

PX 27

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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

CONFIDENTIAL DEPOSITION OF THOMAS MONTAG

New York, New York

Wednesday, September 24, 2025

Reported by:
Jeremy Frank, MPM
JOB NO. 1995561

September 24, 2025

2:40 p.m.

Deposition of THOMAS MONTAG, held at the
offices of Goodwin Procter LLP, 620 Eighth
Avenue, New York, New York, pursuant to
Notice, before Jeremy Frank, a Stenographic
Court Reporter and Notary Public of the State
of New York.

A P P E A R A N C E S:

COTCHETT, PITRE & McCARTHY LLP
Attorneys for Plaintiffs and the
Proposed Class

840 Malcolm Road
Burlingame, CA 94010

BY: BRIAN DANITZ, ESQ.
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(650) 697-6300

GOODWIN PROCTER, LLP
Attorneys for Defendants

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BY: SABRINA M. ROSE-SMITH, ESQ.
SRoseSmith@goodwinlaw.com
ANGELICA RANKINS, ESQ.
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(202) 346-4029

ALSO PRESENT:

RICHARD MORALES, videographer

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the respective parties hereto, that the filing, sealing and certification of the within deposition shall be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED that all objections, except as to the form of the question, shall be reserved to the time of the trial;

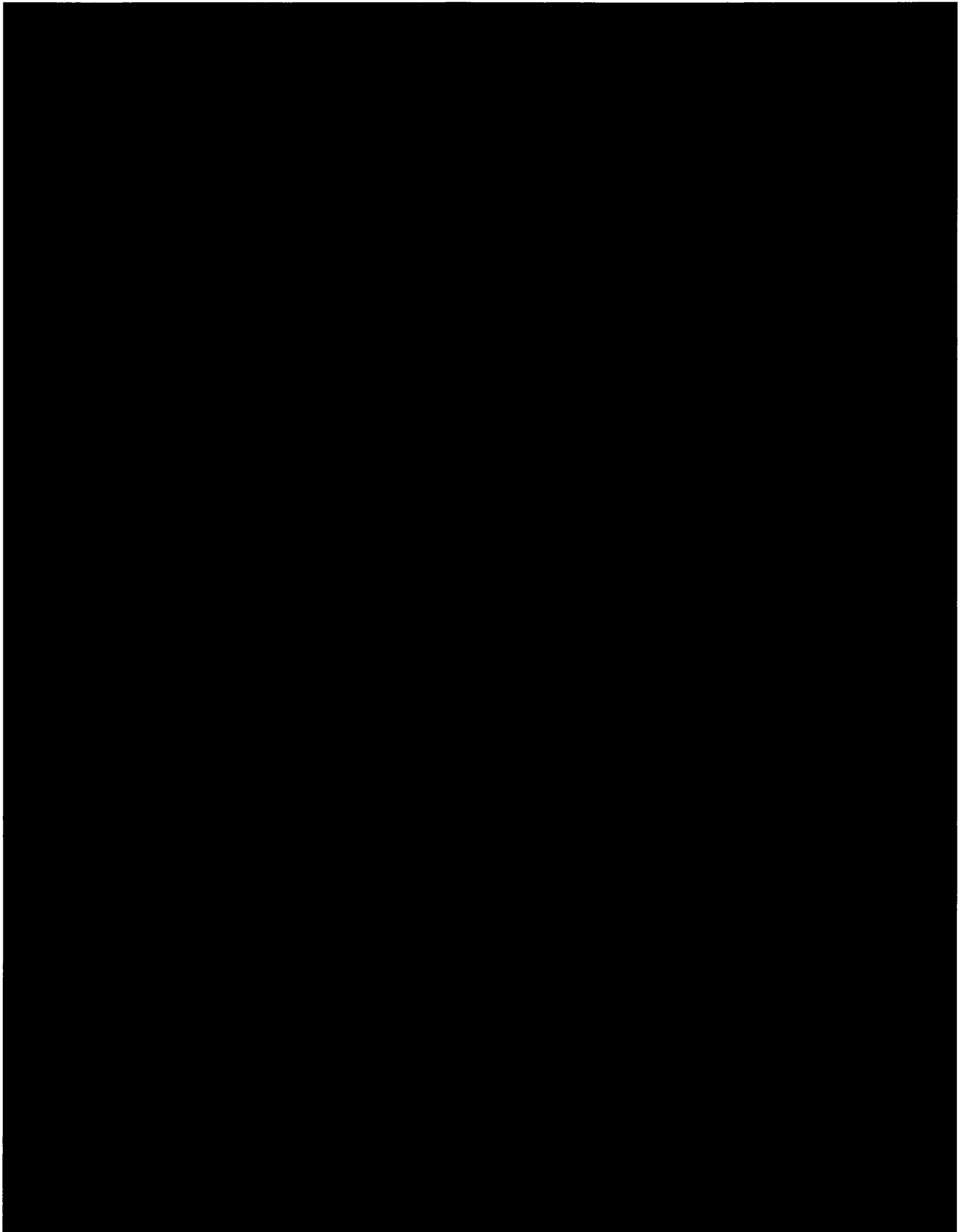
IT IS FURTHER STIPULATED AND AGREED that the within deposition may be signed before any Notary Public with the same force and effect as if signed and sworn to before the Court.

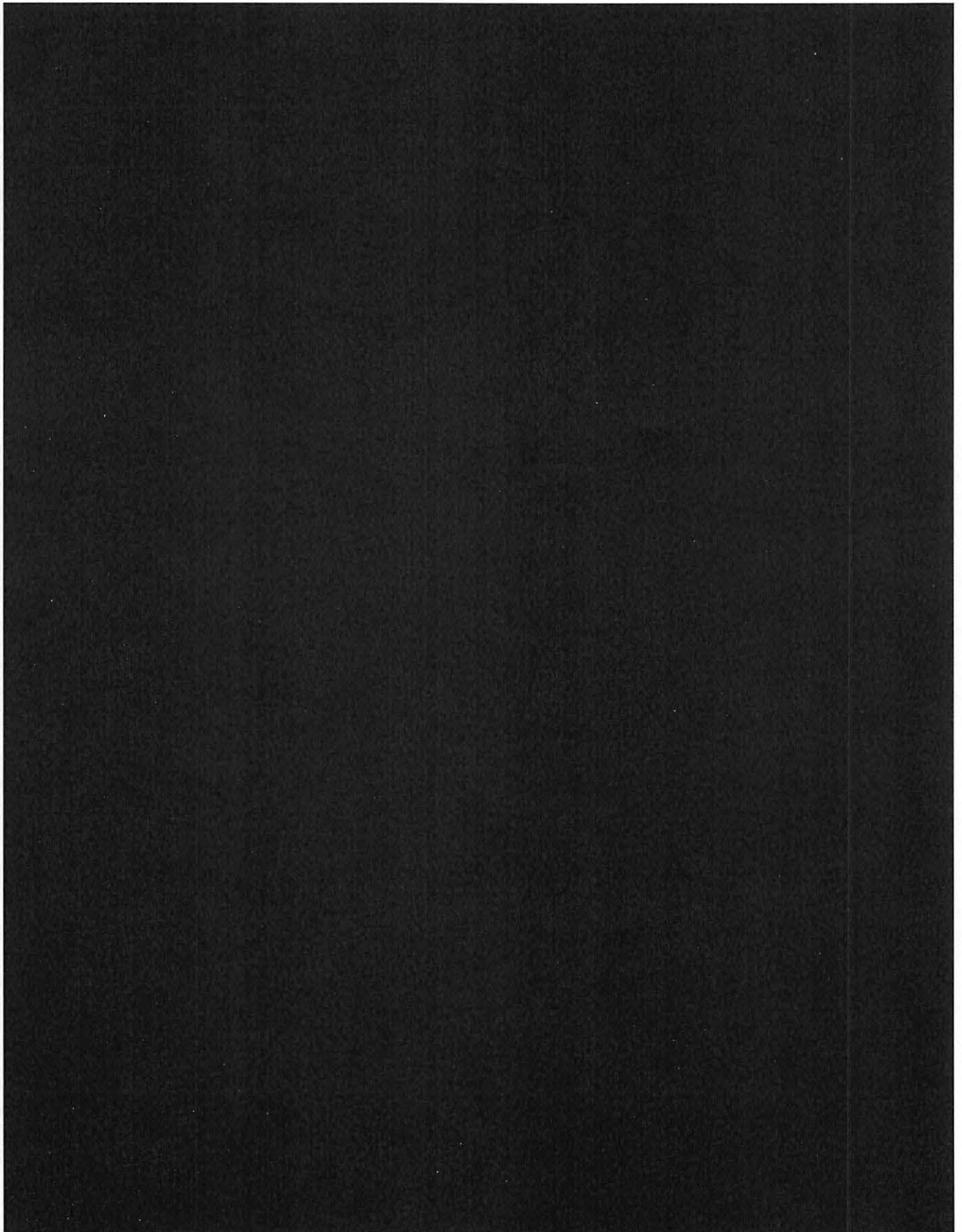
THE VIDEOGRAPHER: Good afternoon, we are now on the record. My name is Richard Morales of Steno. Today is September 24th, 2025, the time is approximately 2:40 p.m. Eastern time. This deposition is being held at the office of Goodwin Procter. The caption of the case is in Re Bank of America California Unemployment Benefits Litigation. The name of the witness is Thomas Montag.

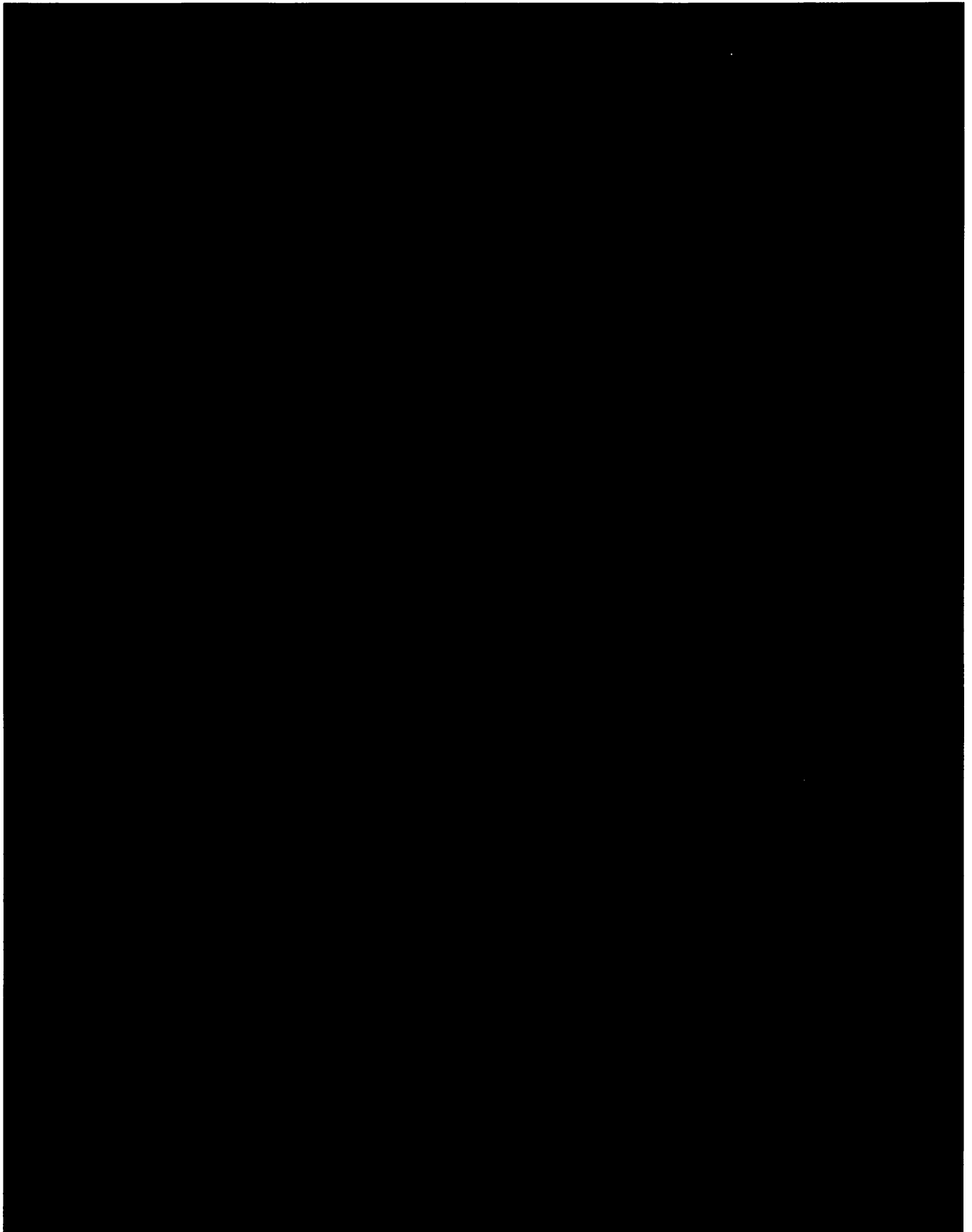
At this time will the attorneys identify themselves and the parties they represent, after which The Court Reporter, Jeremy Frank, will swear in the witness and we can proceed.

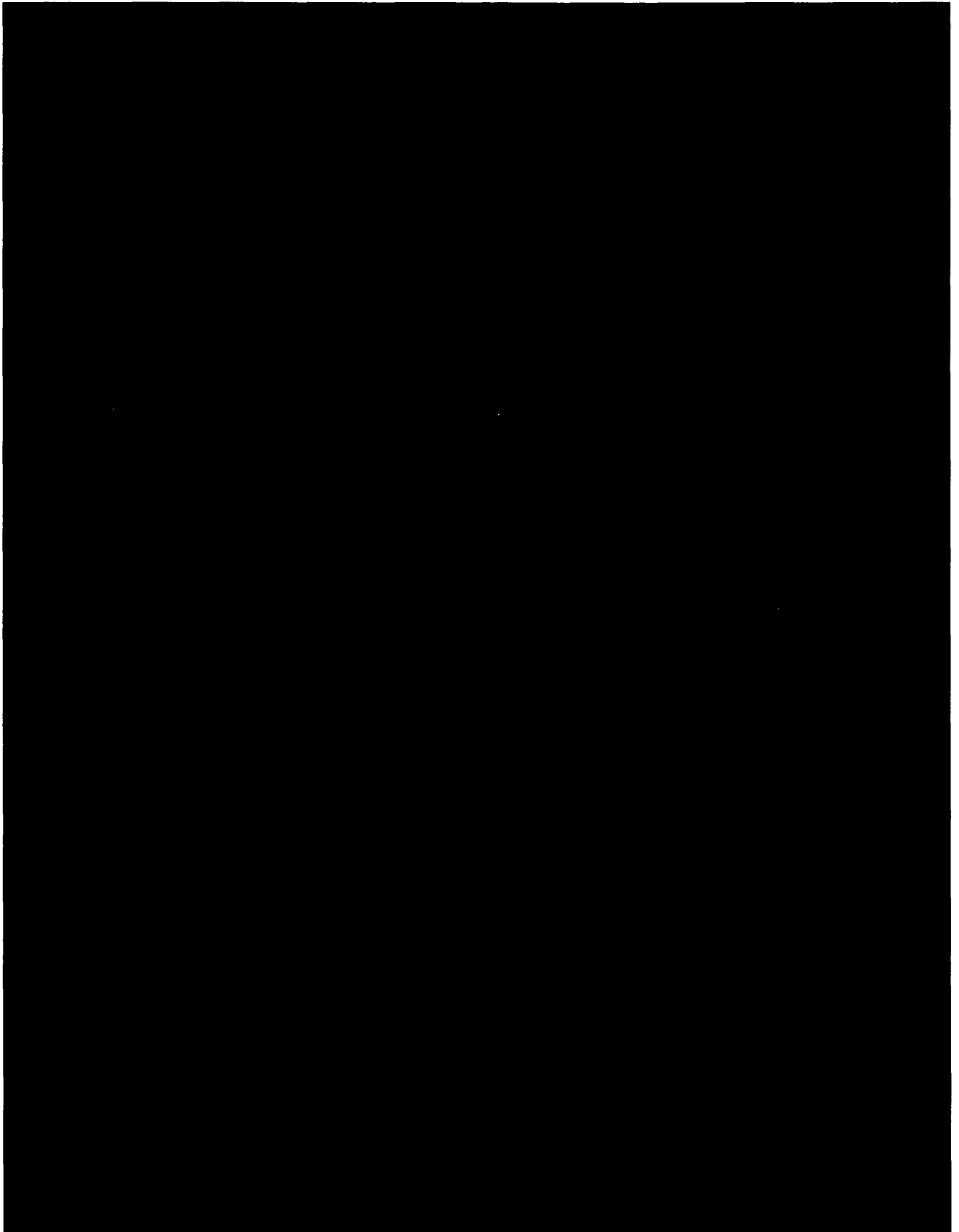
MR. DANITZ: Brian Danitz for the plaintiffs.

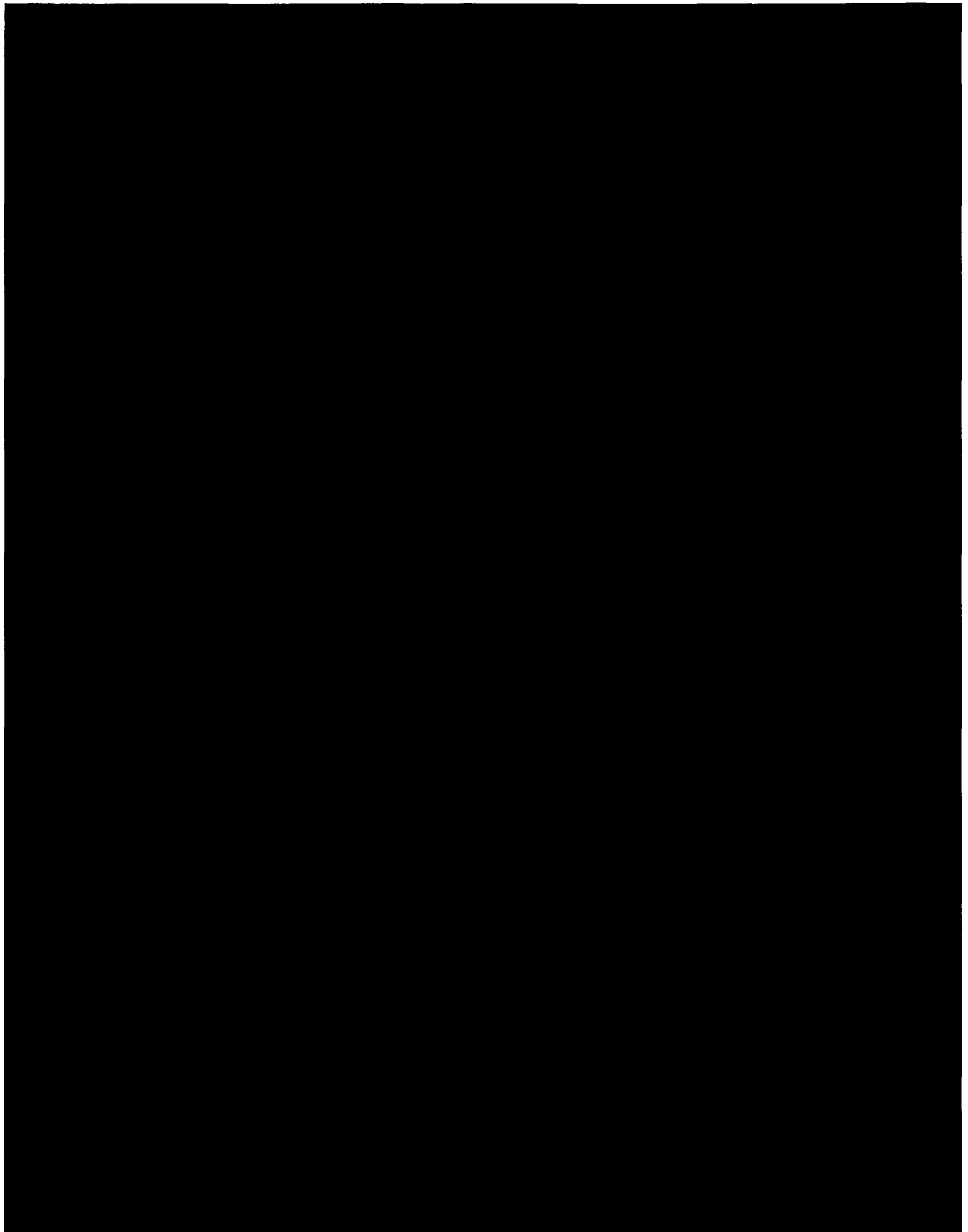
MS. ROSE-SMITH: Sabrina Rose-Smith of Goodwin Procter on behalf of Bank of America and the

