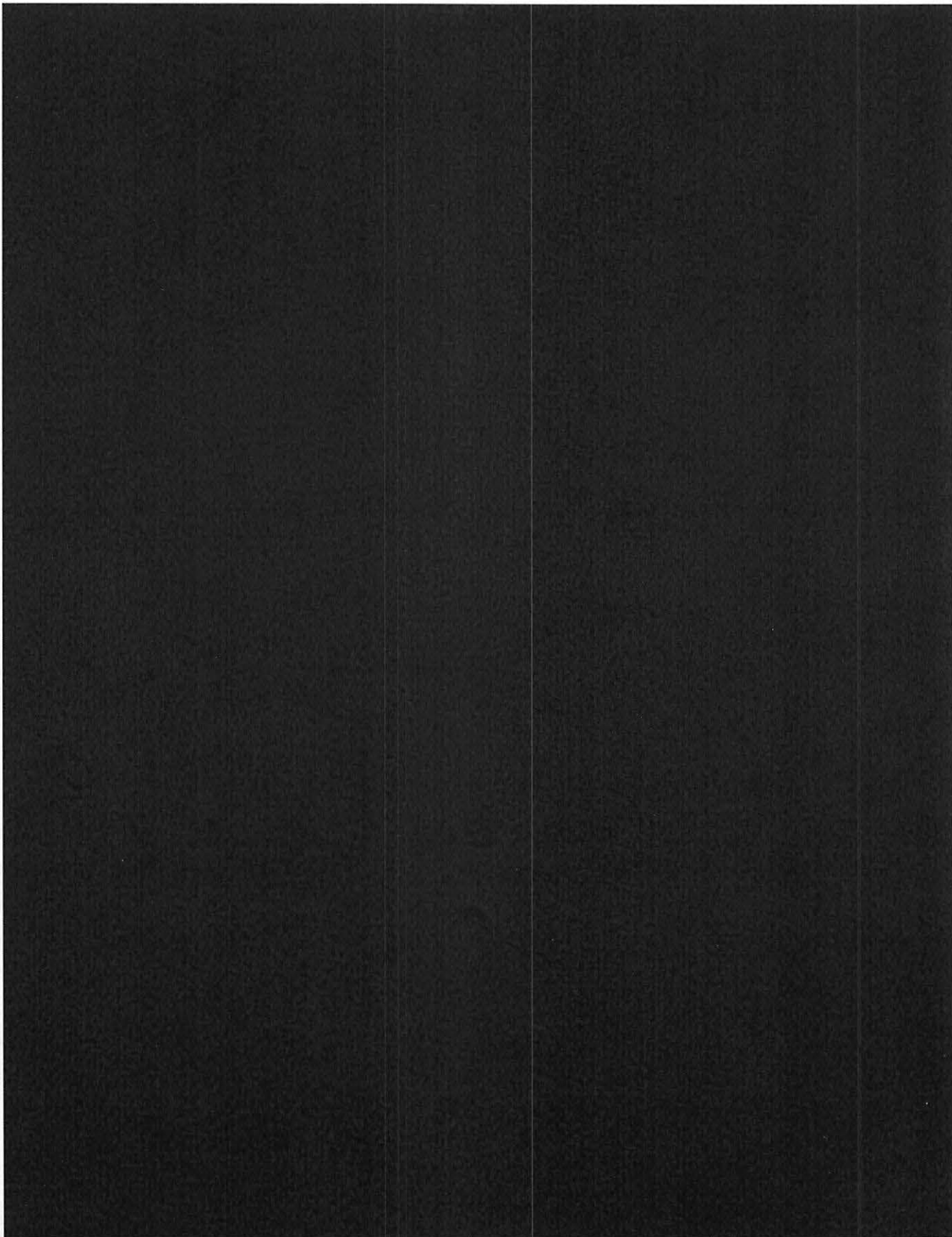
22 Q That's completely fine. I just want to make
23 sure we're on the same page. So you reviewed the
24 declaration that you had submitted in this litigation
25 previously?

