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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION

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) Case No.:
) 3:21-md-02992-GPC-MSB
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DEPOSITION BY WRITTEN QUESTIONS OF
CALIFORNIA EMPLOYMENT DEVELOPMENT DEPARTMENT

(READ BY SHAMEEL SINGH)

Appearing Remotely
Thursday, May 8, 2025

Stenographically reported by:
EMILY SAMELSON, CSR No. 14043
Job No.: 10163945

Shameel Singh

In Re Bank of America CA Unemployment Benefits Litigation

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Deposition By Written Questions of CALIFORNIA
EMPLOYMENT DEVELOPMENT DEPARTMENT (READ BY SHAMEEL
SINGH), taken on behalf of Plaintiffs, all parties
appearing remotely, commencing at 10:11 a.m. and ending
at 11:24 a.m. on Thursday, May 8, 2025, stenographically
reported before Emily Samelson, CSR No. 14043.

Shameel Singh

In Re Bank of America CA Unemployment Benefits Litigation

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

(All parties appearing remotely)

For Plaintiffs and the Proposed Class:

COTCHETT, PITRE & MCCARTHY, LLP
BY: DAVID G. HOLLENBERG, ESQ.
840 Malcolm Road, Suite 200
Burlingame, California 94010
650.697.6000
dhollenberg@cpmlegal.com

ALTSHULER BERZON LLP
BY: MICHAEL RUBIN, ESQ.
177 Post Street, Suite 300
San Francisco, California 94108
415.421.7151
mrubin@altber.com

For Individual Plaintiffs:

SWIGART LAW GROUP, APC
BY: JOSHUA B. SWIGART, ESQ.
ILANA PLATKIEWICZ, ESQ.
2221 Camino Del Rio S., Suite 308
San Diego, California 92108
866.219.3343
josh@swigartlawgroup.com

For California Employment Development Department:

CALIFORNIA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
BY: LEANNA C. COSTANTINI, ESQ.
300 South Spring Street, Suite 1702
Los Angeles, California 90013
213.269.6231
leanna.costantini@doj.ca.gov

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Shameel Singh

In Re Bank of America CA Unemployment Benefits Litigation

1 A P P E A R A N C E S (CONT'D):

2 (All parties appearing remotely)

3 For Defendant BANK OF AMERICA, N.A.:

4 GOODWIN PROCTER LLP

BY: LAURA BRYN, ESQ.

5 BENJAMIN SHIN, ESQ.

601 South Figueroa Street, Suite 4100

6 Los Angeles, California 90017

213.426.2584

7 lbryns@goodwinlaw.com

bshin@goodwinlaw.com

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10 Also Present: Nicholas Scheuer, EDD Representative

Shameel Singh

In Re Bank of America CA Unemployment Benefits Litigation

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Shameel Singh

In Re Bank of America CA Unemployment Benefits Litigation

1 Thursday, May 8, 2025; 10:11 a.m.

2 --oOo--

3 THE STENOGRAPHIC REPORTER: My name is Emily
4 Samelson, a California Certified Shorthand Reporter,
5 License Number 14043. I am a code-compliant reporter
6 and will be producing a transcript of this proceeding
7 that is automatically admissible in court.

8 SHAMEEL SINGH (AS REPRESENTATIVE OF
9 THE CALIFORNIA EMPLOYMENT DEVELOPMENT DEPARTMENT),
10 having first been duly sworn, was
11 examined and testified as follows:

12 THE STENOGRAPHIC REPORTER: Proceed, Counsel.

13 MR. HOLLENBERG: Okay. Good morning. This is
14 David Hollenberg from Cotchett, Pitre & McCarthy on
15 behalf of the plaintiffs.

16 Plaintiffs move the notice of subpoena to EDD
17 as Exhibit 1 to this deposition by written questions.

18 (Exhibit 1 was marked for identification.)

19 MS. BRYs: Good morning. This is Laura Brys,
20 counsel for Bank of America.

21 Bank of America moves as Exhibit 2 BANA's
22 objections and cross written questions into the record.

23 (Exhibit 2 was marked for identification.)

24 MS. COSTANTINI: Good morning. Leanna
25 Costantini. I'm the attorney for the deponent, the

Shameel Singh

In Re Bank of America CA Unemployment Benefits Litigation

1 California EDD.

2 So I will be reading the definitions.

3 The first one is: "Bank" refers to defendant
4 Bank of America, N.A.

5 No. 2: "claim fraud filter" and "CFF" refers
6 to the Bank's automated claim fraud filter that the Bank
7 applied between September 28, 2020, and June 8, 2021, to
8 notice of error claims submitted by EDD debit
9 cardholders and that was the subject of the
10 preliminary injunction order entered in the consolidated
11 Yick v. Bank of America, N.A. action on or about June 2,
12 2021 (N.D. Cal, Case No. 3:21-cv-00376-VC, Dkt. 103).