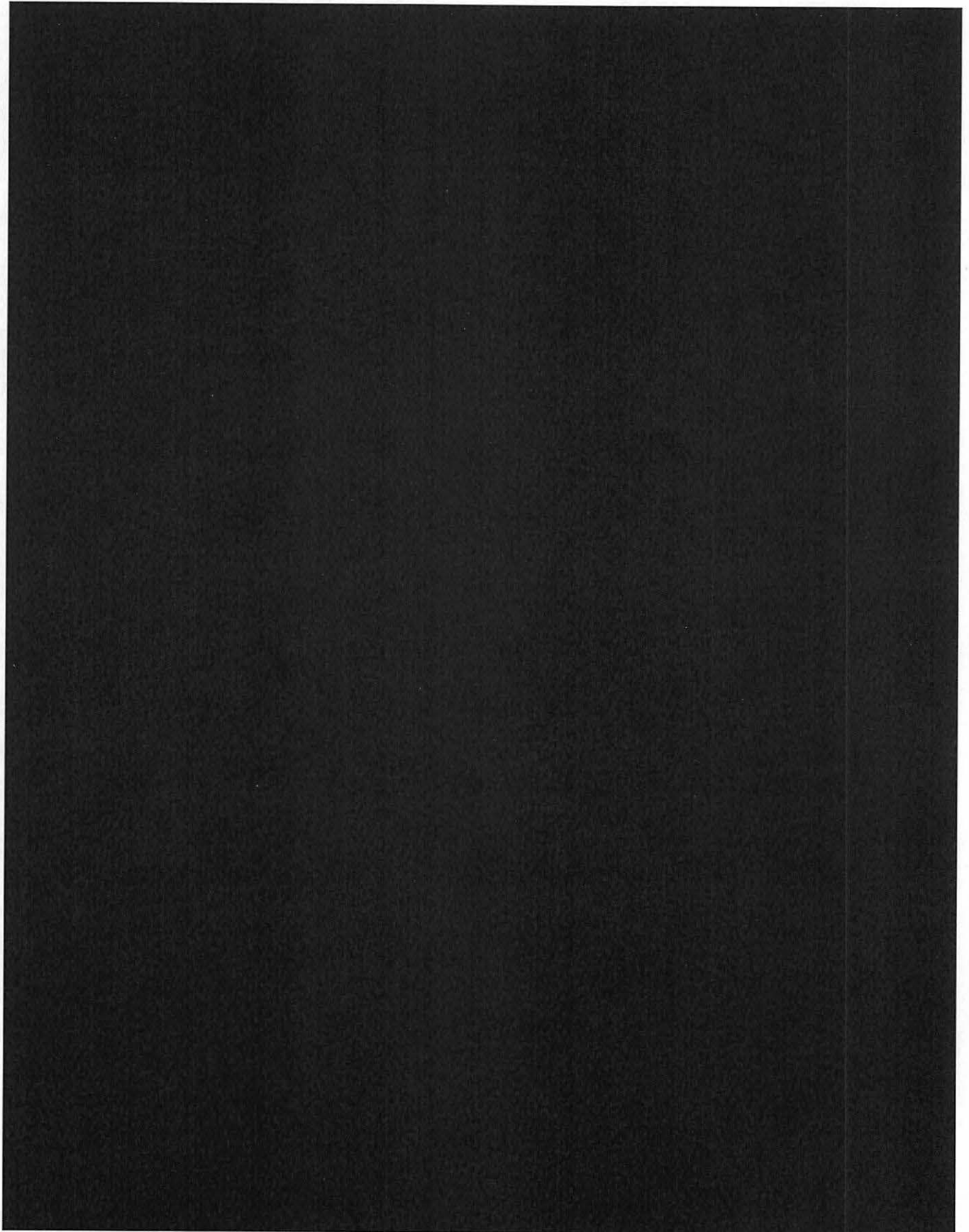


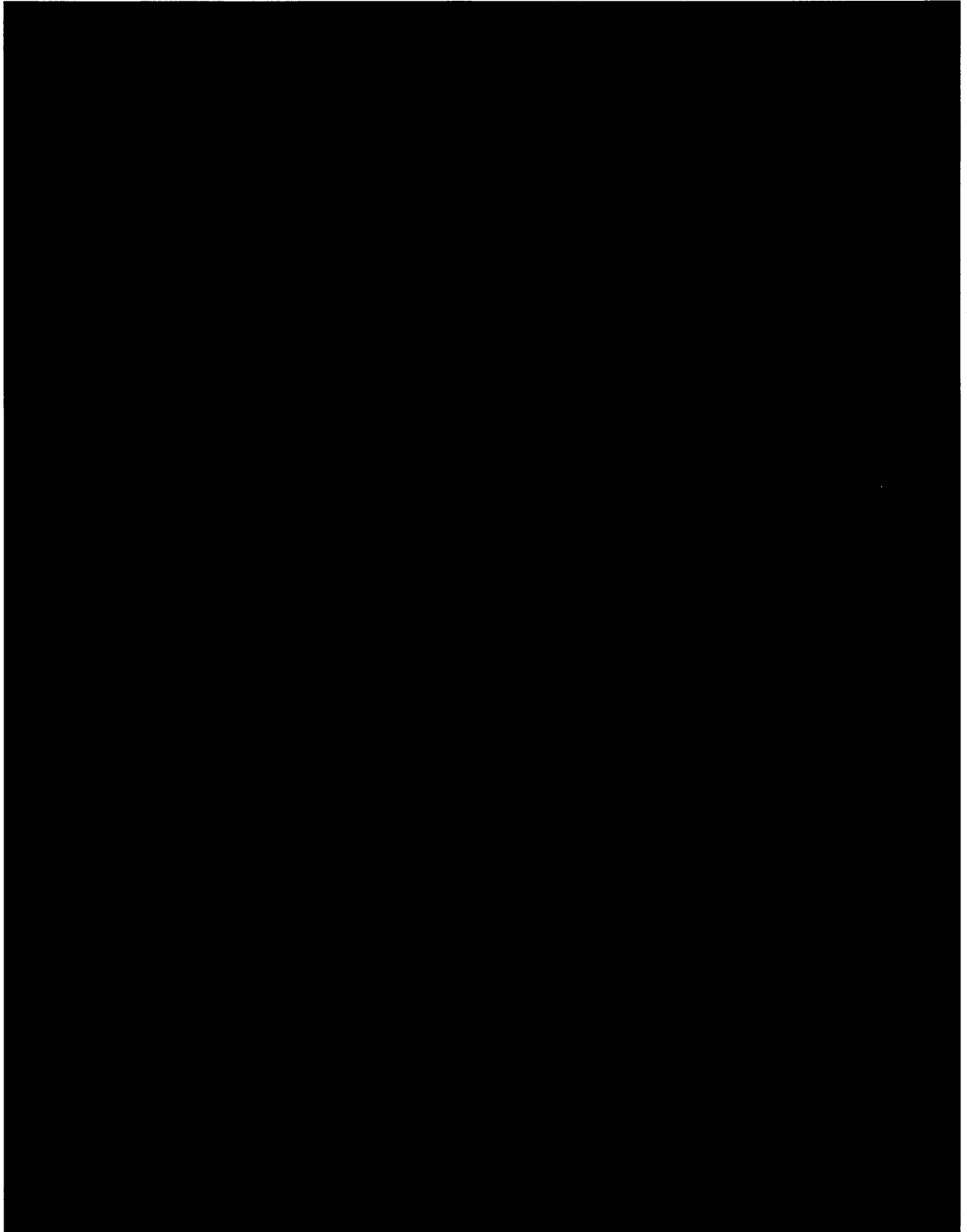


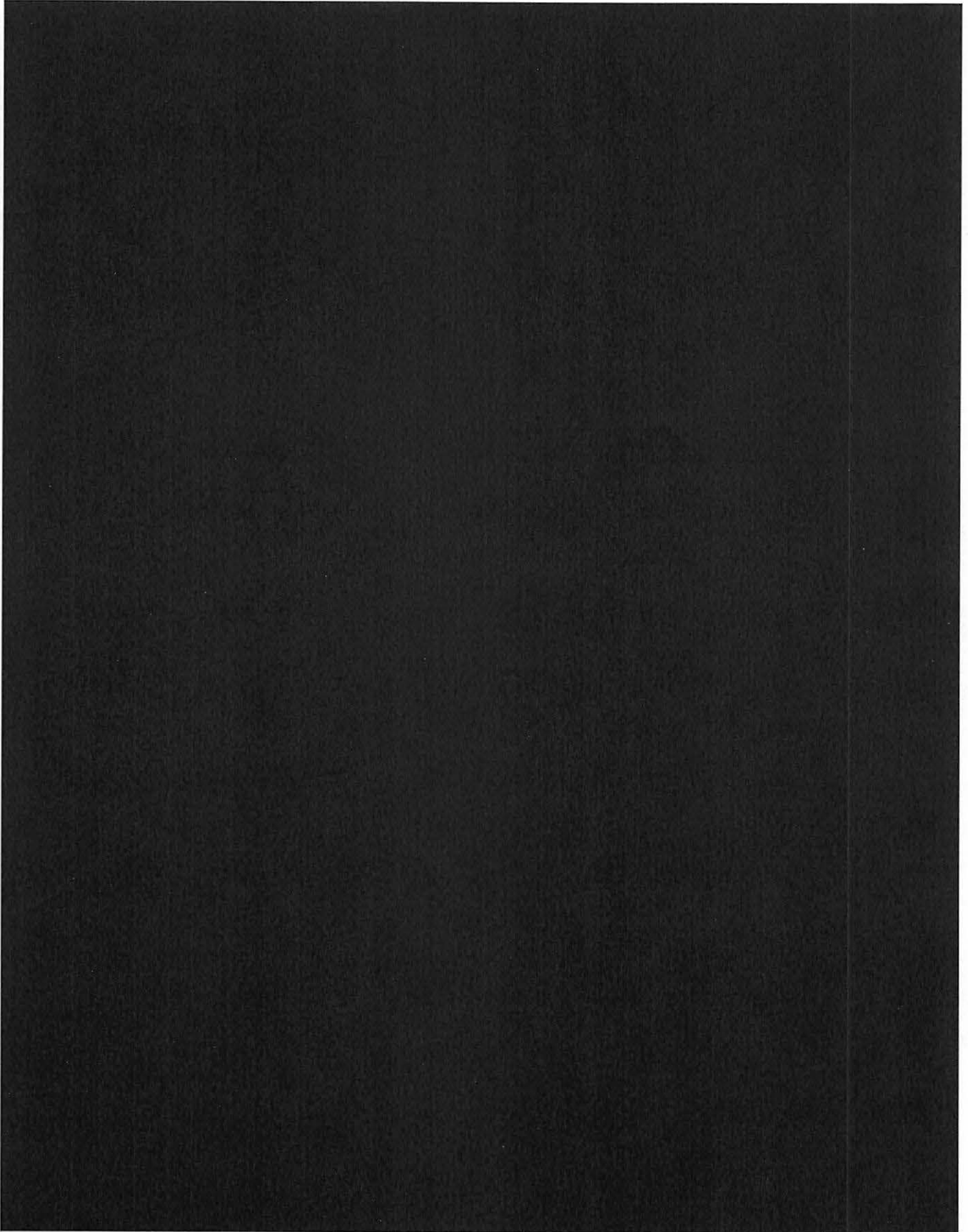


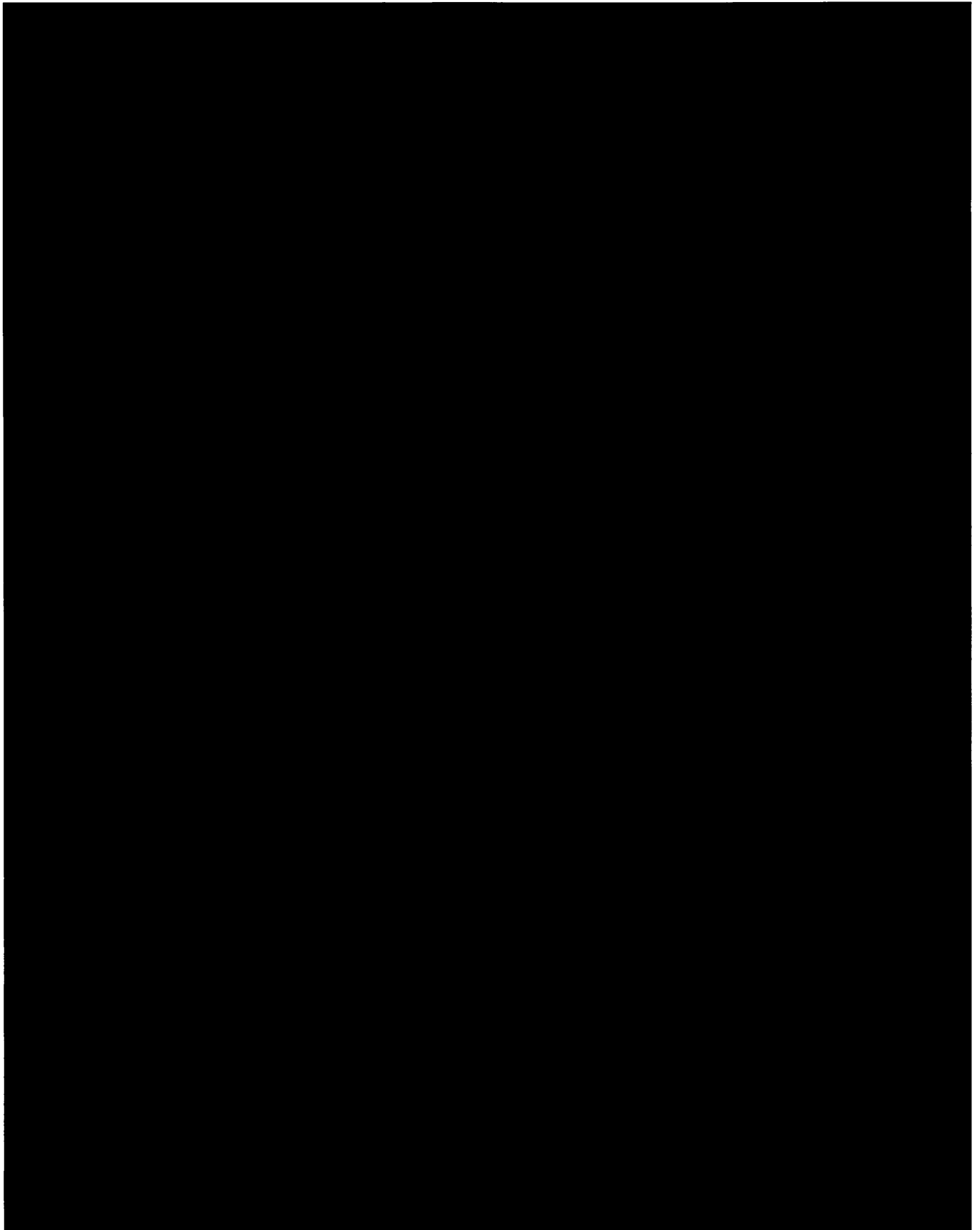


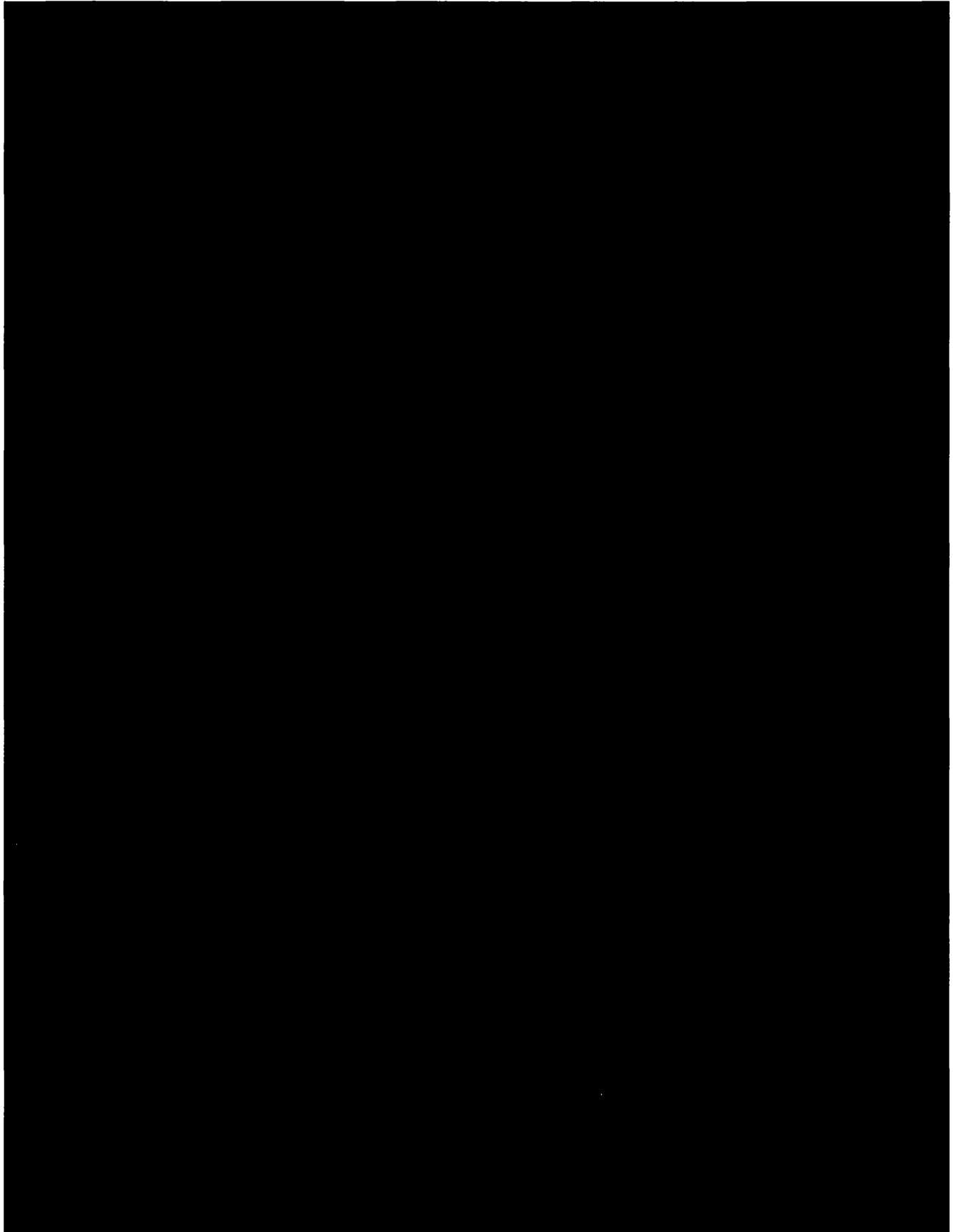


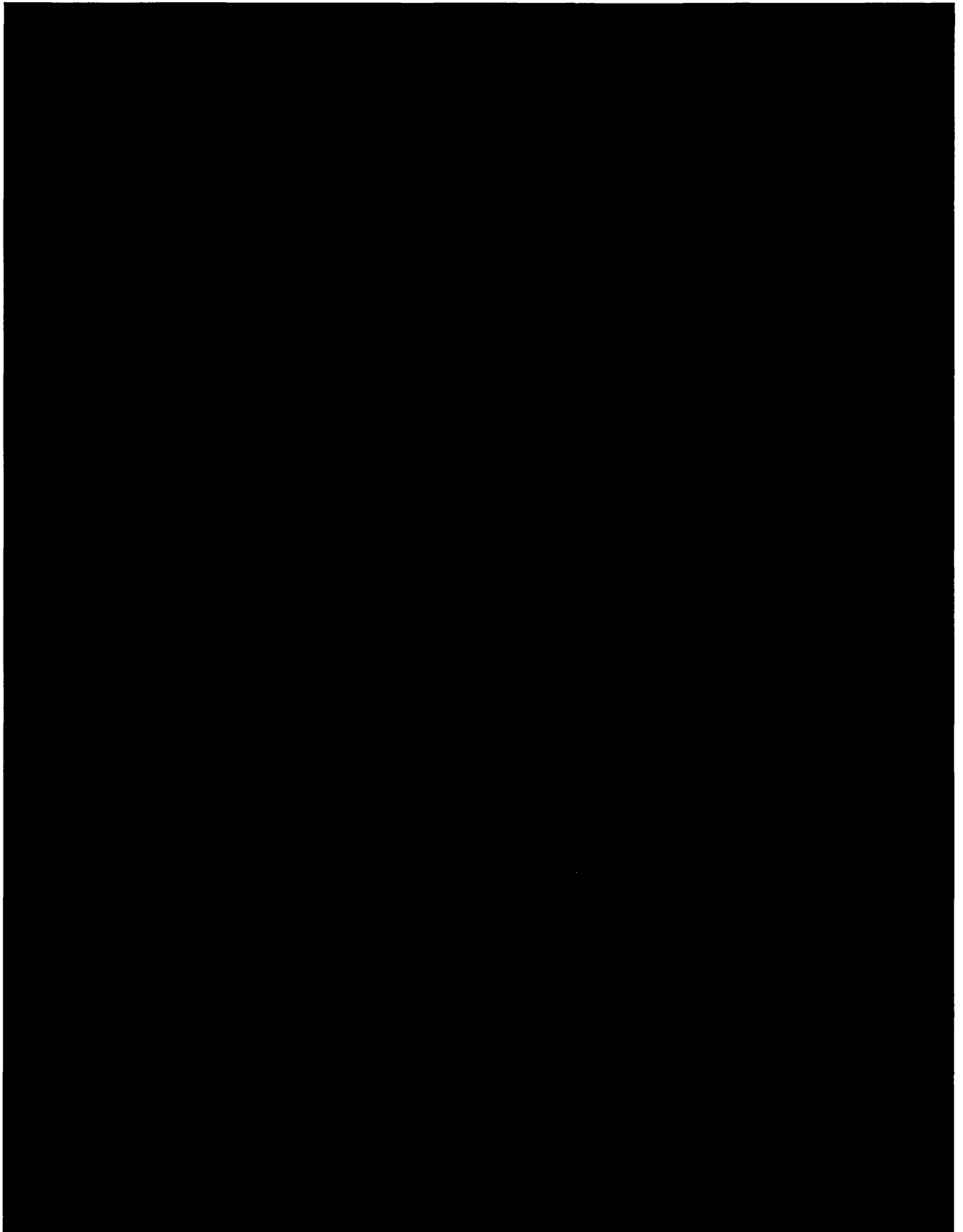


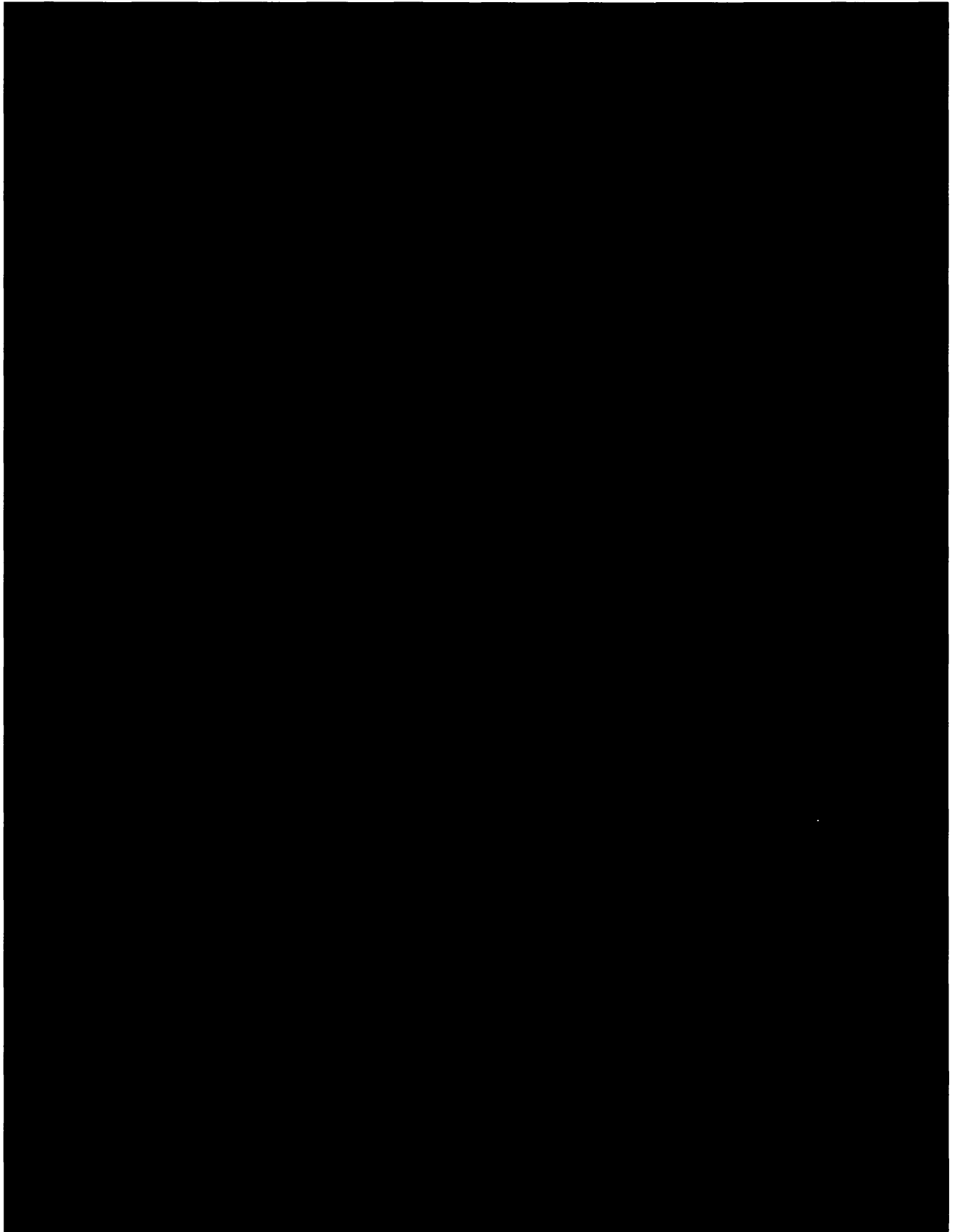


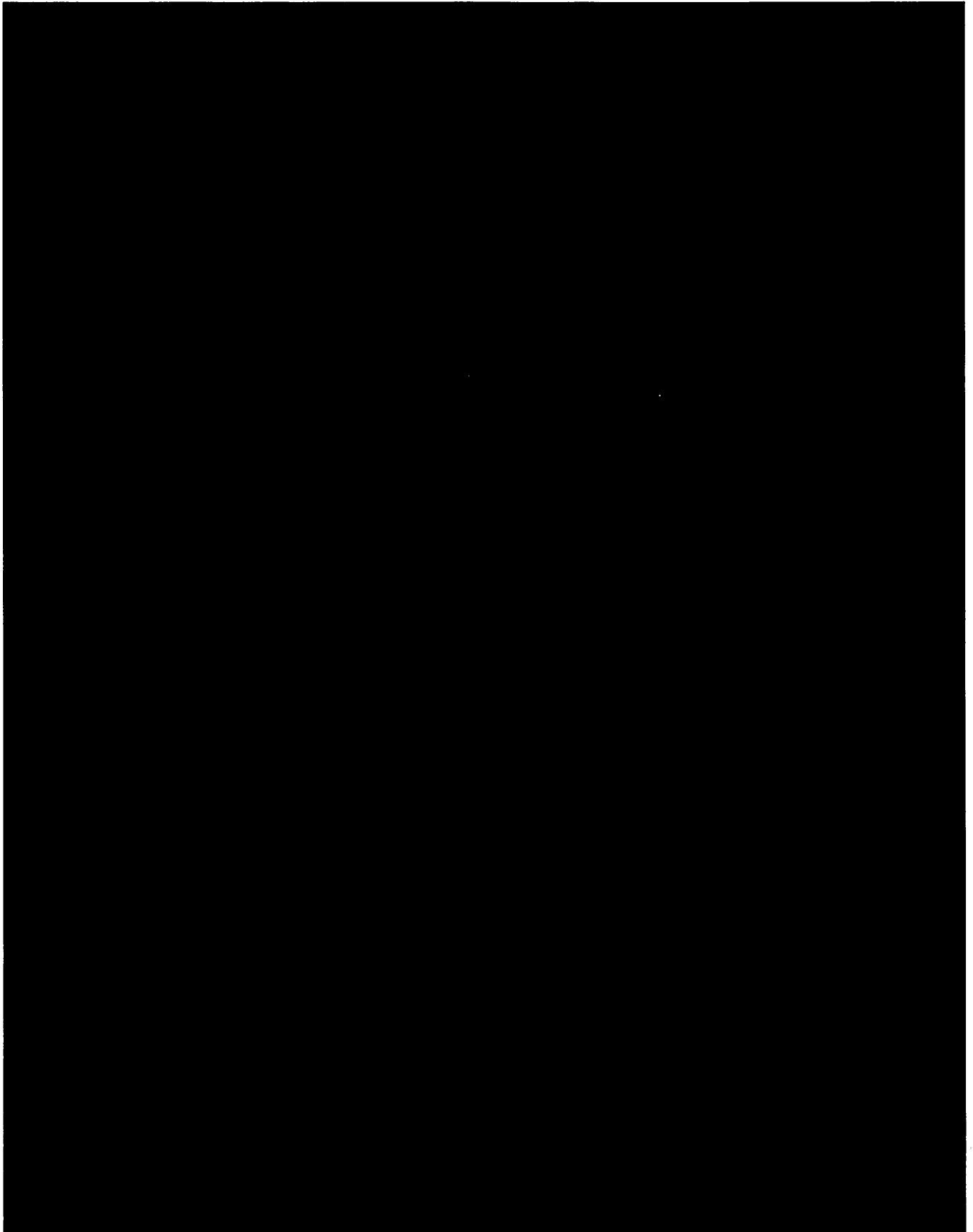


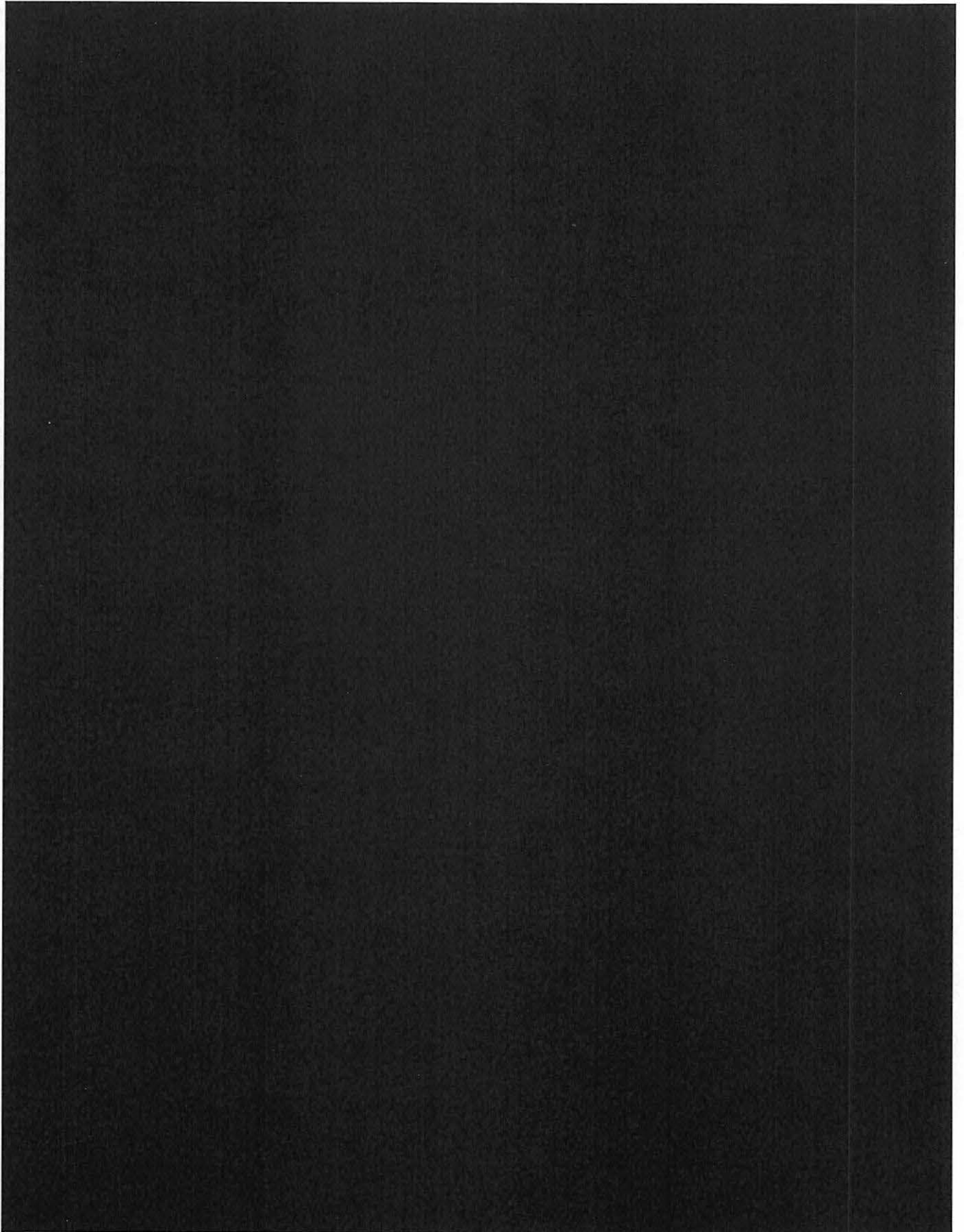


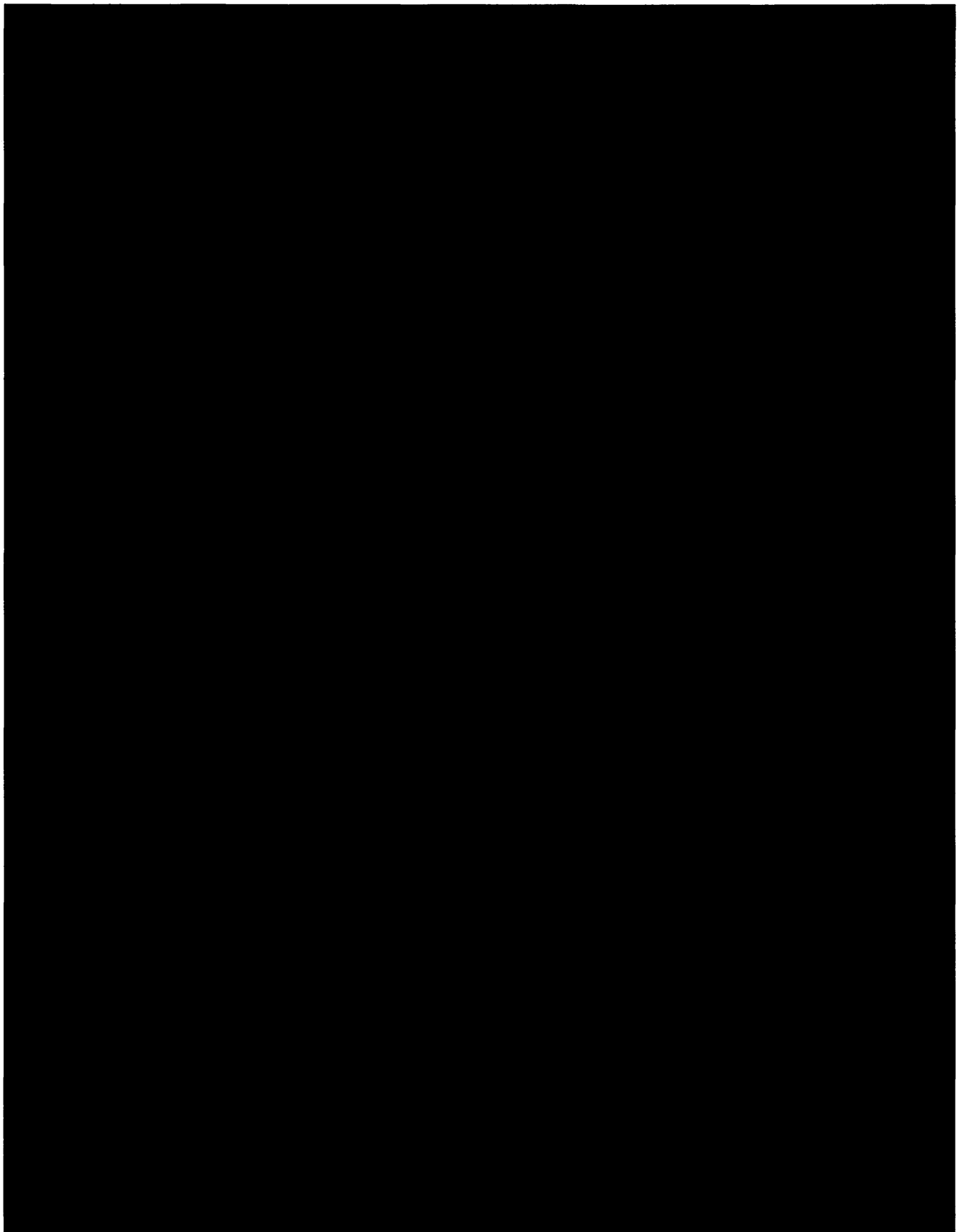


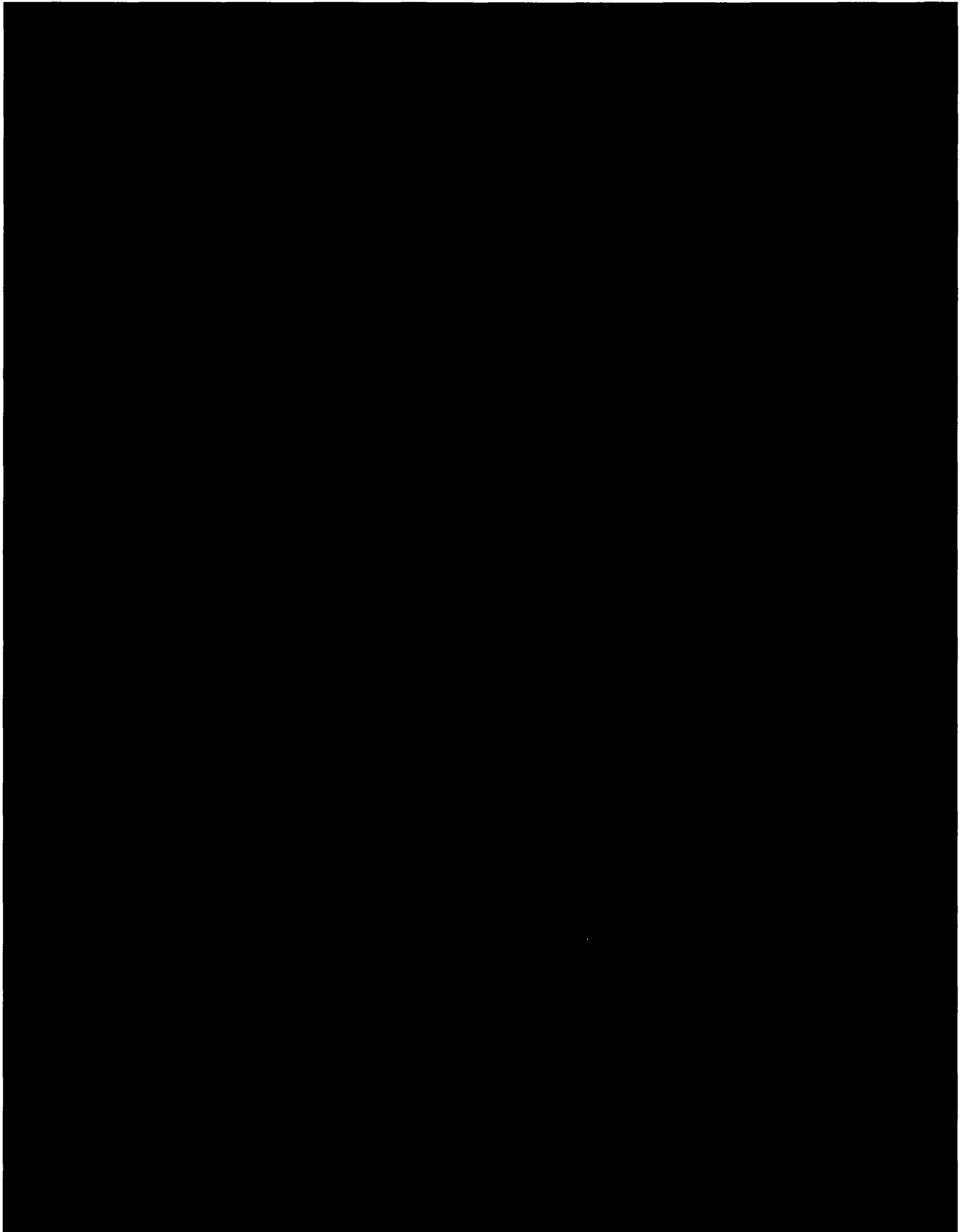


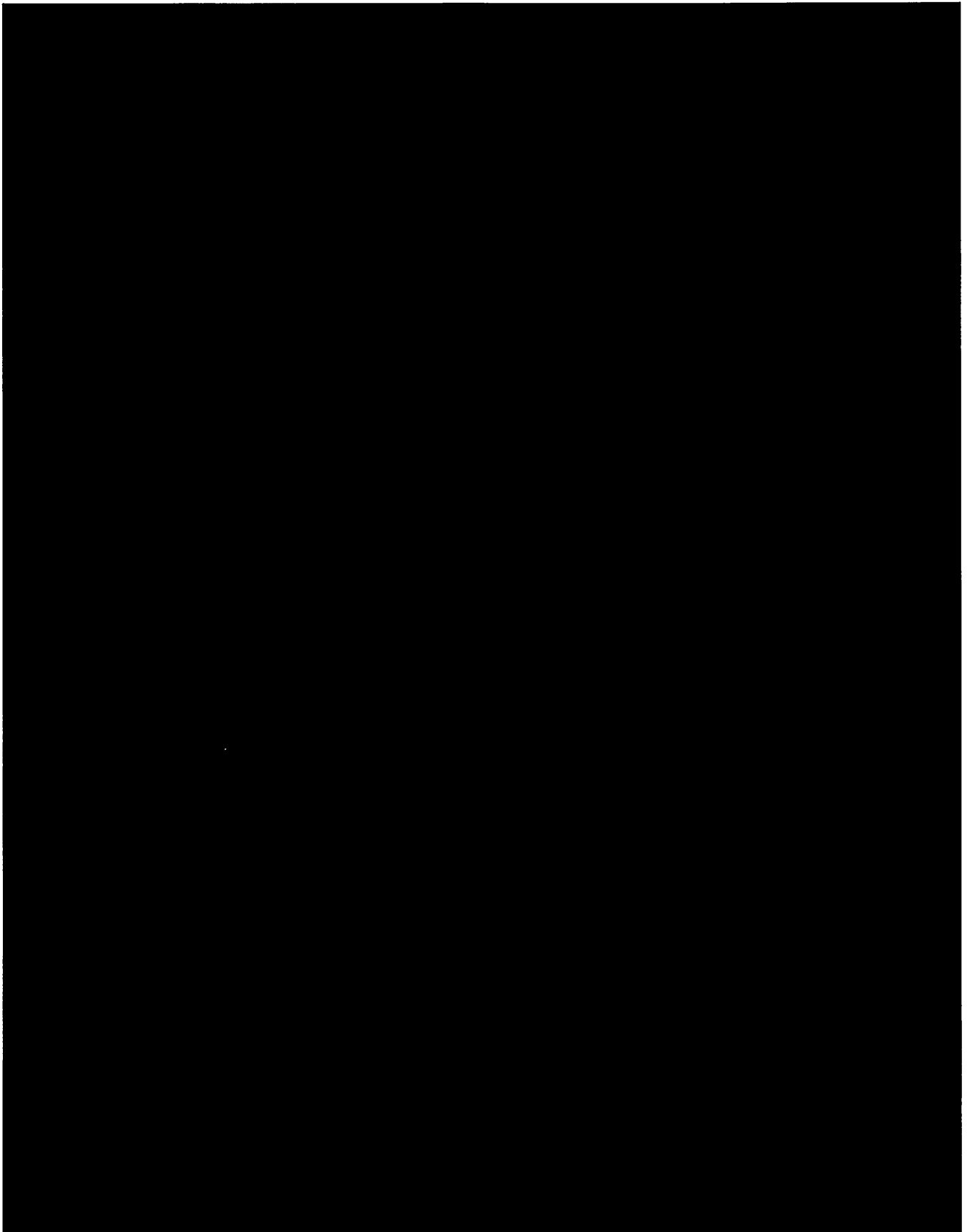