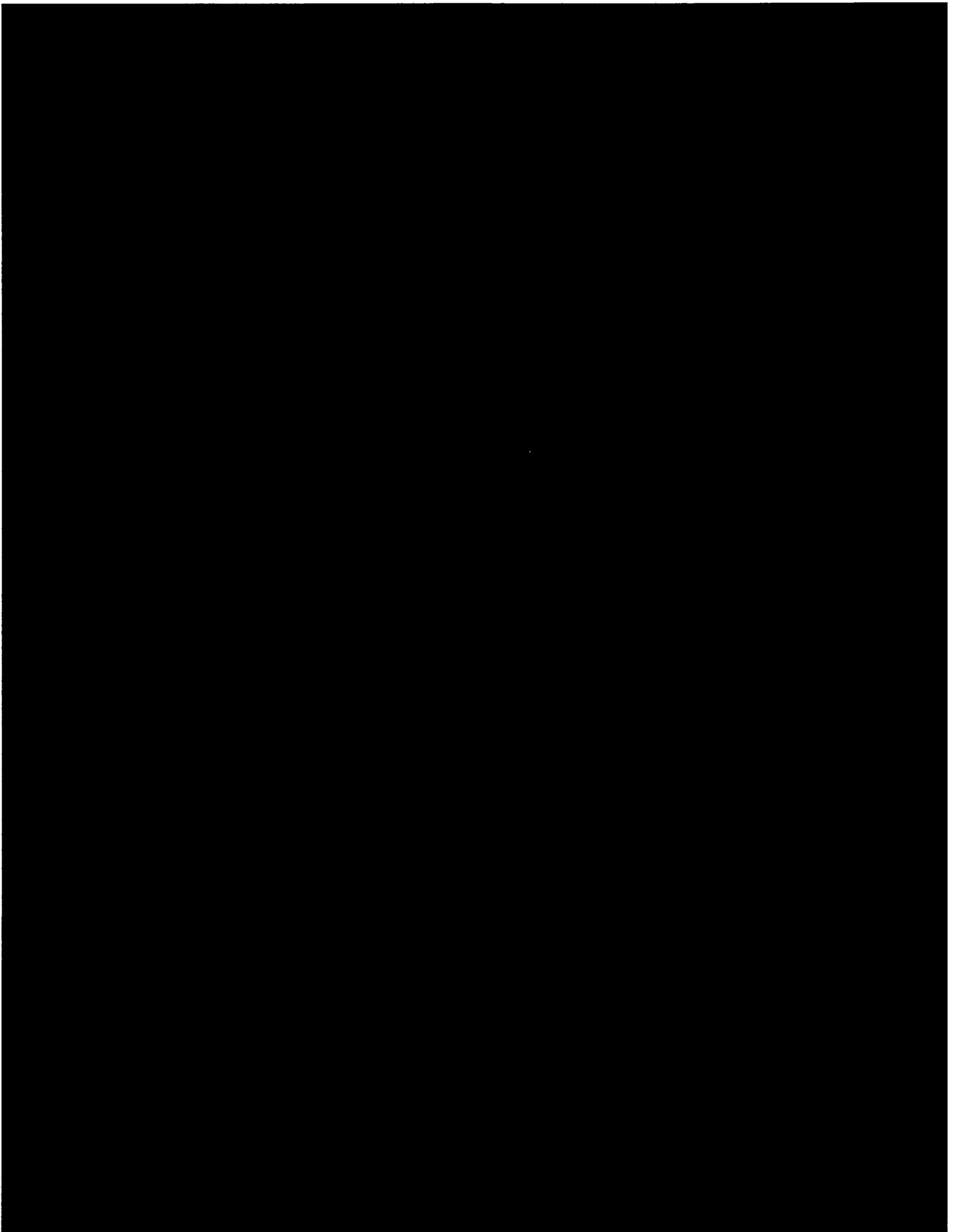


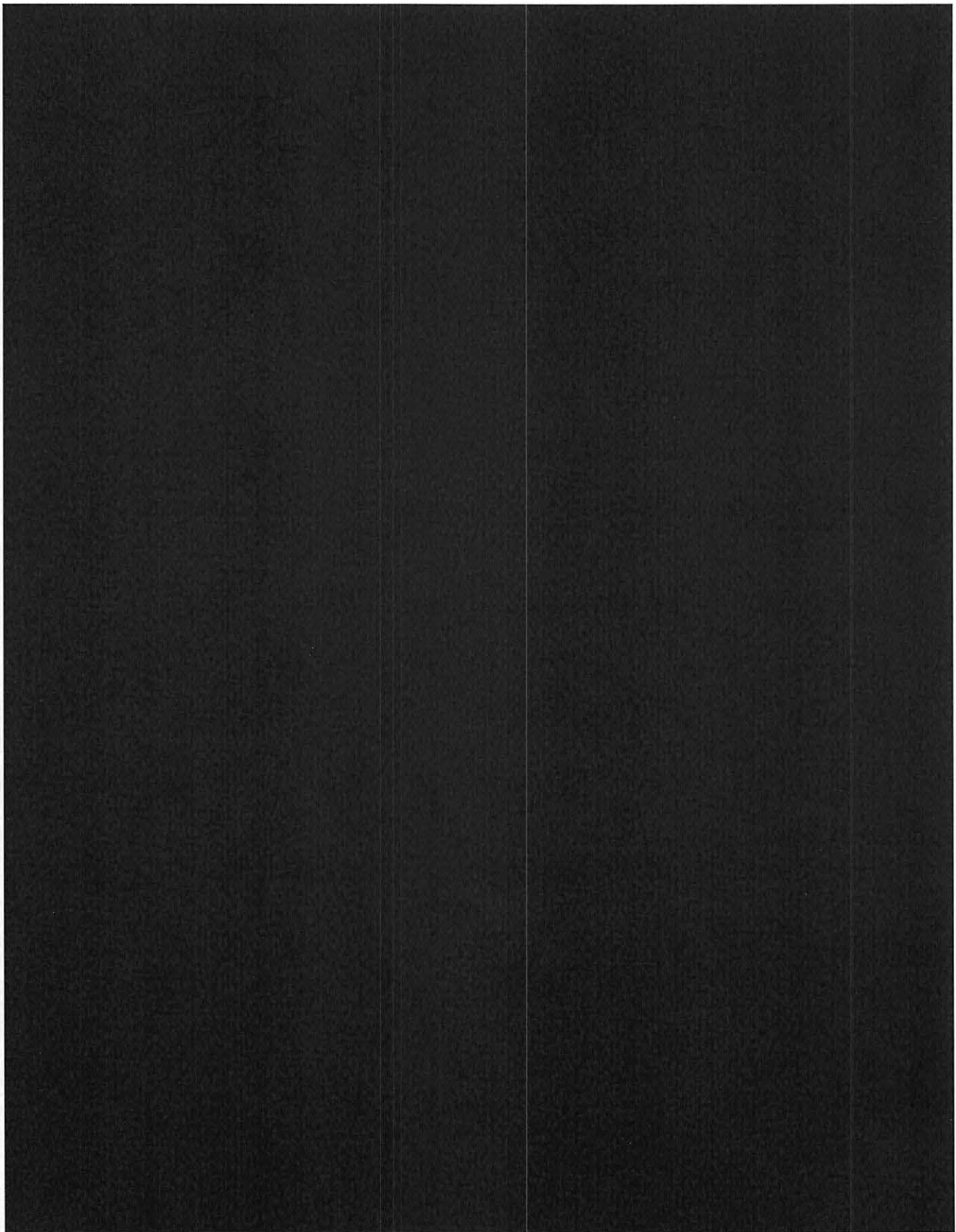


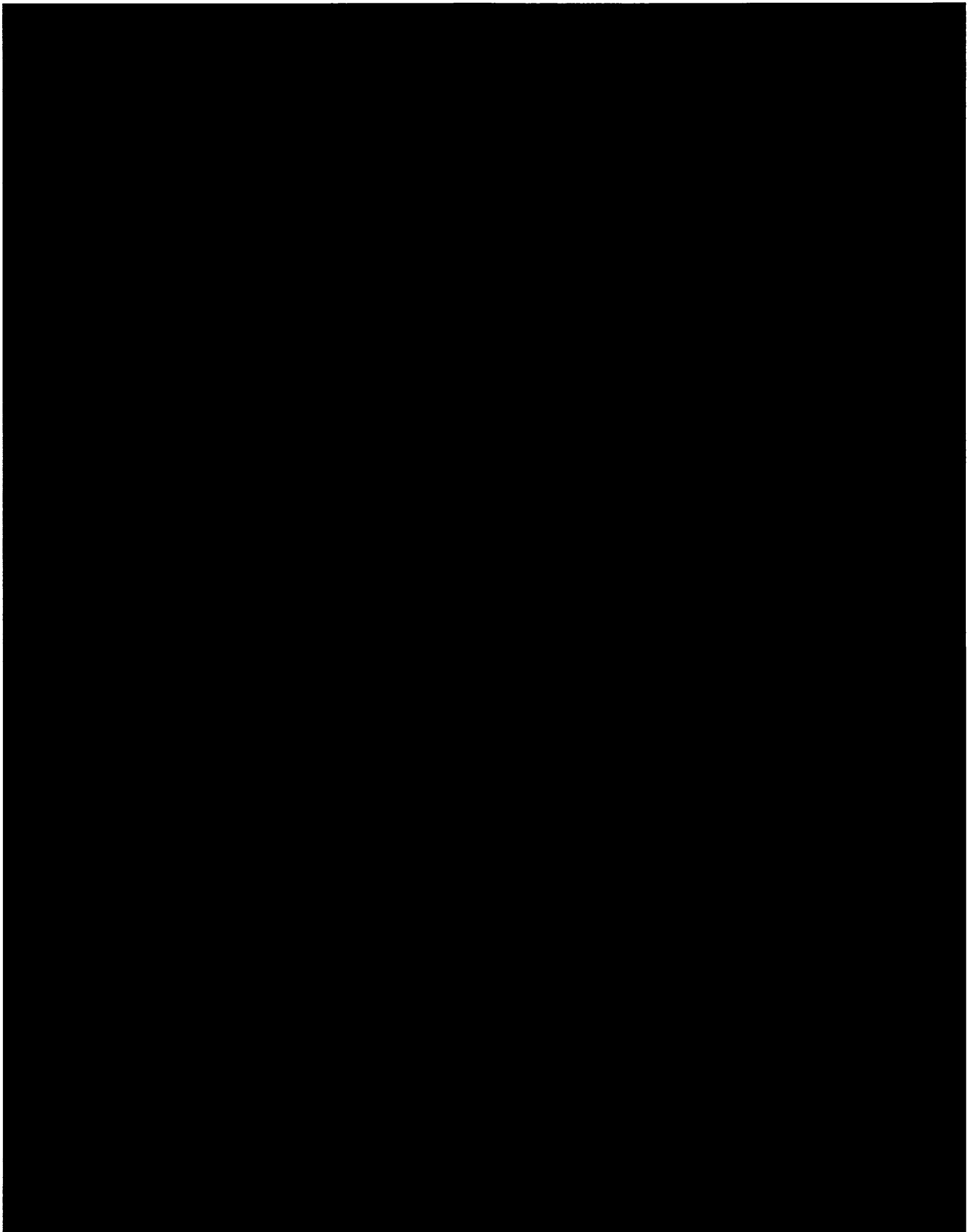


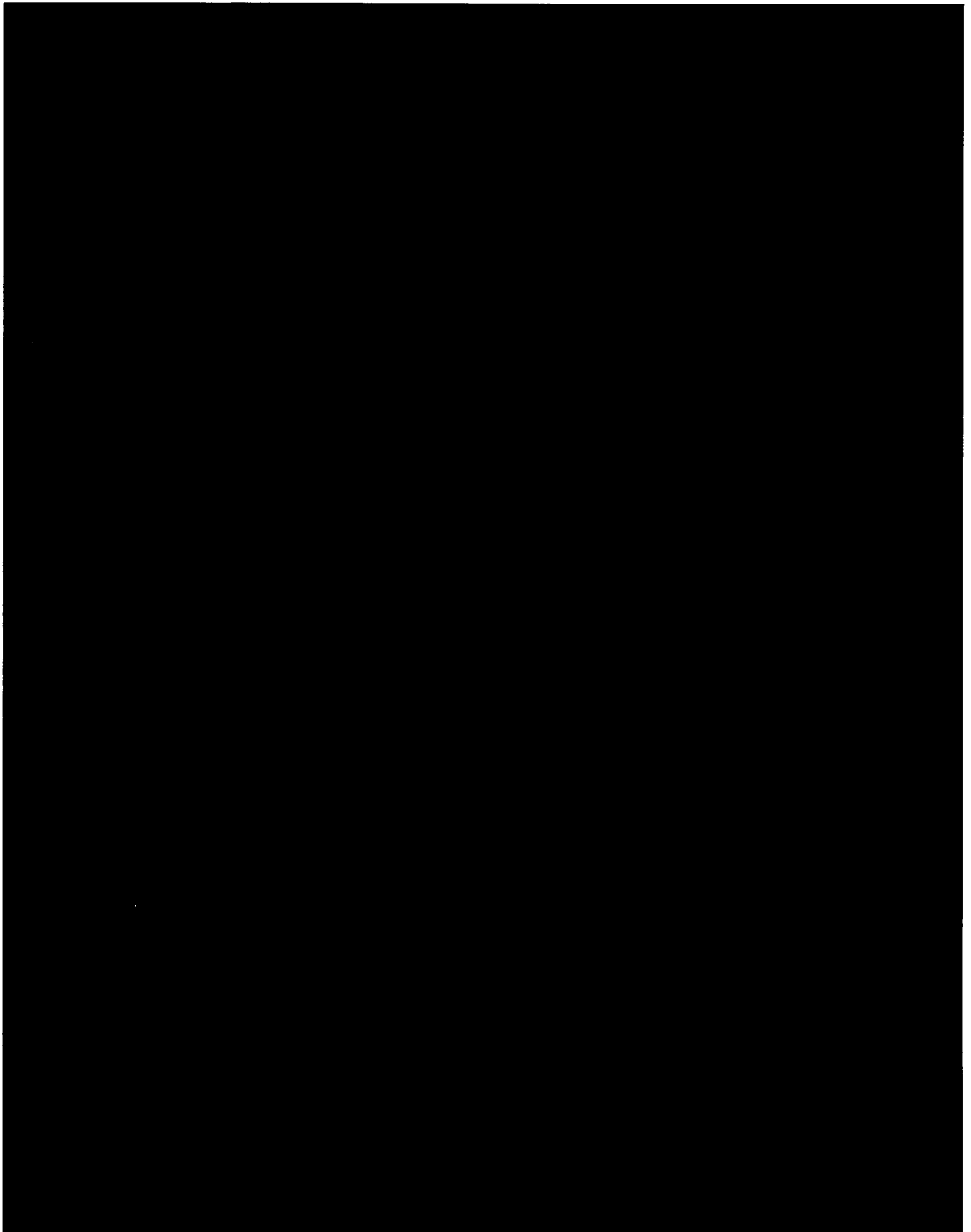


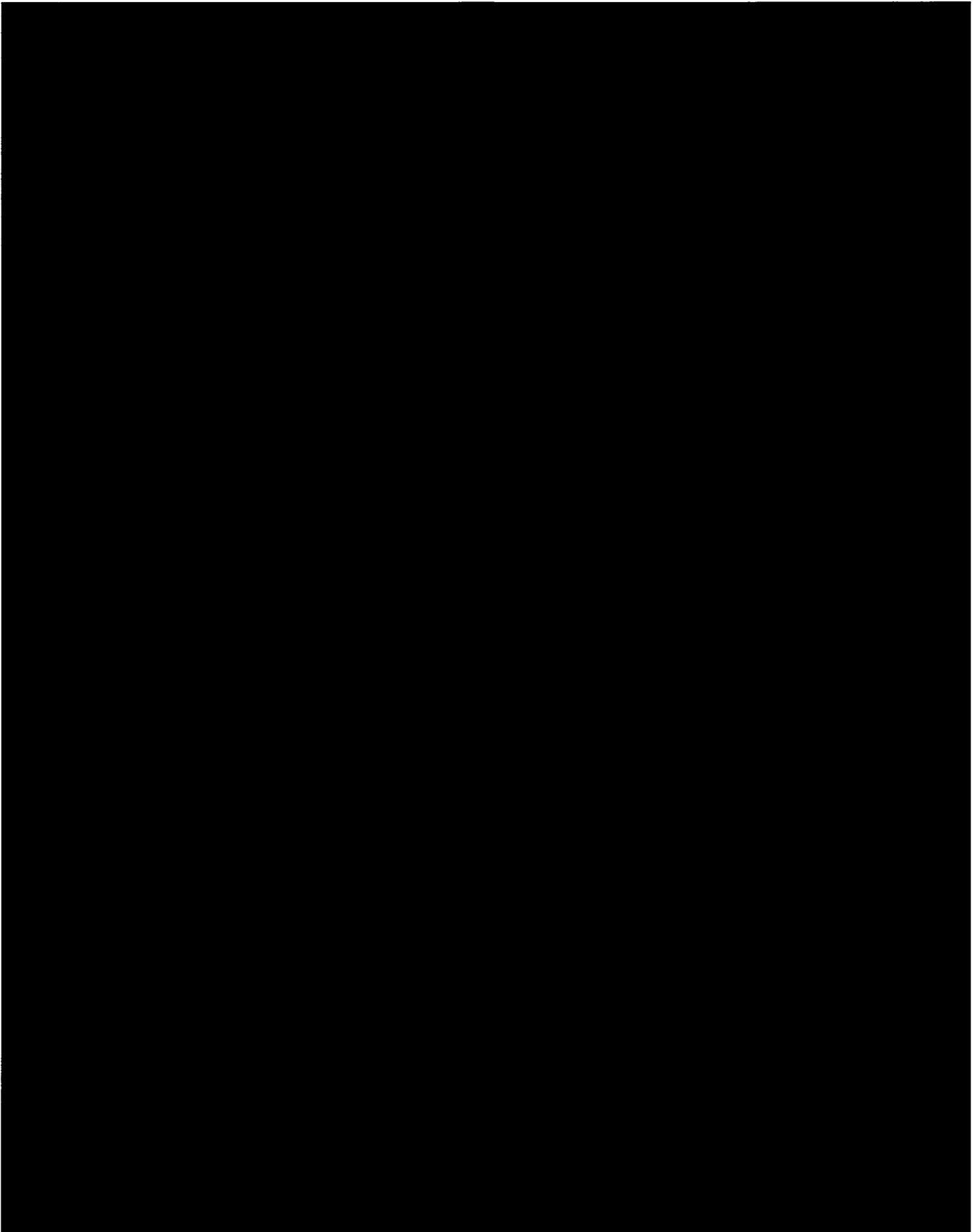


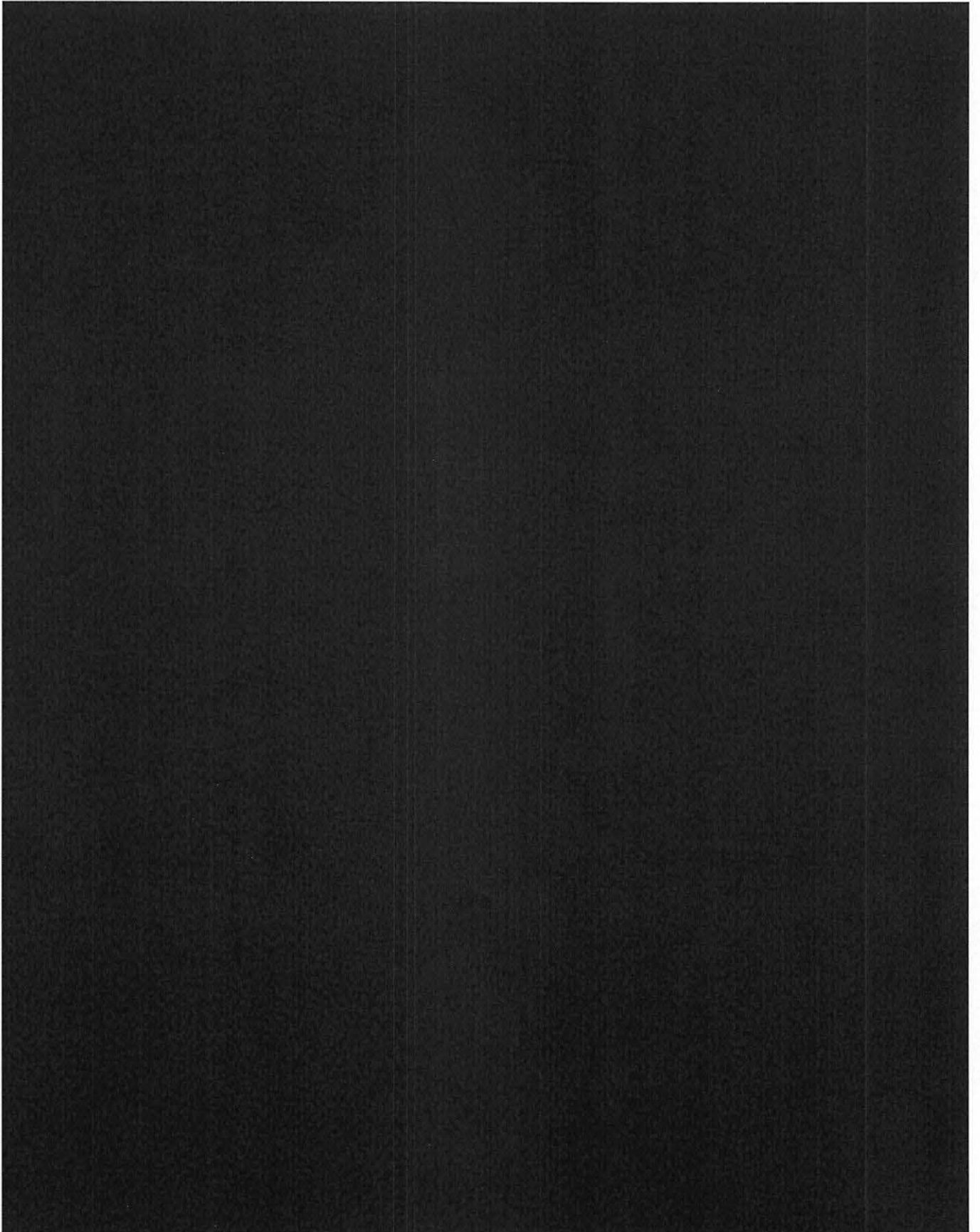