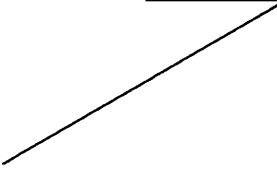
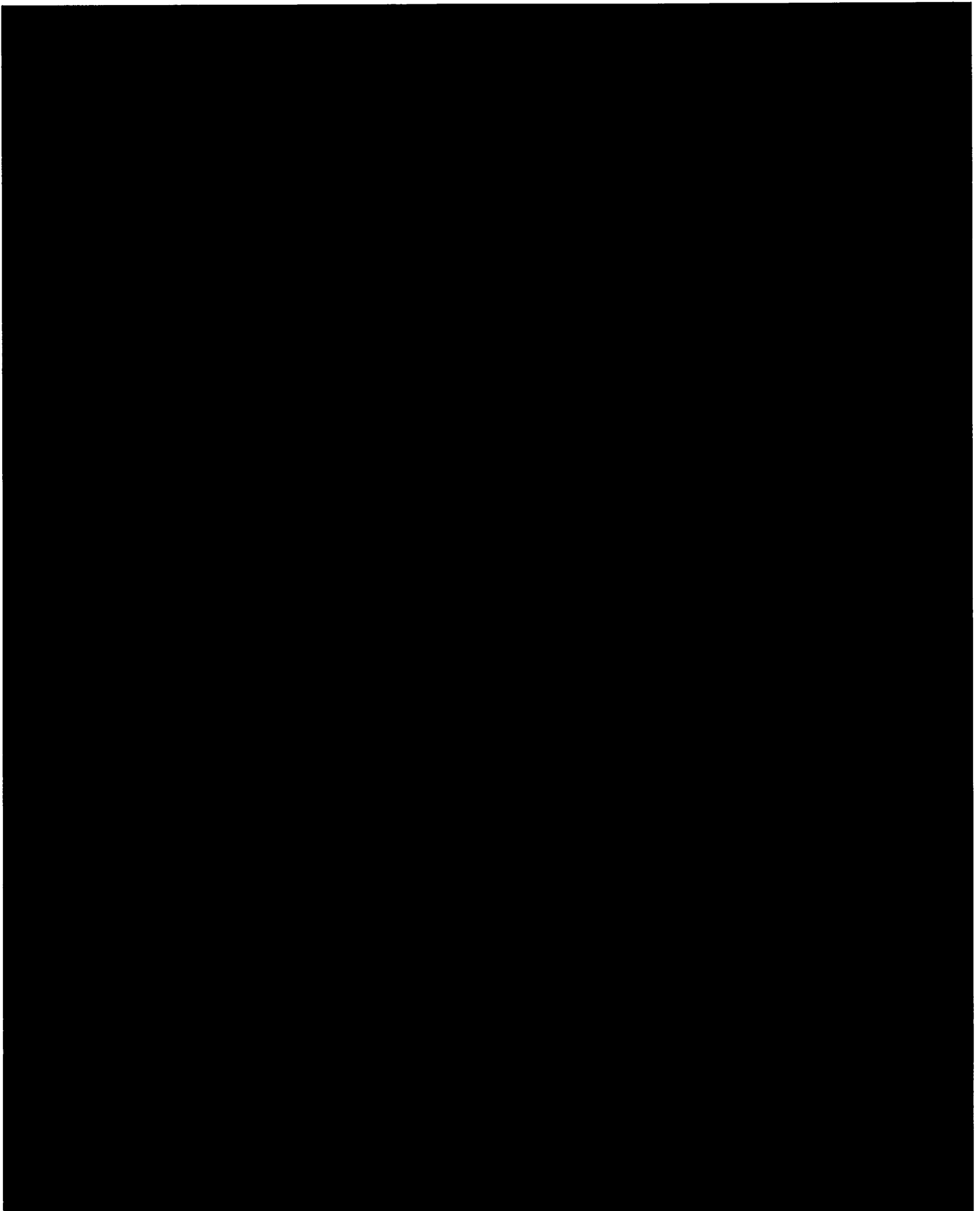
13 No. 3: "Defendant" refers to defendant Bank of
14 America, N.A.