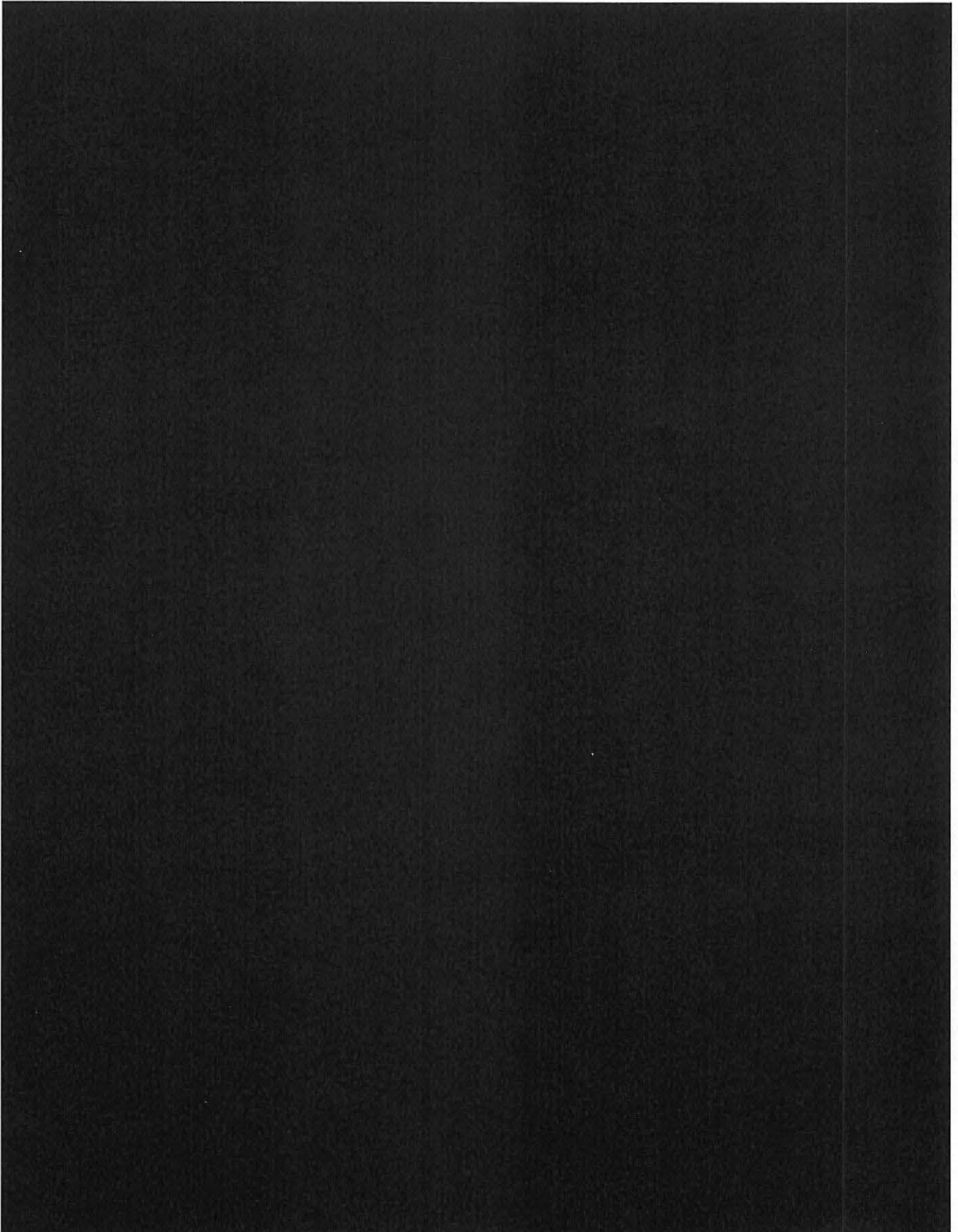


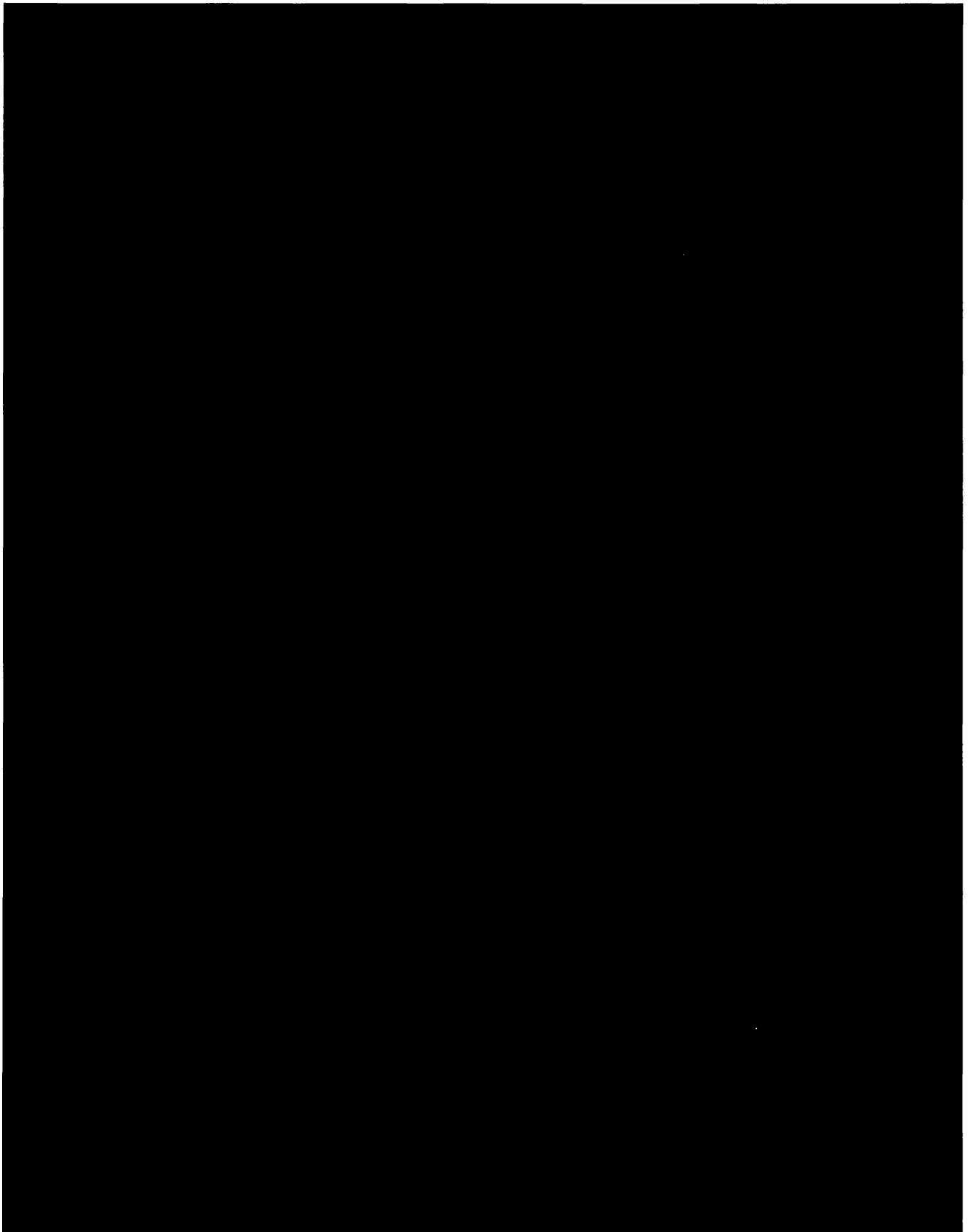


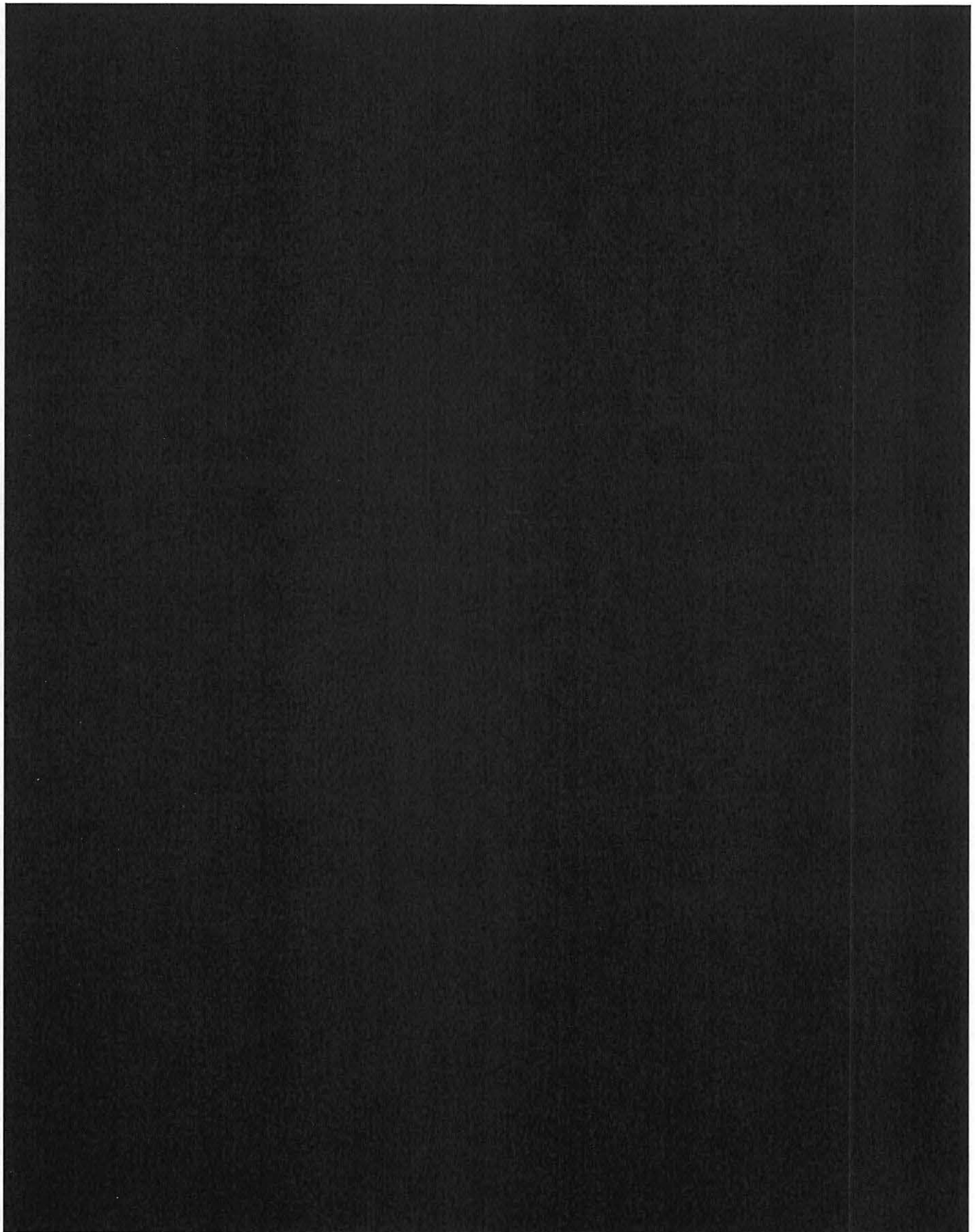


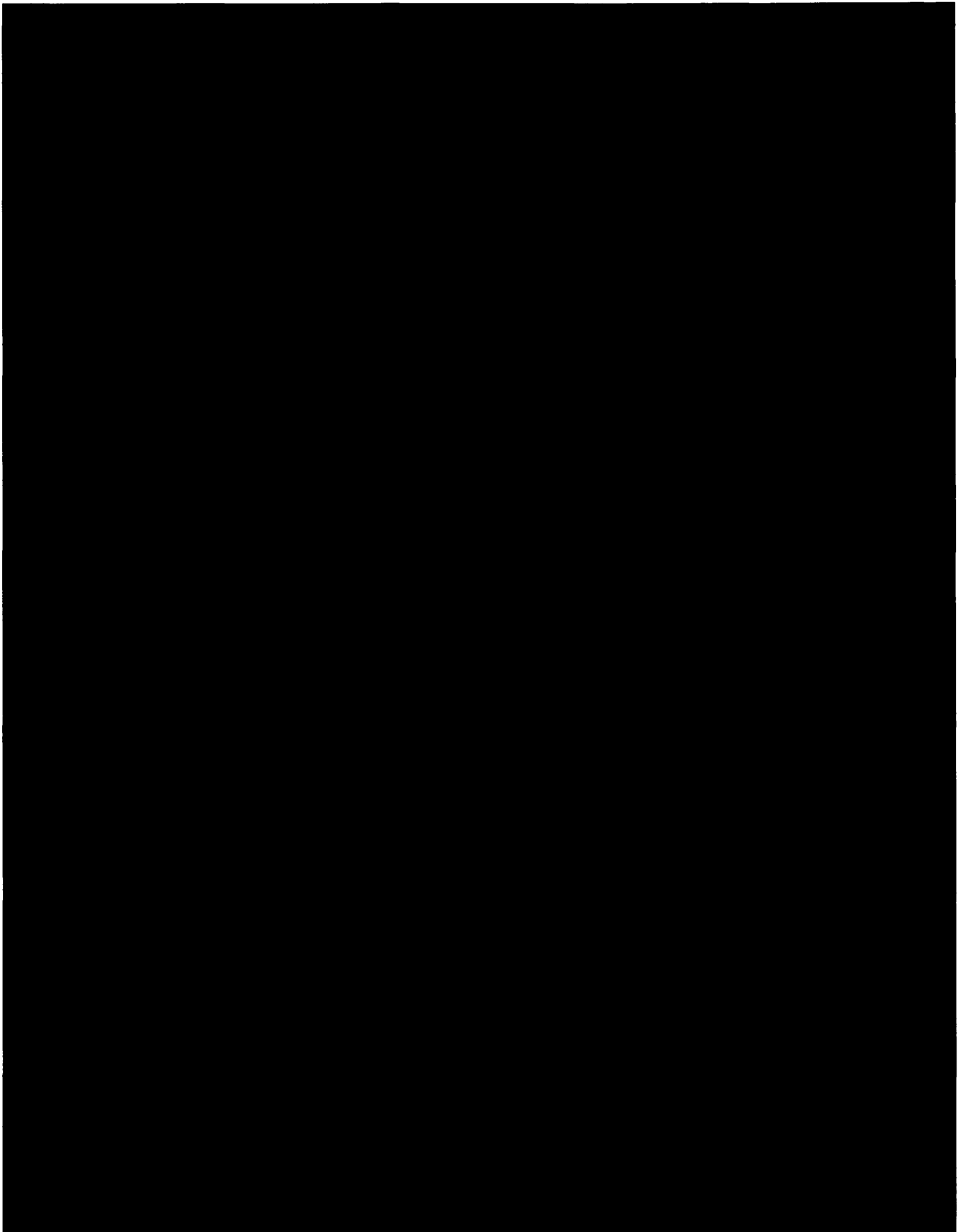


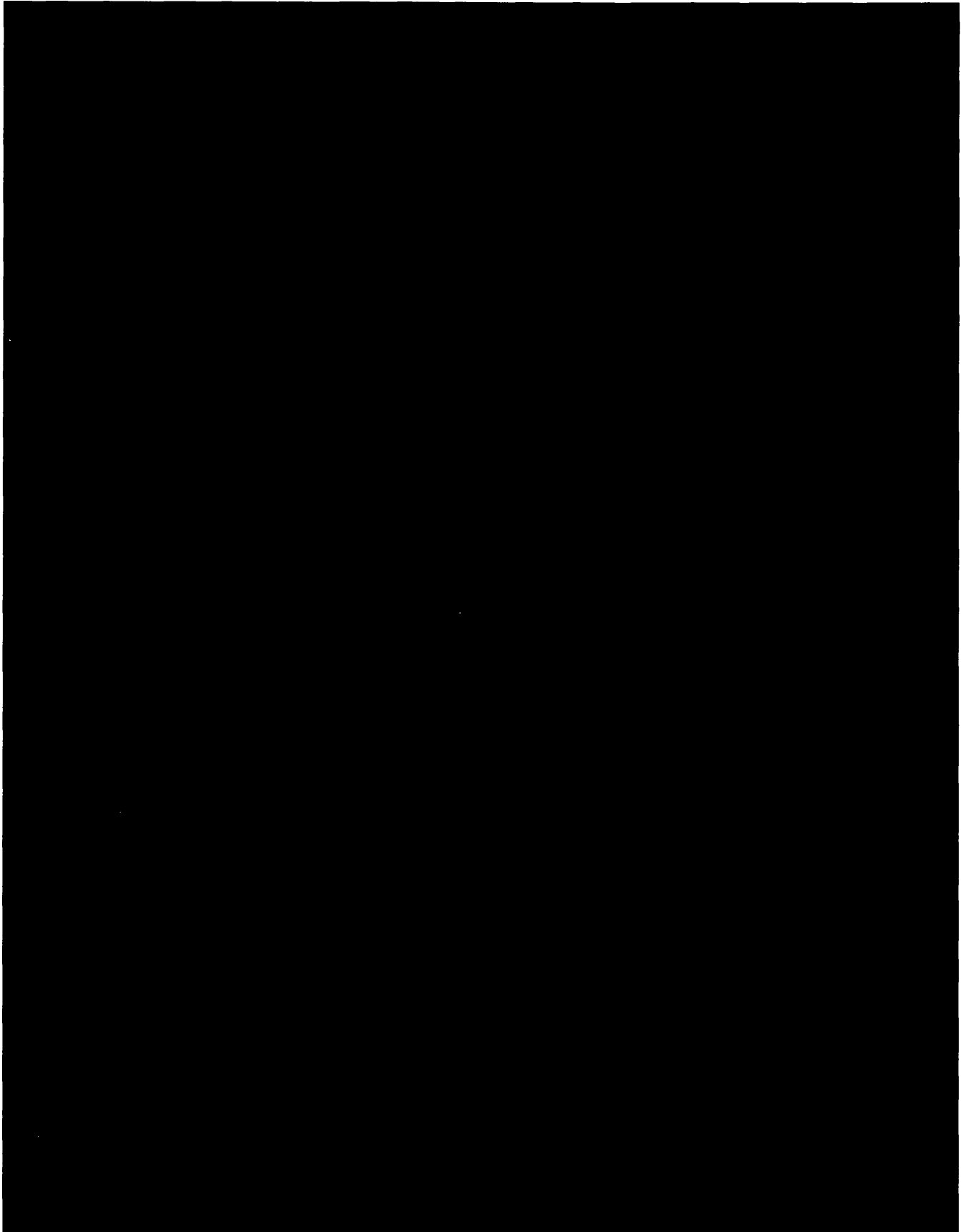


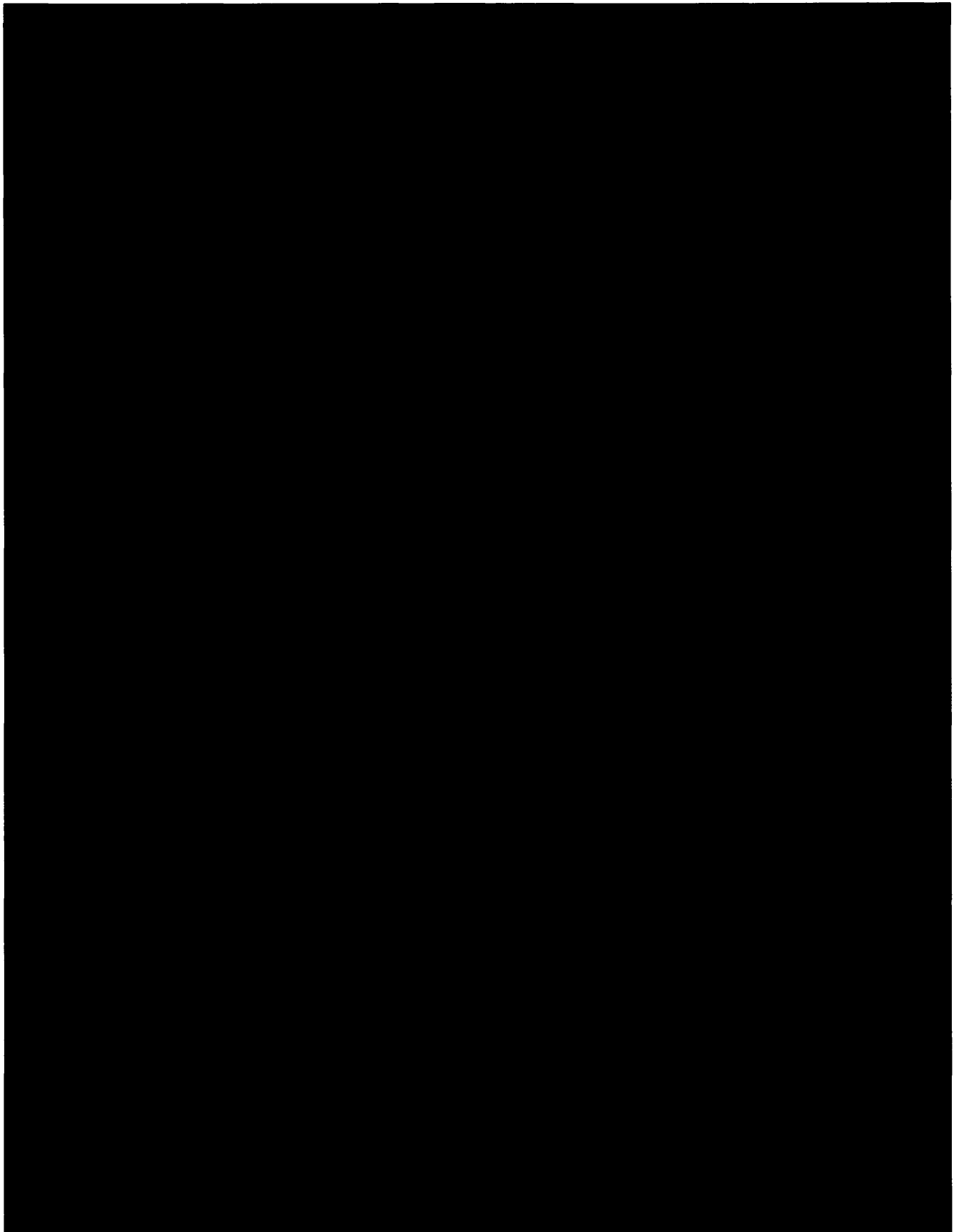


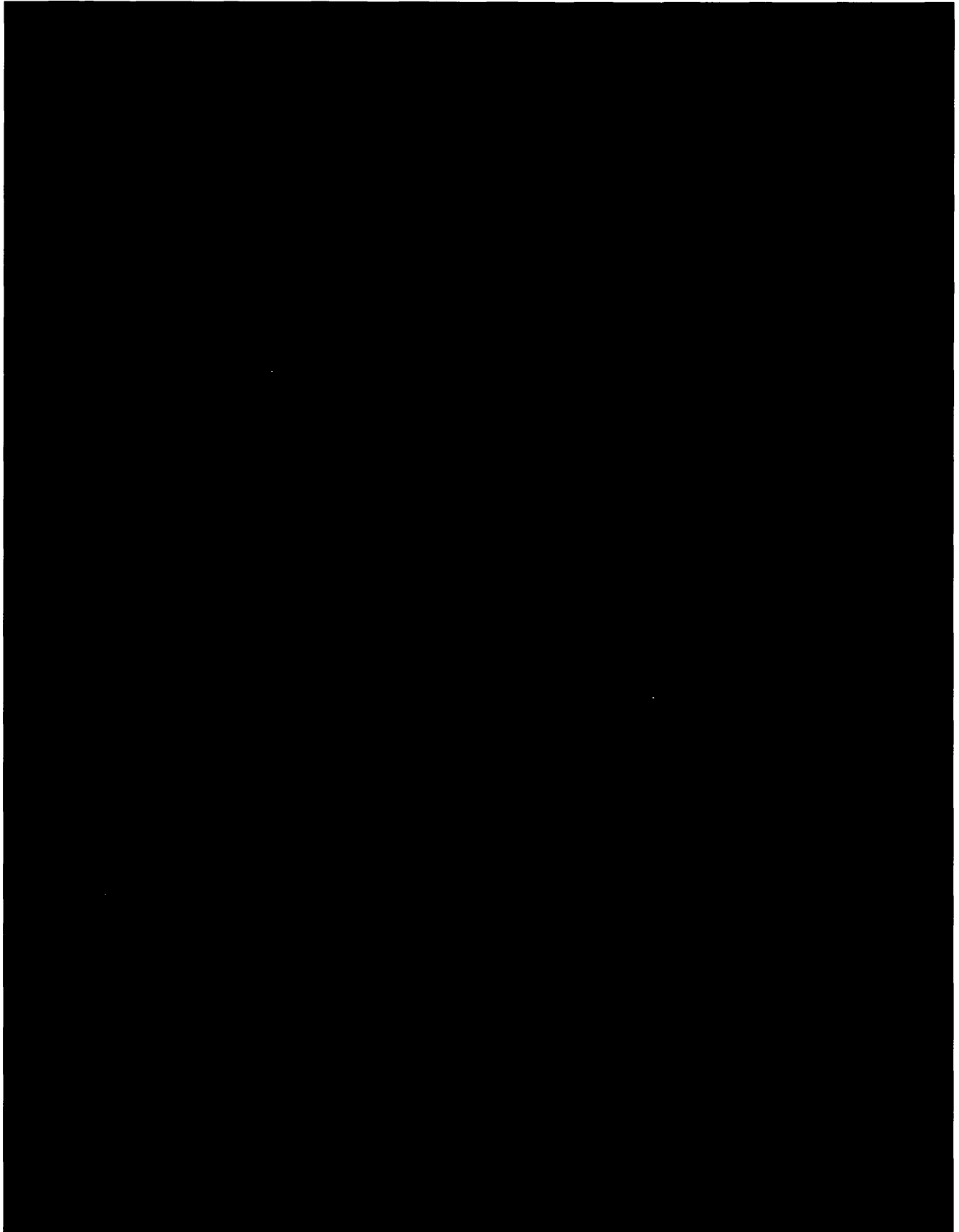


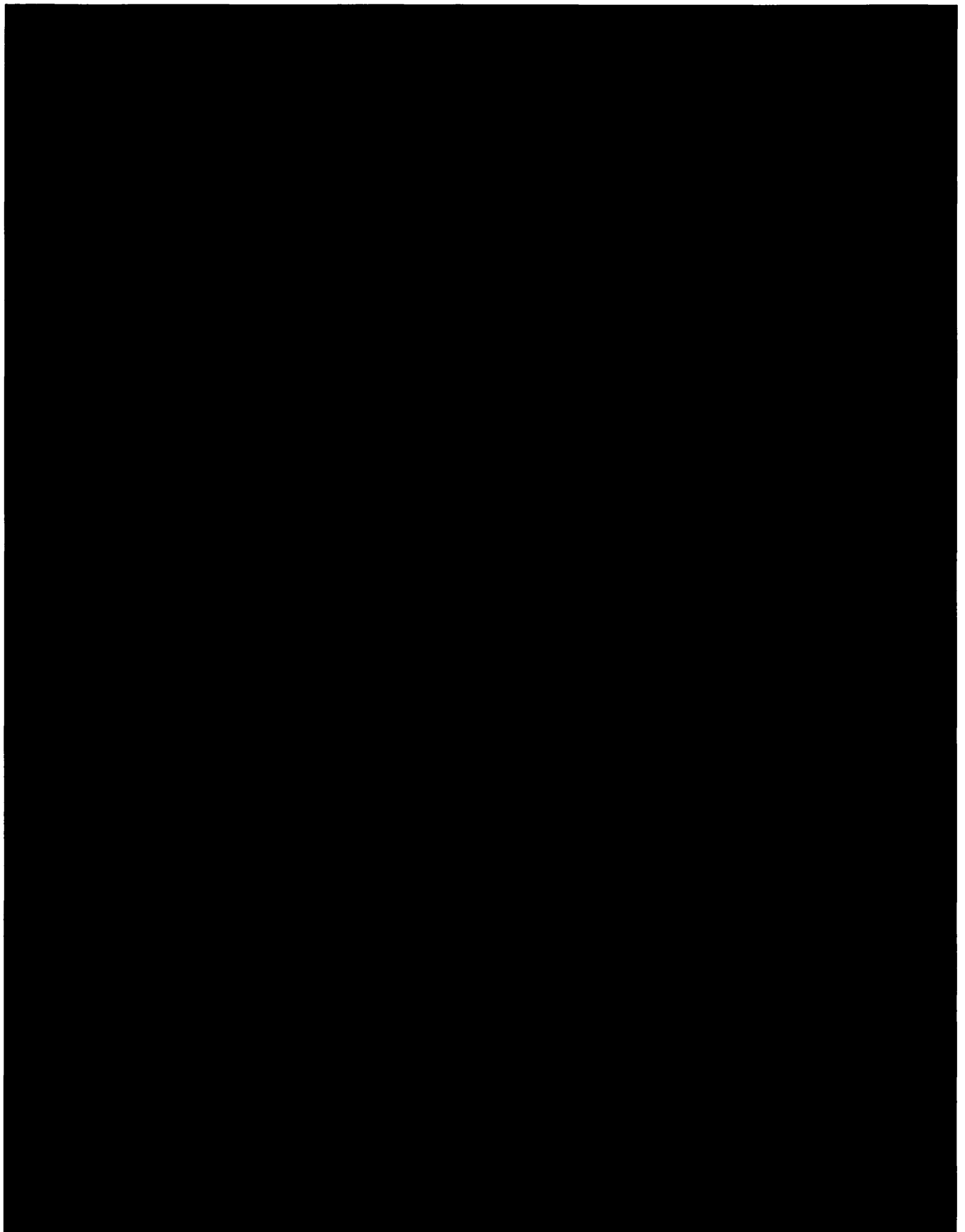


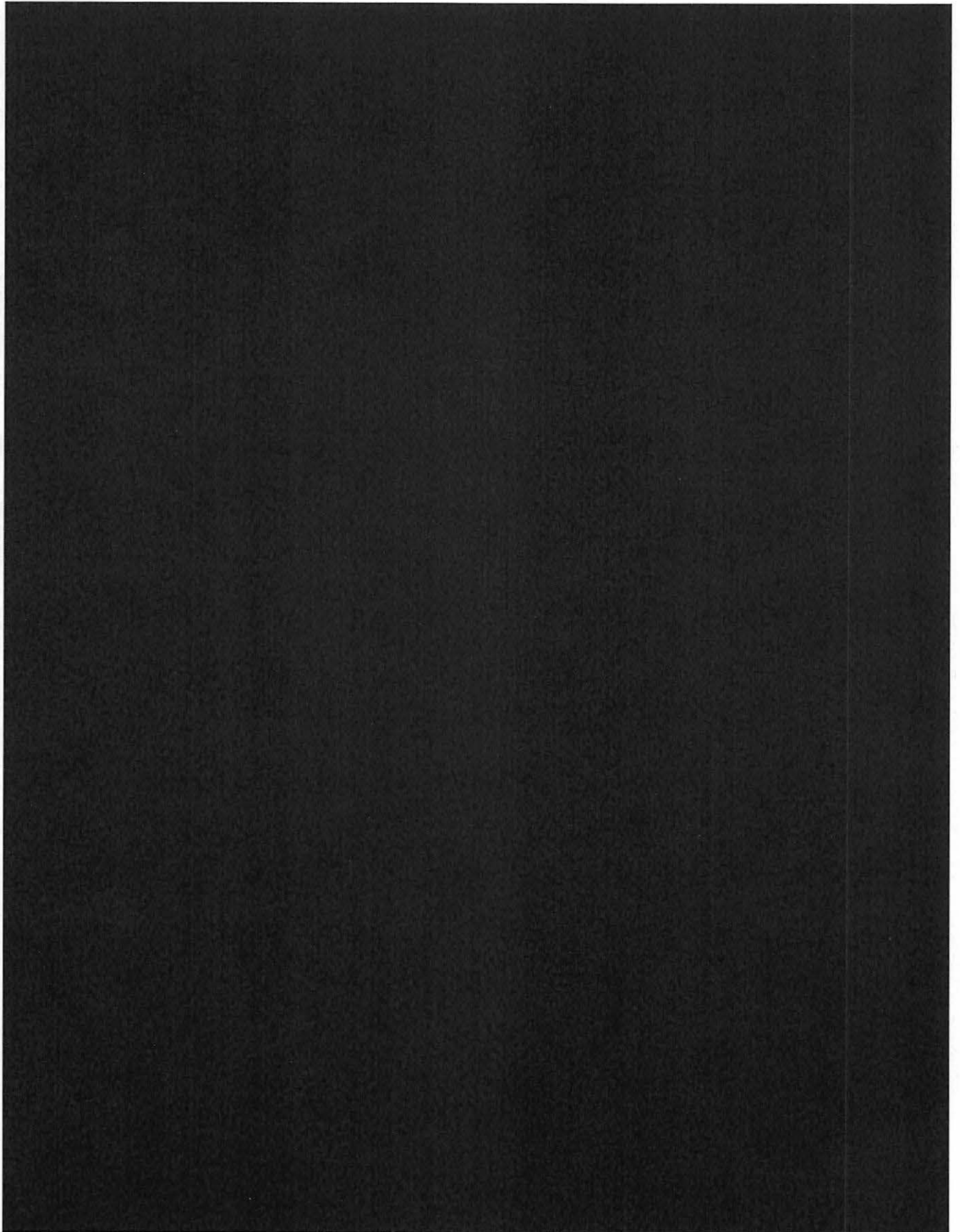


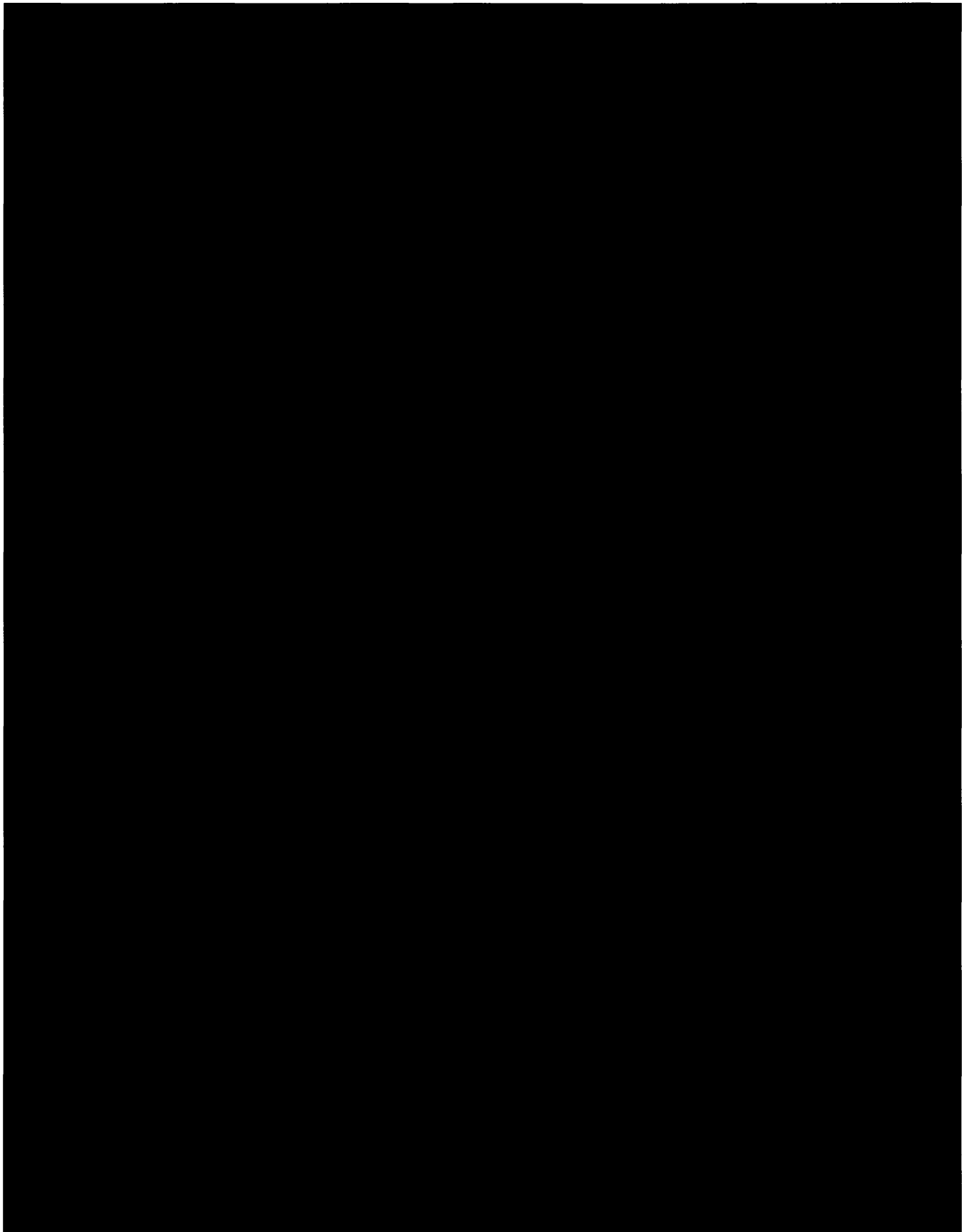


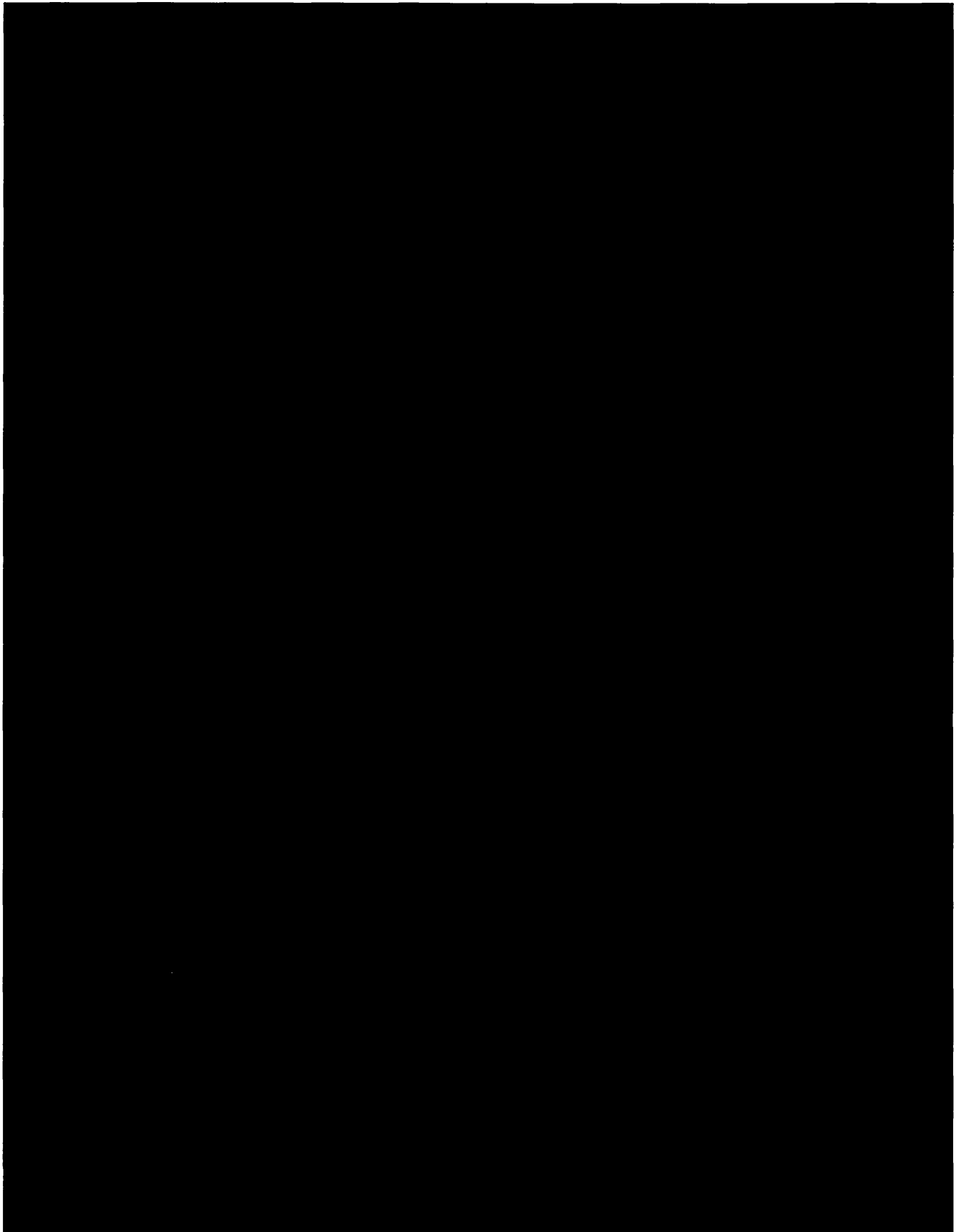


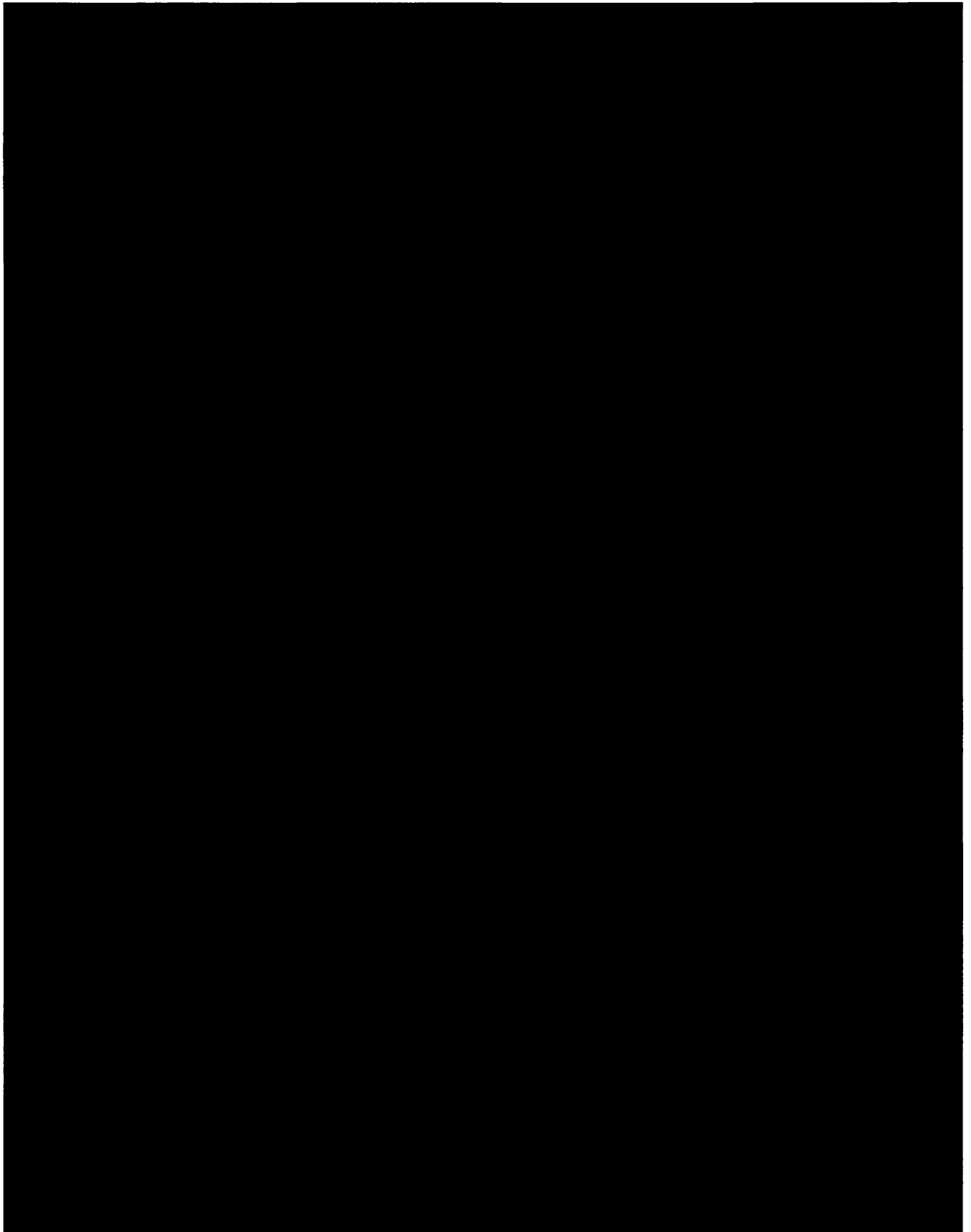


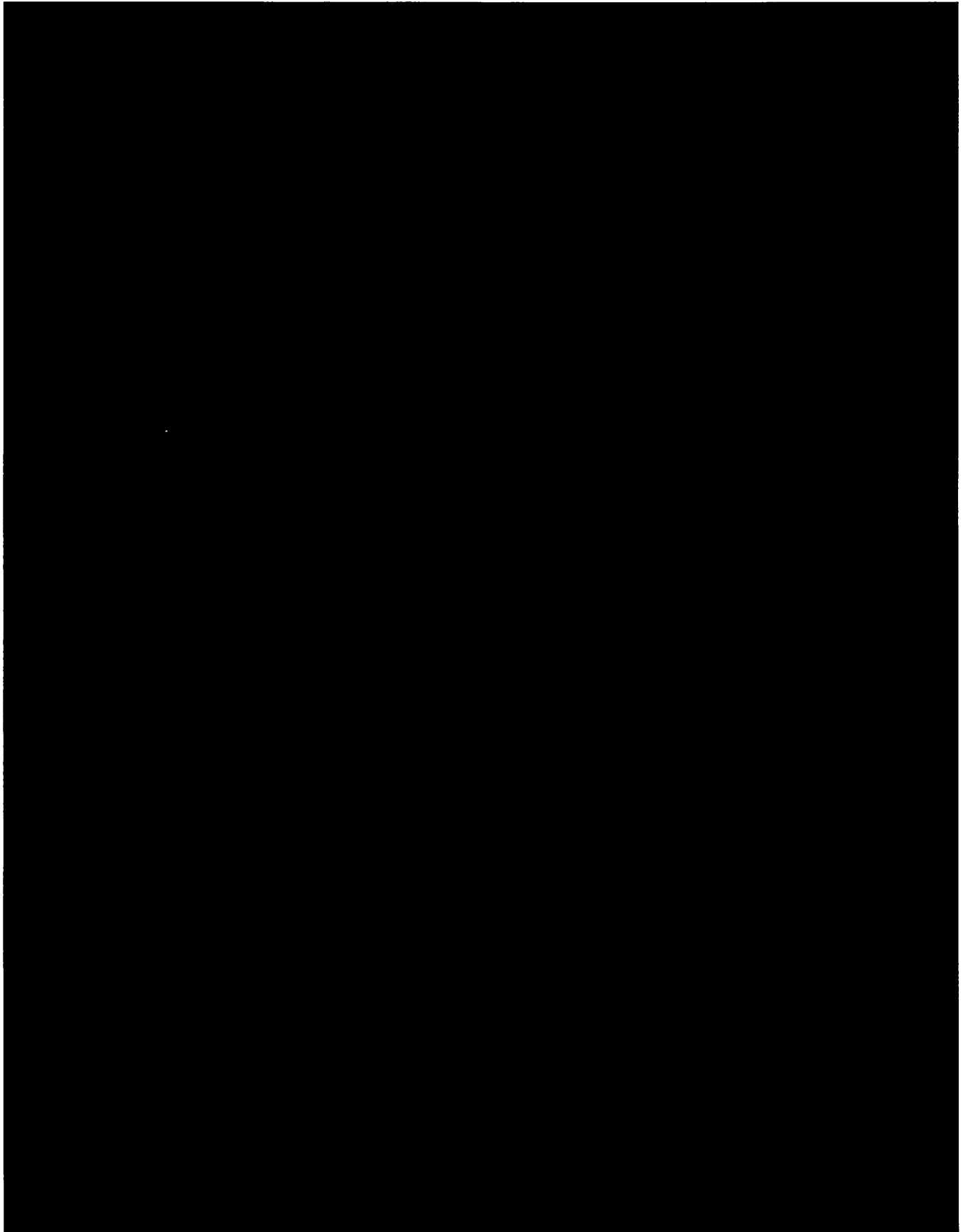