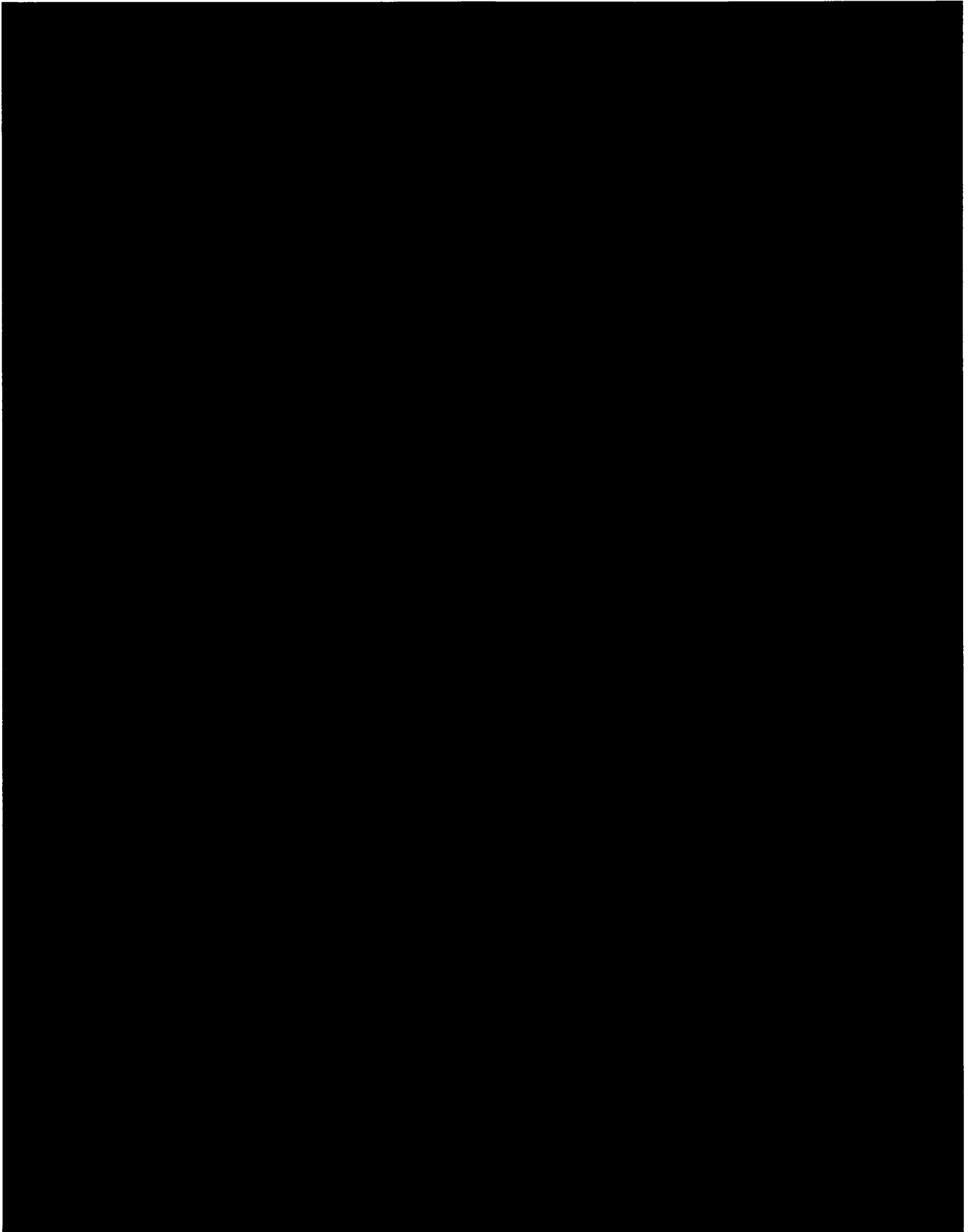


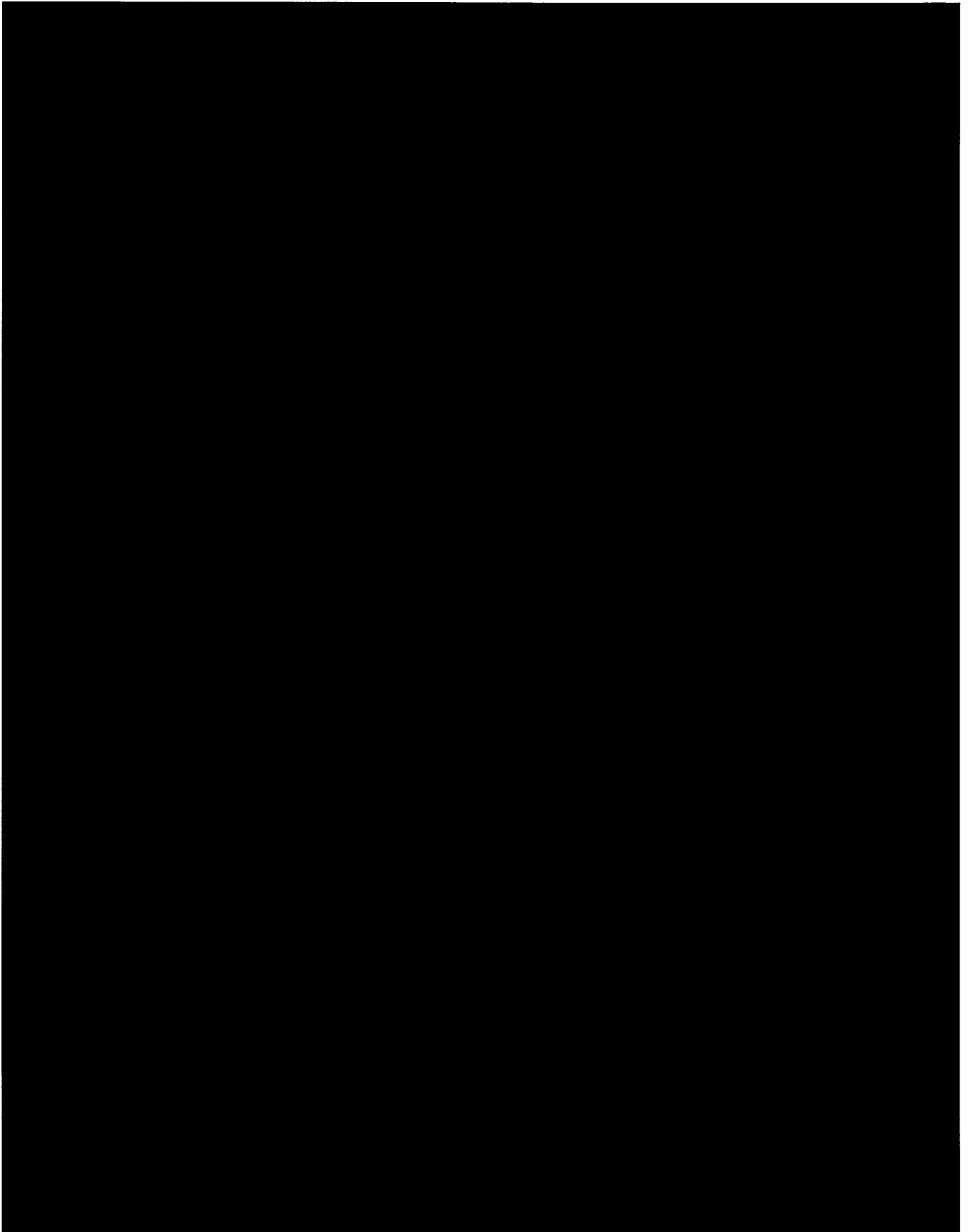


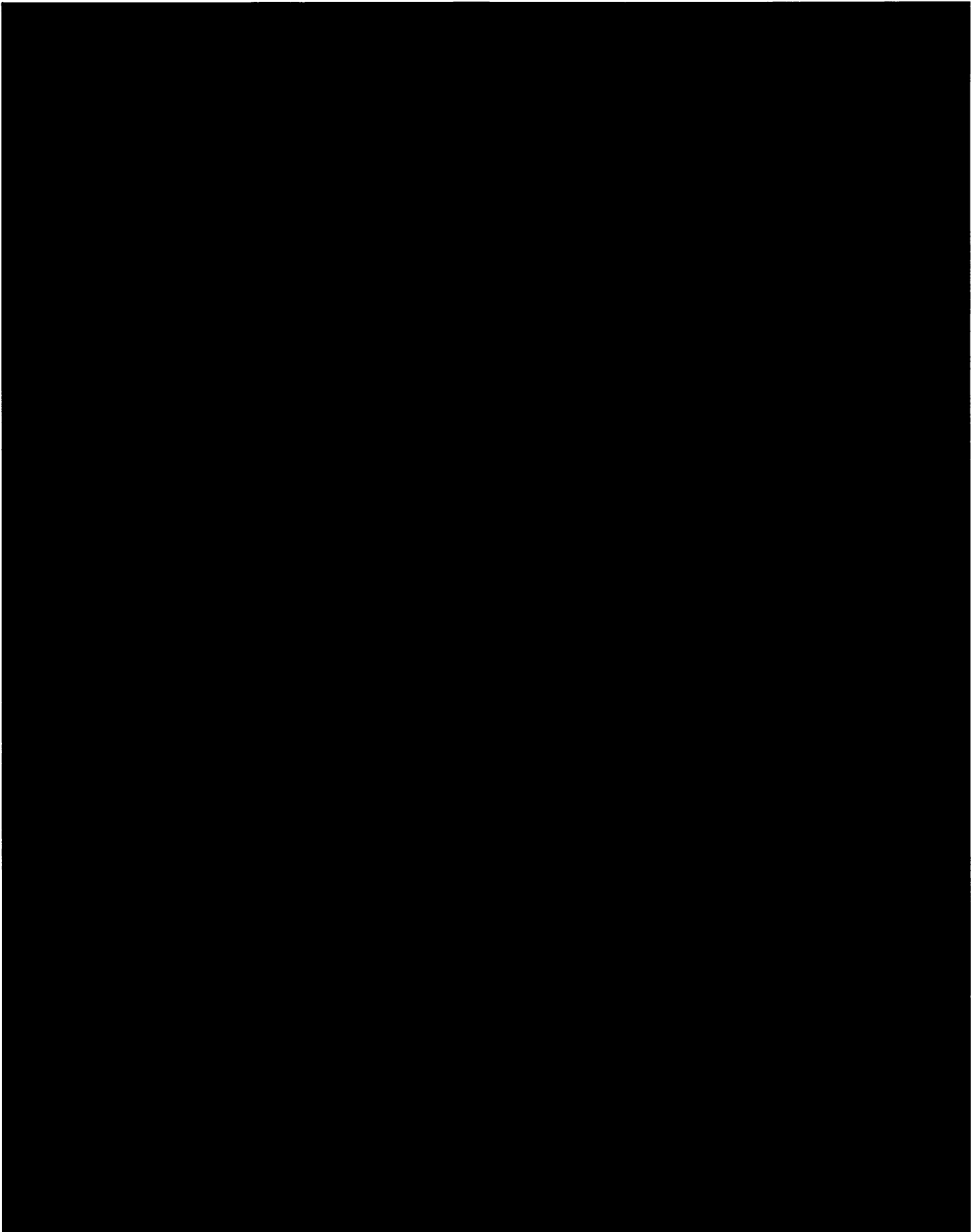


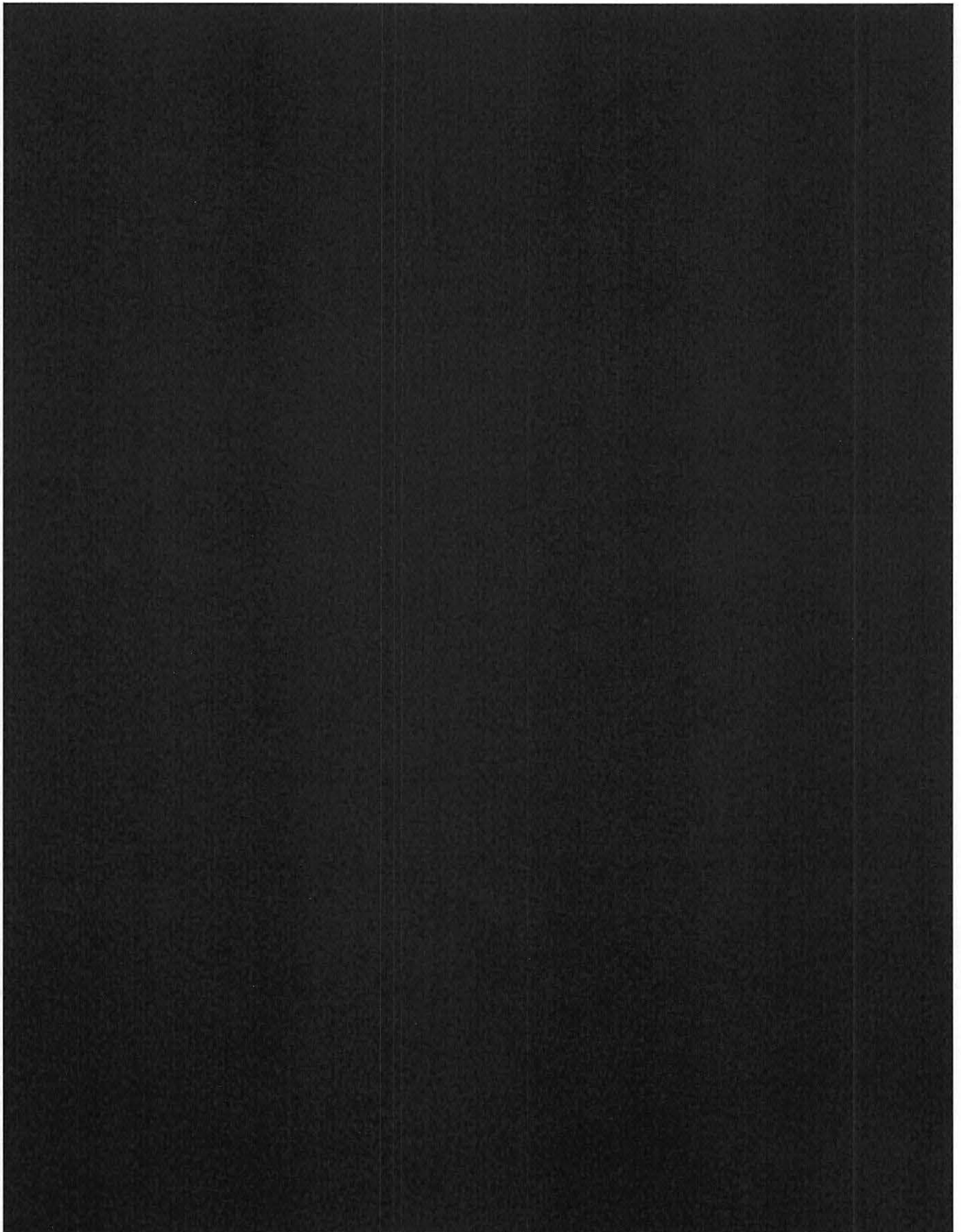


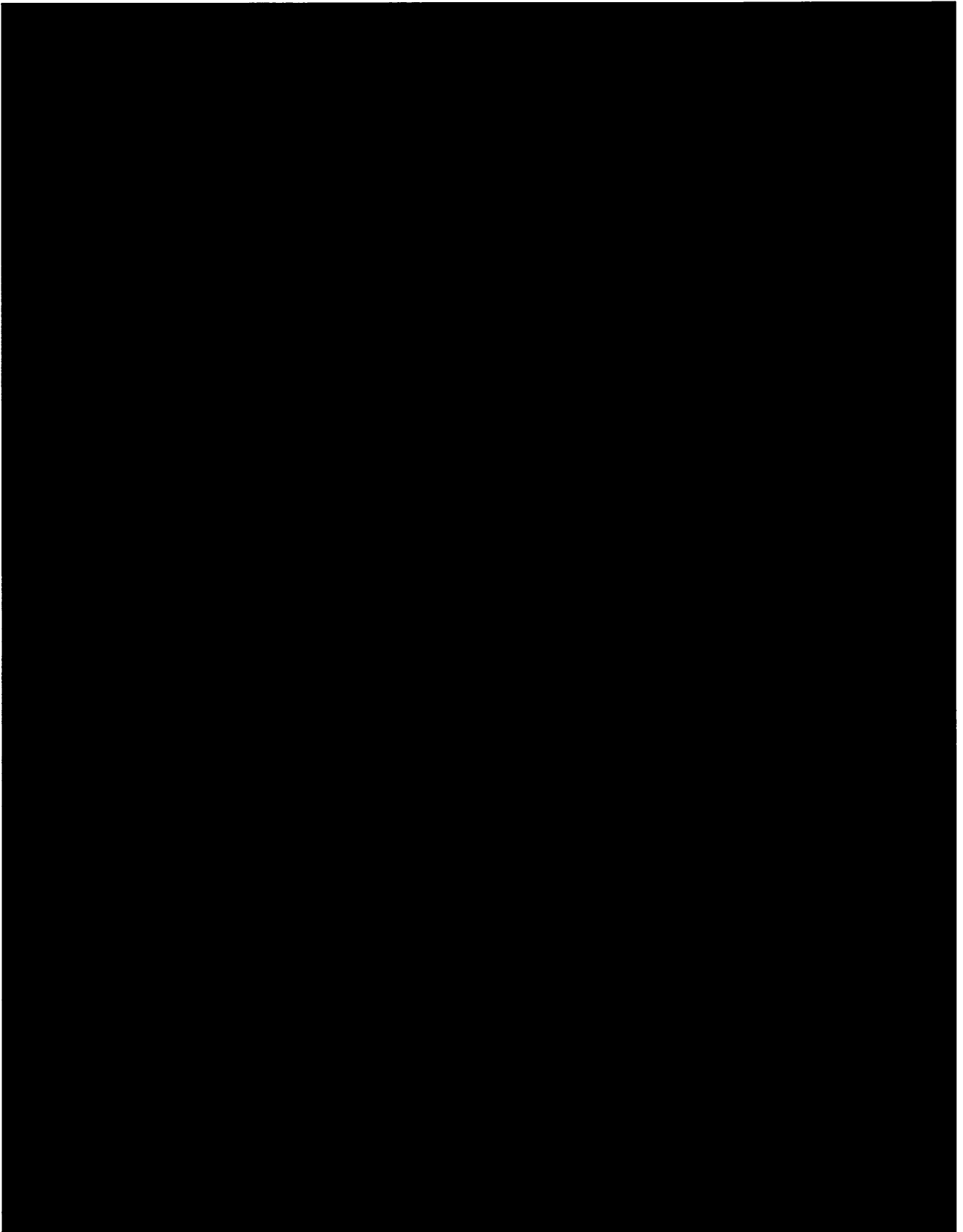


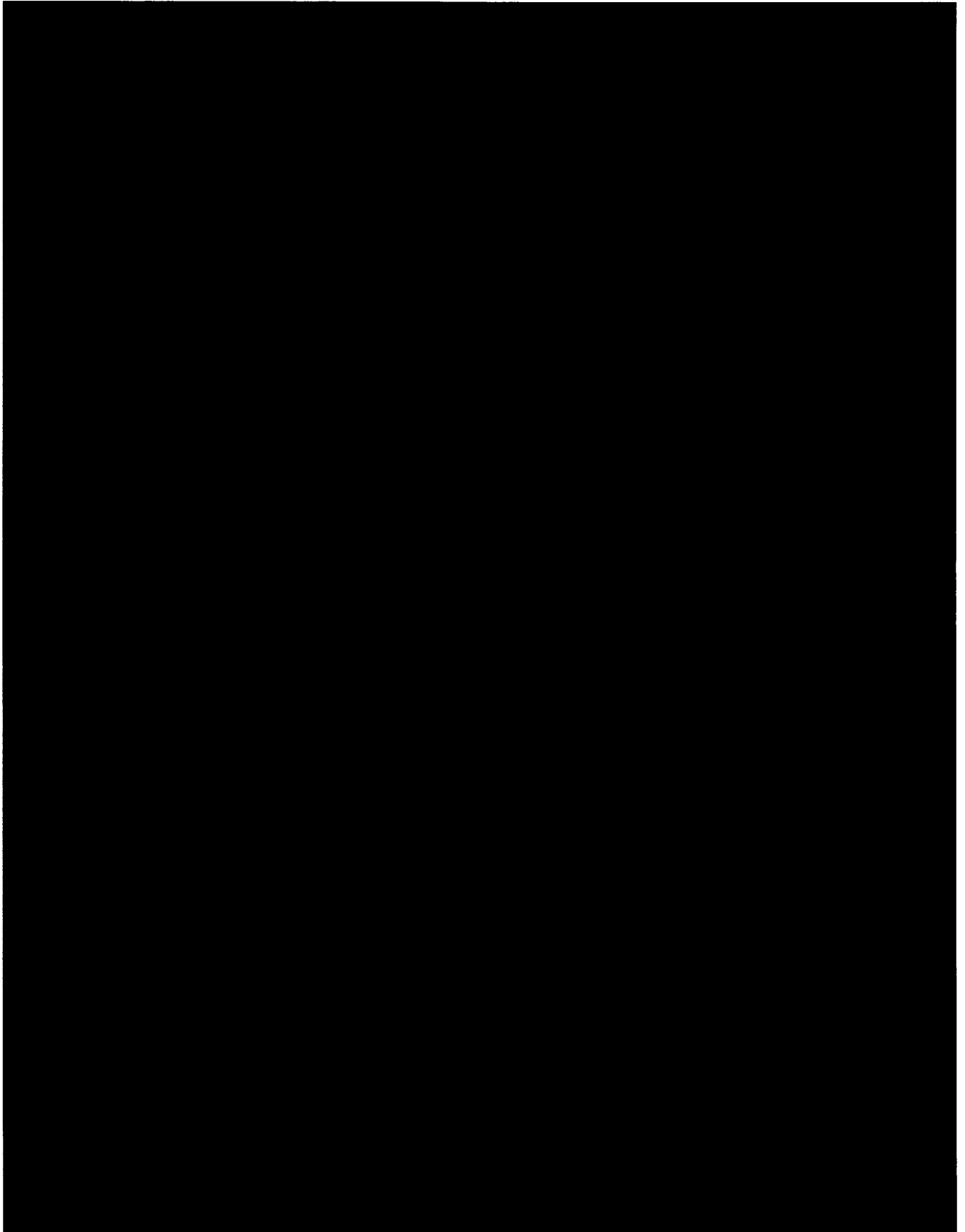