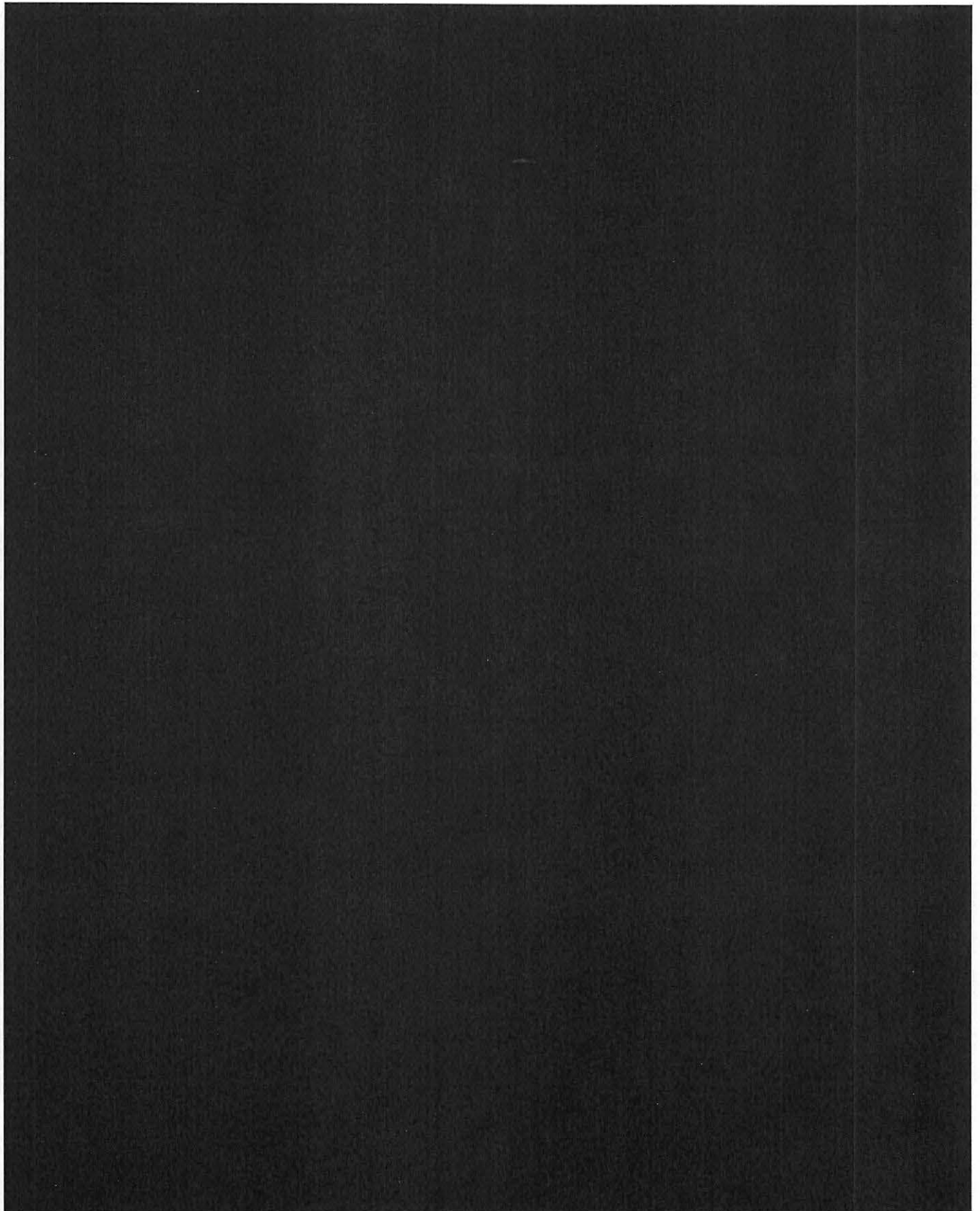
15 No. 4: "EDD" means the California Employment
16 Development Department.

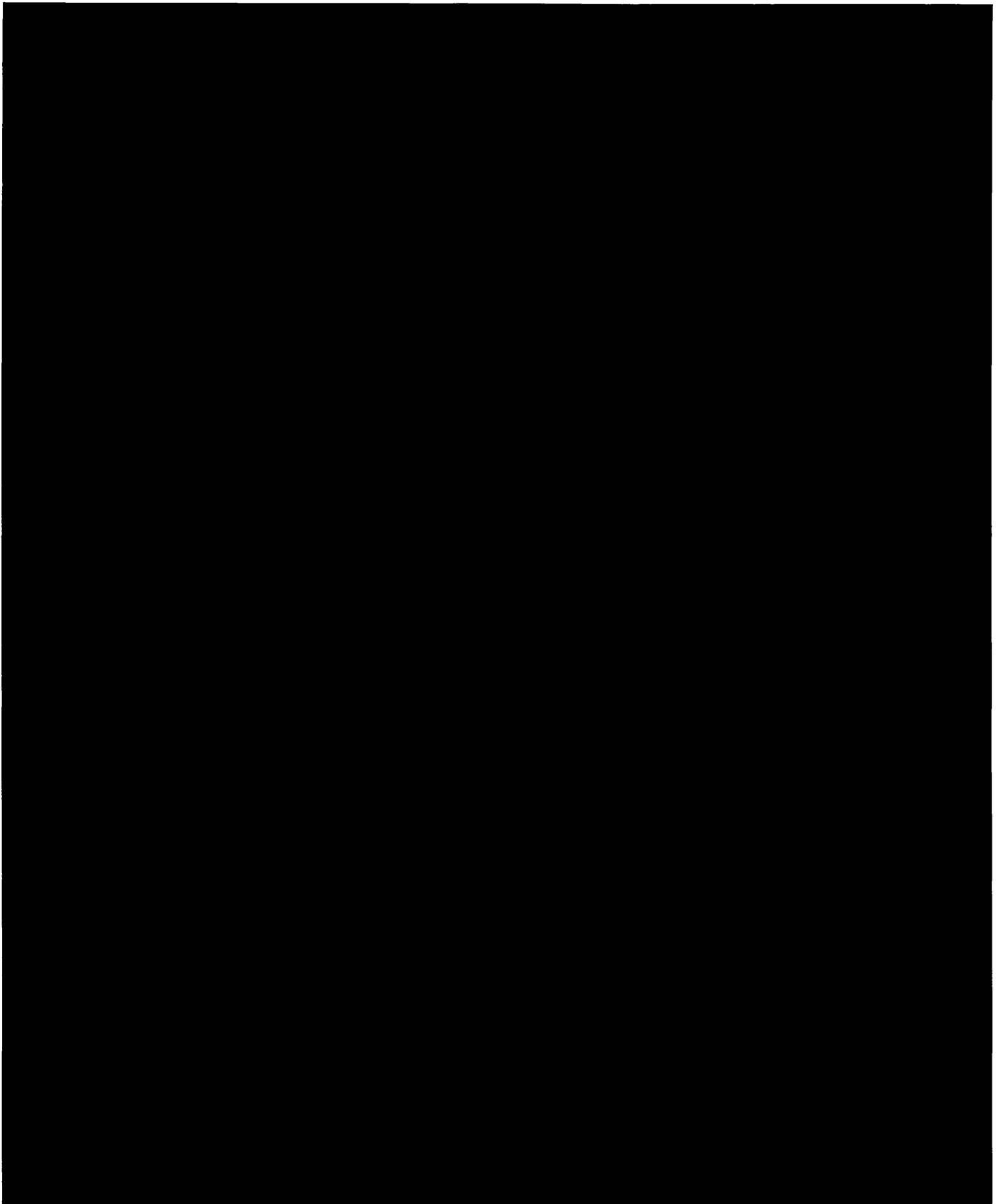
17 No. 5: "EDD debit card" refers to a prepaid
18 debit card issued by defendant to an EDD debit
19 cardholder for the purpose of allowing the EDD debit
20 cardholder to access, spend, or otherwise use EDD
21 benefits deposited into their EDD debit card account.