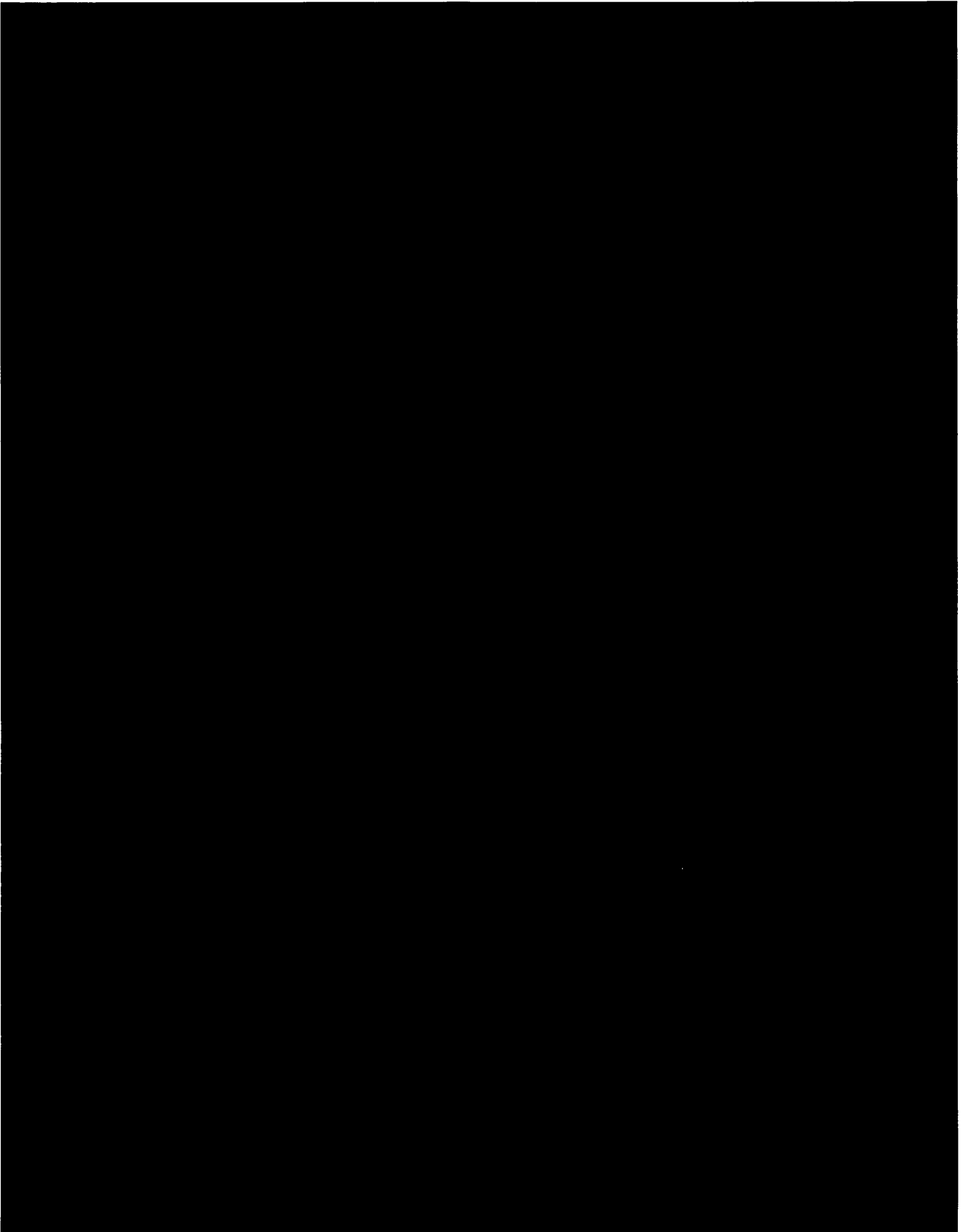


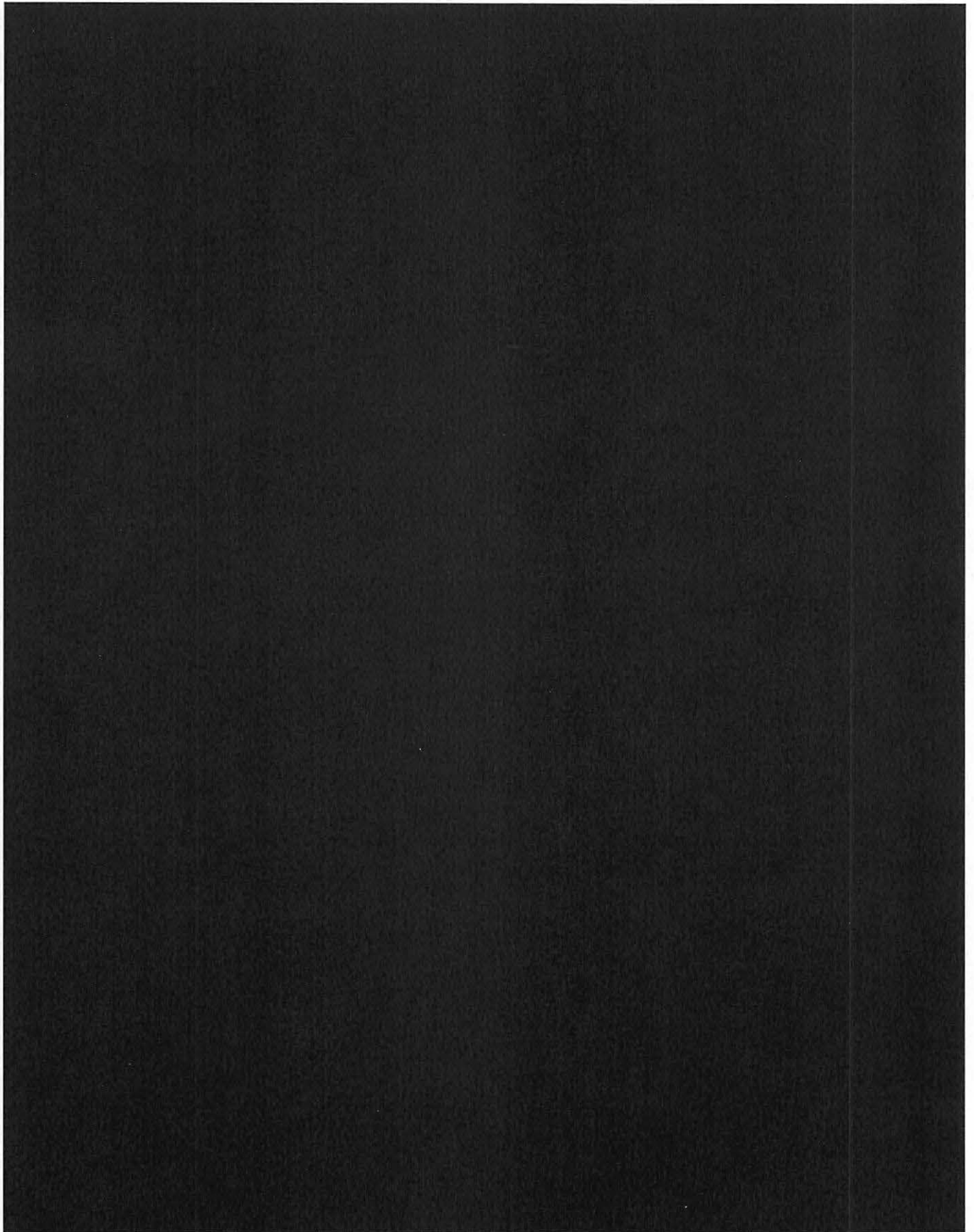


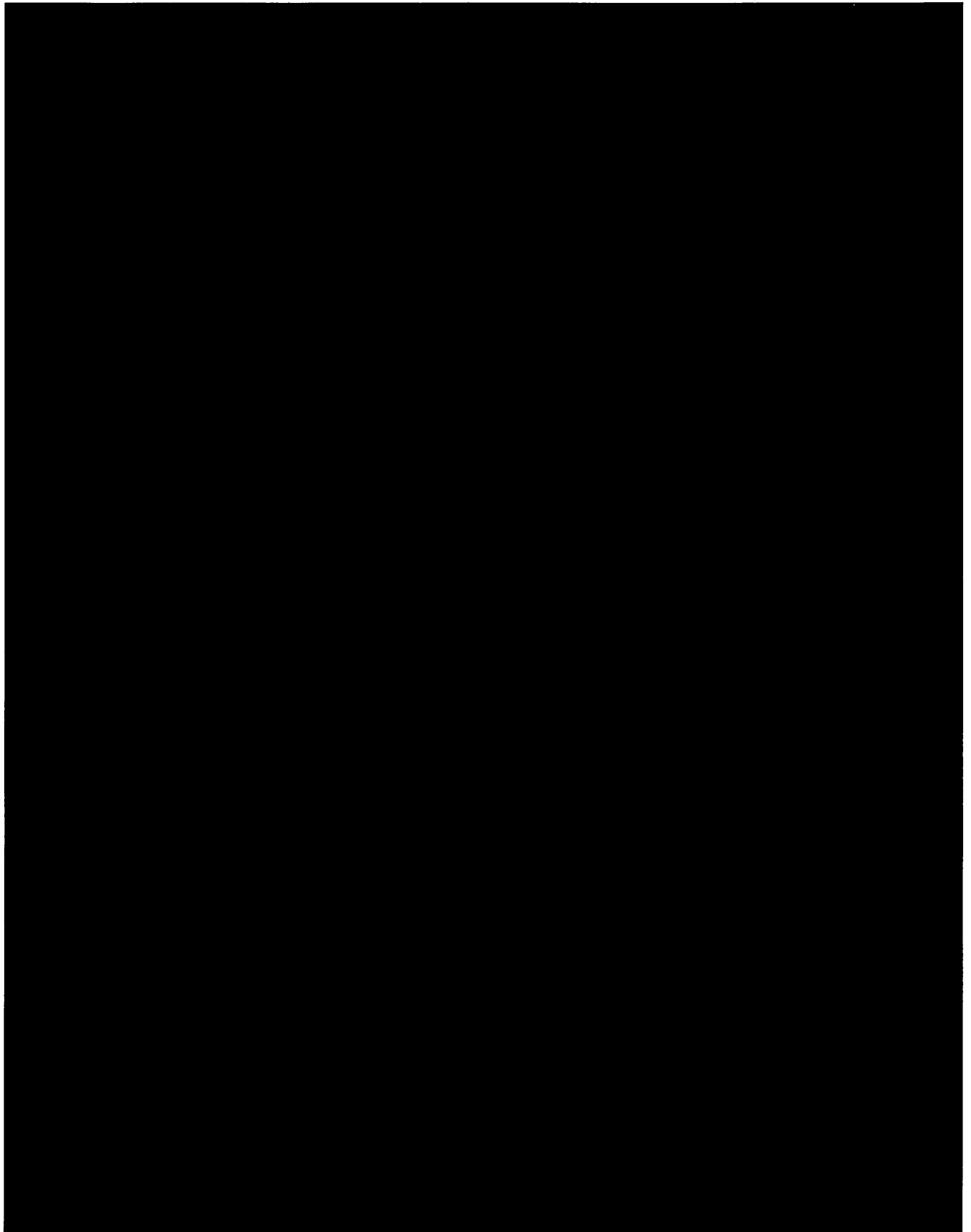


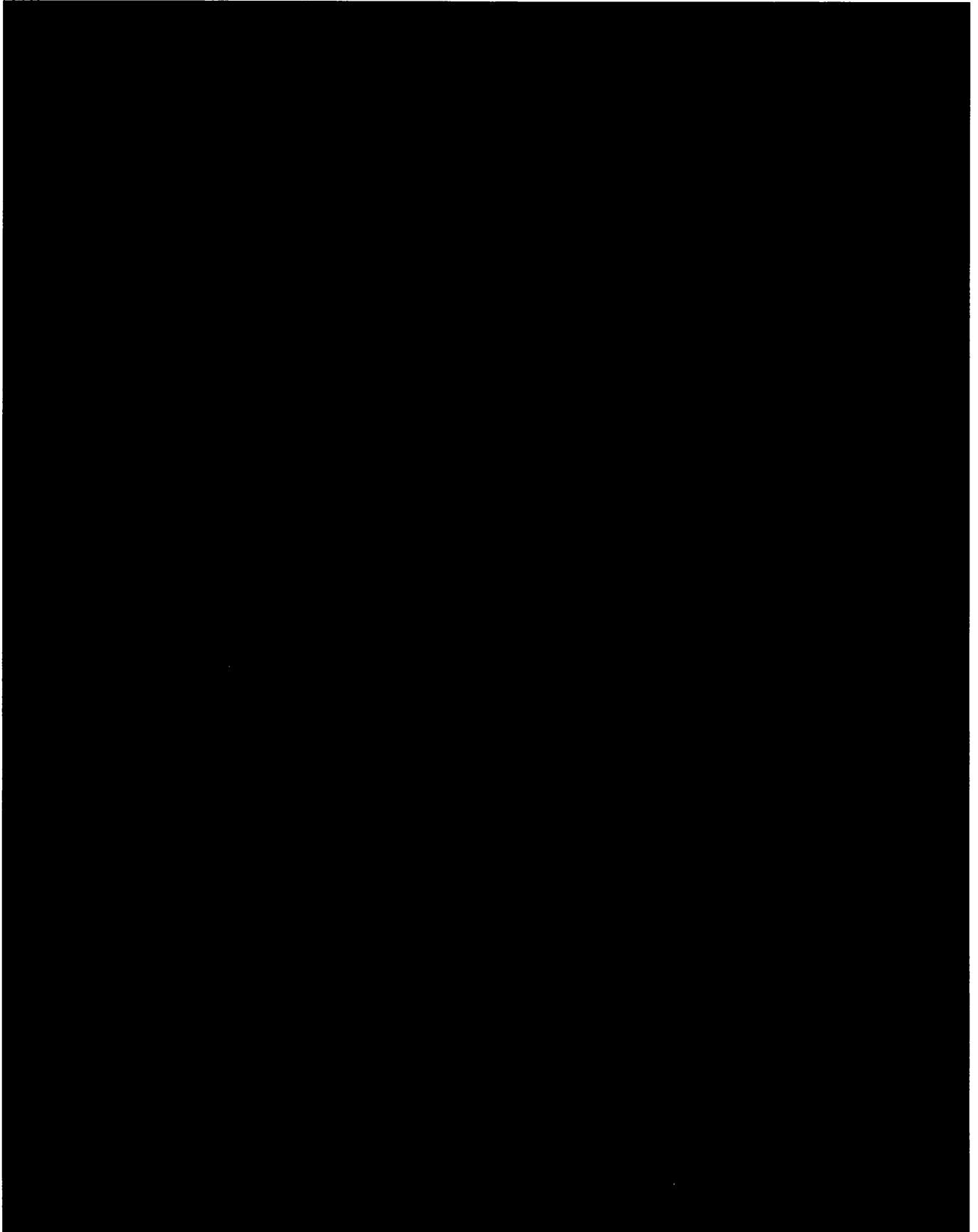


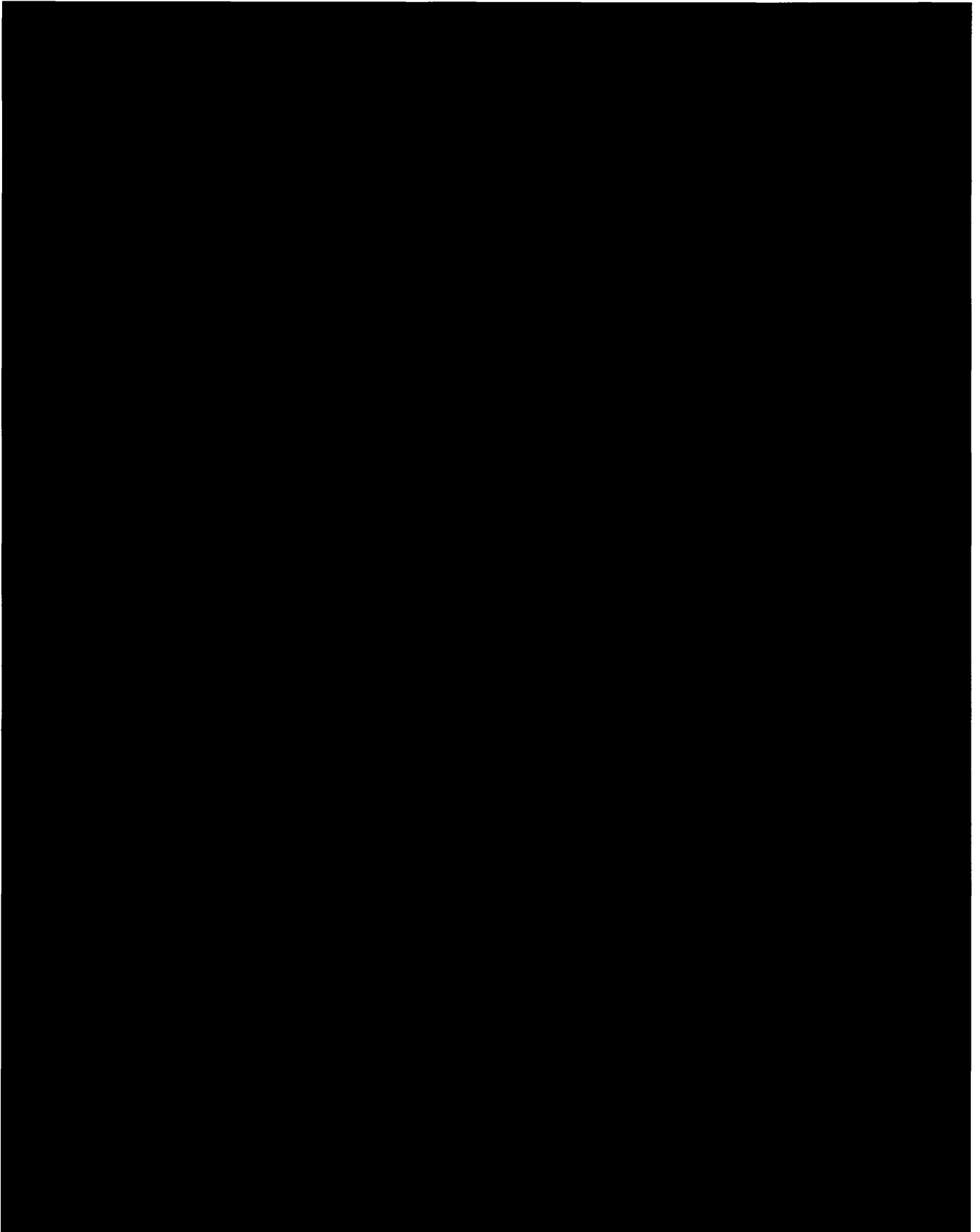


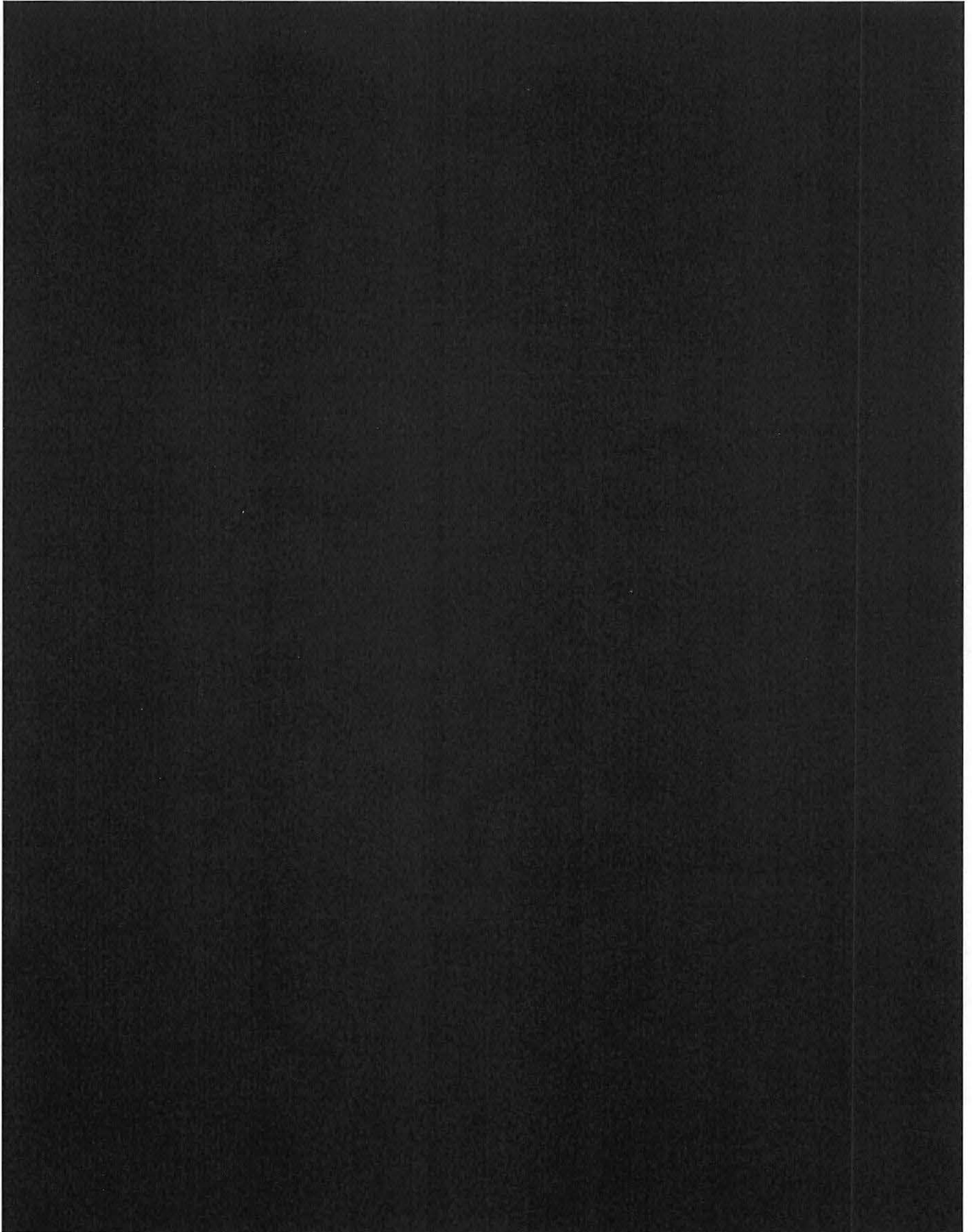


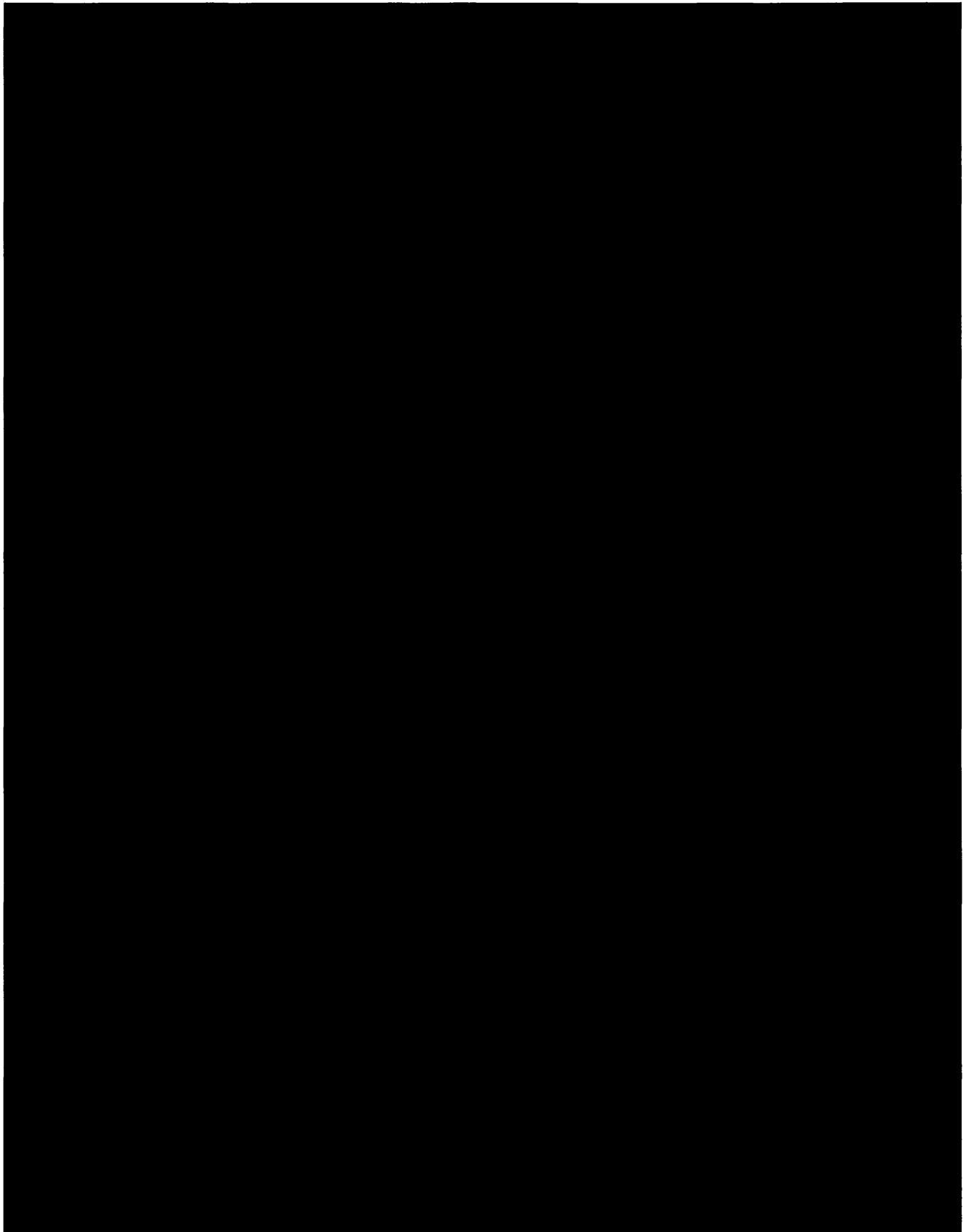


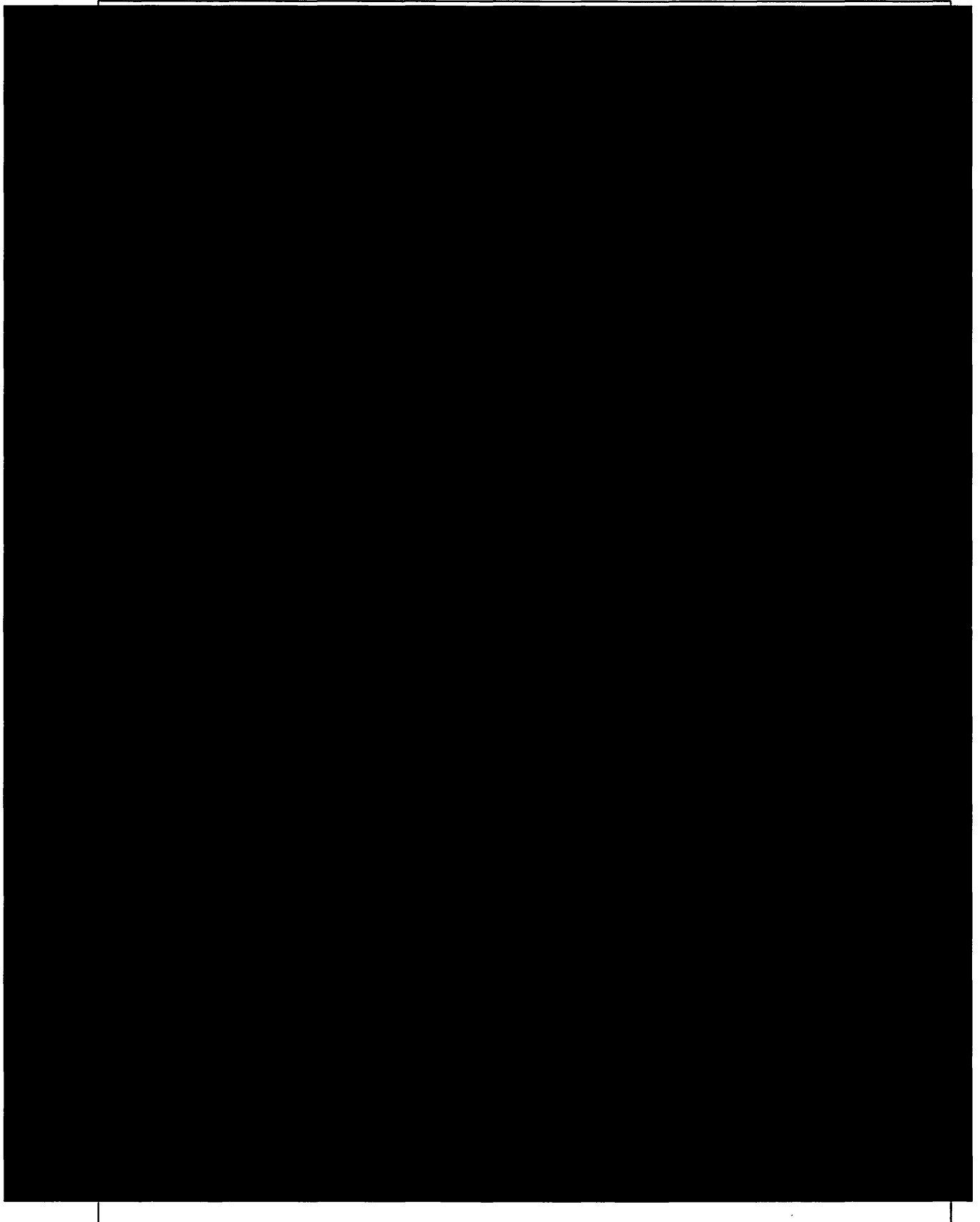


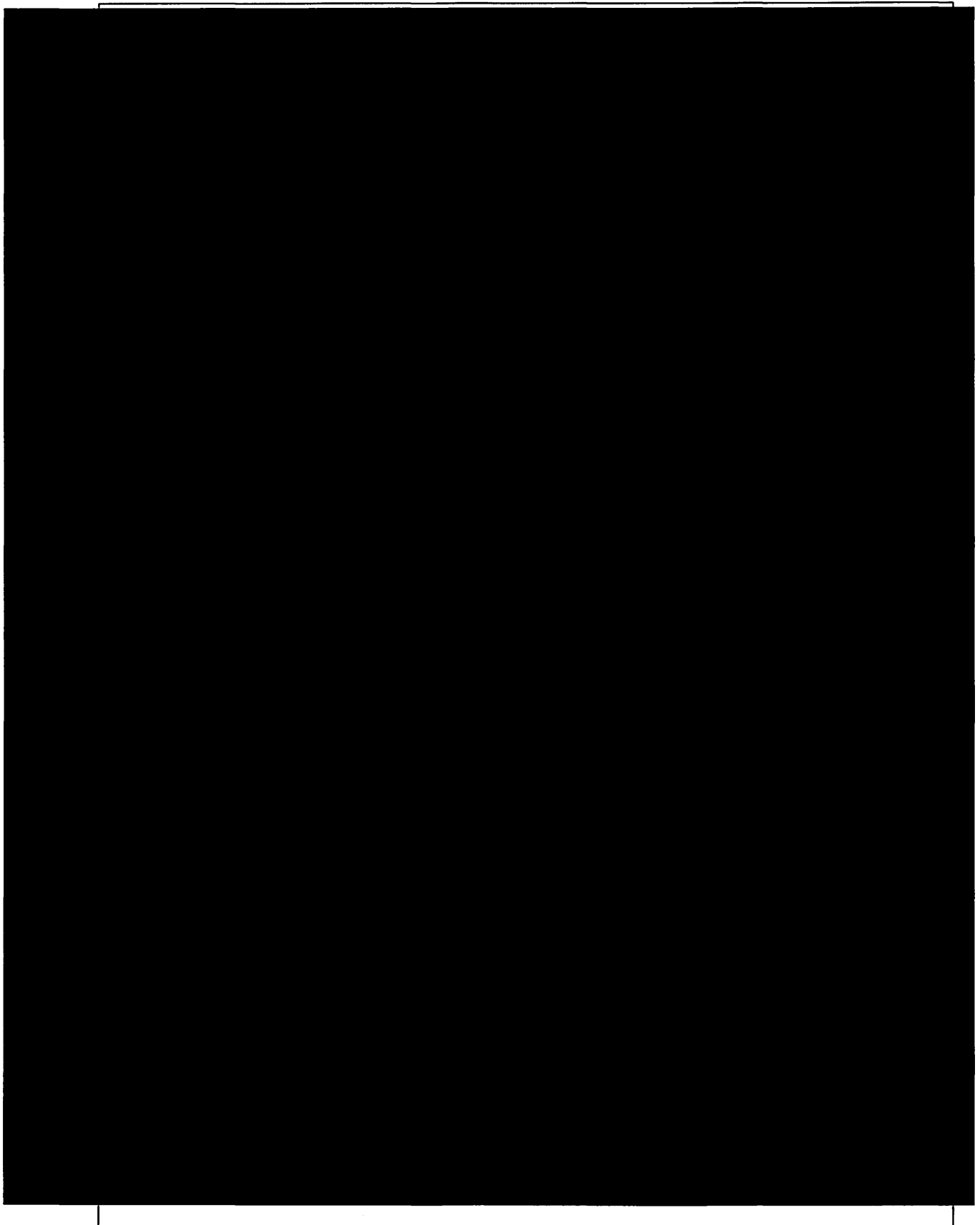


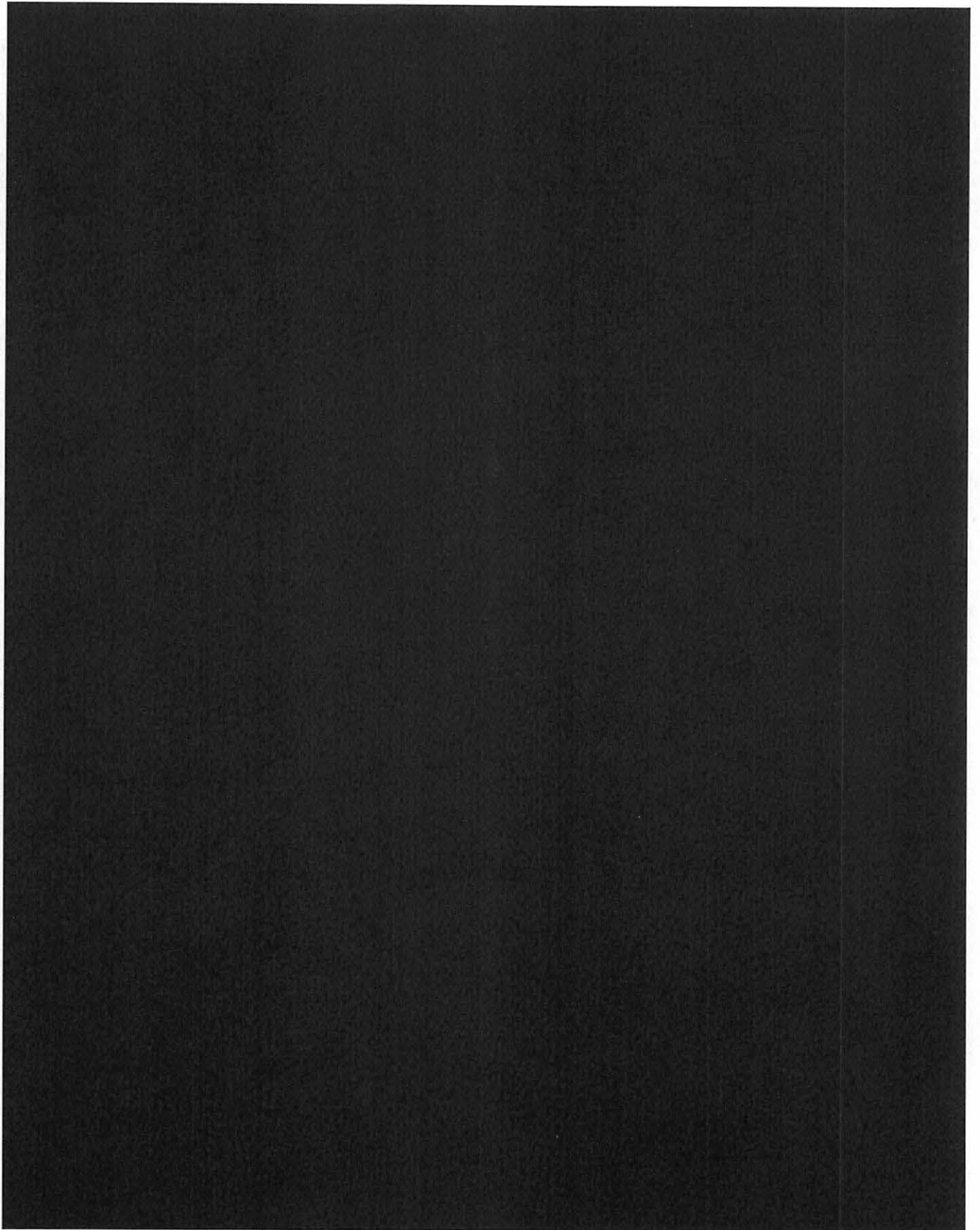


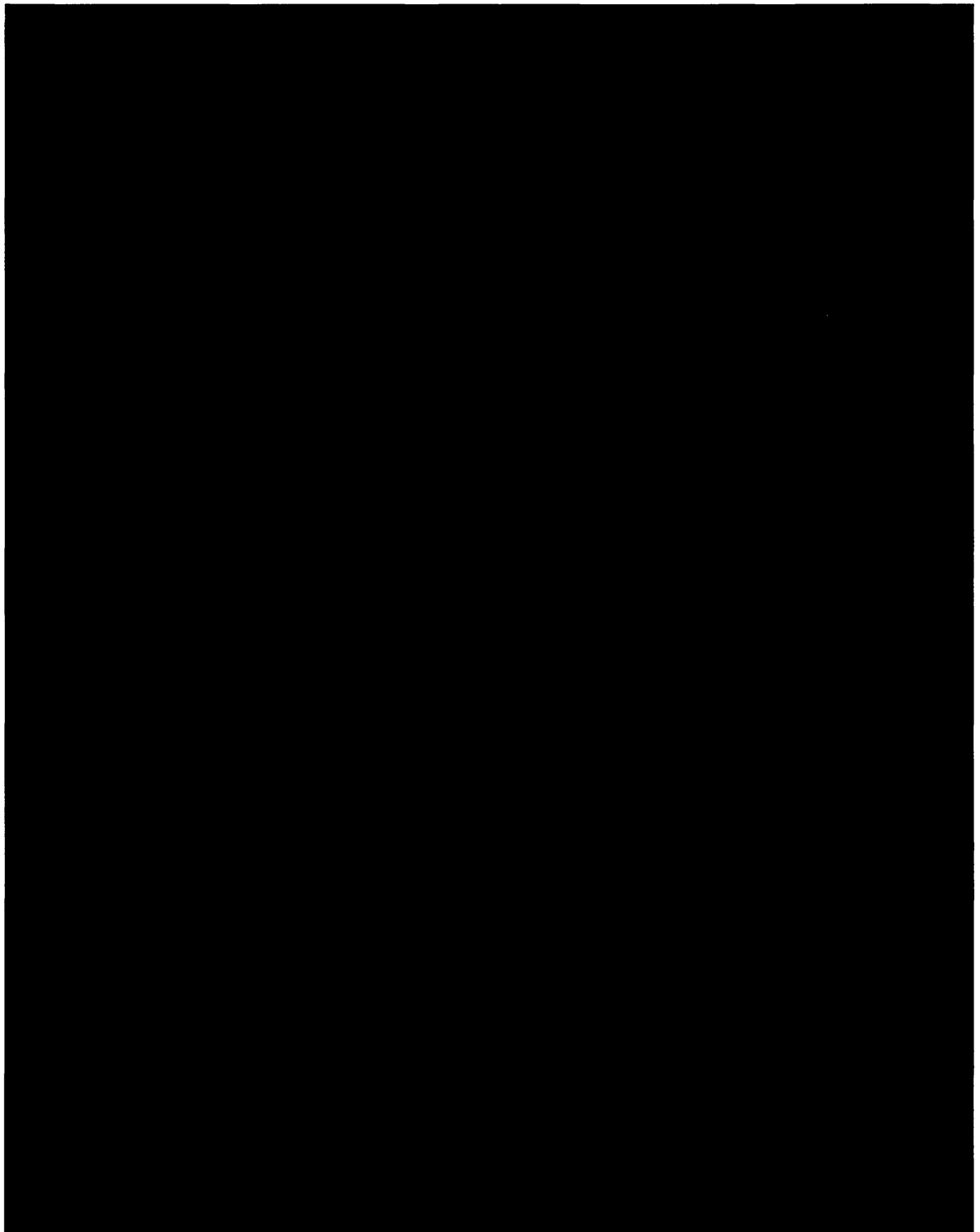


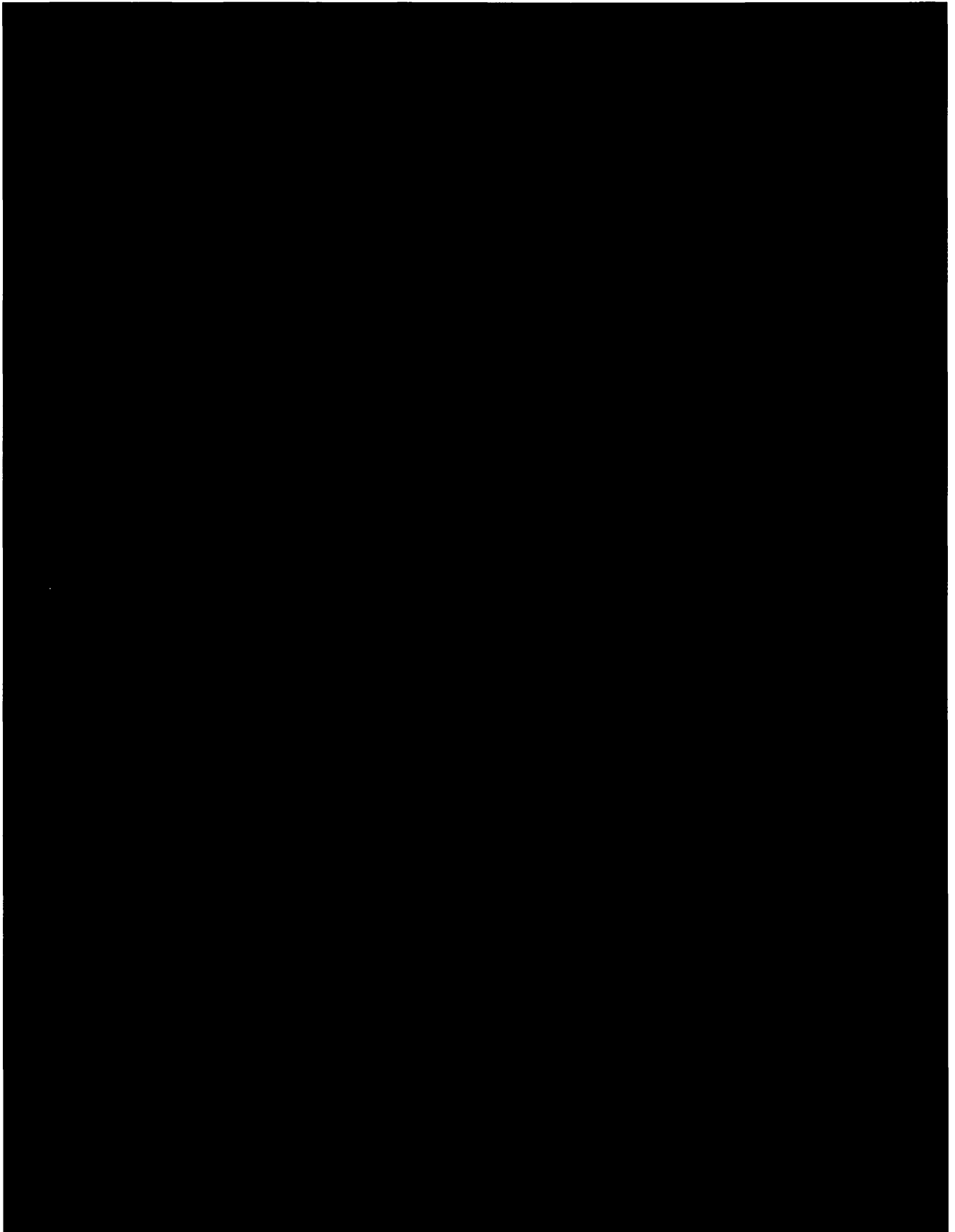