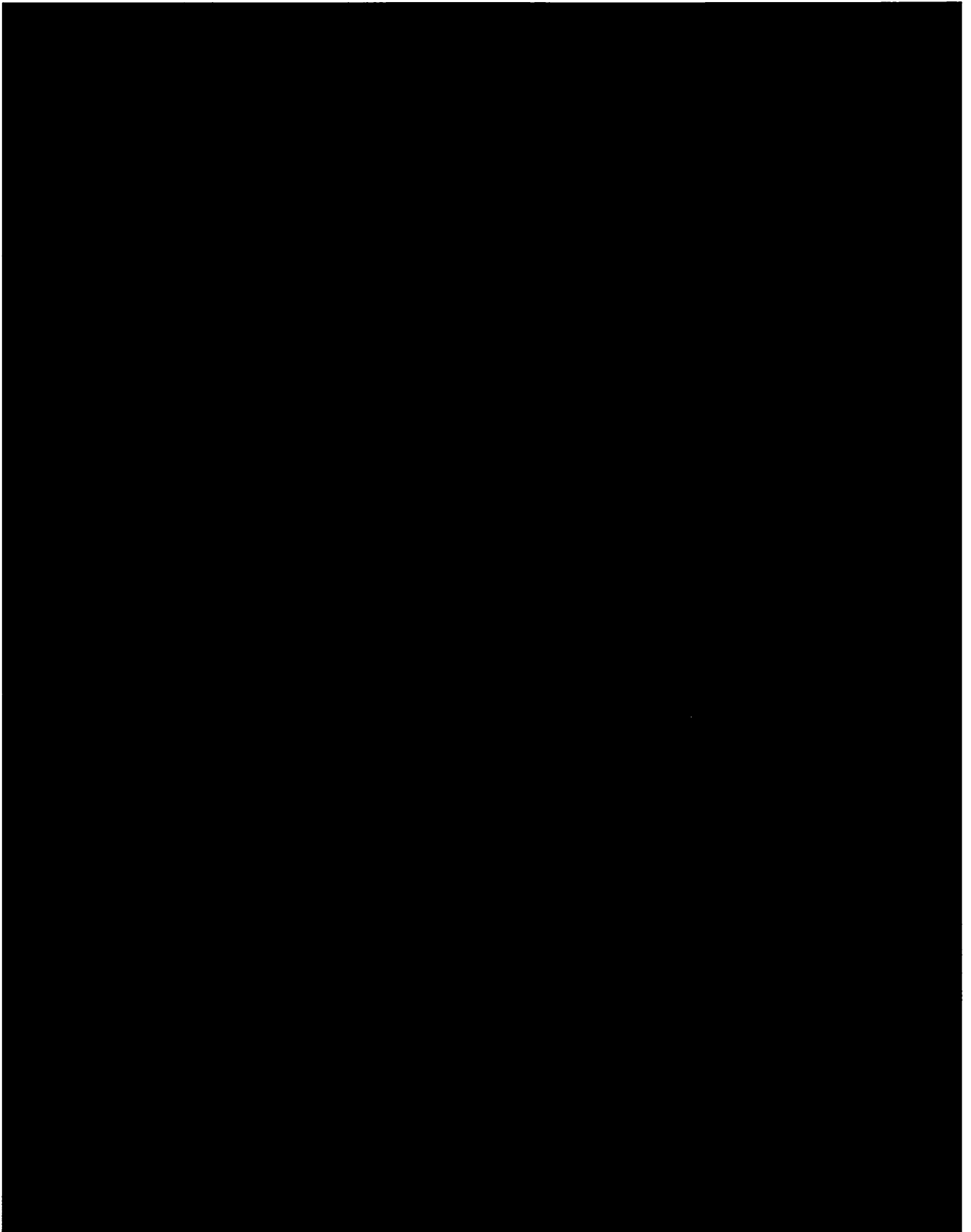


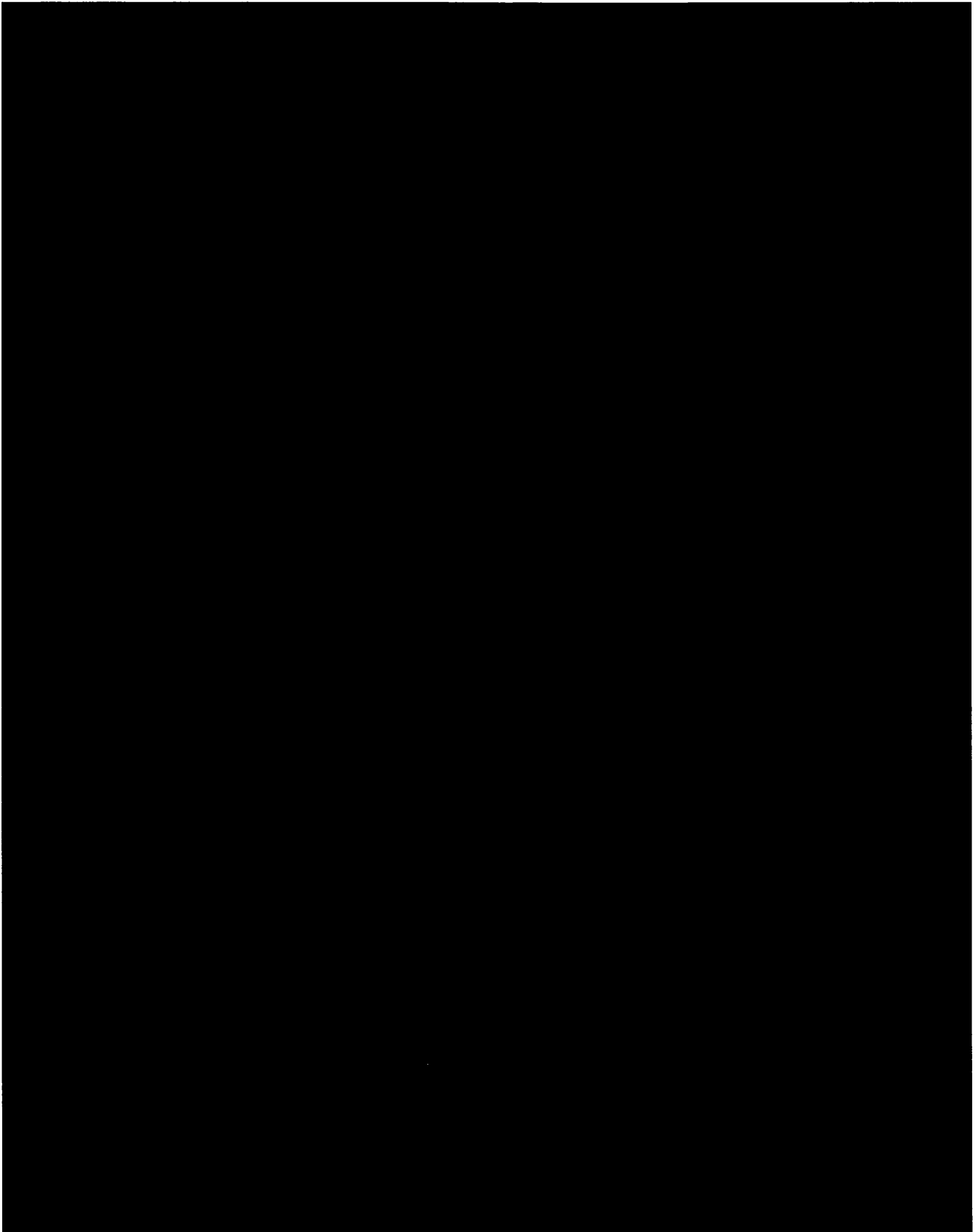


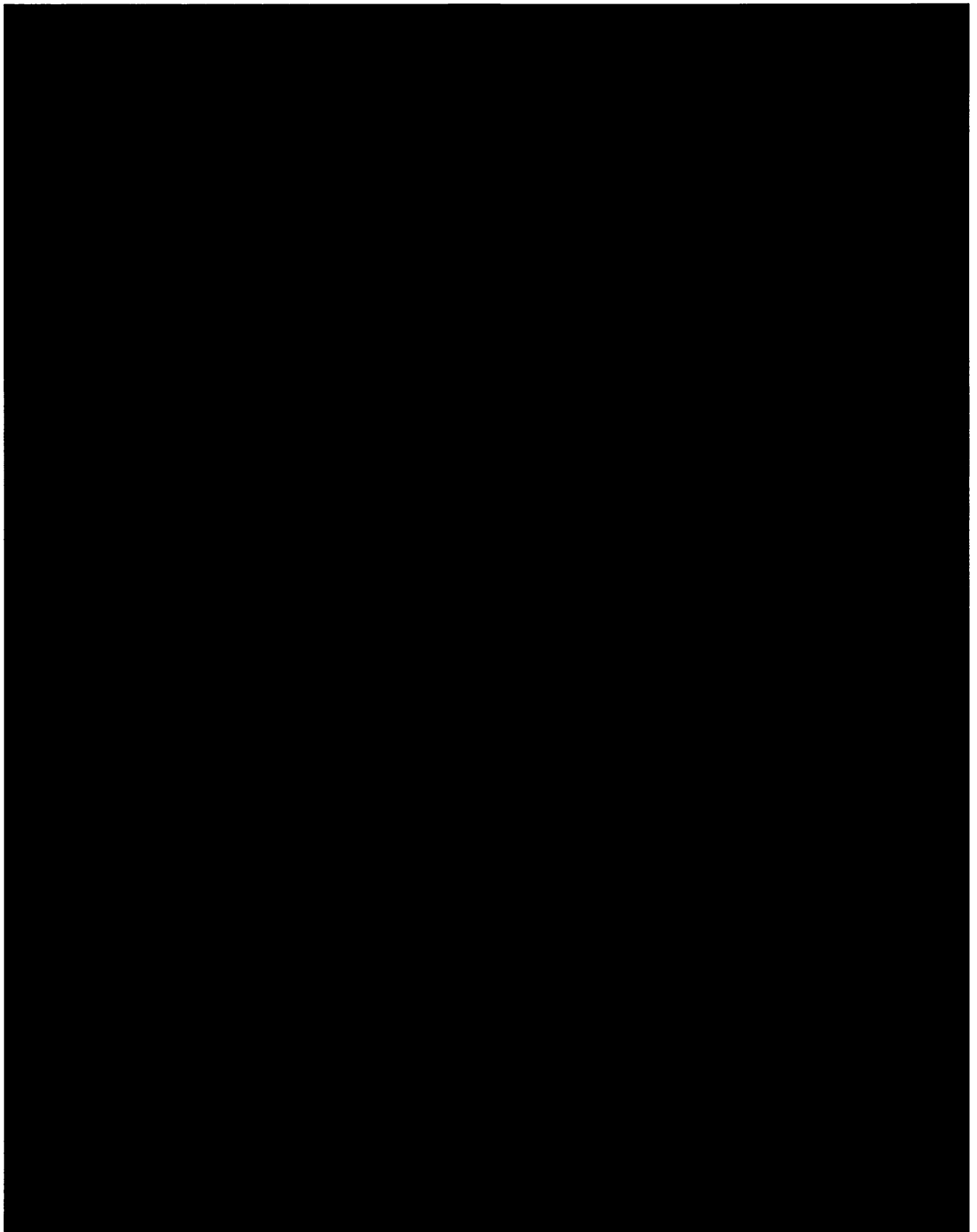


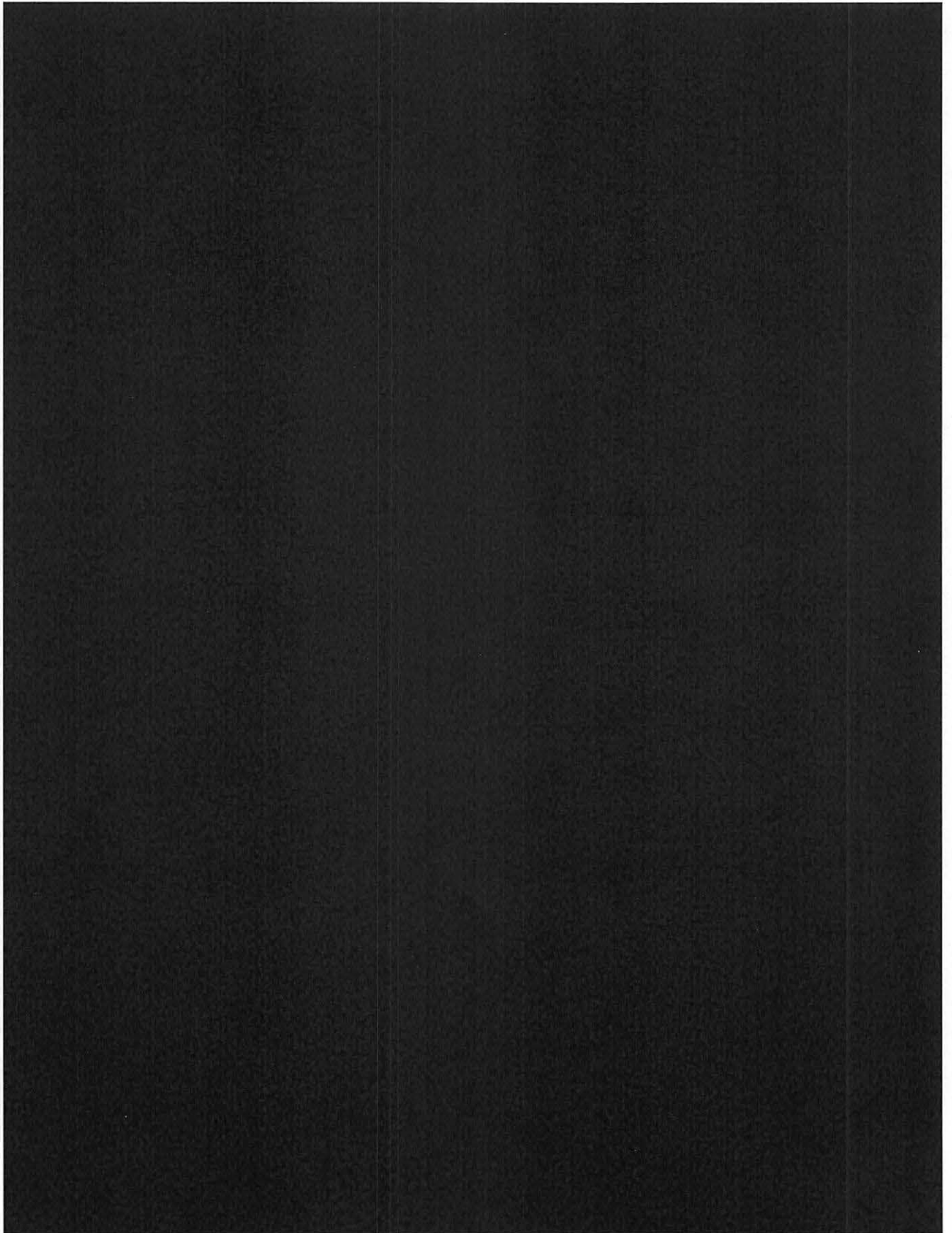


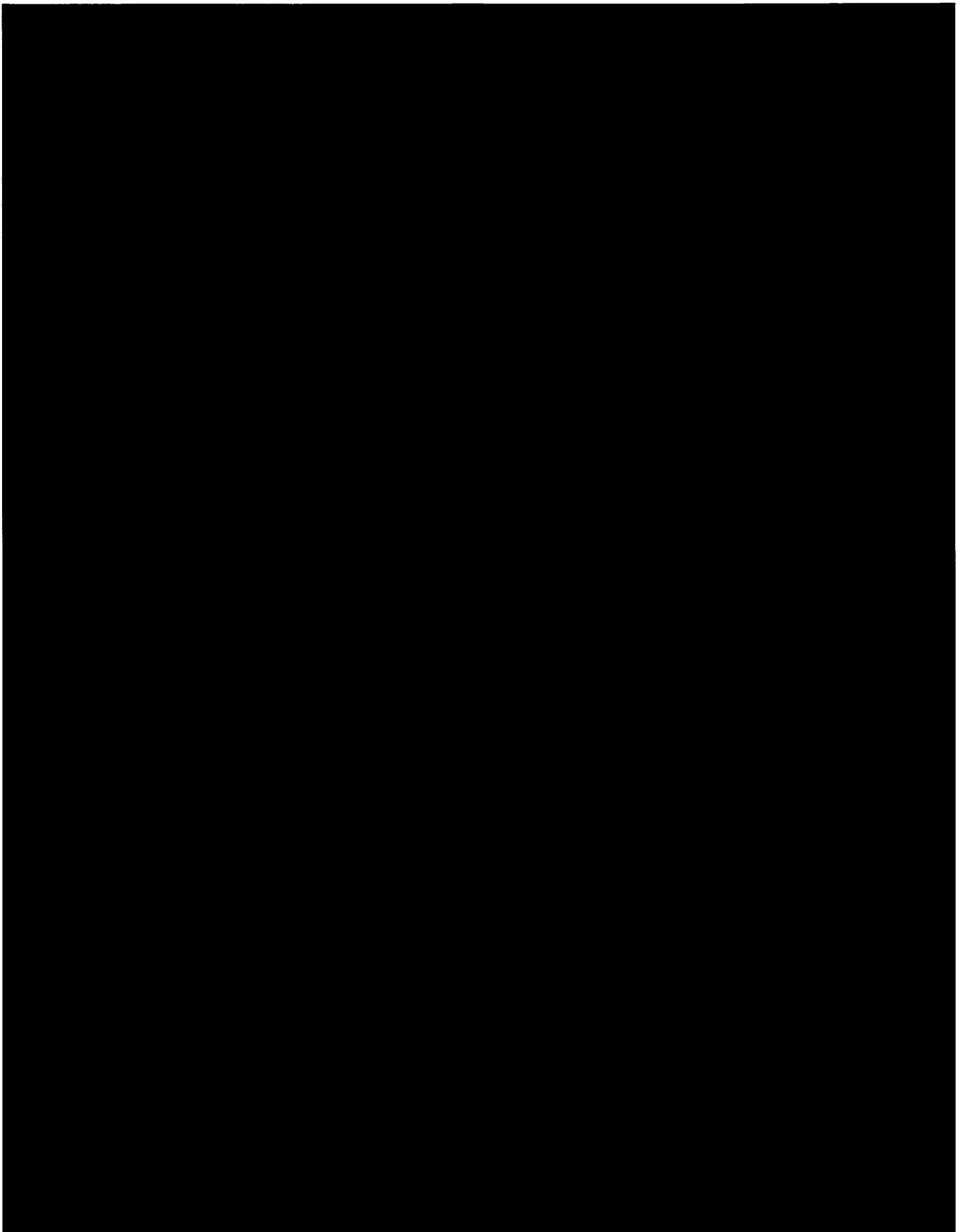


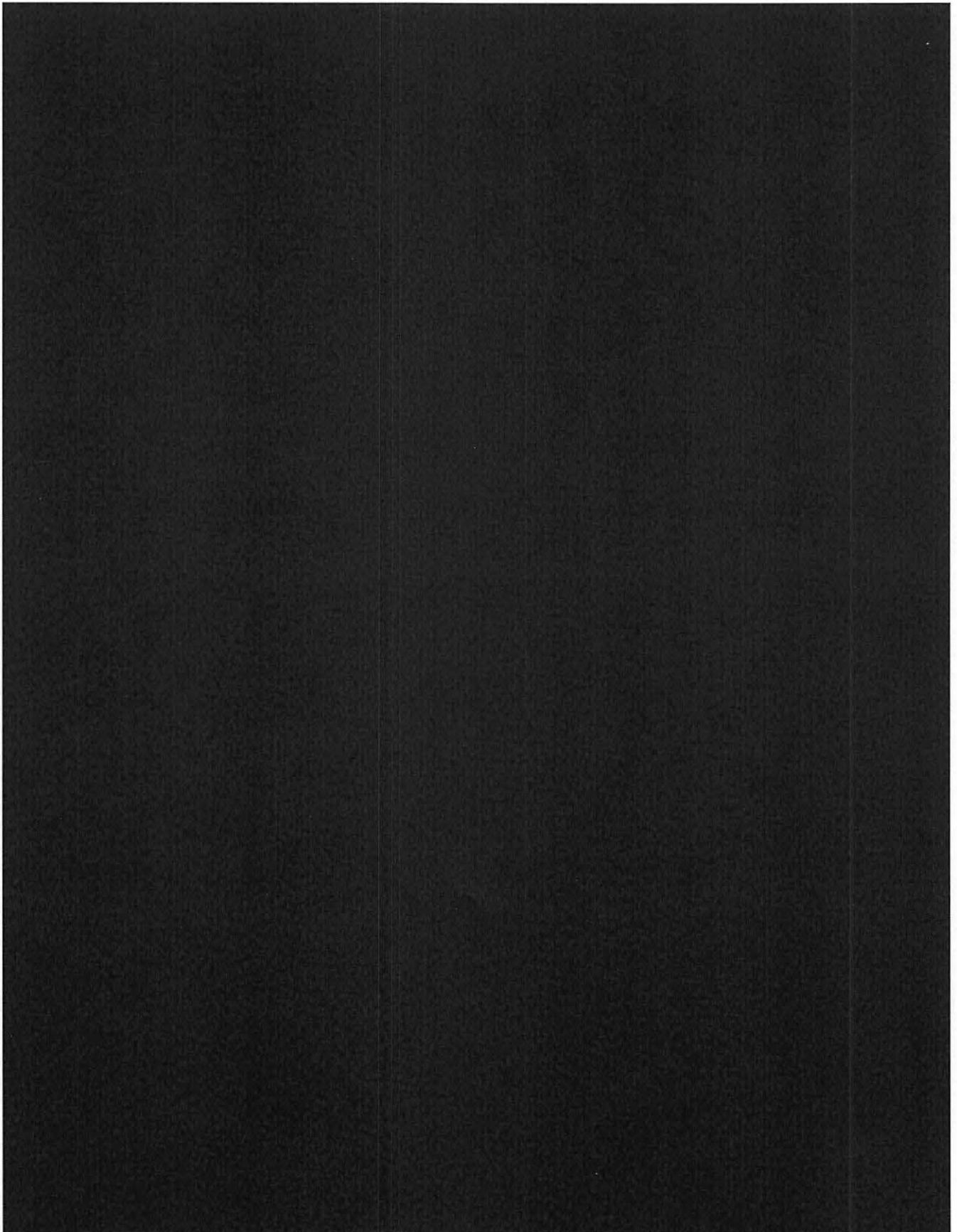


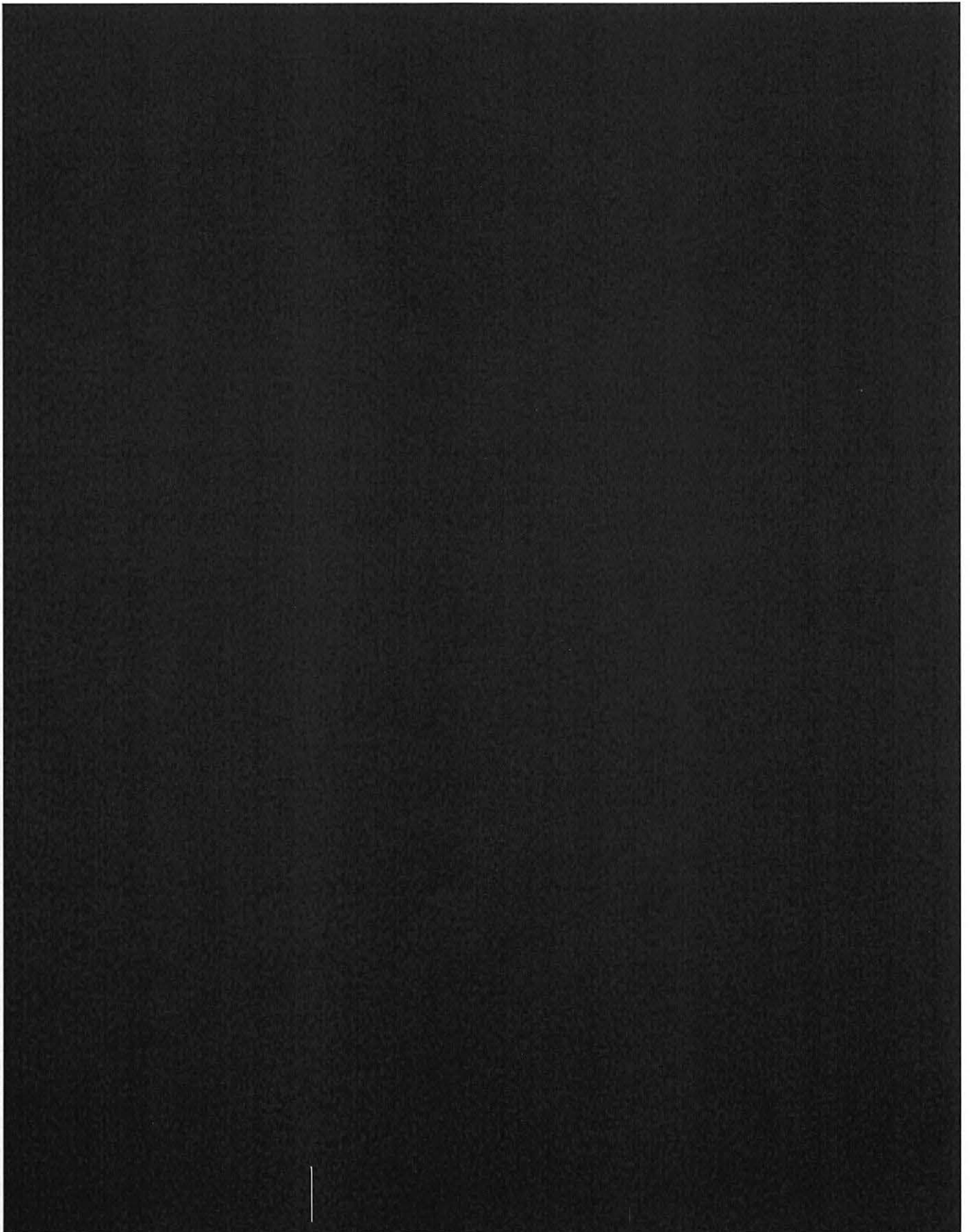