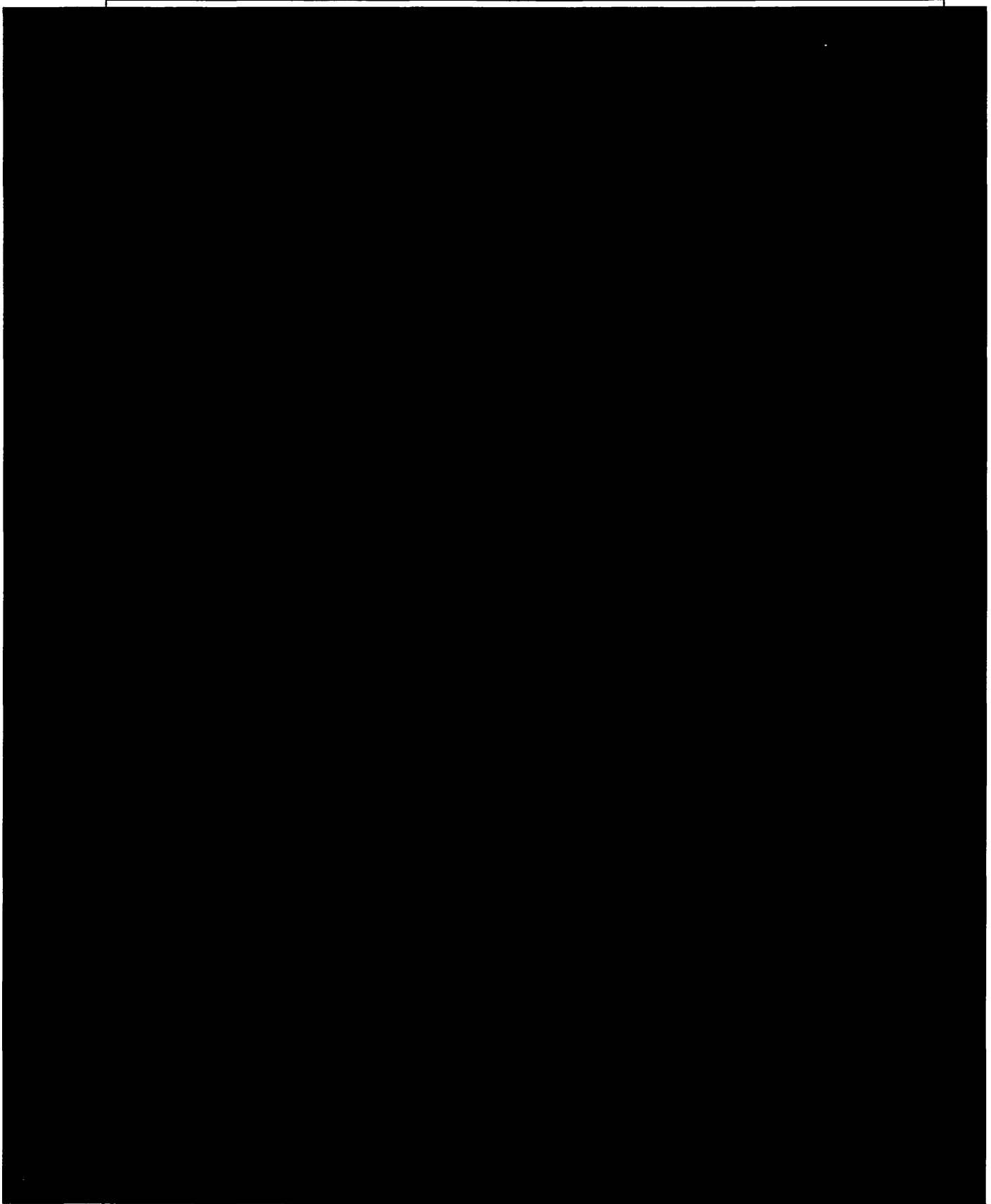
22 No. 6: "EDD debit card account" refers to a
23 bank account established by defendant for use by an EDD
24 debit cardholder.