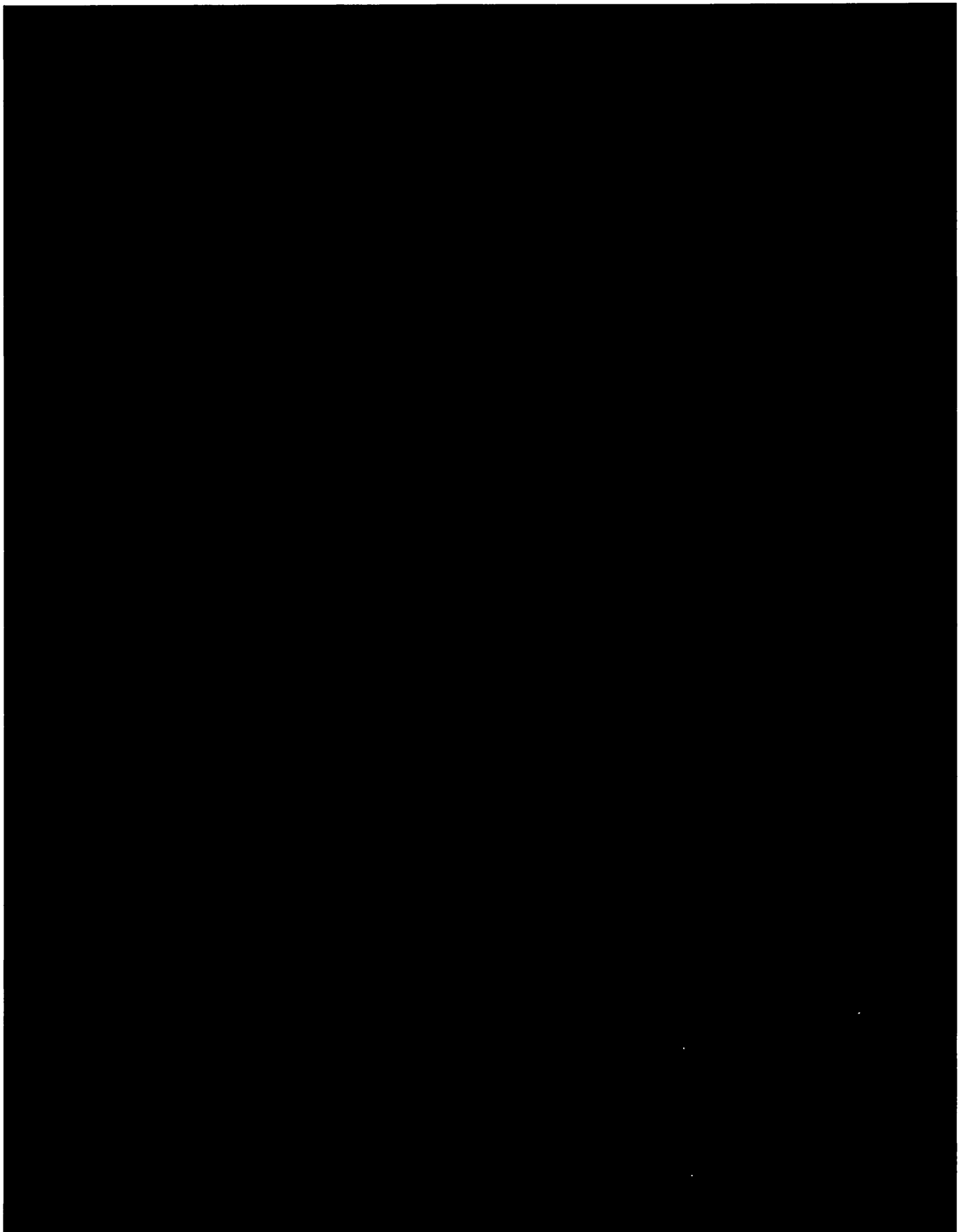


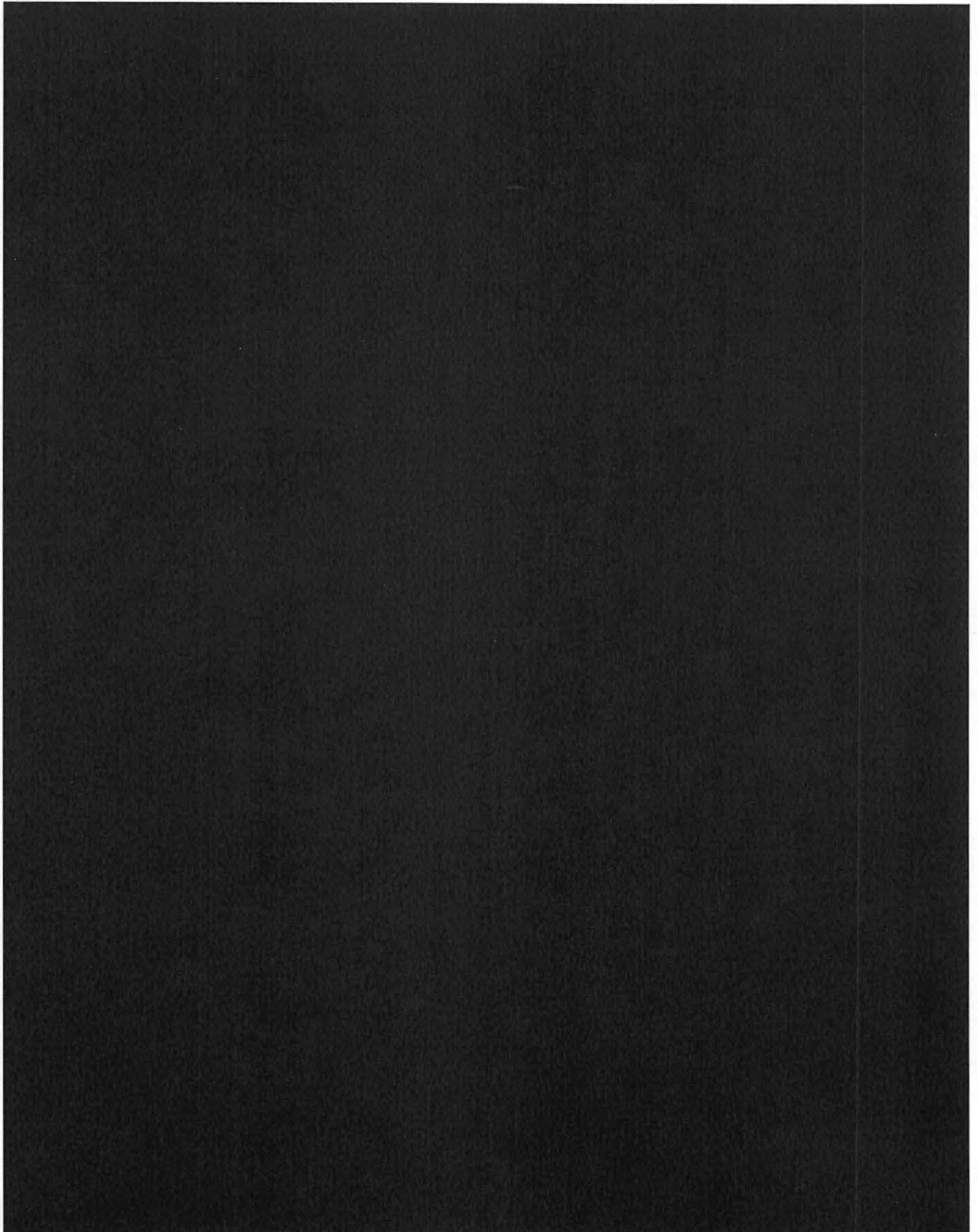


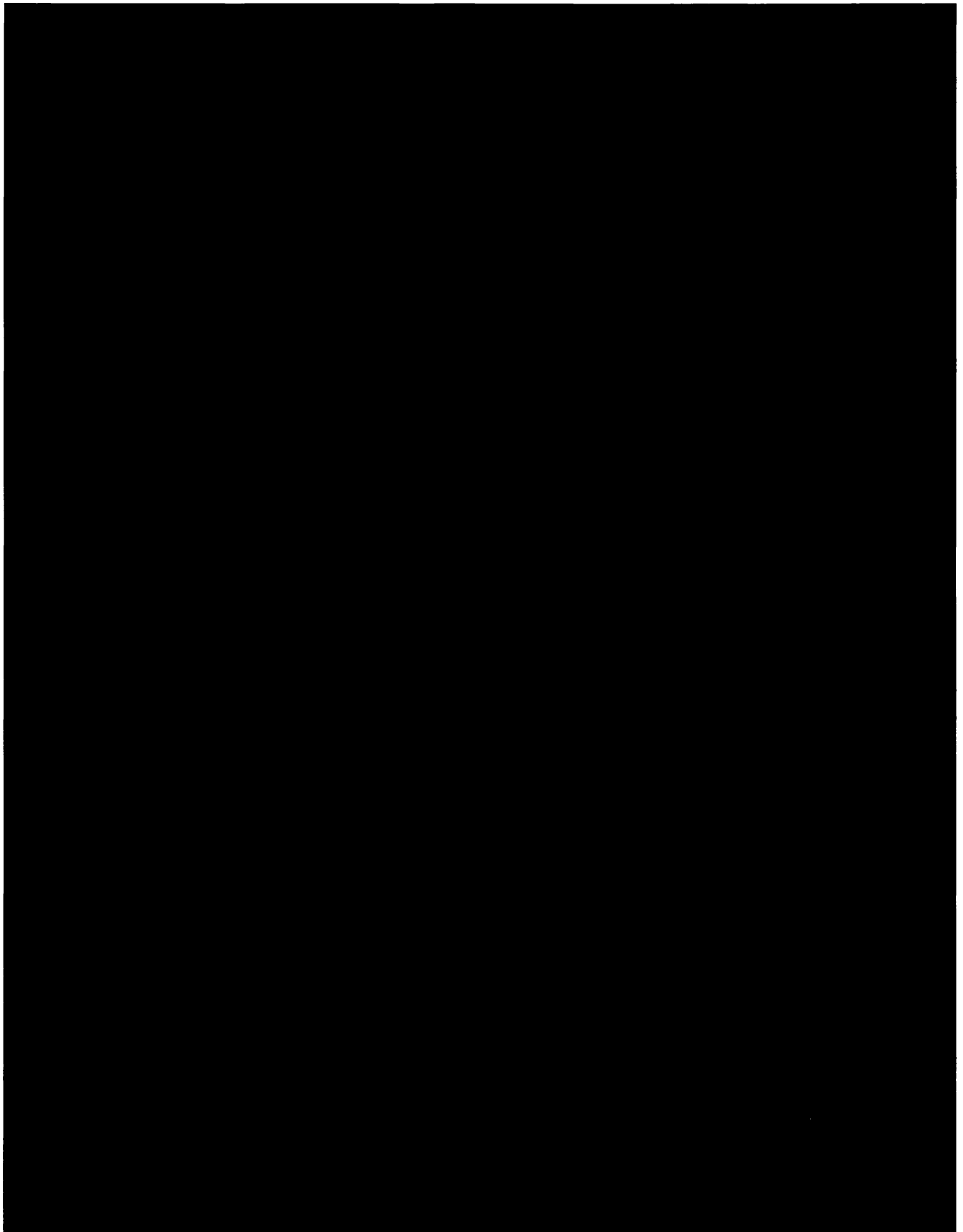


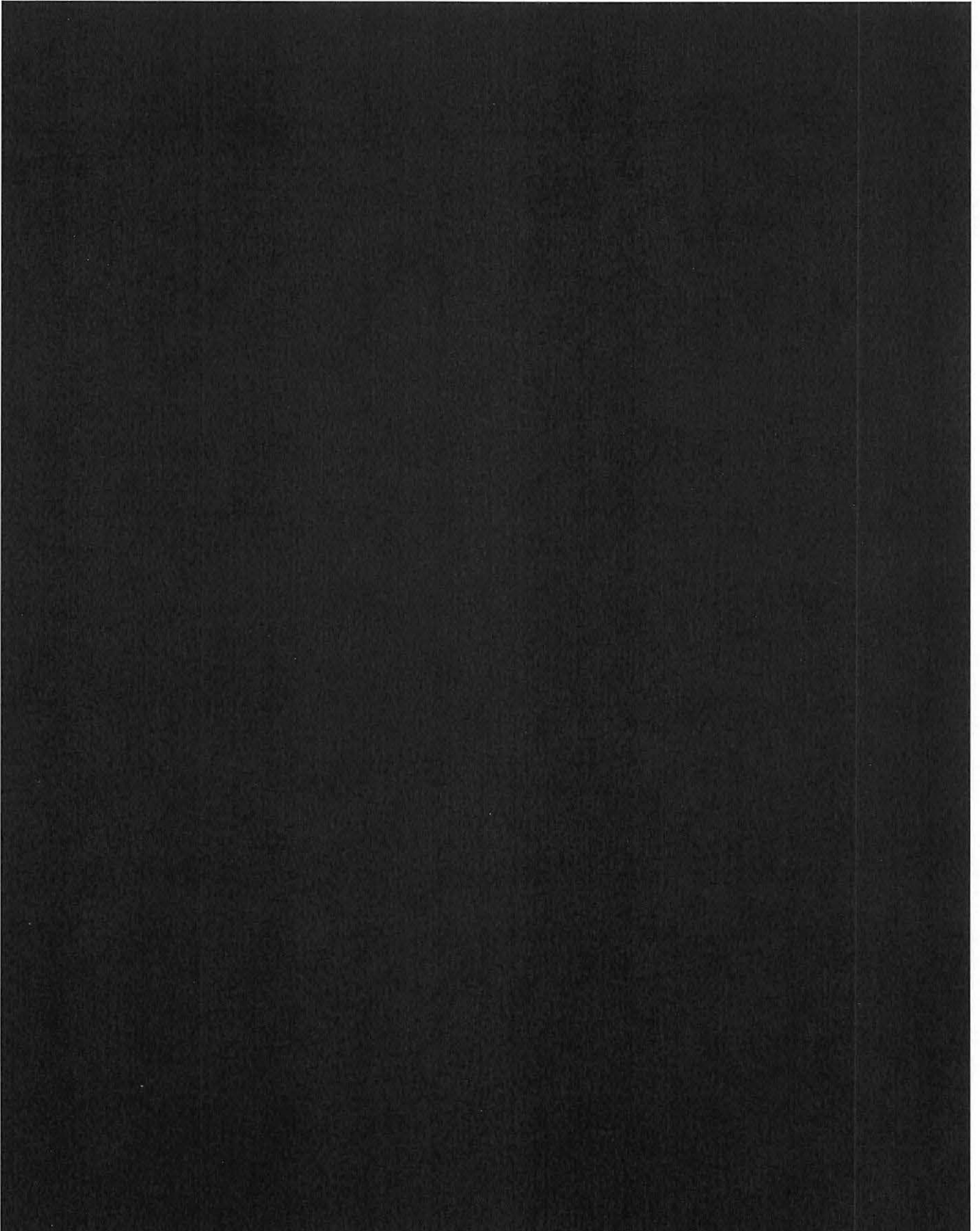


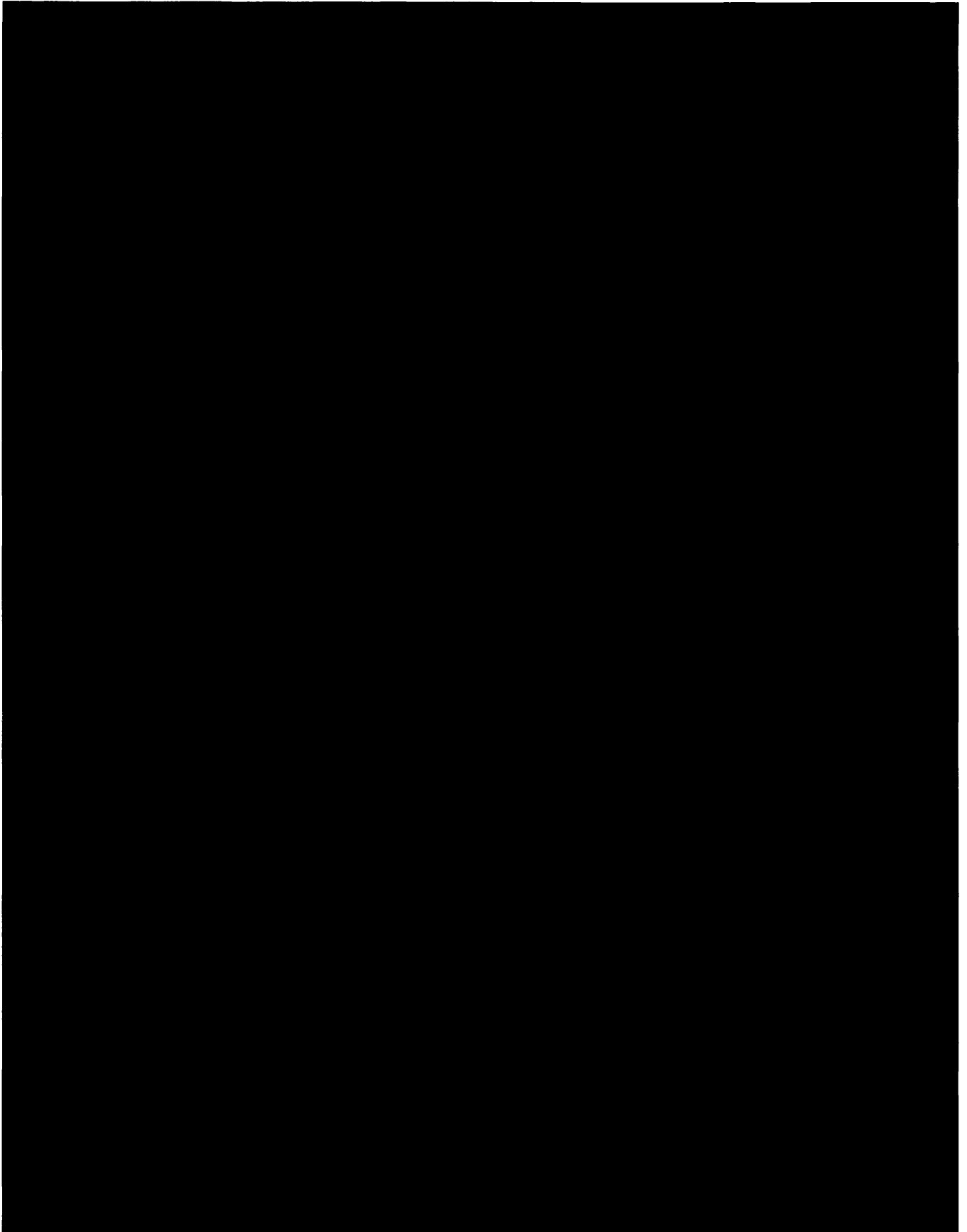


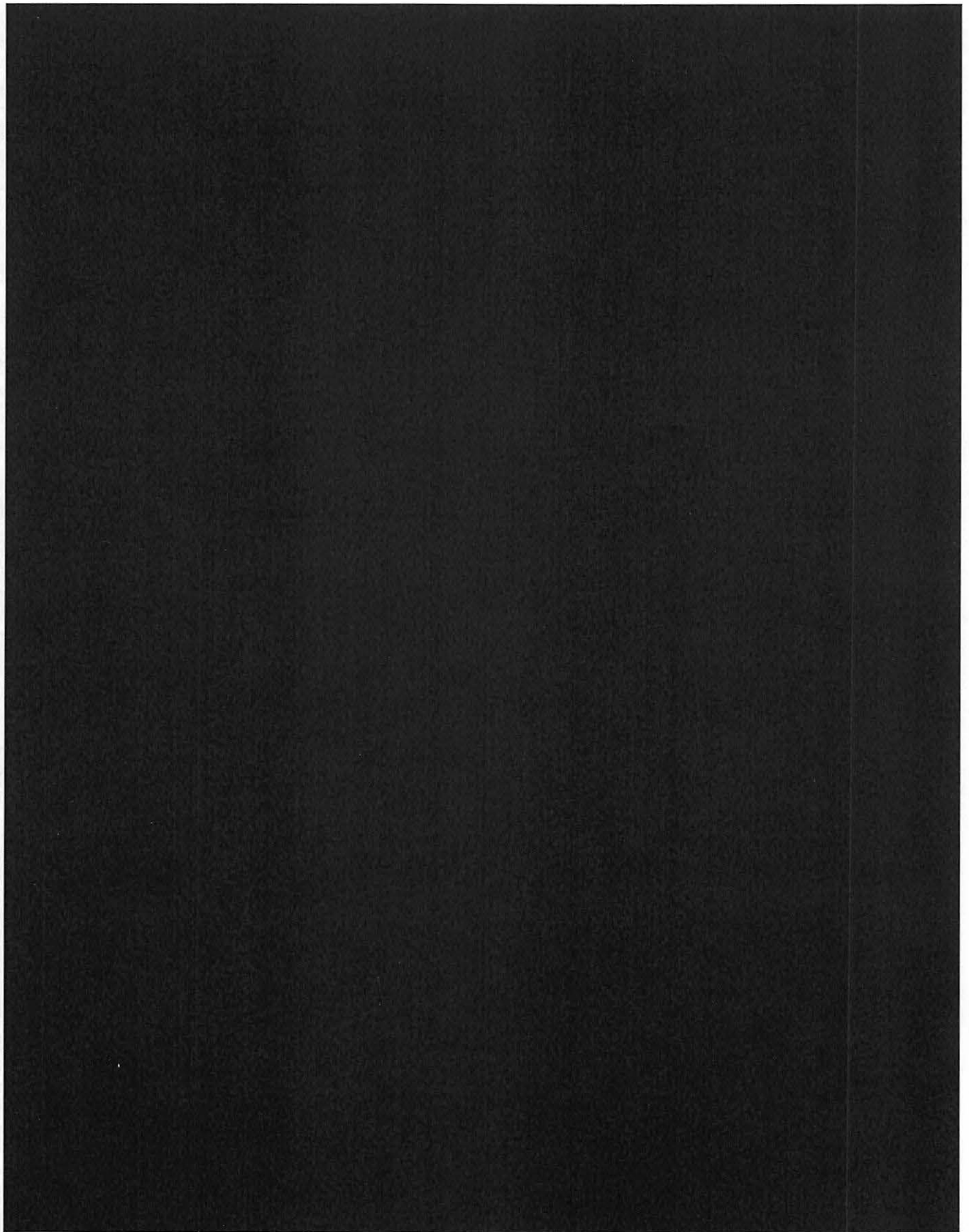


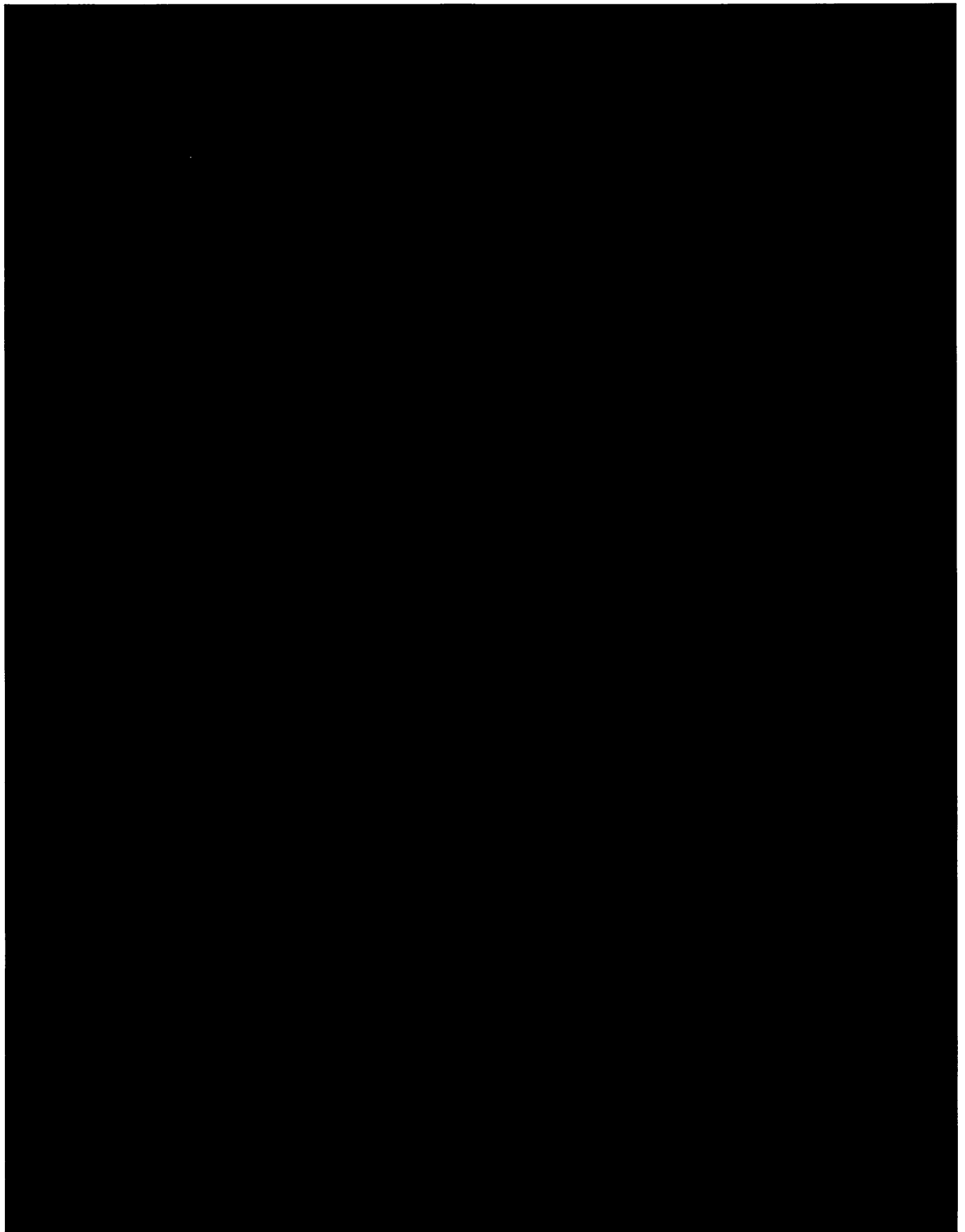


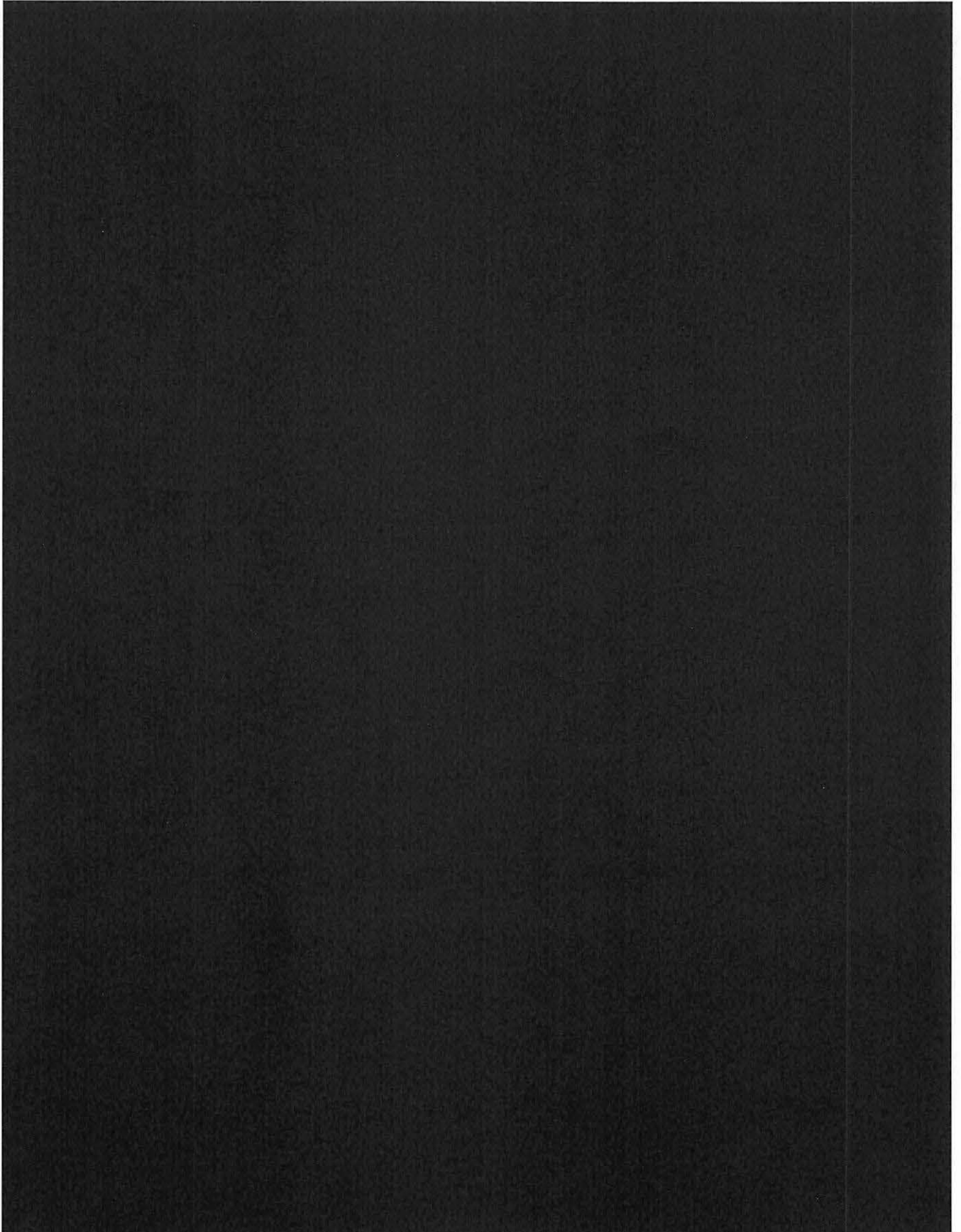


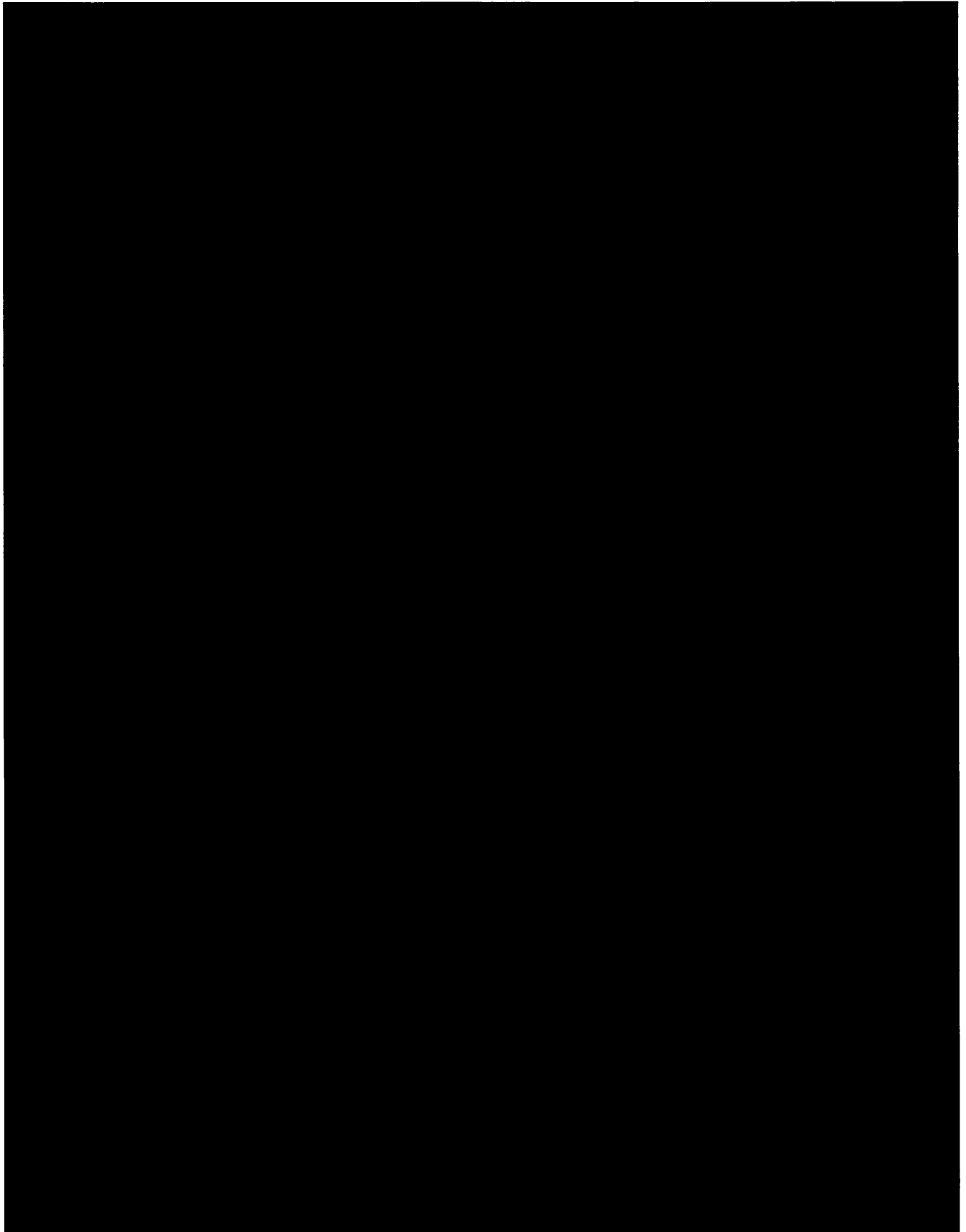


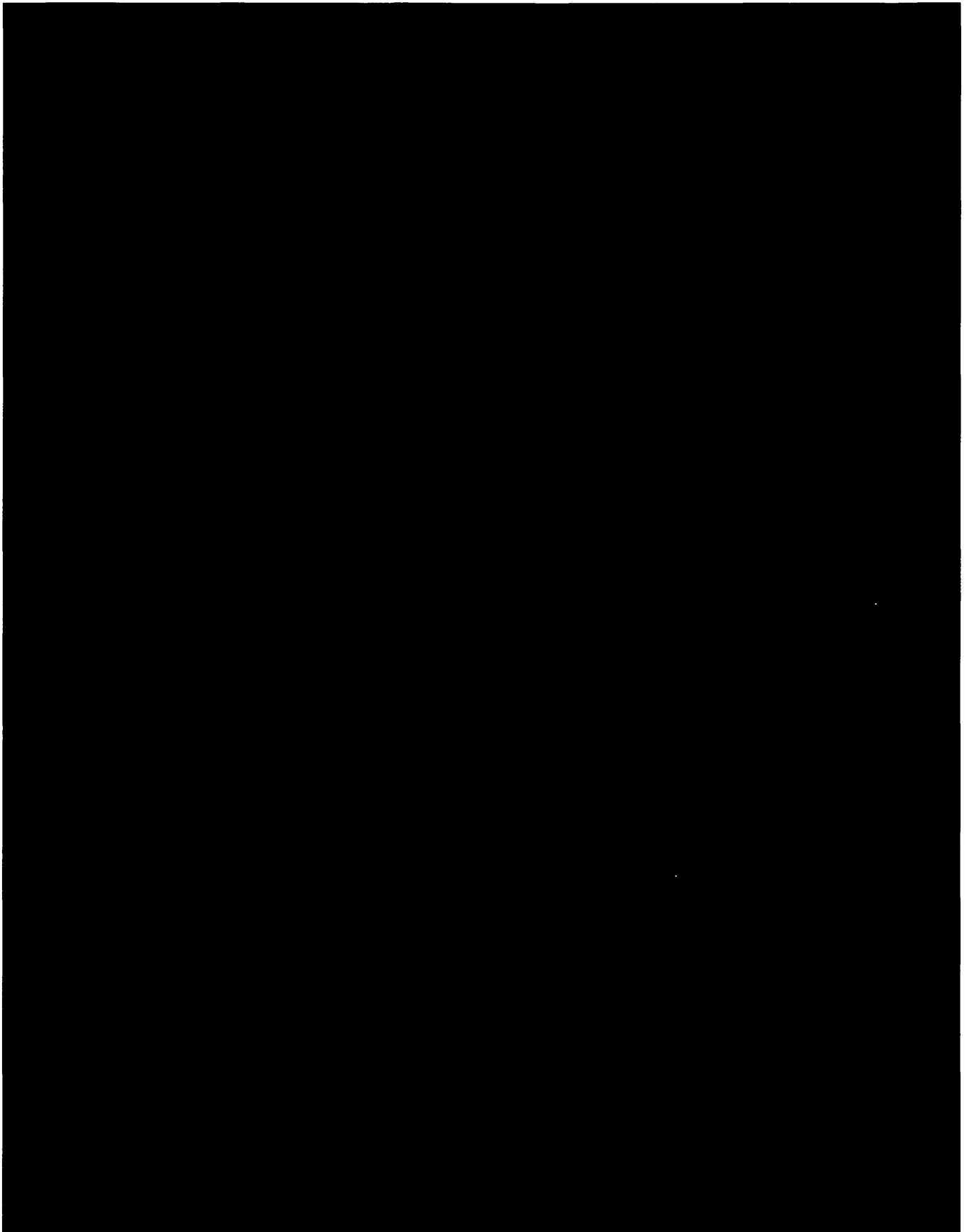


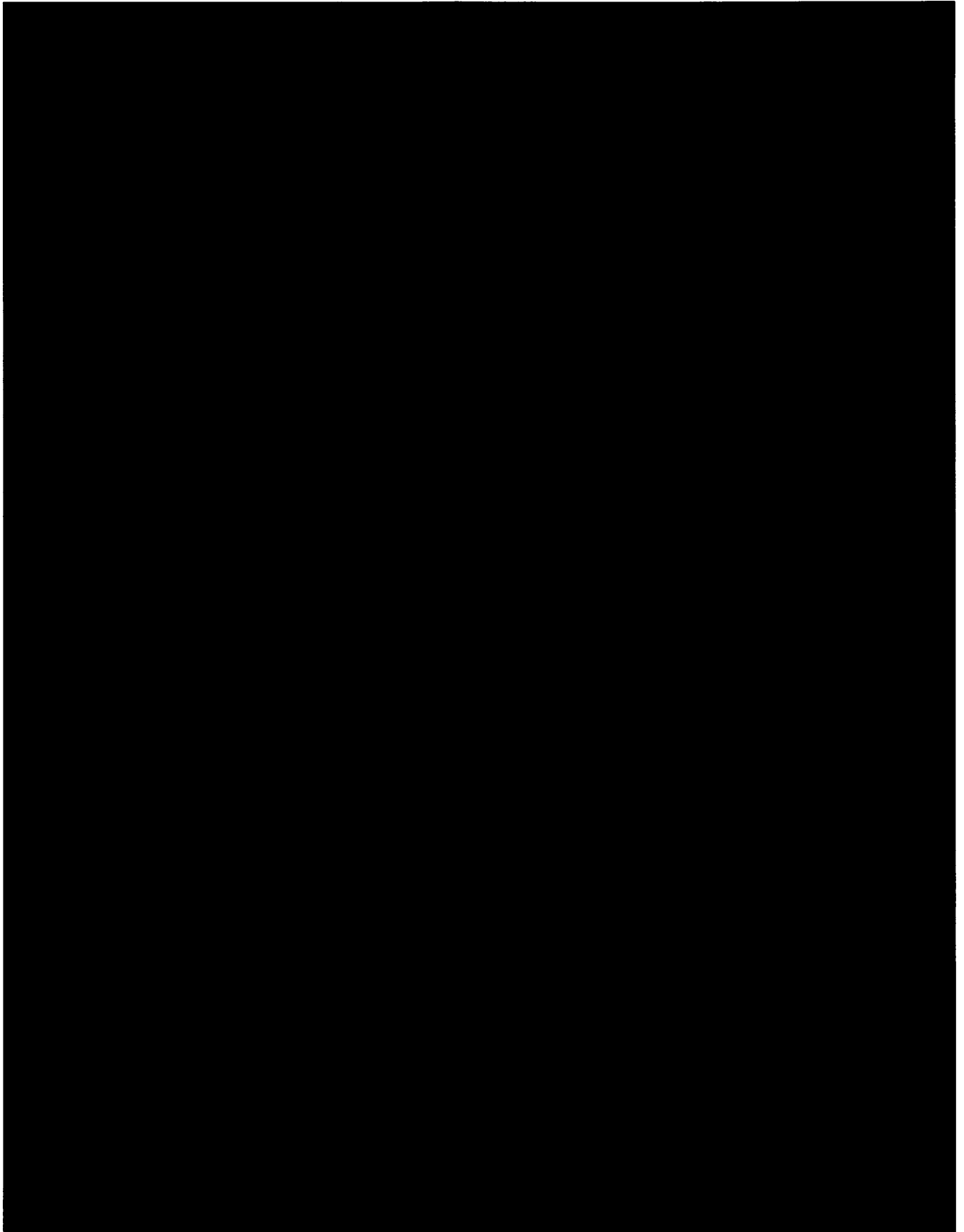


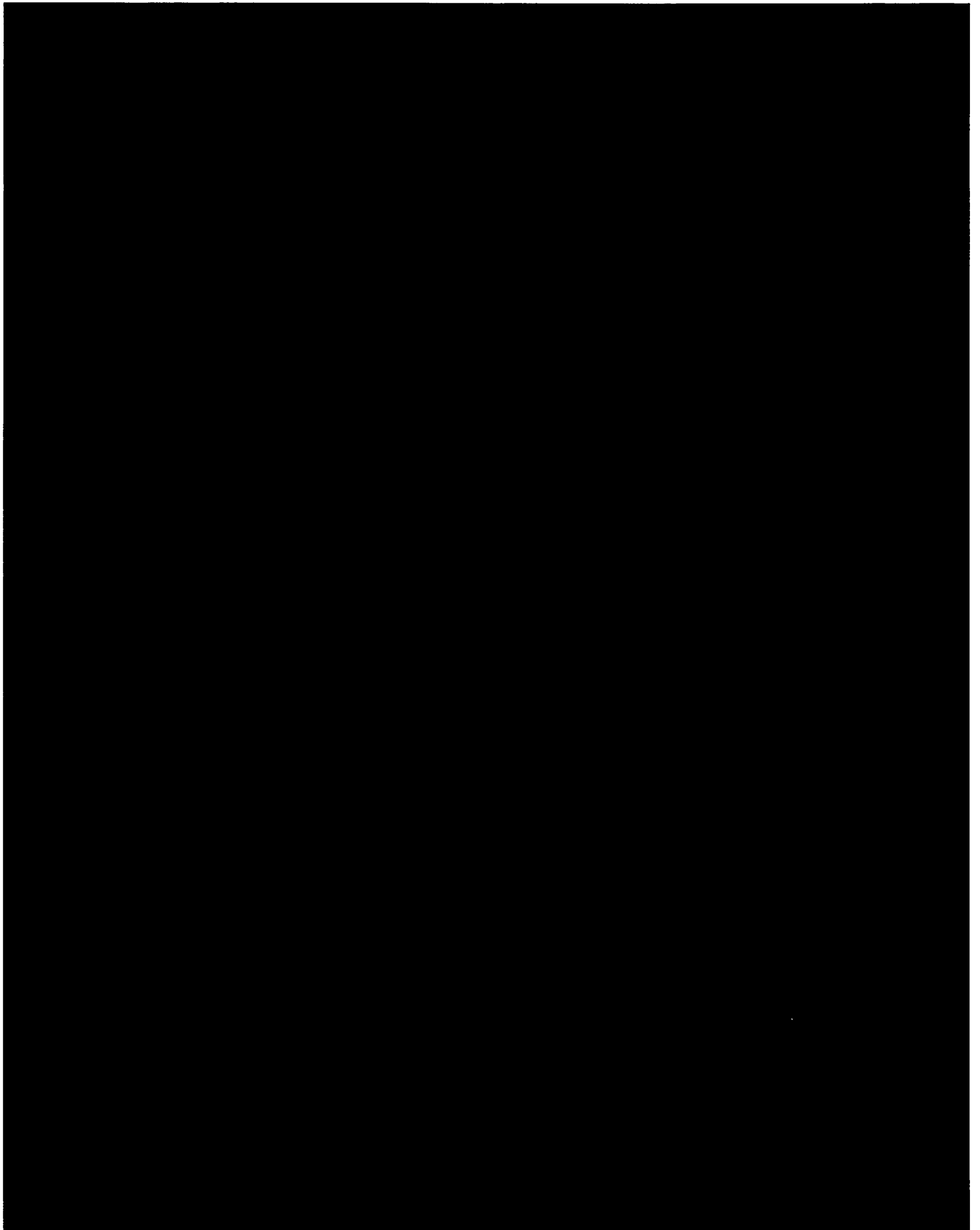


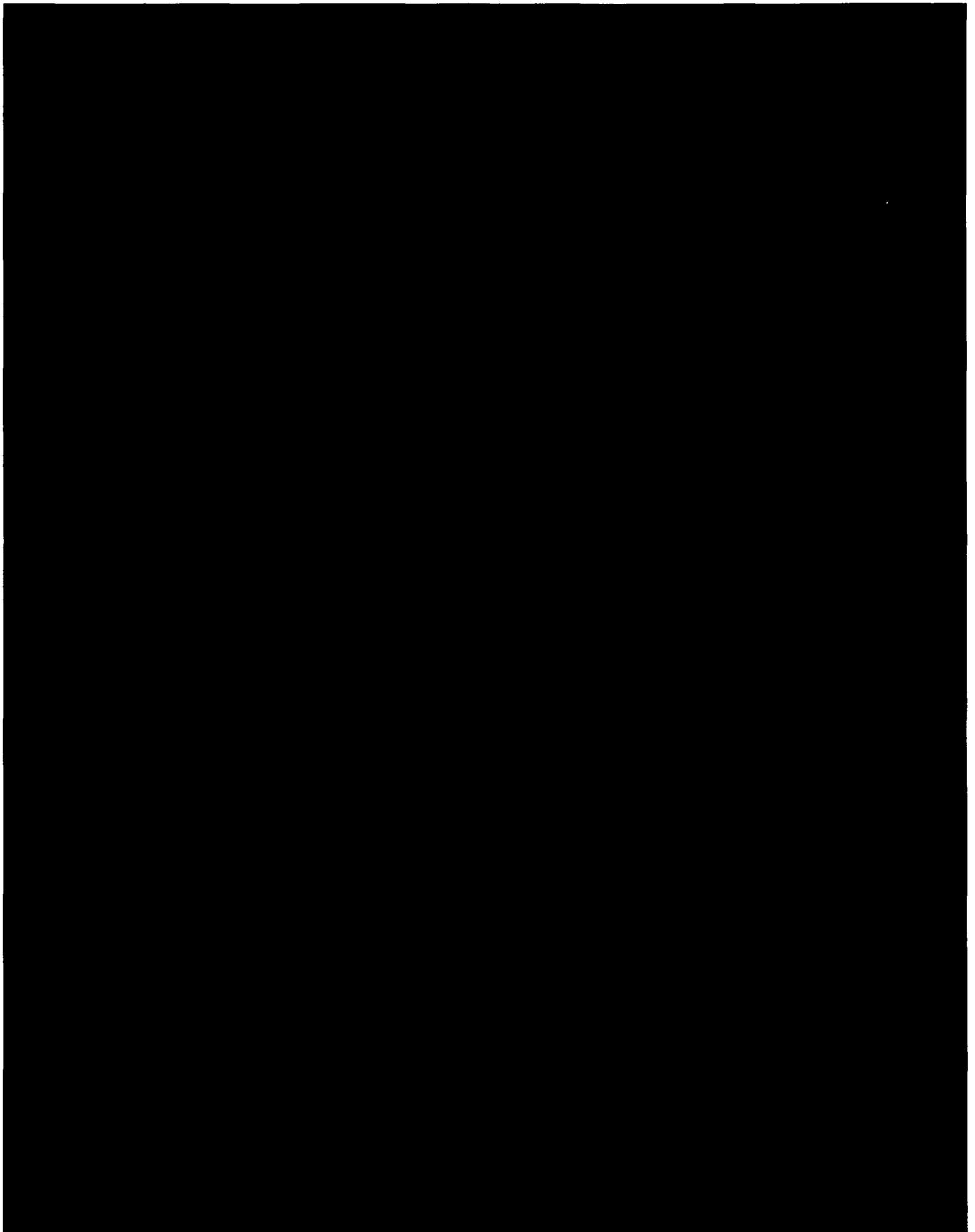