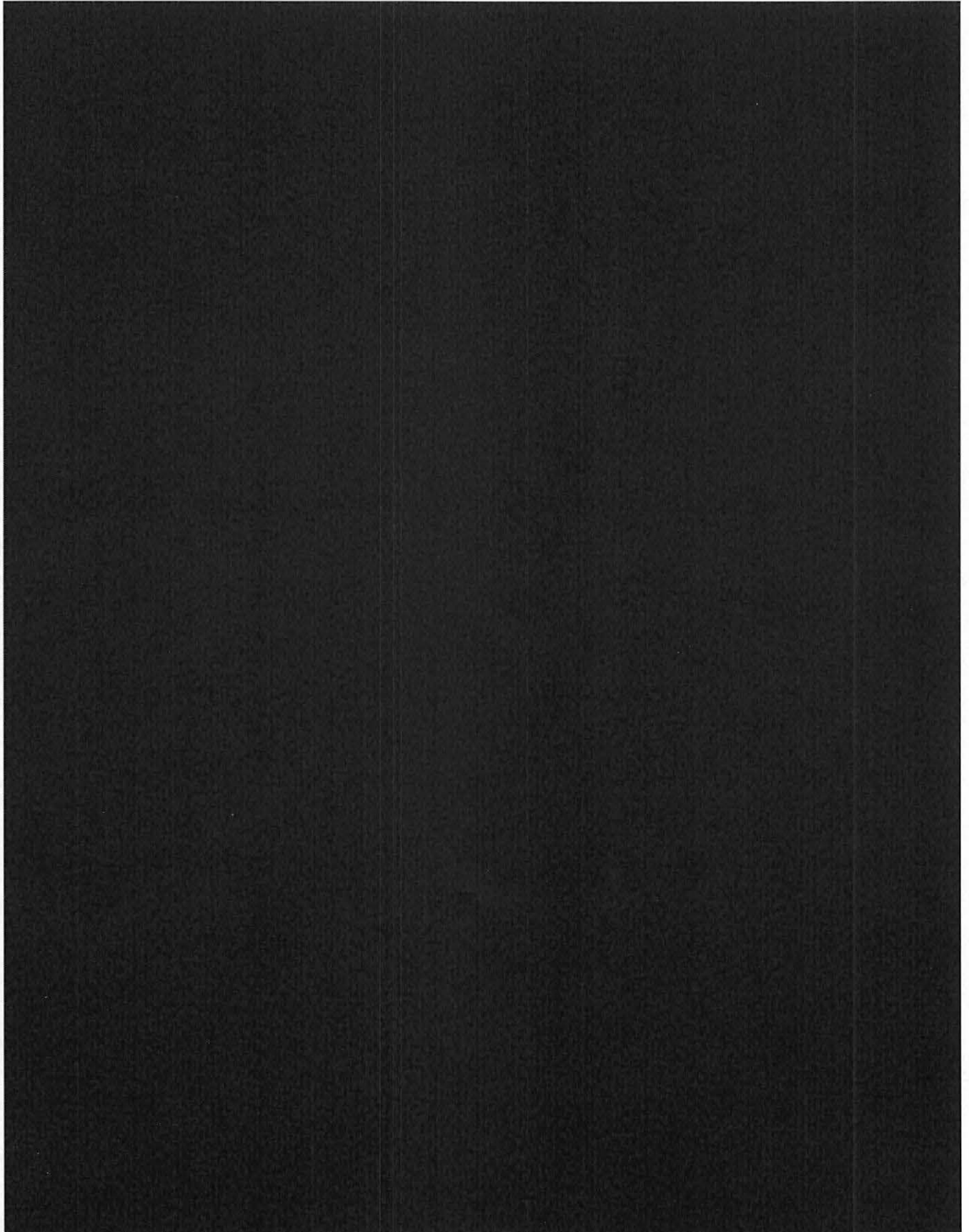


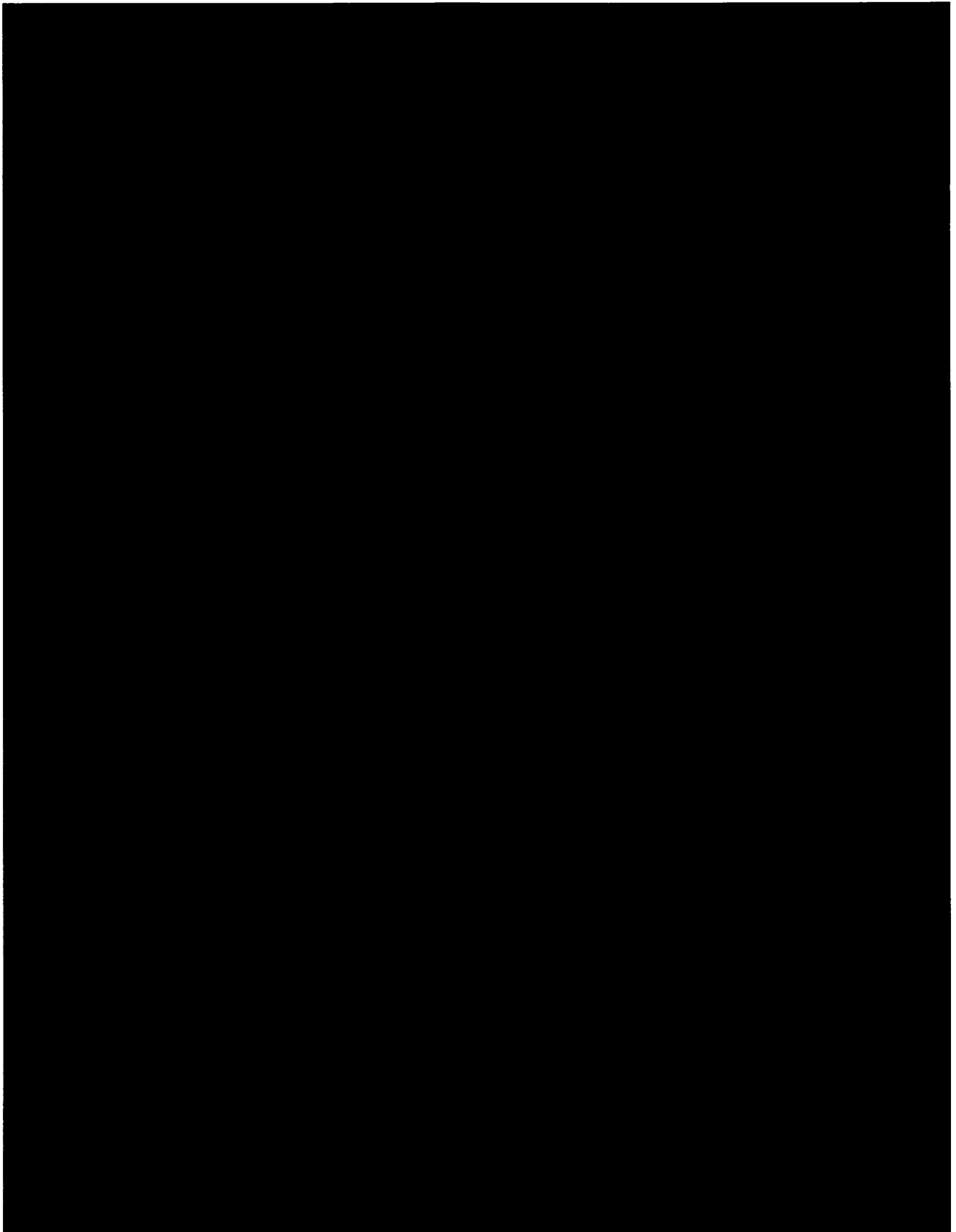


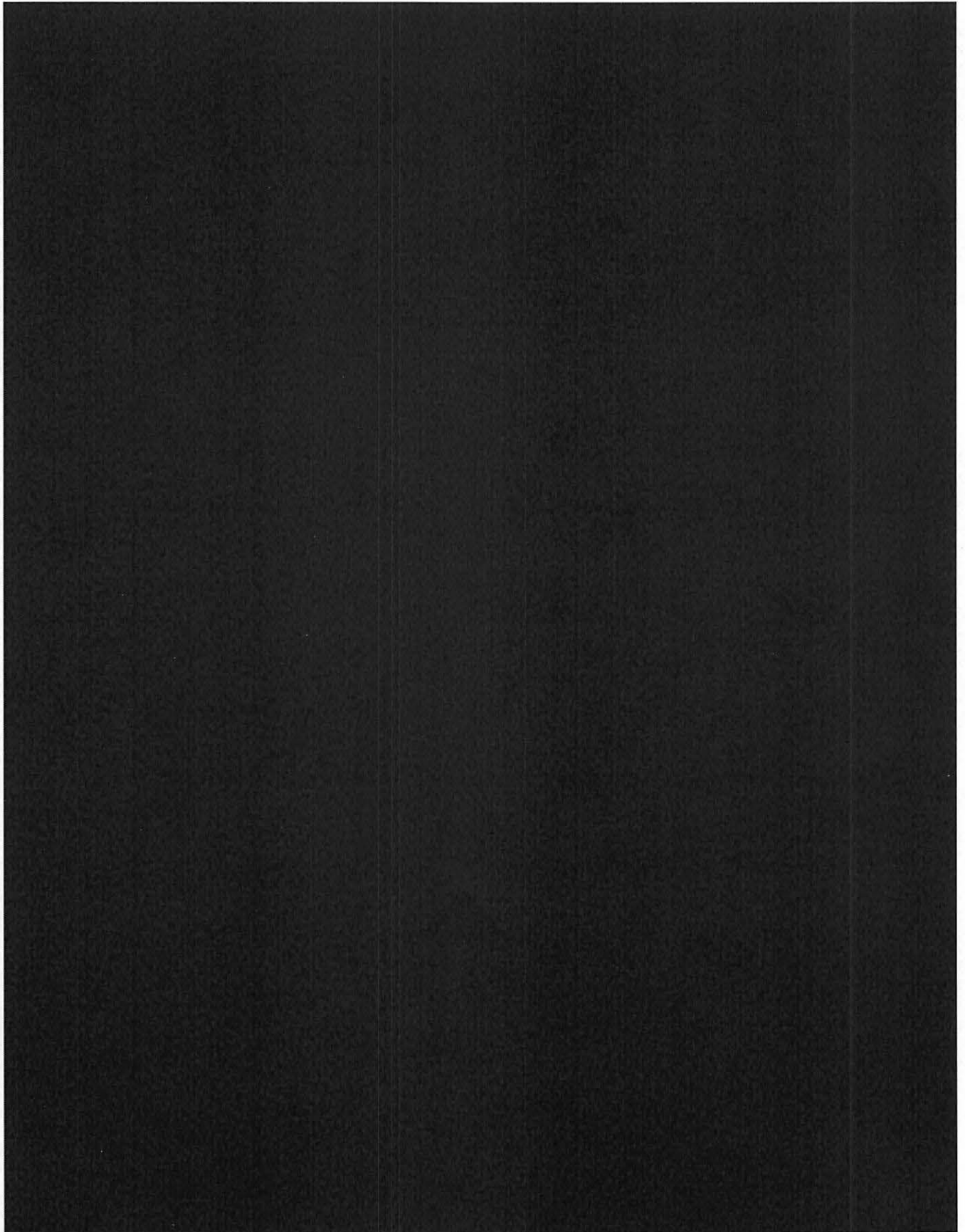


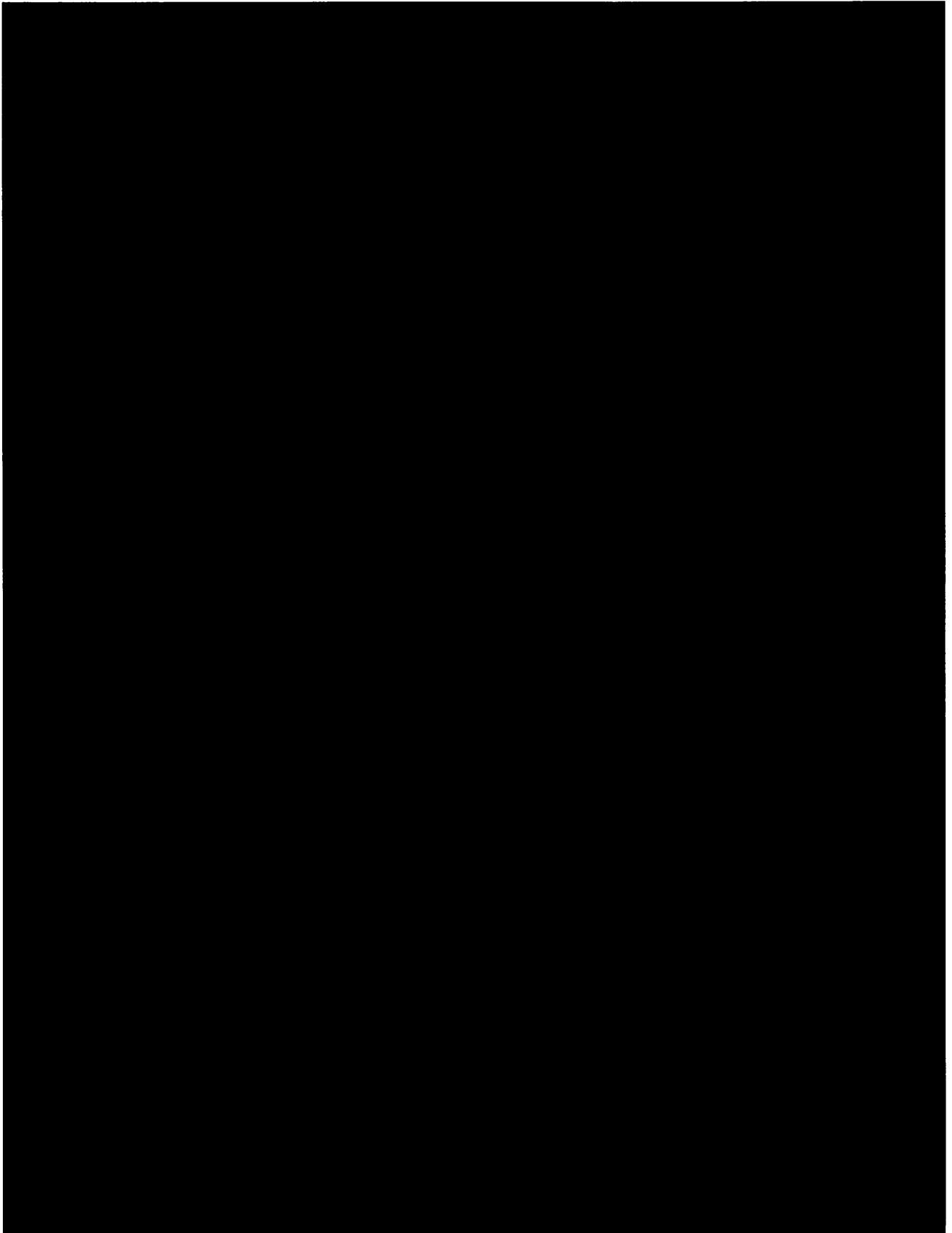


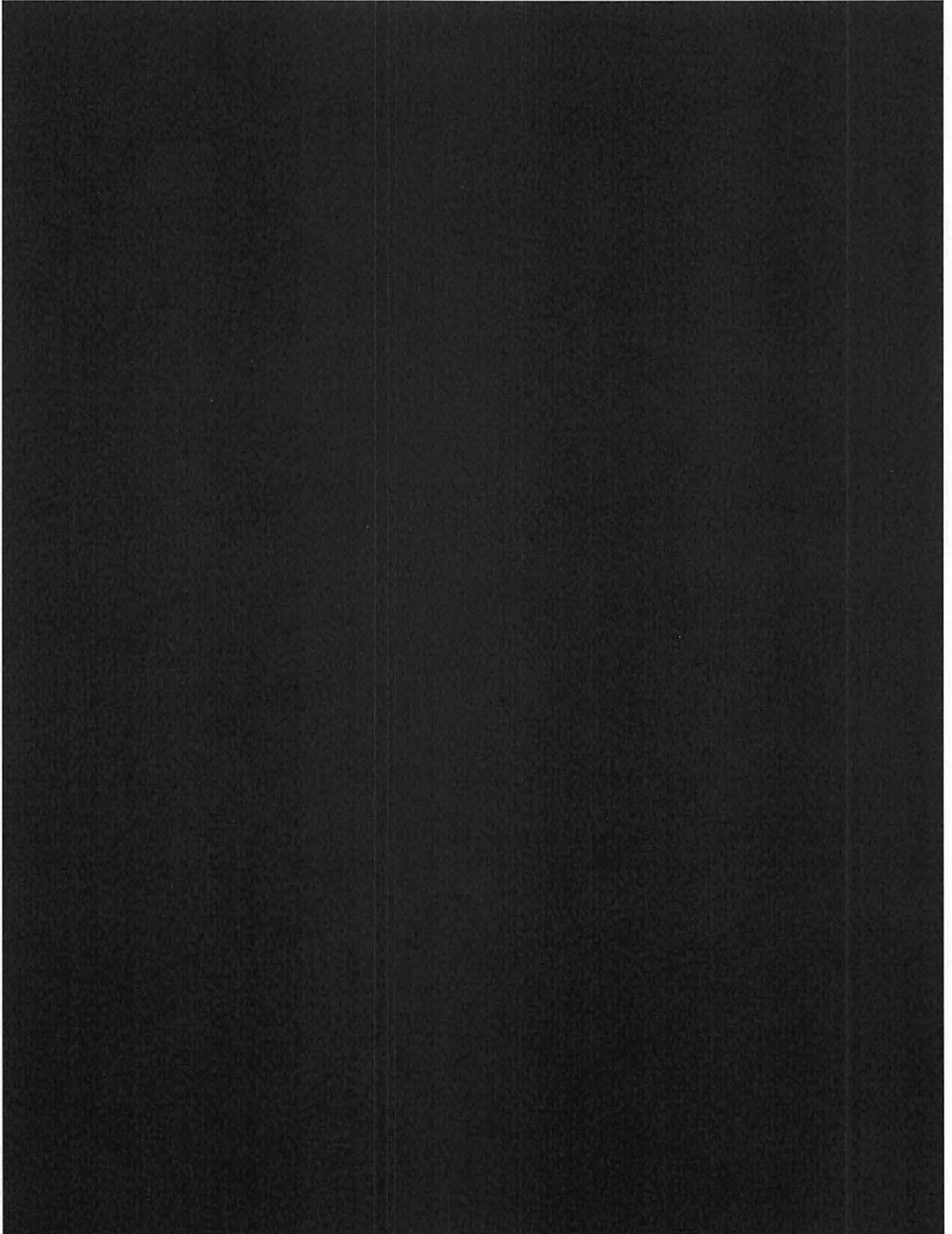


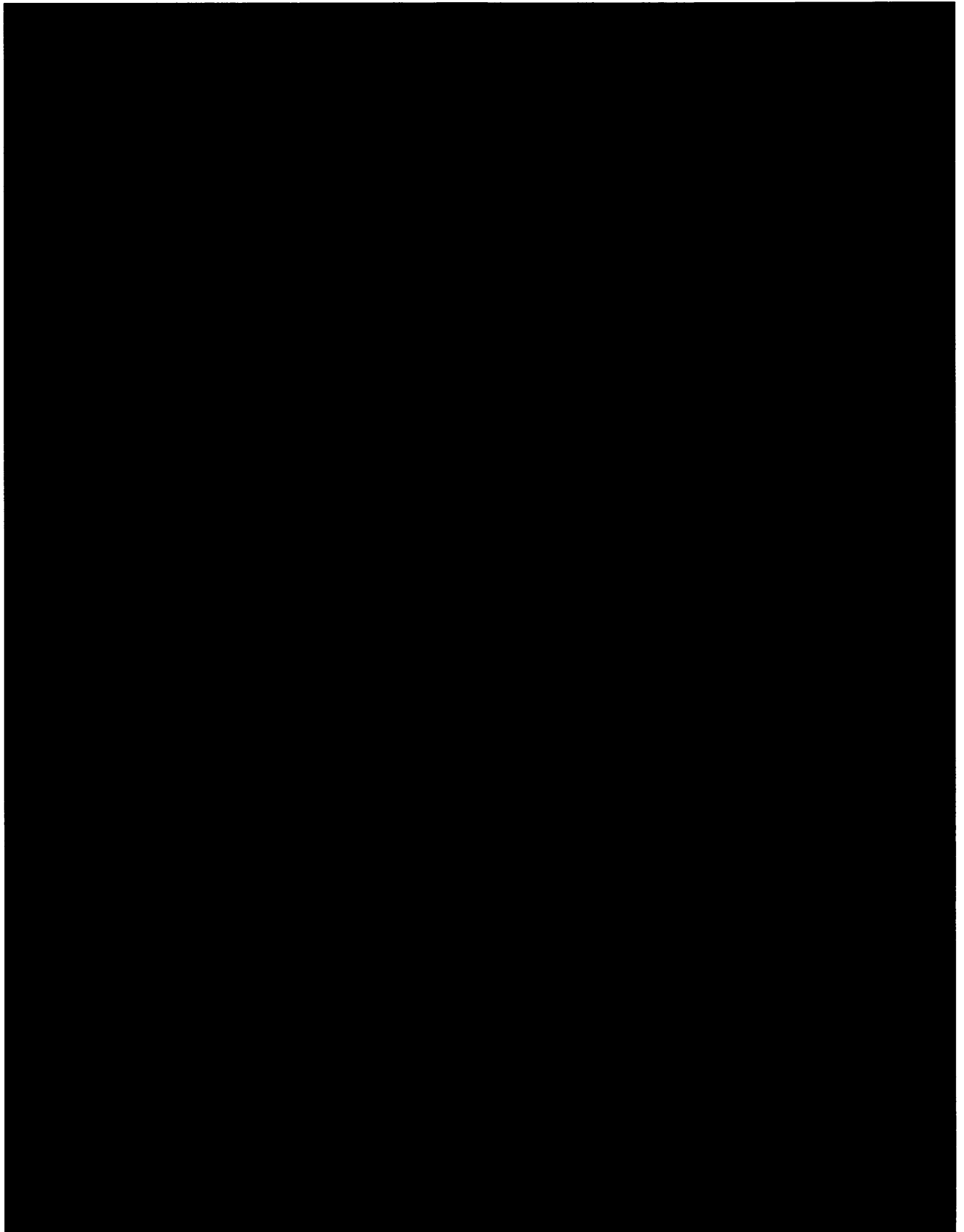