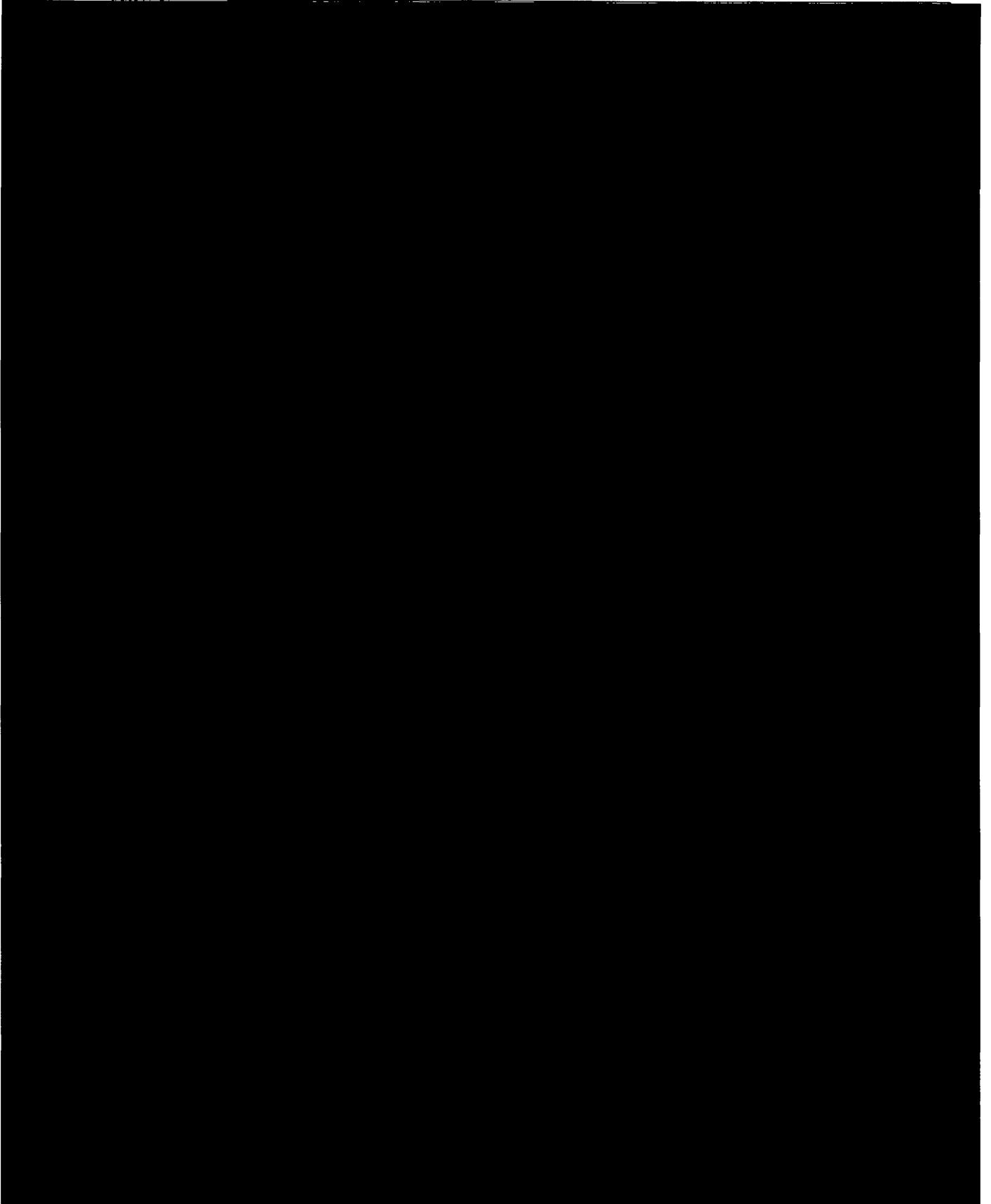
25 No. 7: "EDD debit cardholder" refers to a