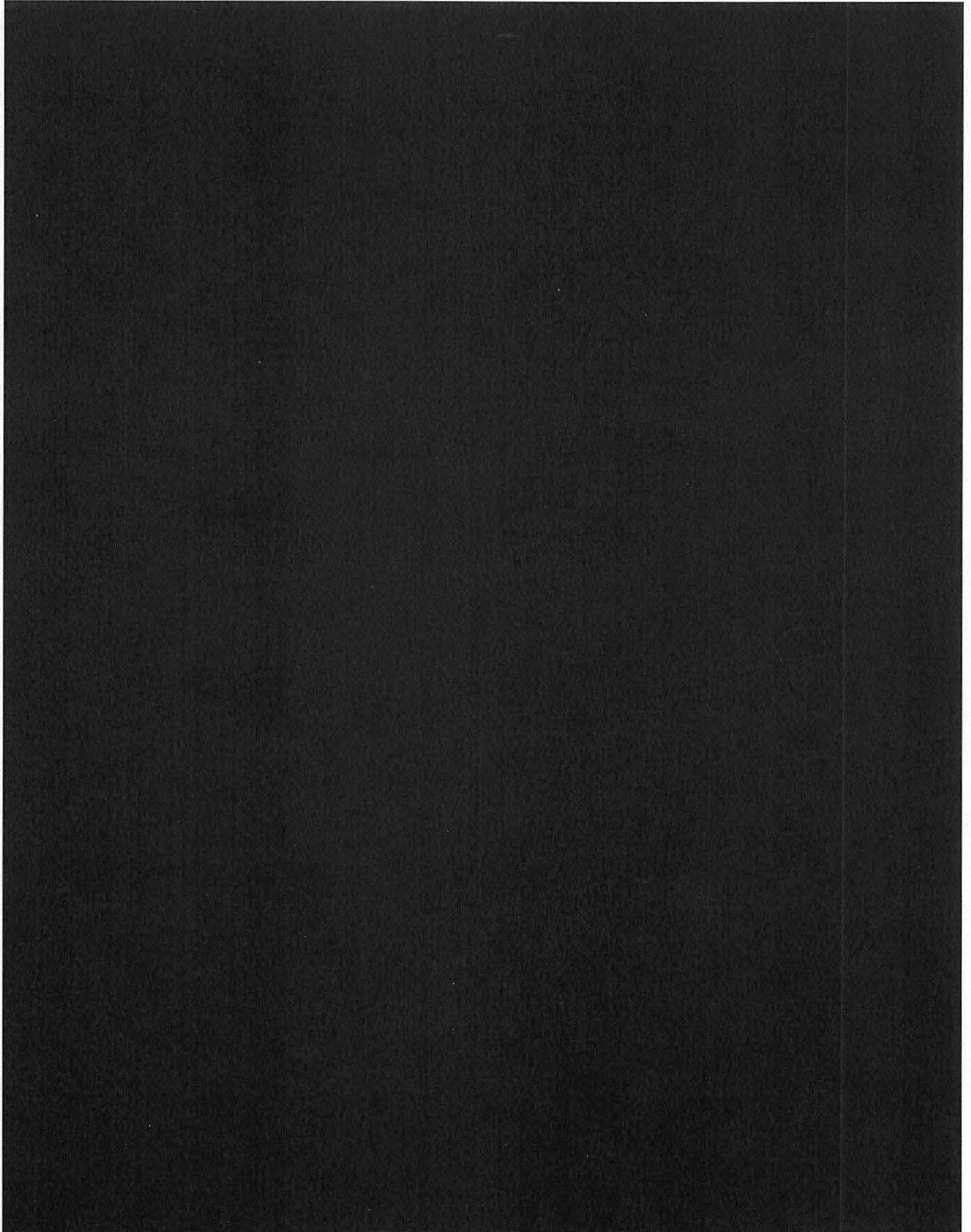


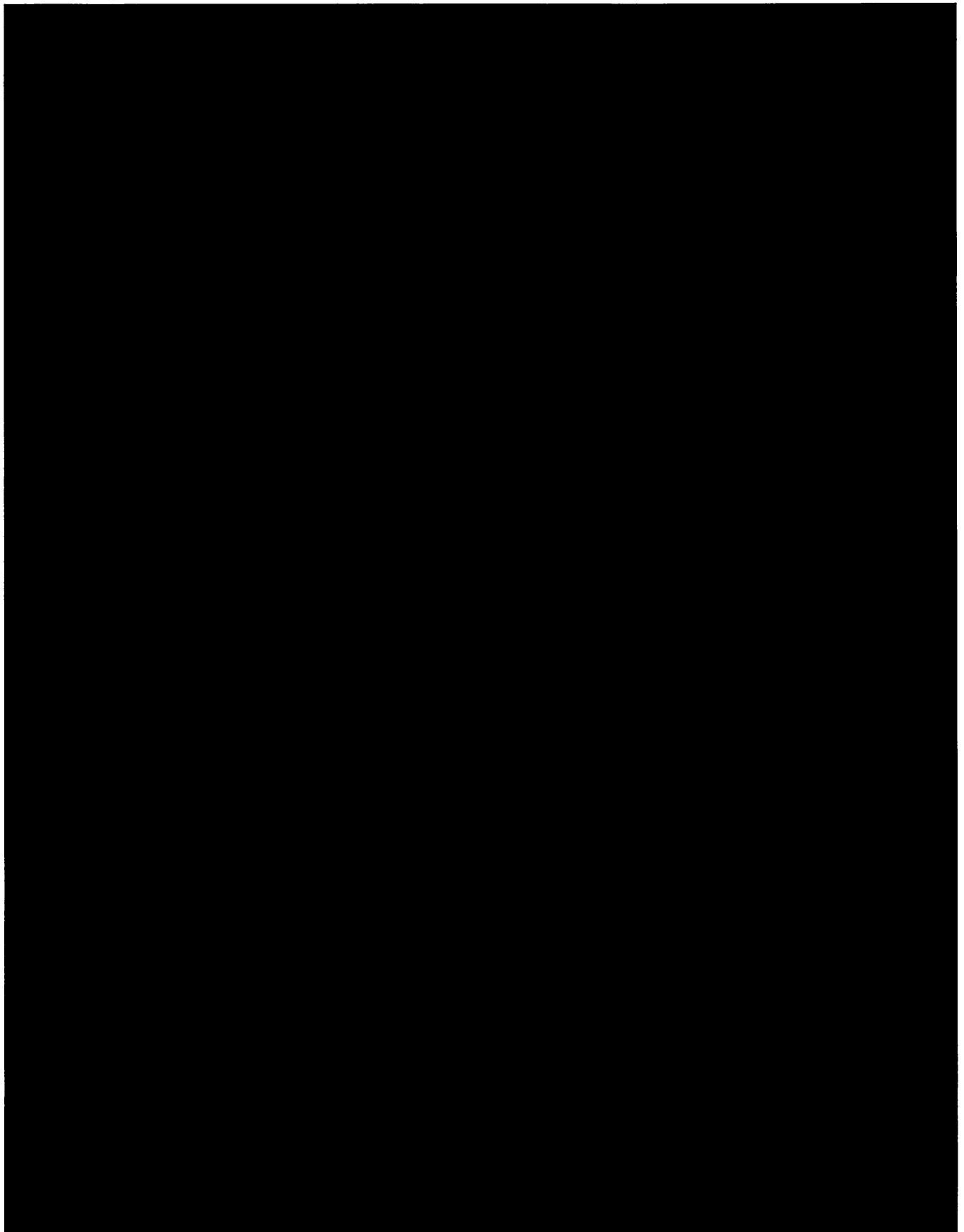


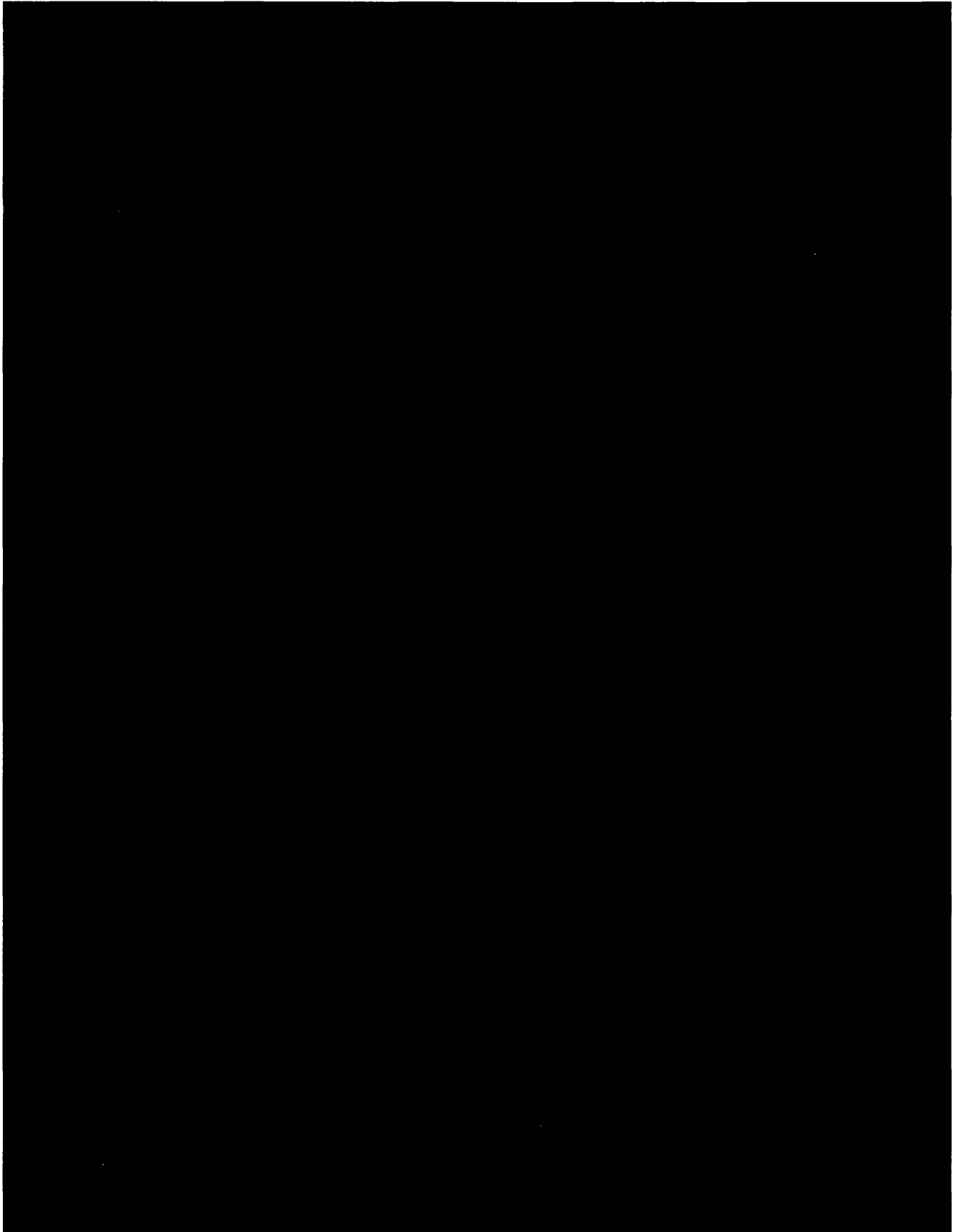


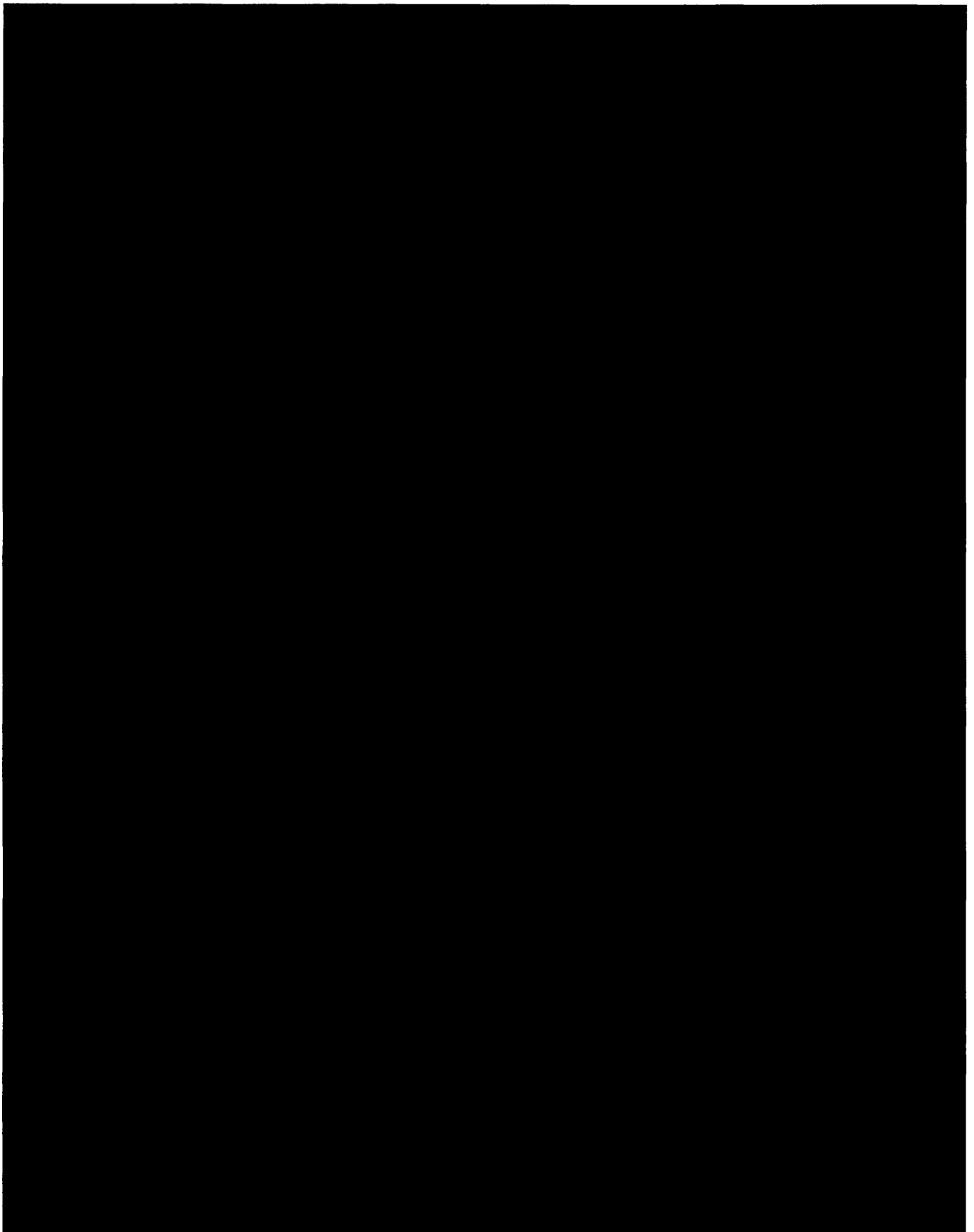


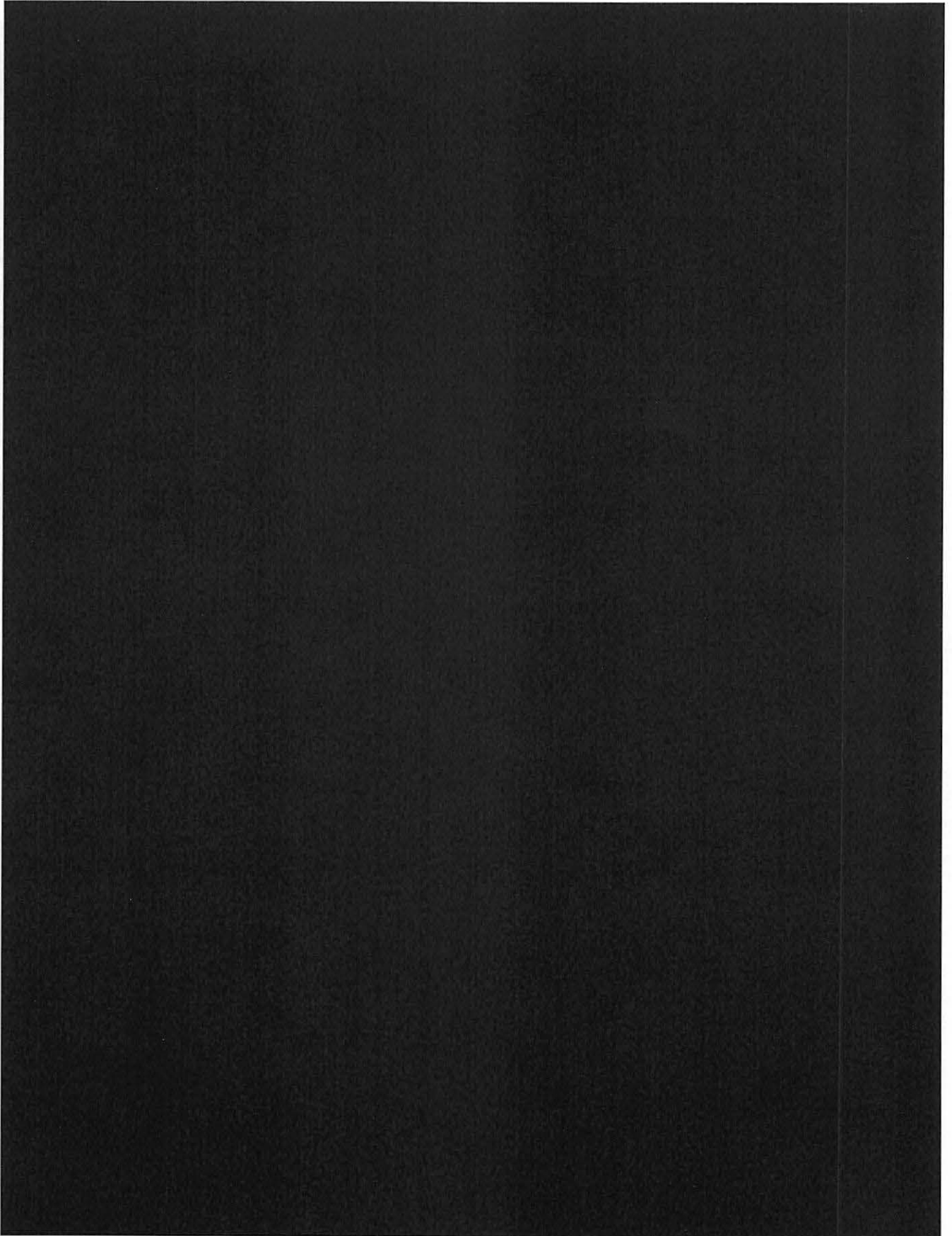


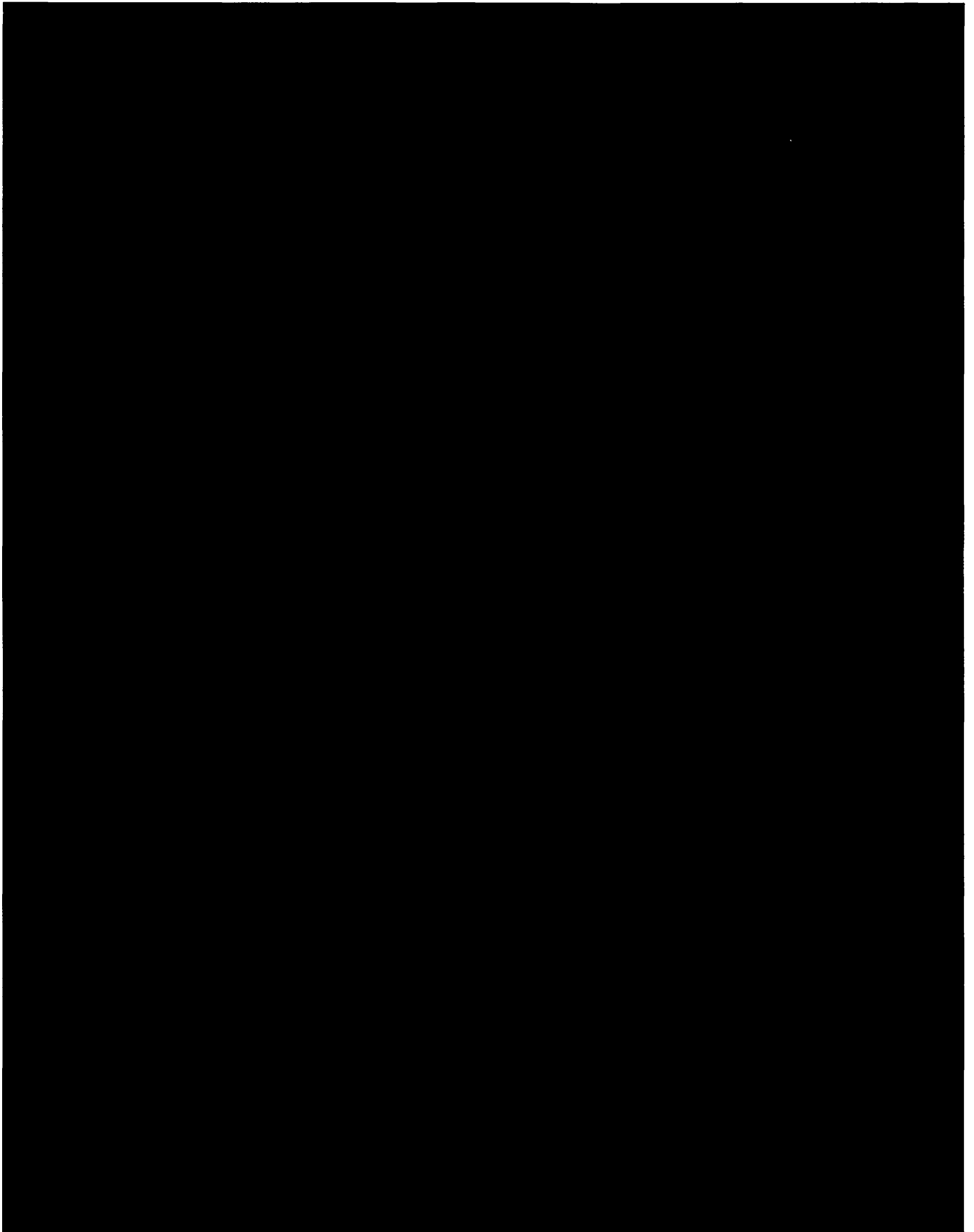


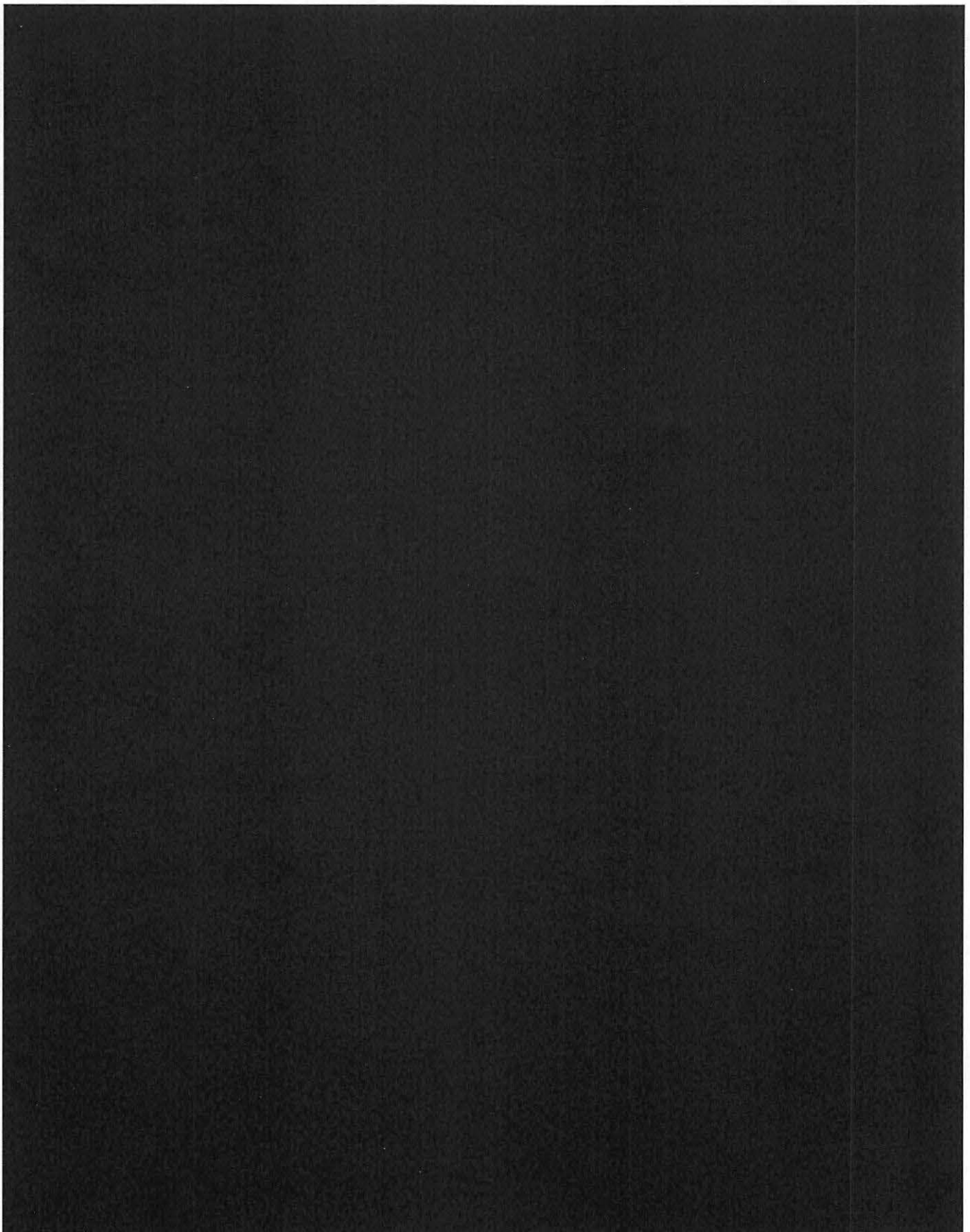


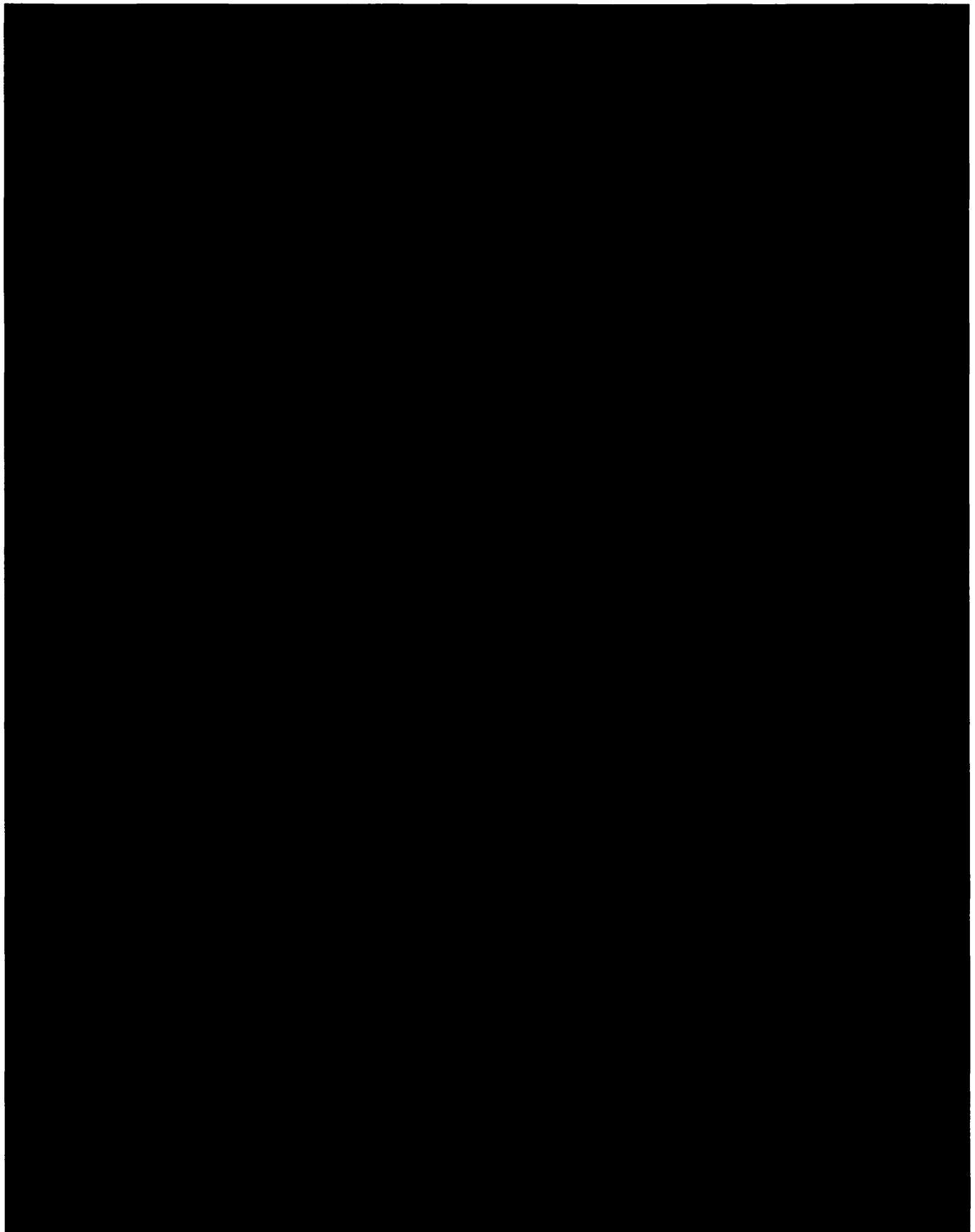


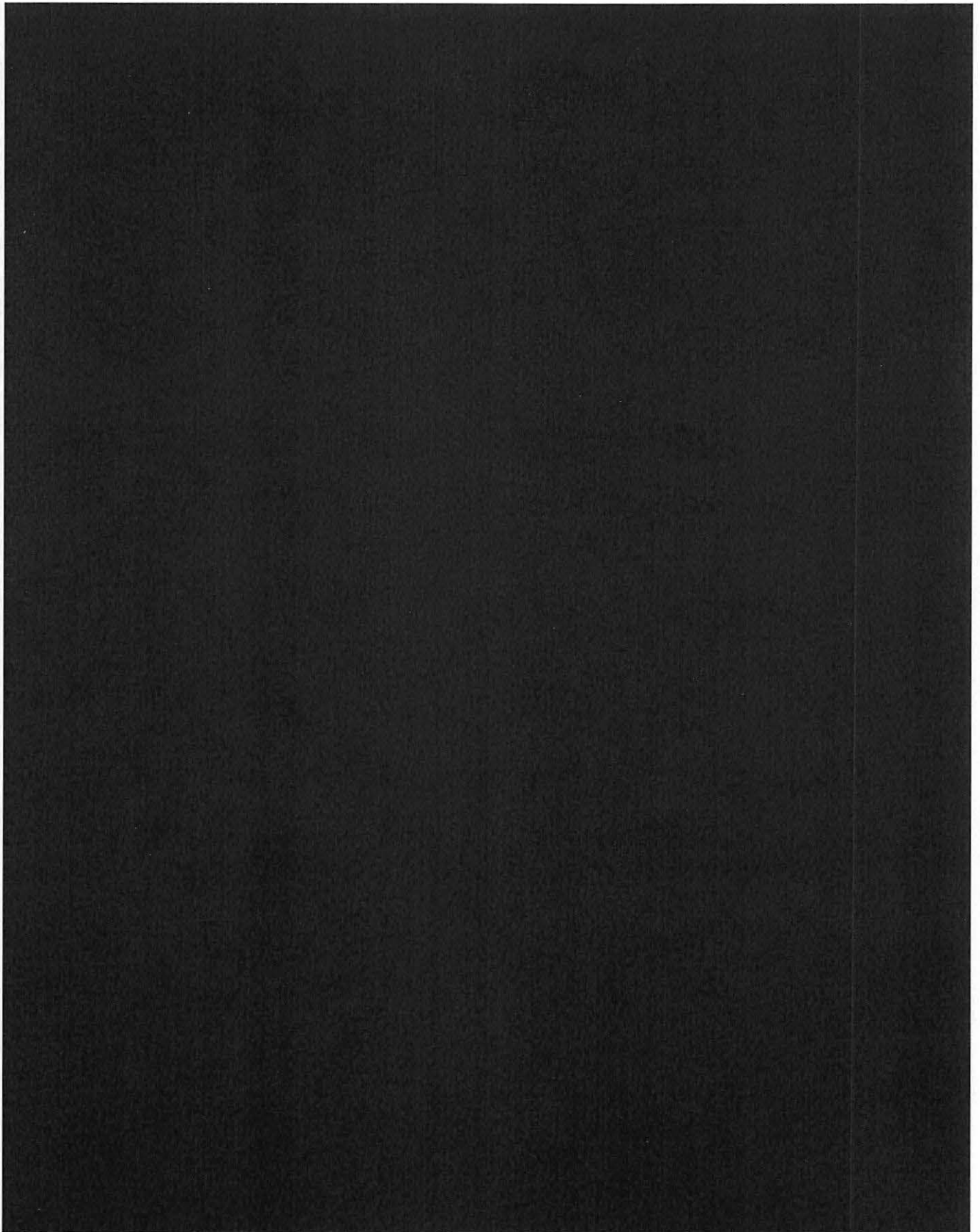


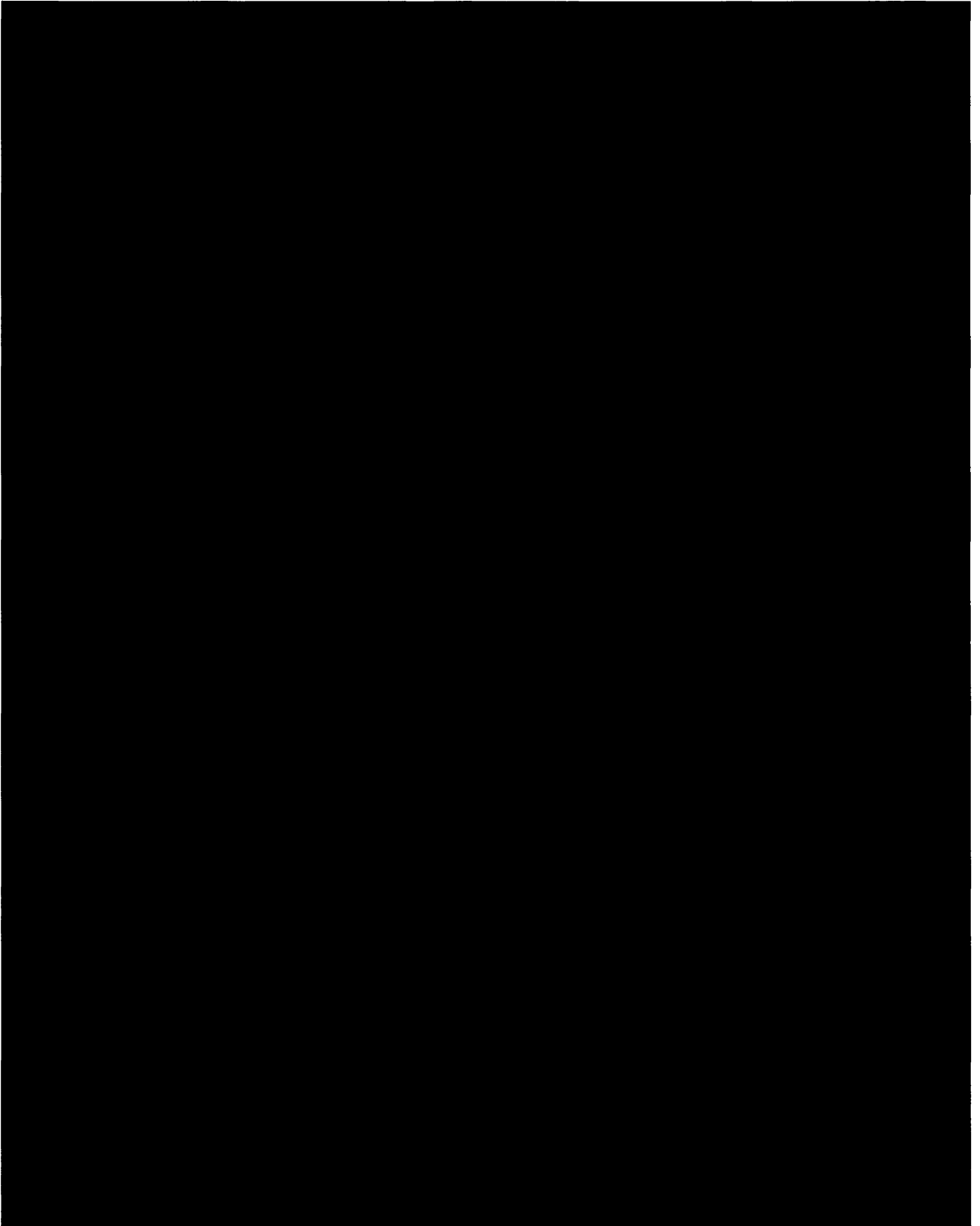


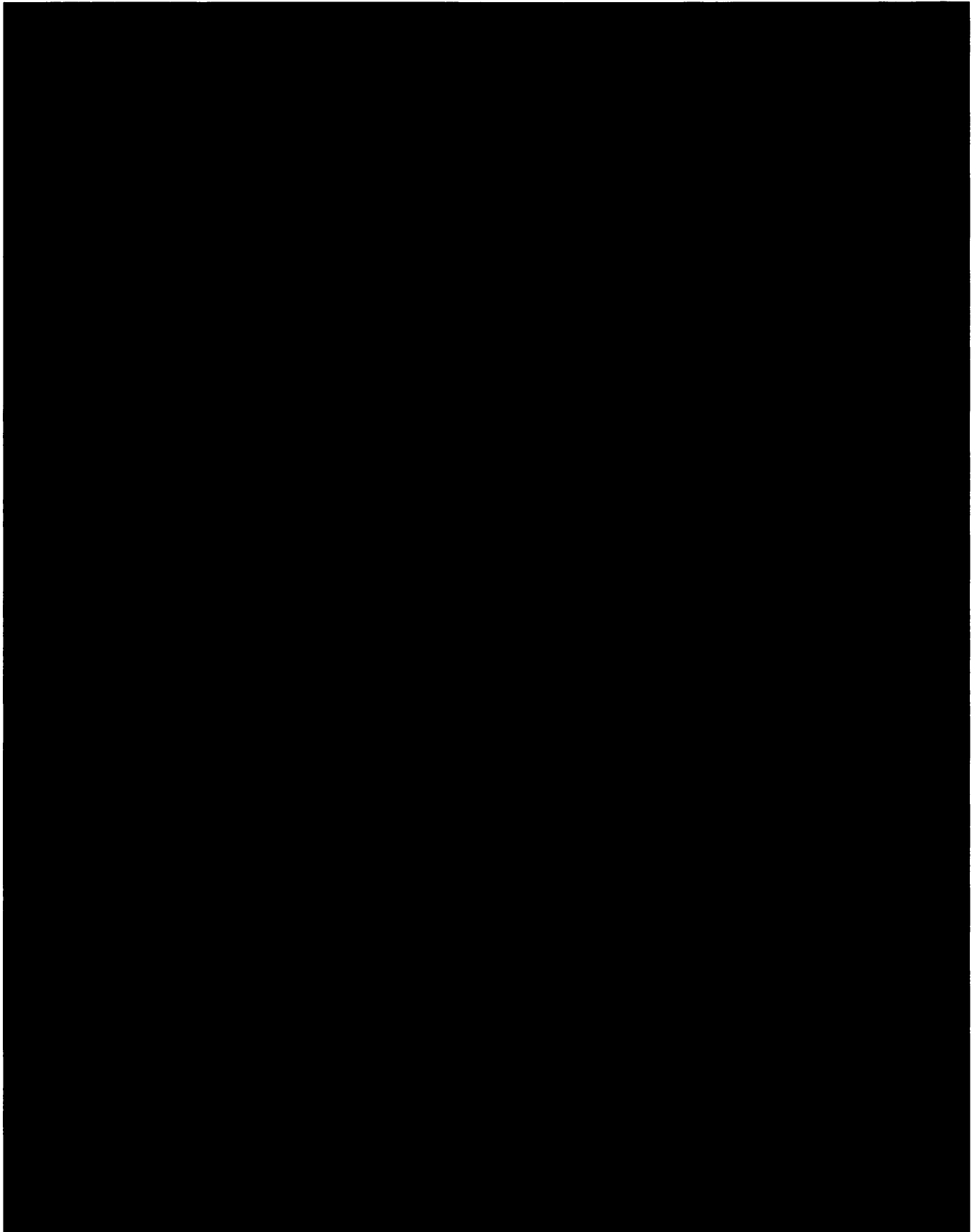


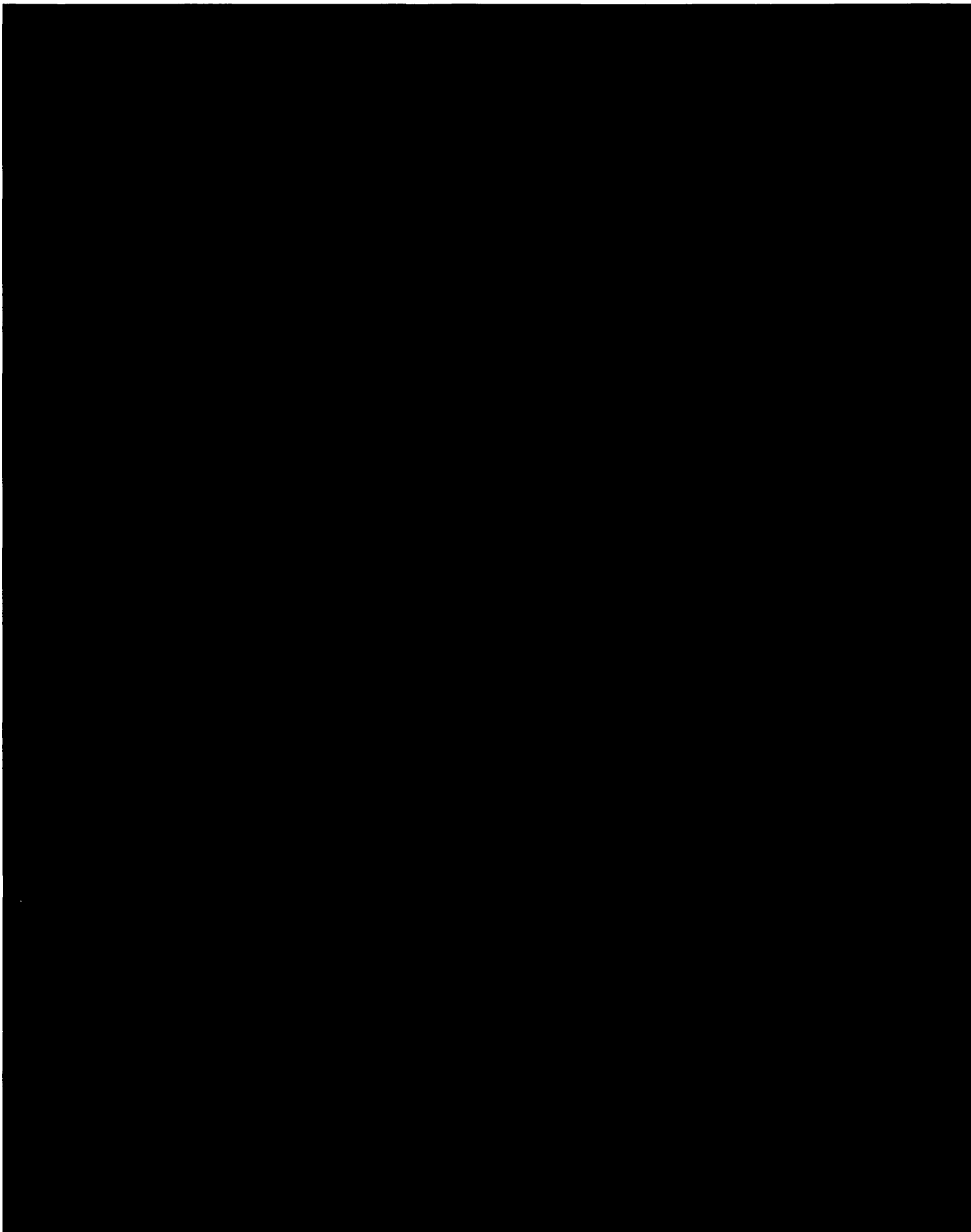