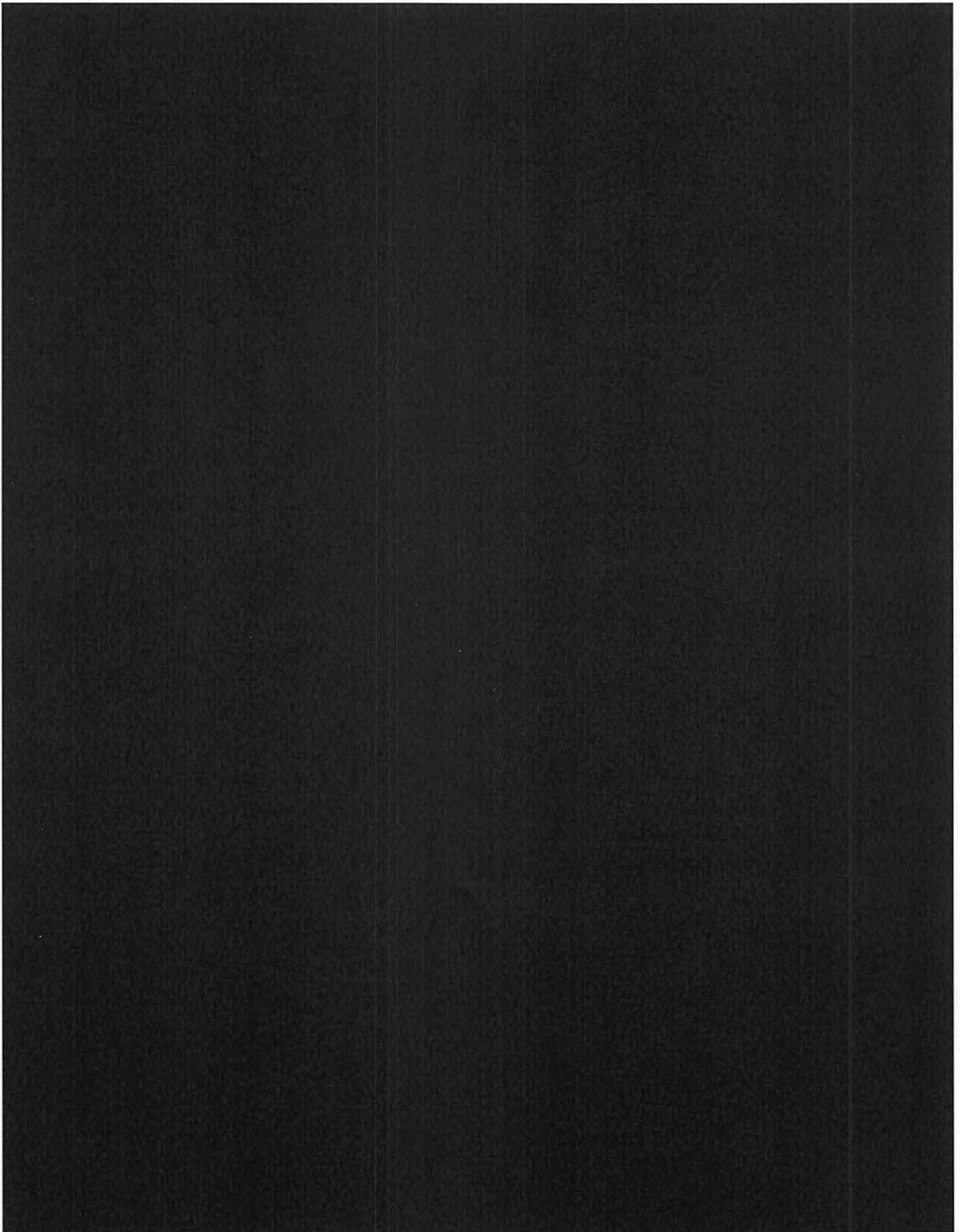


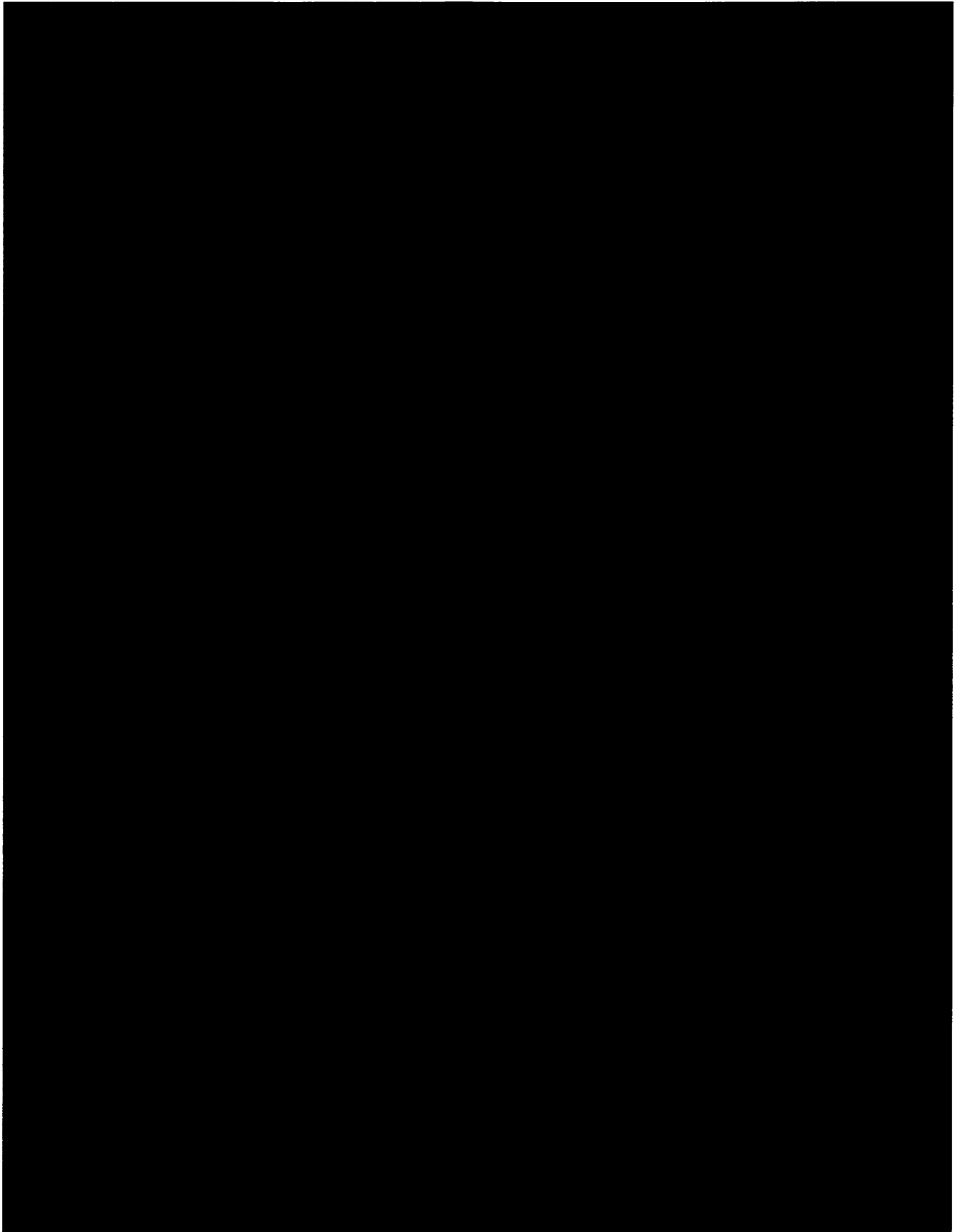


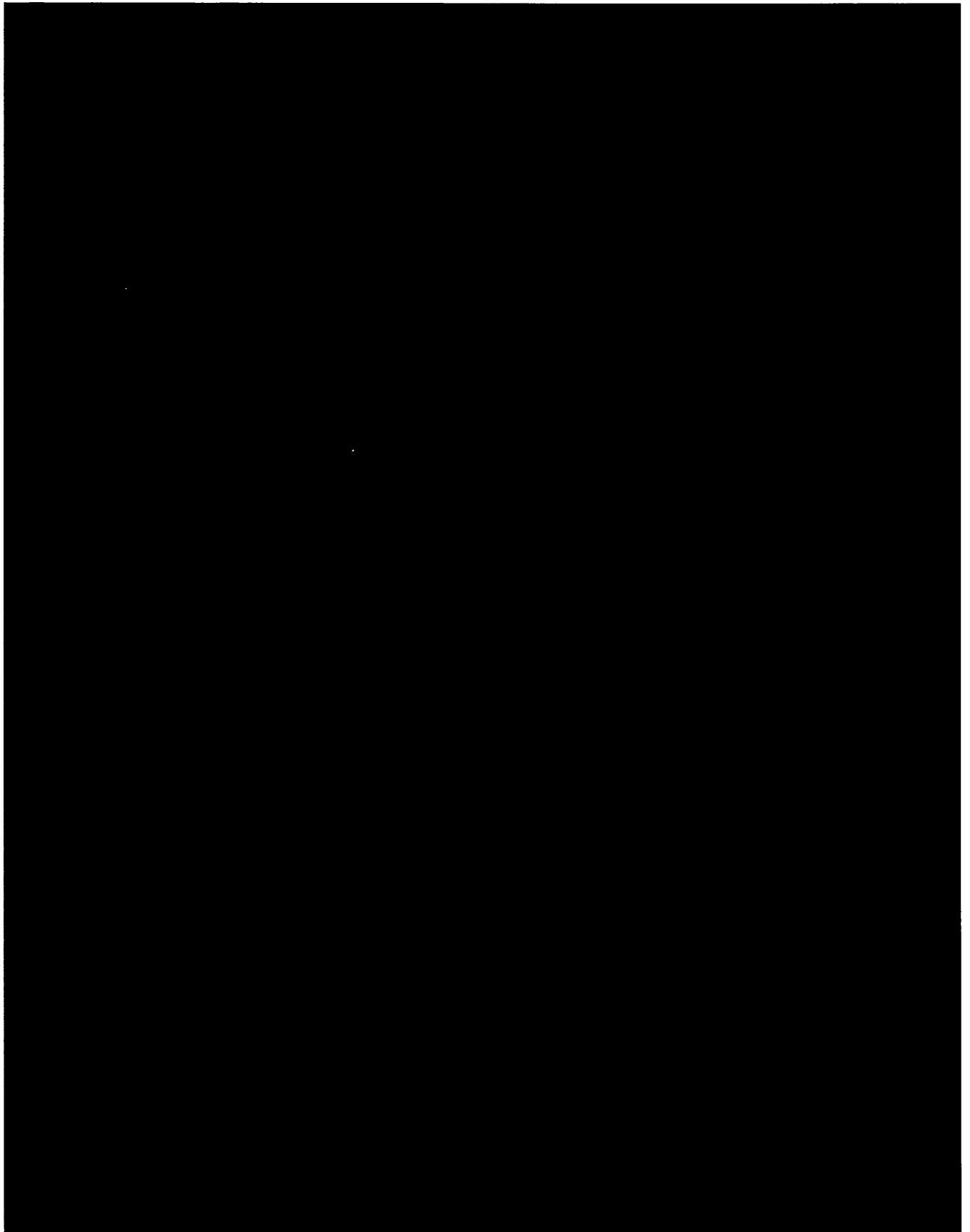


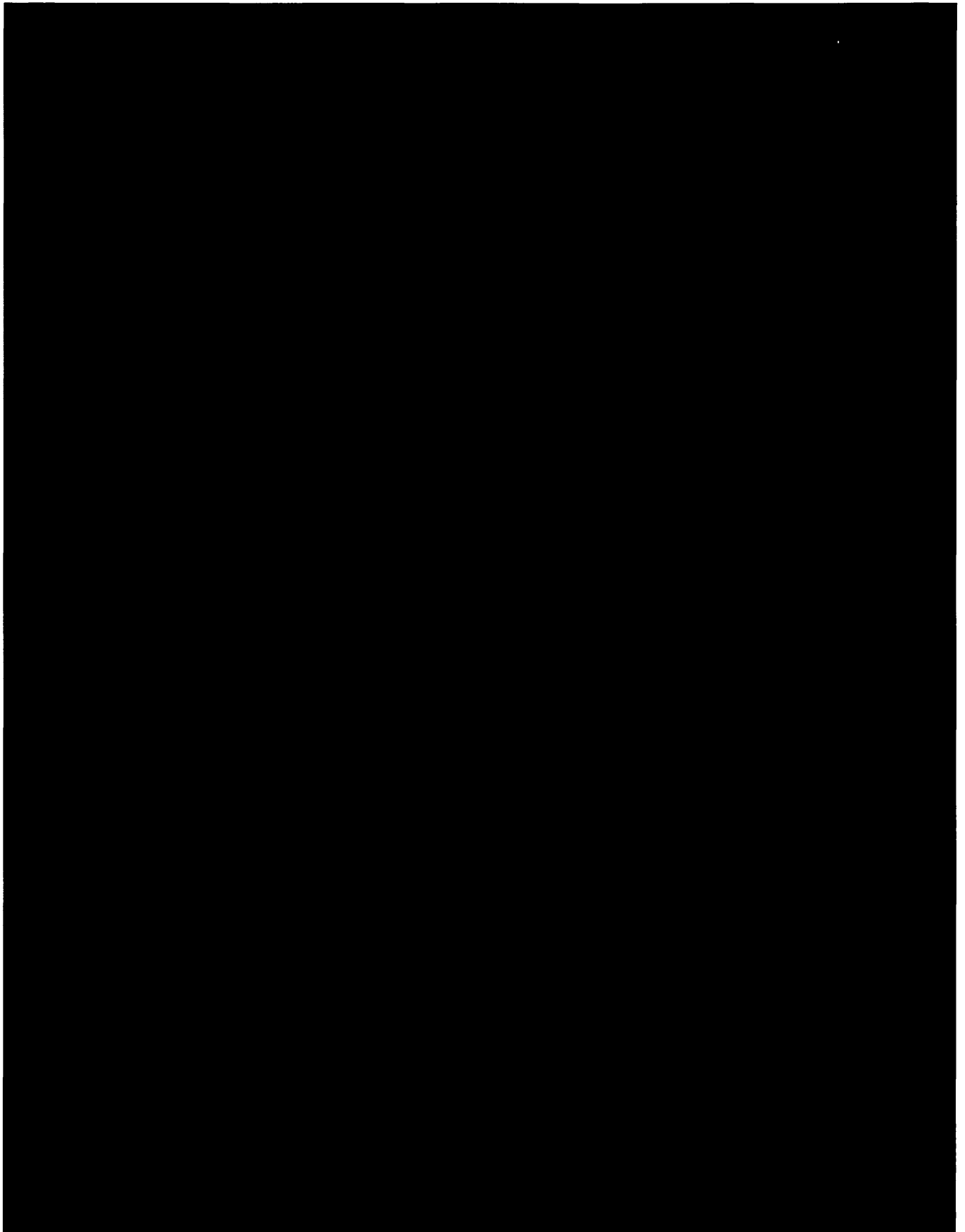












1 STATE OF CALIFORNIA)

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.