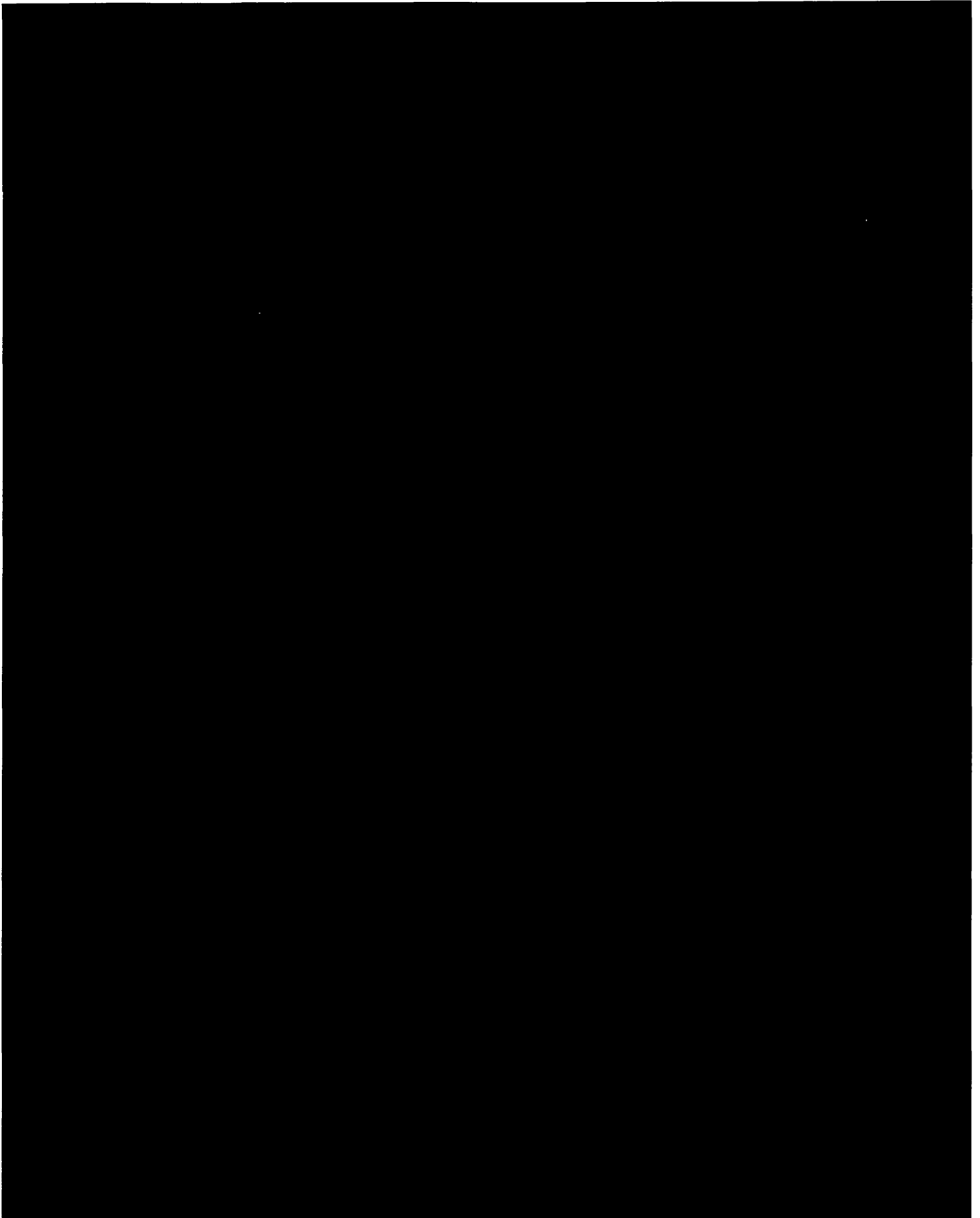