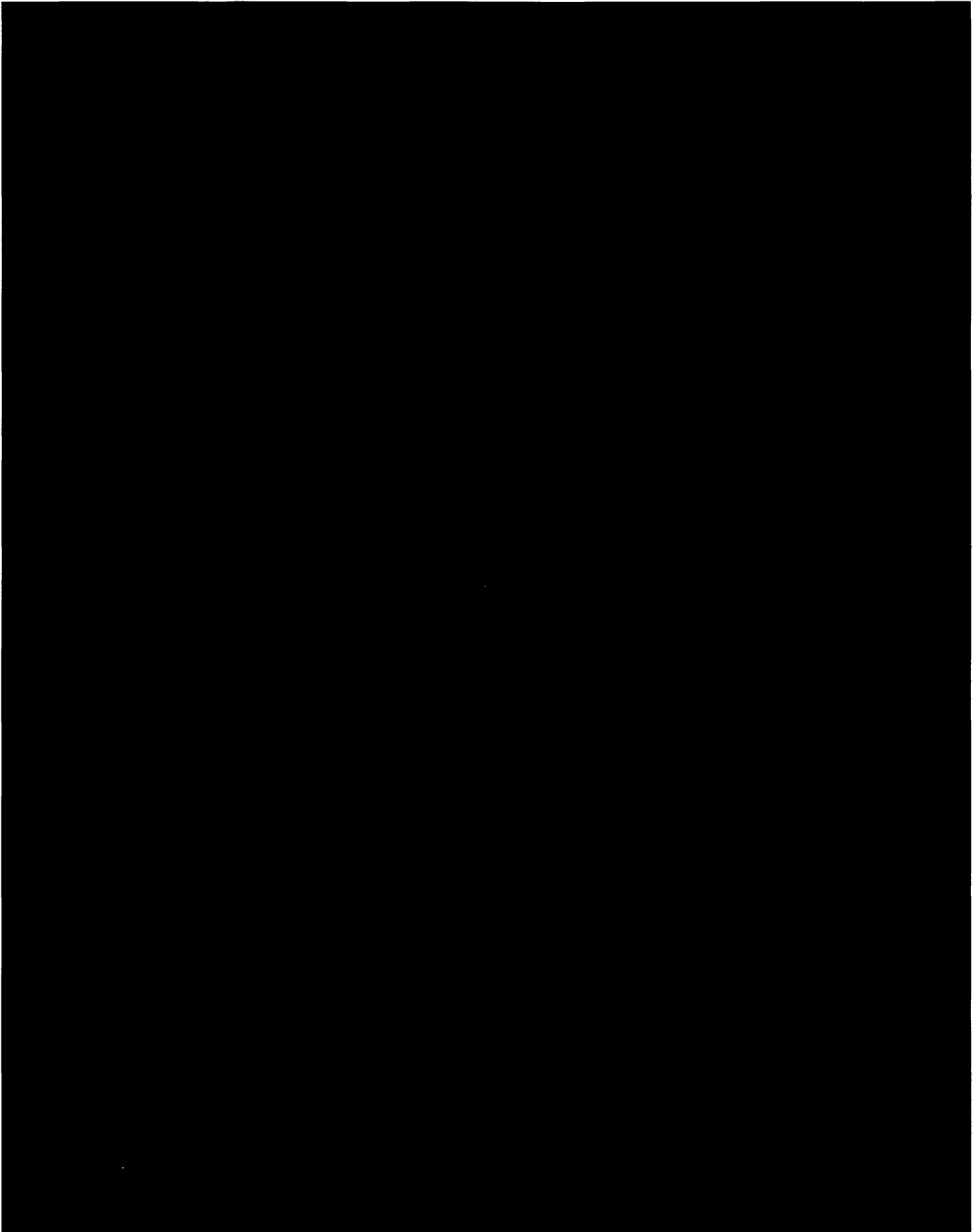


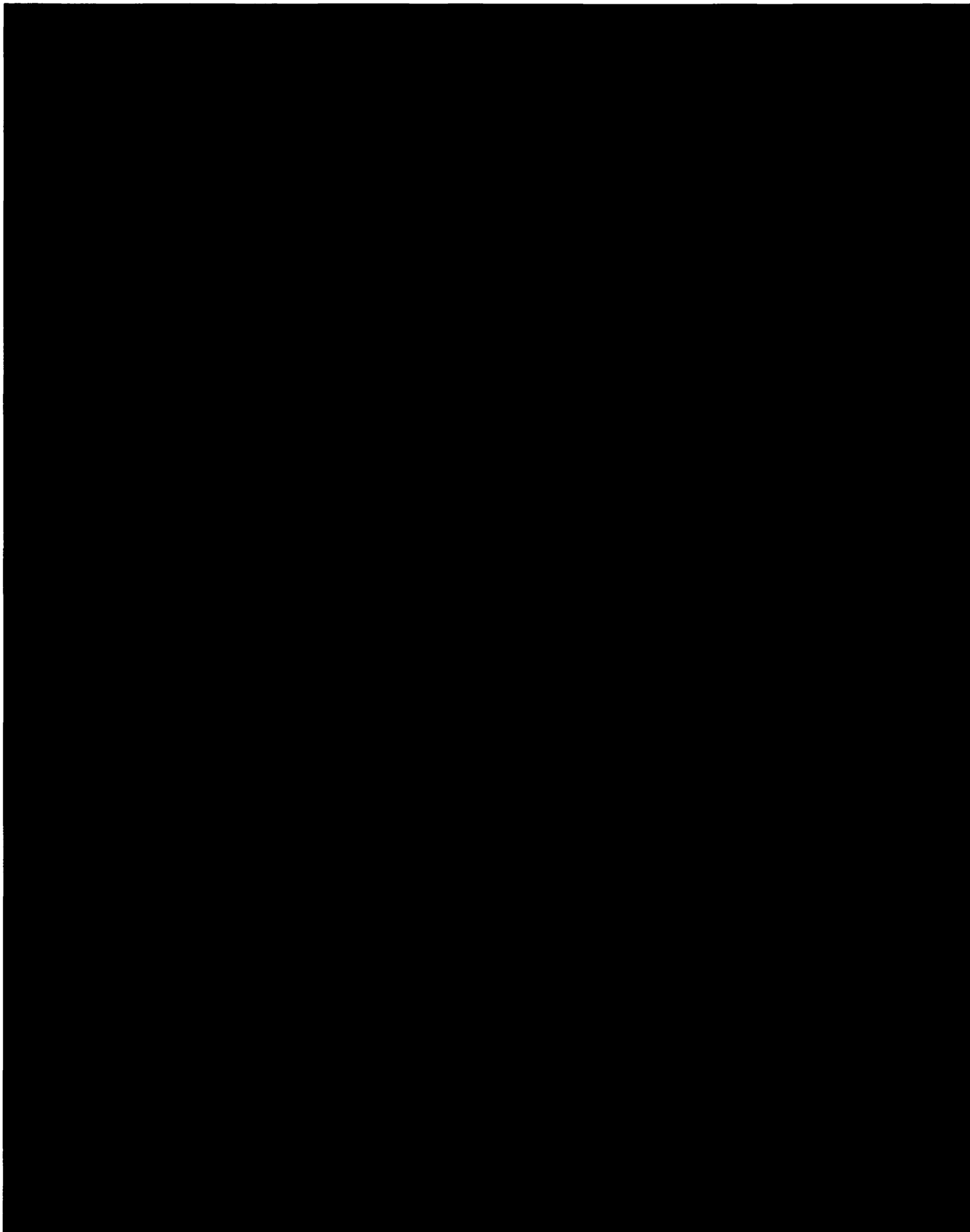


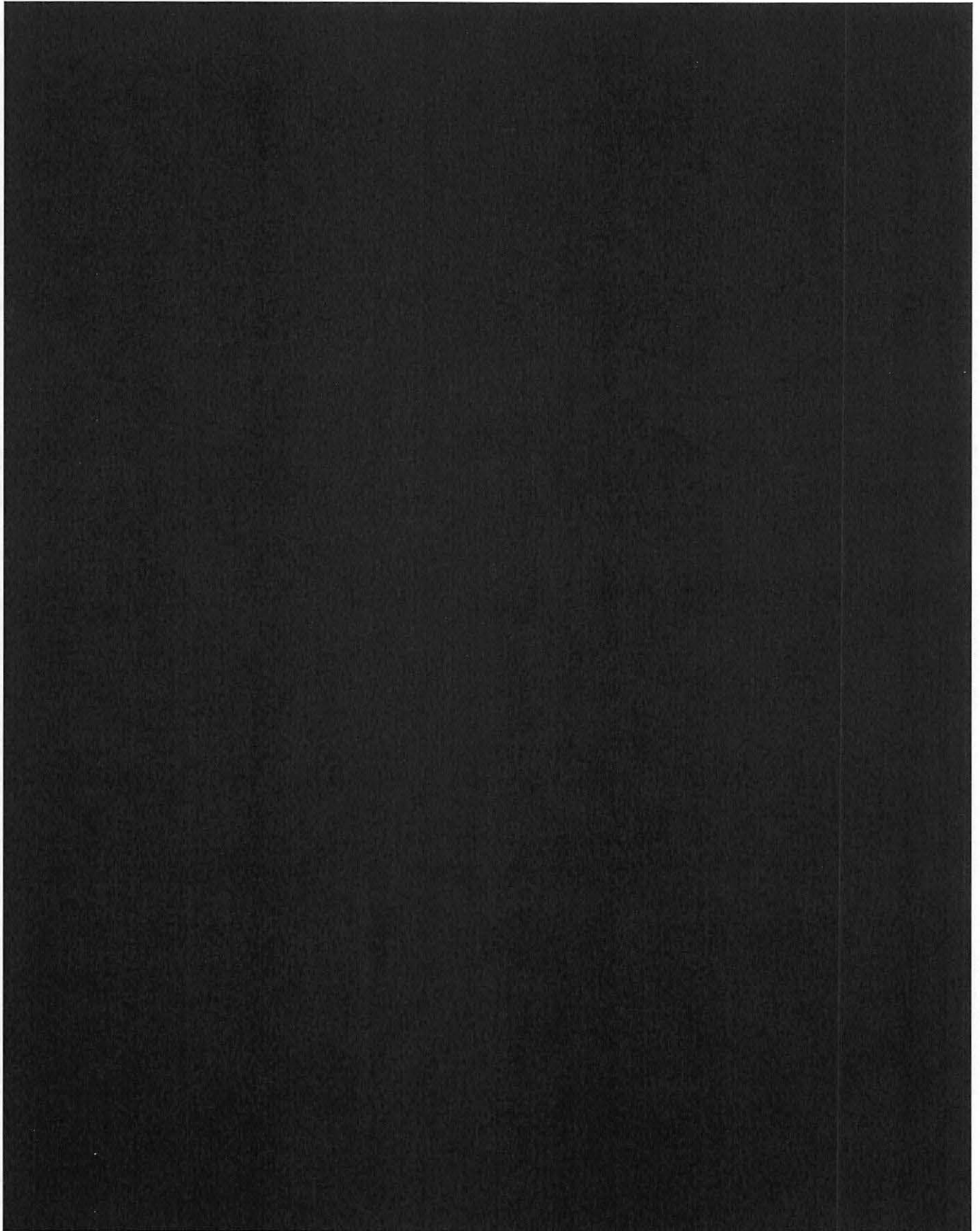


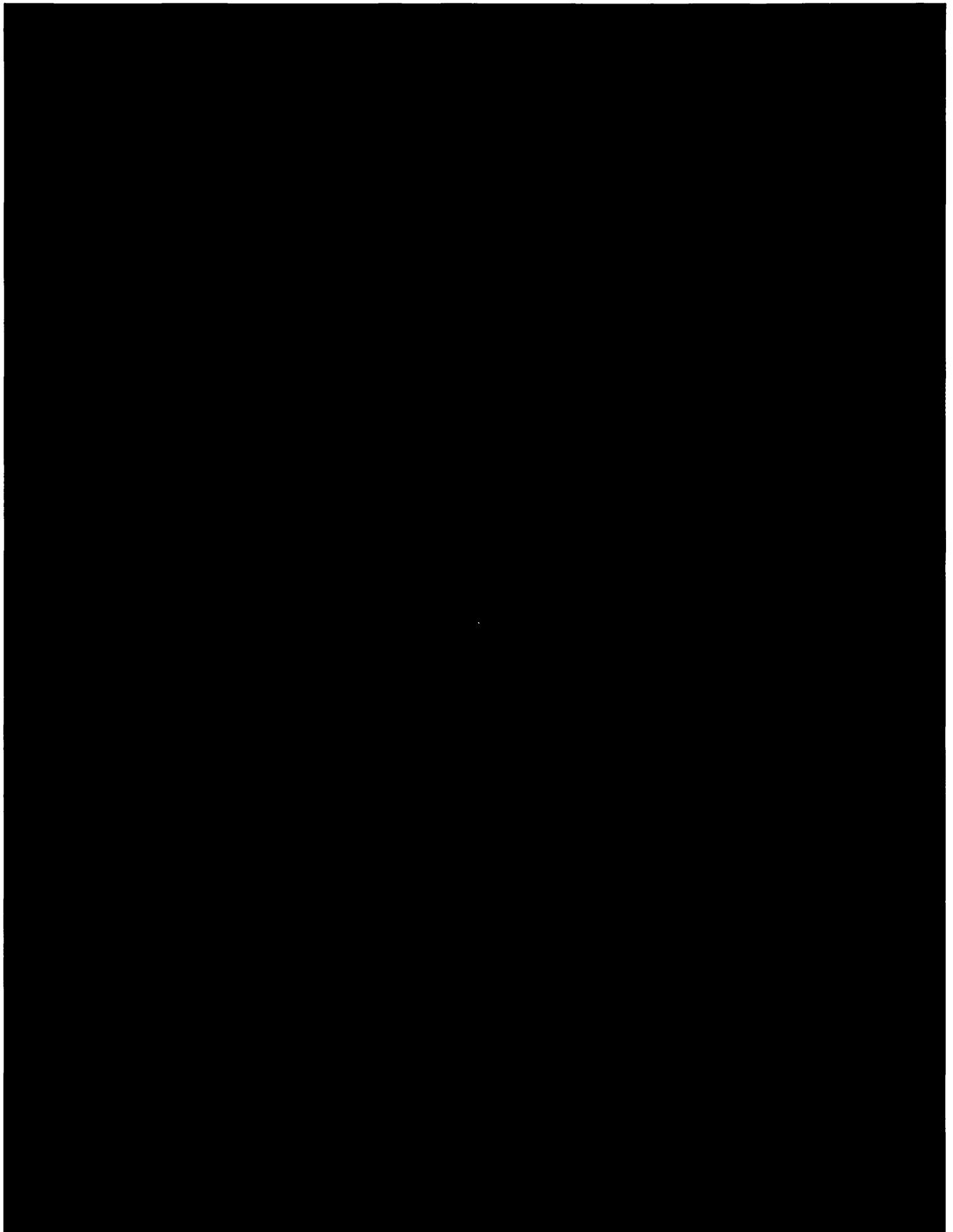


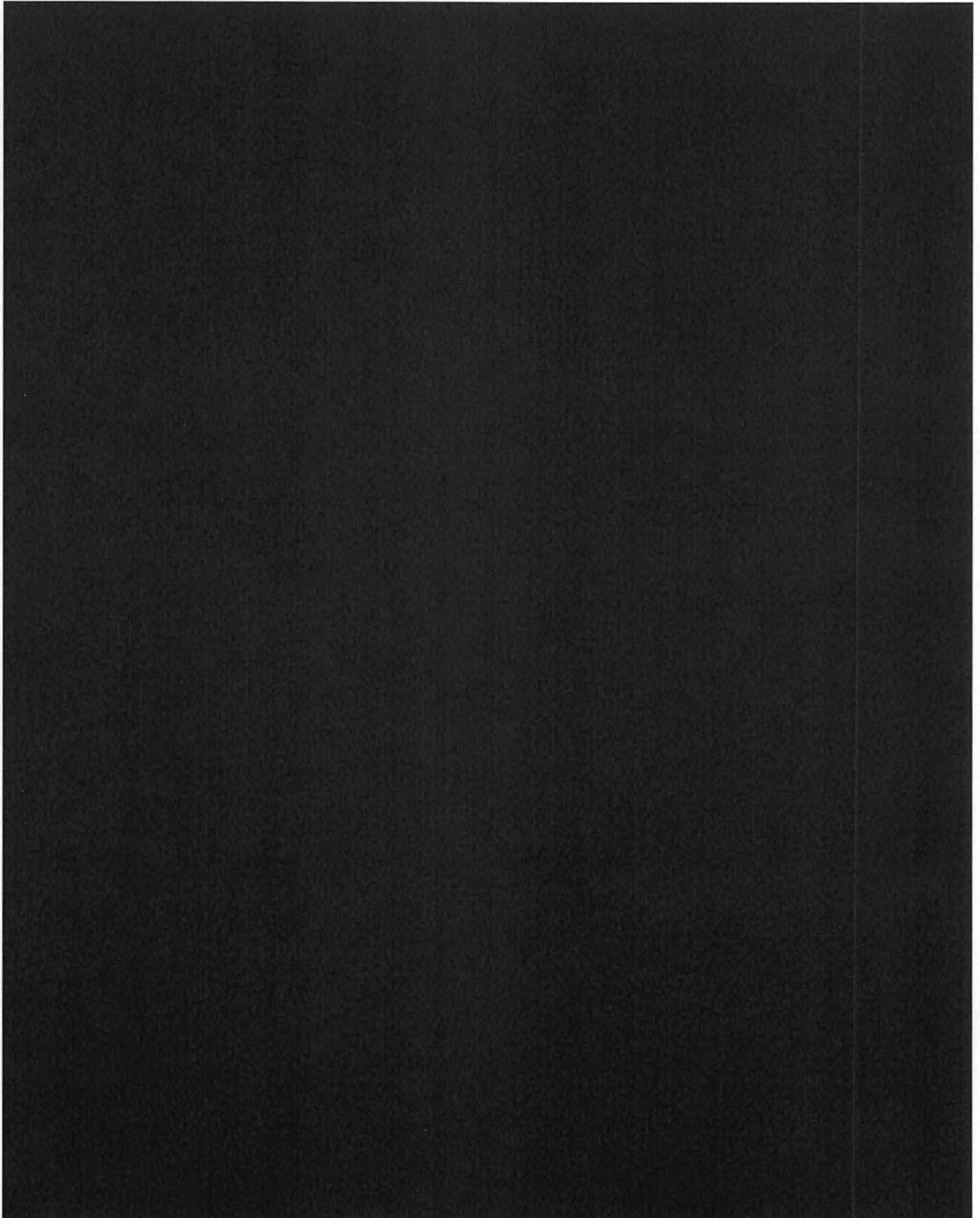


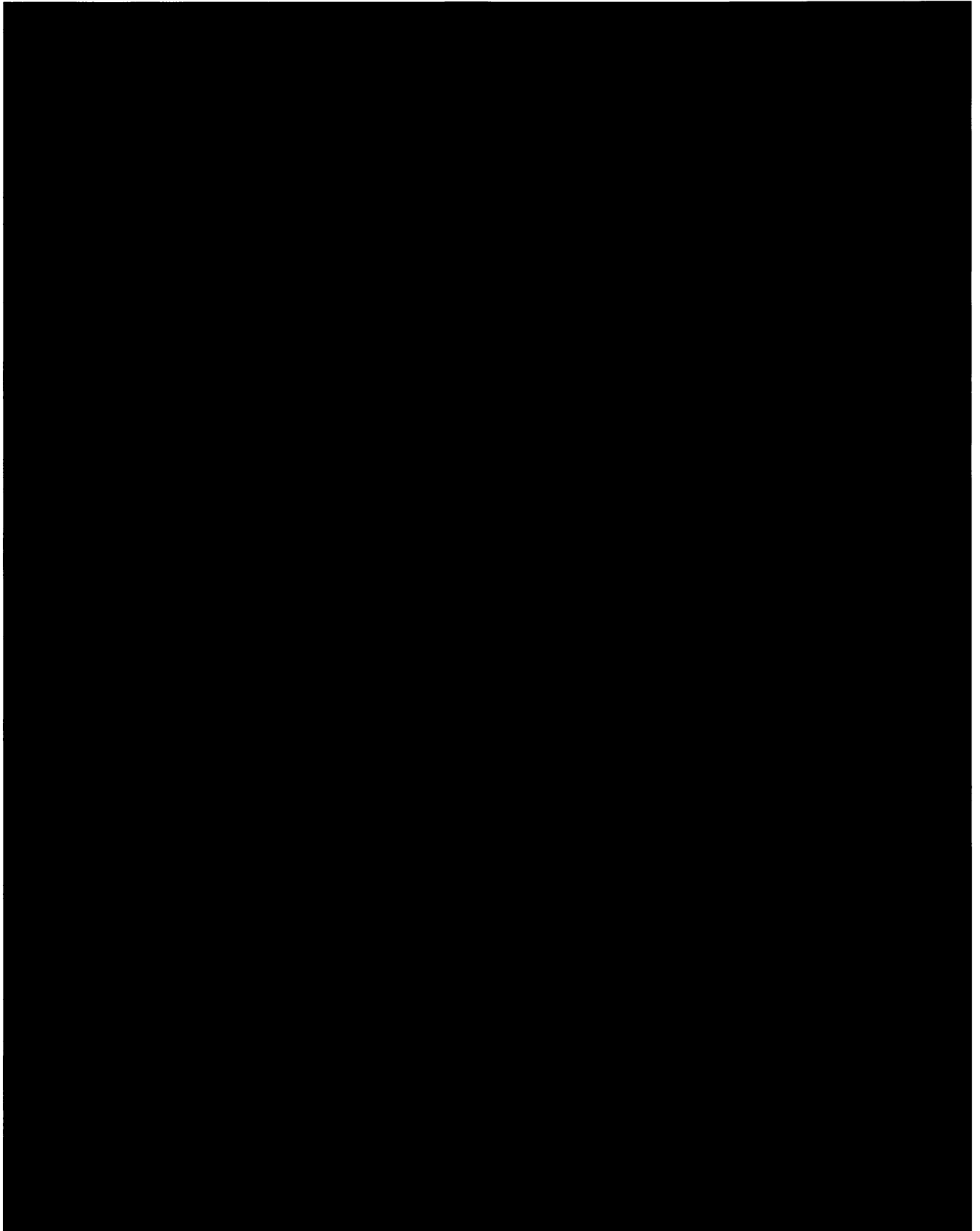












C E R T I F I C A T E

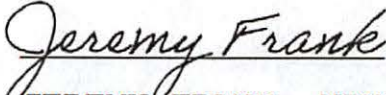
STATE OF NEW YORK)
 : ss.
COUNTY OF NEW YORK)

I, Jeremy Frank, a Notary Public within
and for the State of New York, do hereby
certify:

That THOMAS MONTAG, 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.