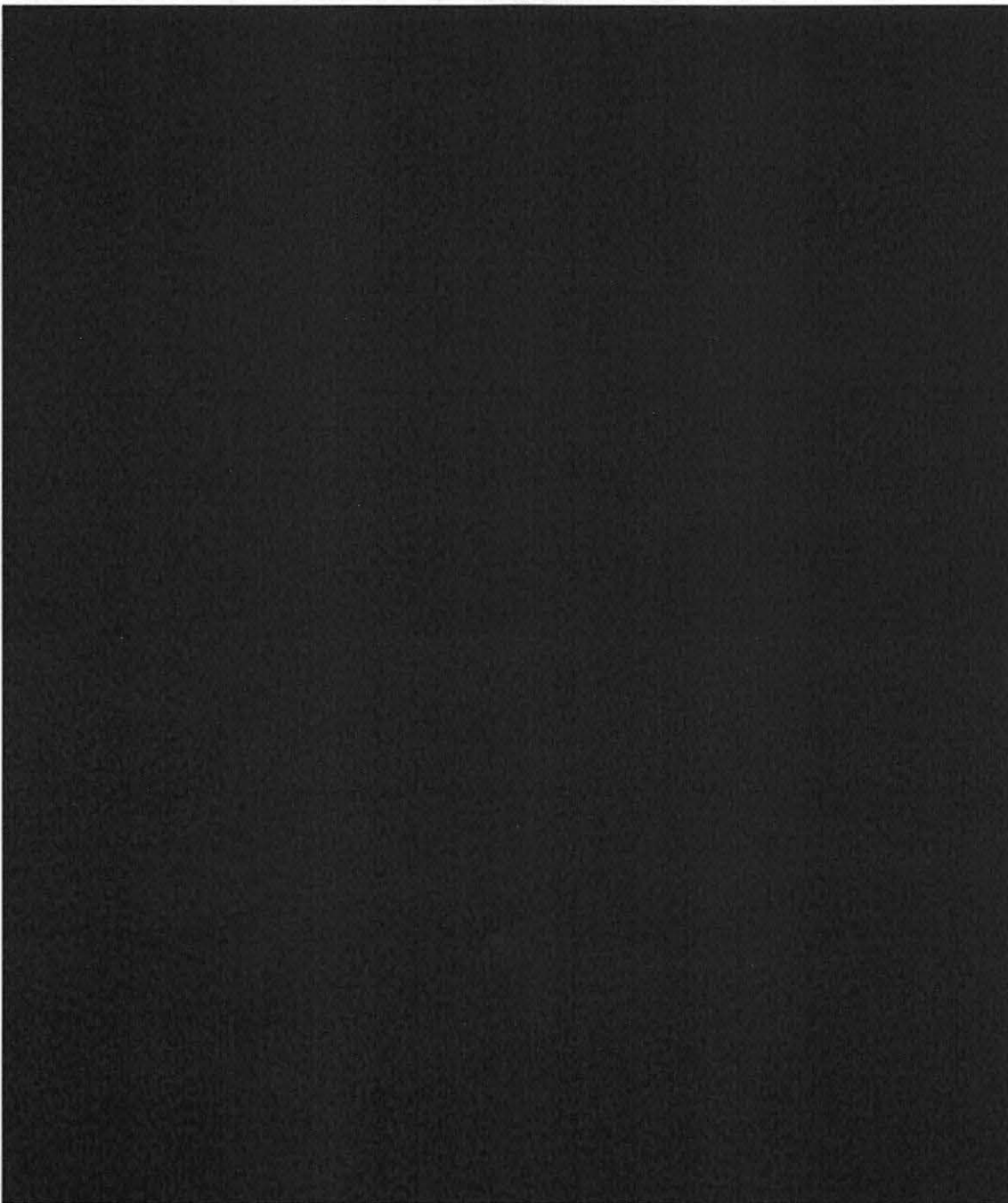
19 I further certify that I am not interested in
20 the event of the action.

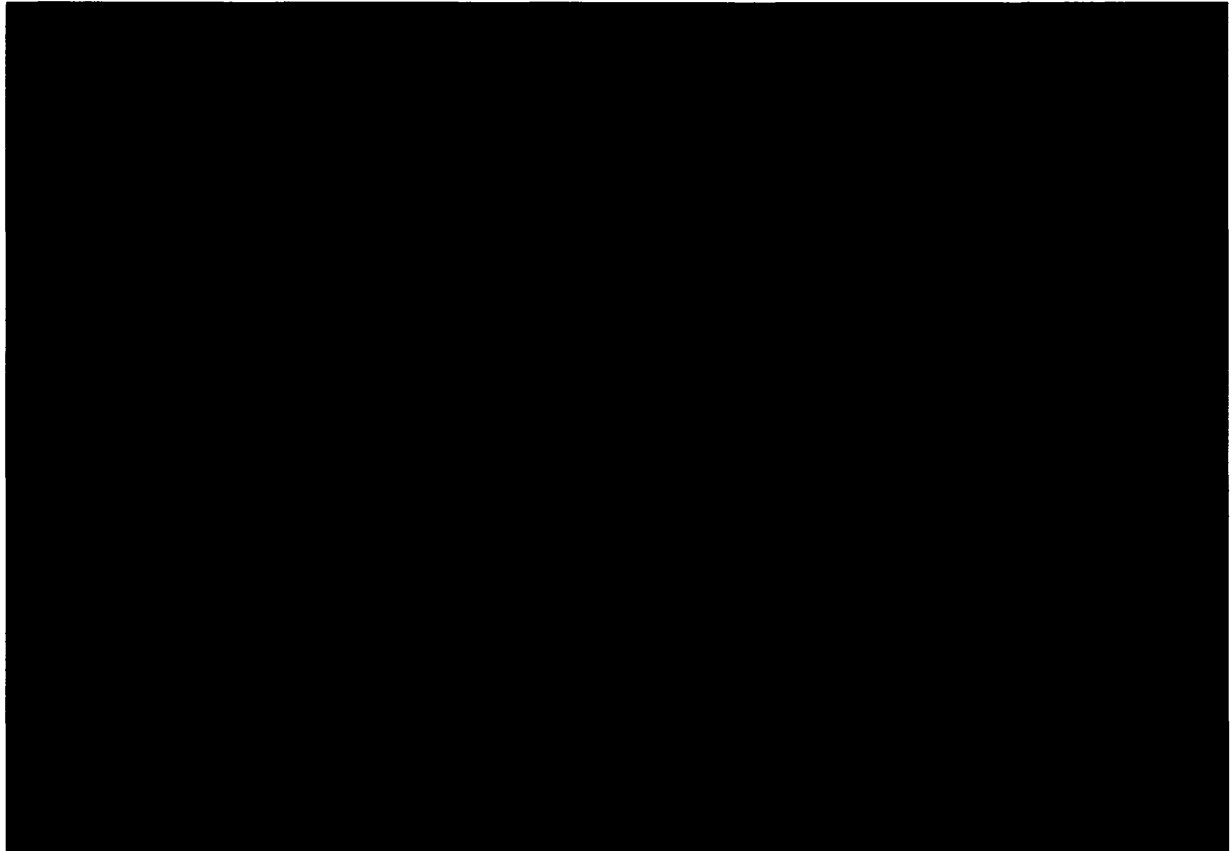
21 Witness my hand this 12th day of February,
22 2025.

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-LAB-MSB
Errata Sheet for February 11, 2025 Deposition of Melissa Ramirez





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 ^{15th}15 day of March, 2025.

A handwritten signature in cursive script, appearing to read "Melissa Ramirez".

Melissa Ramirez