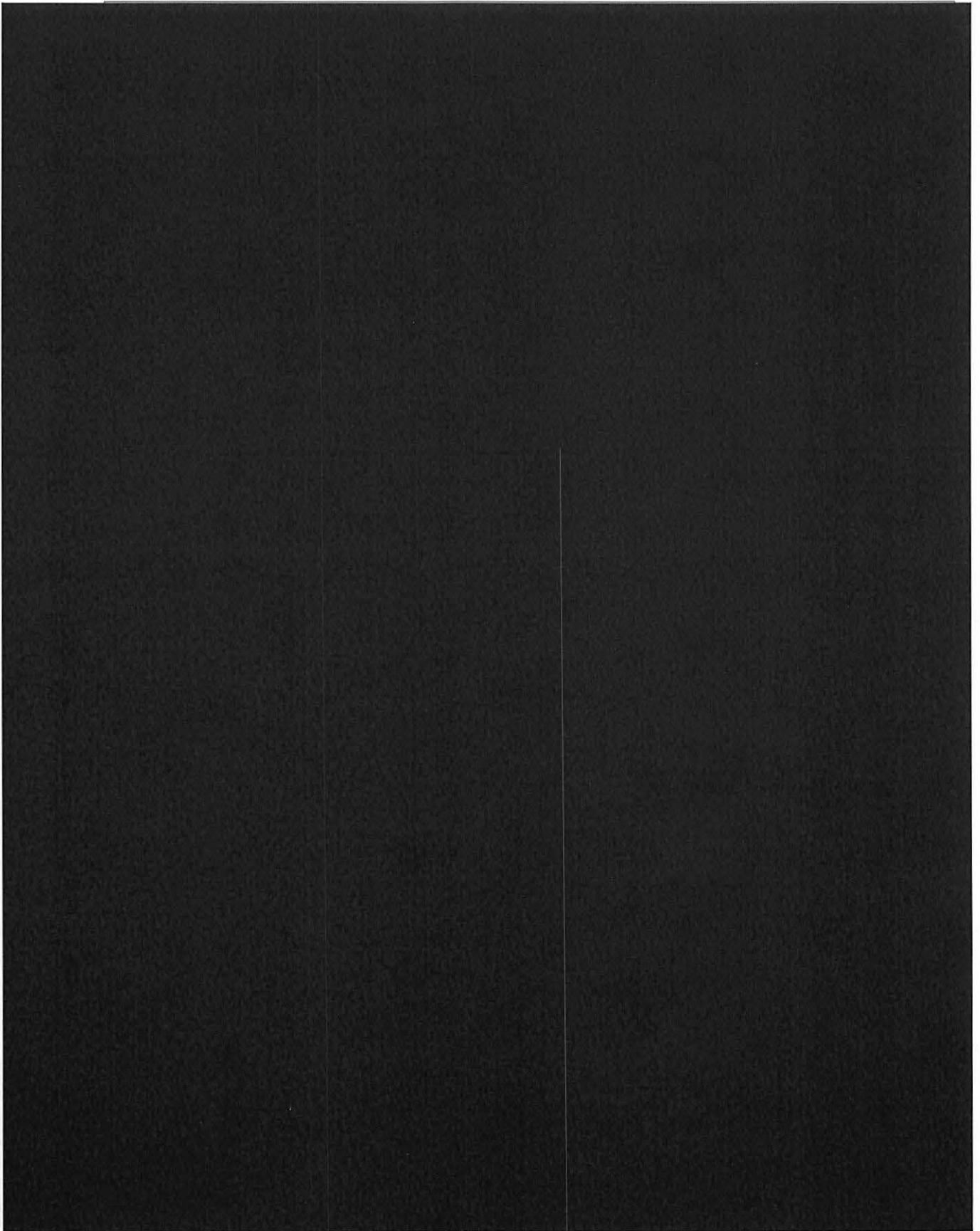


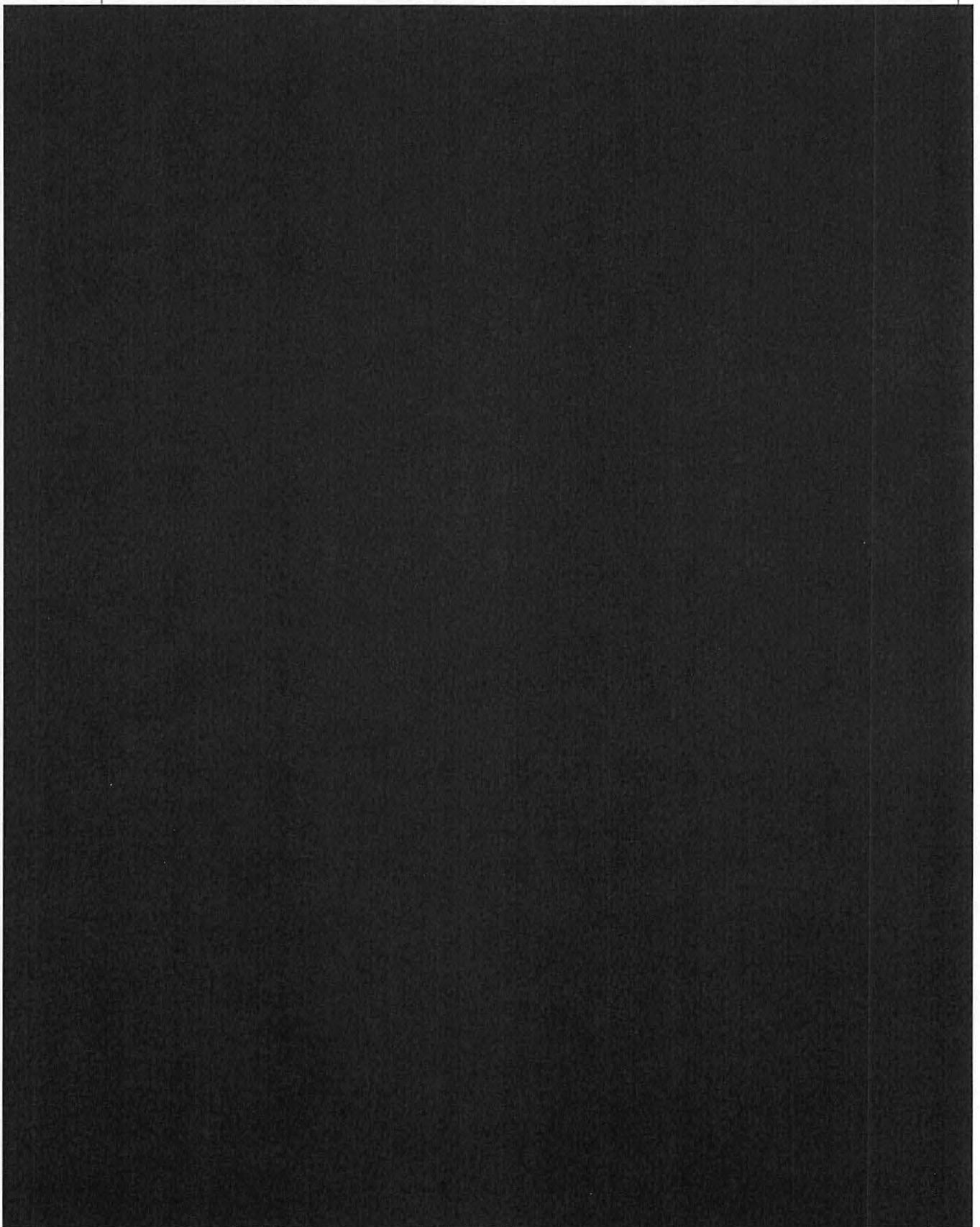