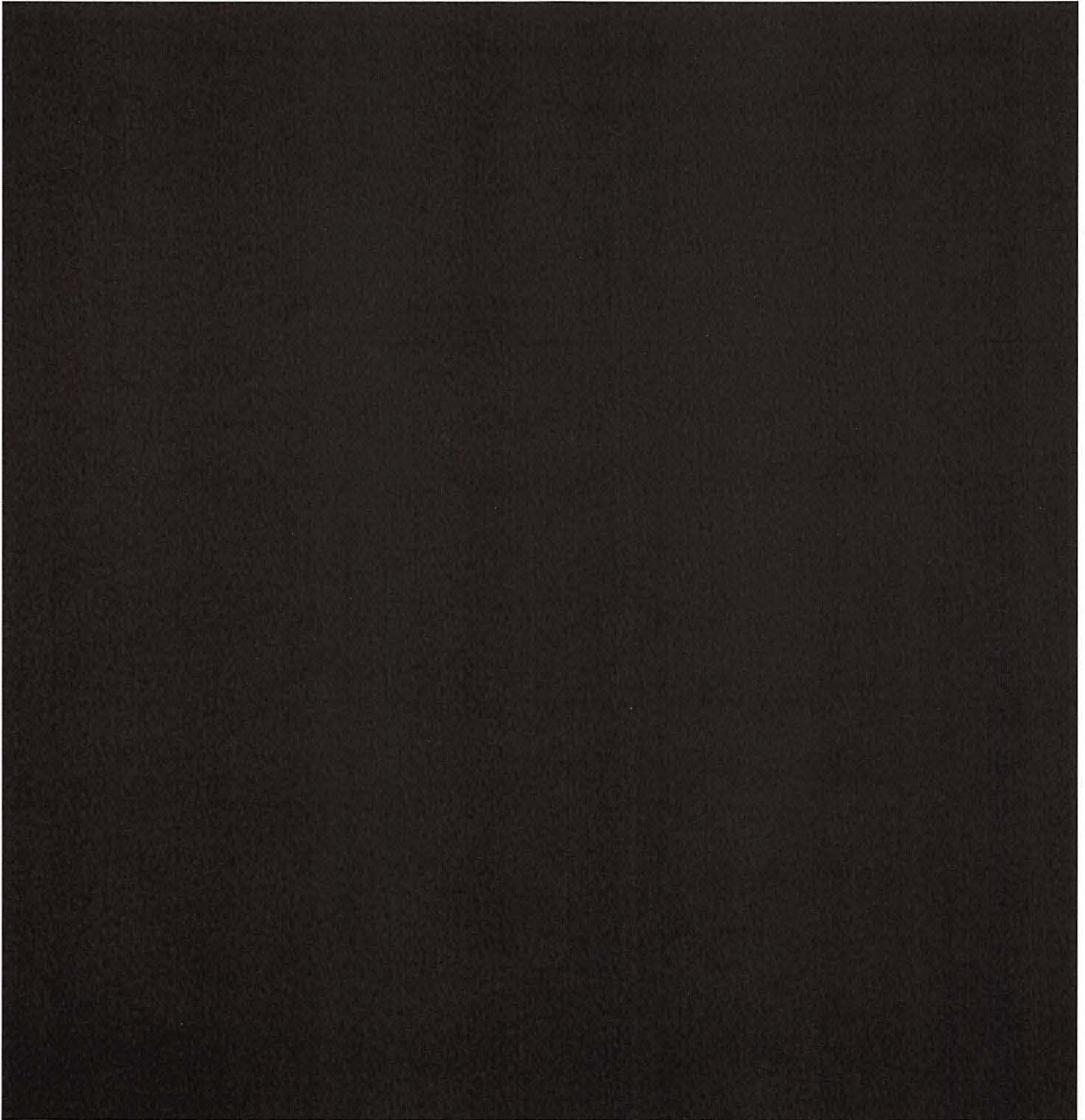
I further certify that I am not related
to any of the parties to this action by blood
or marriage, and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereby
set my hand on the 26th day of September,
2025.


JEREMY FRANK, MPM

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

Errata for Deposition of Thomas Montag, September 24, 2025



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 23 day of october, 2025.

Signed by:

Thomas Montag

ADA44A5AD566490...

Thomas K. Montag