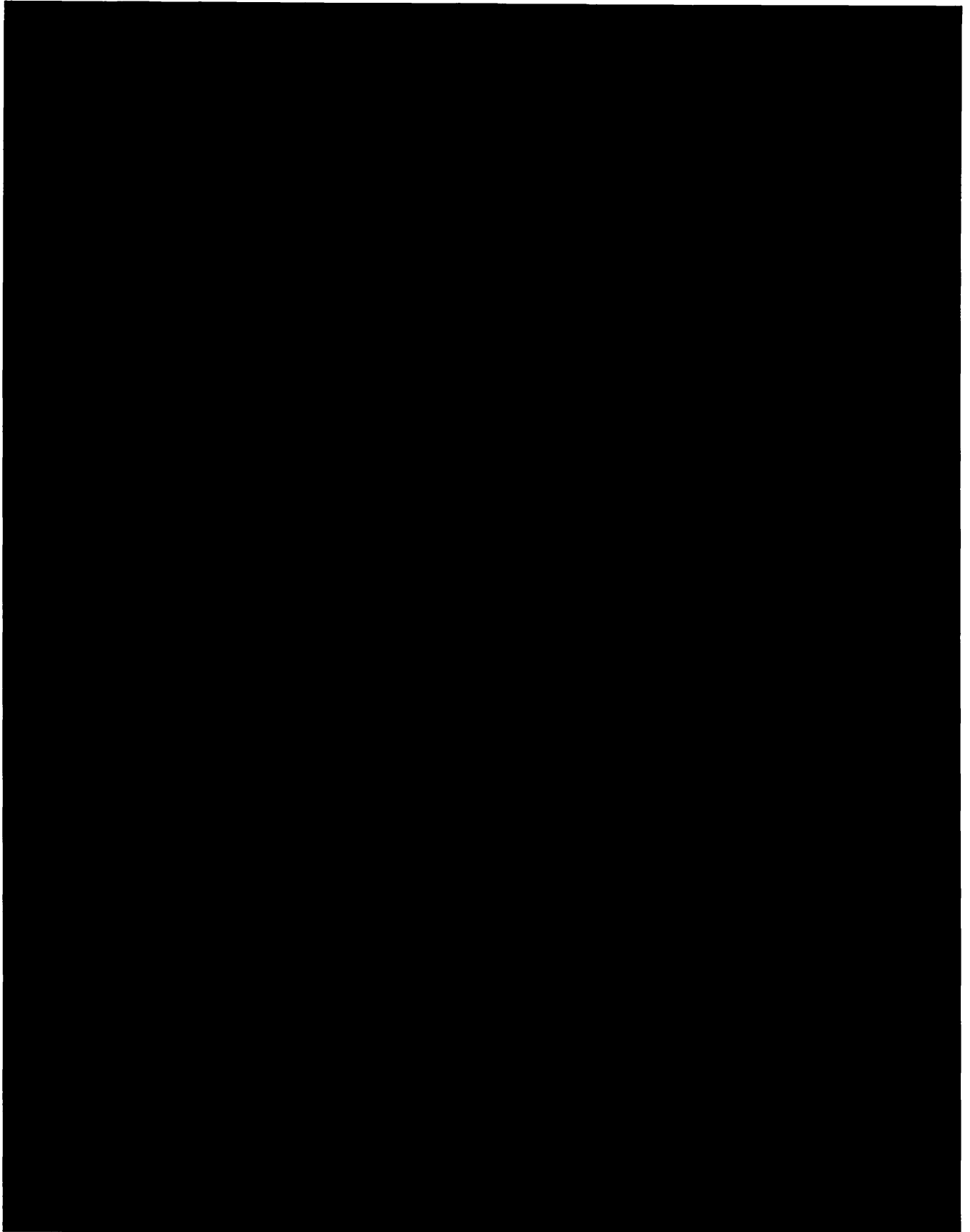


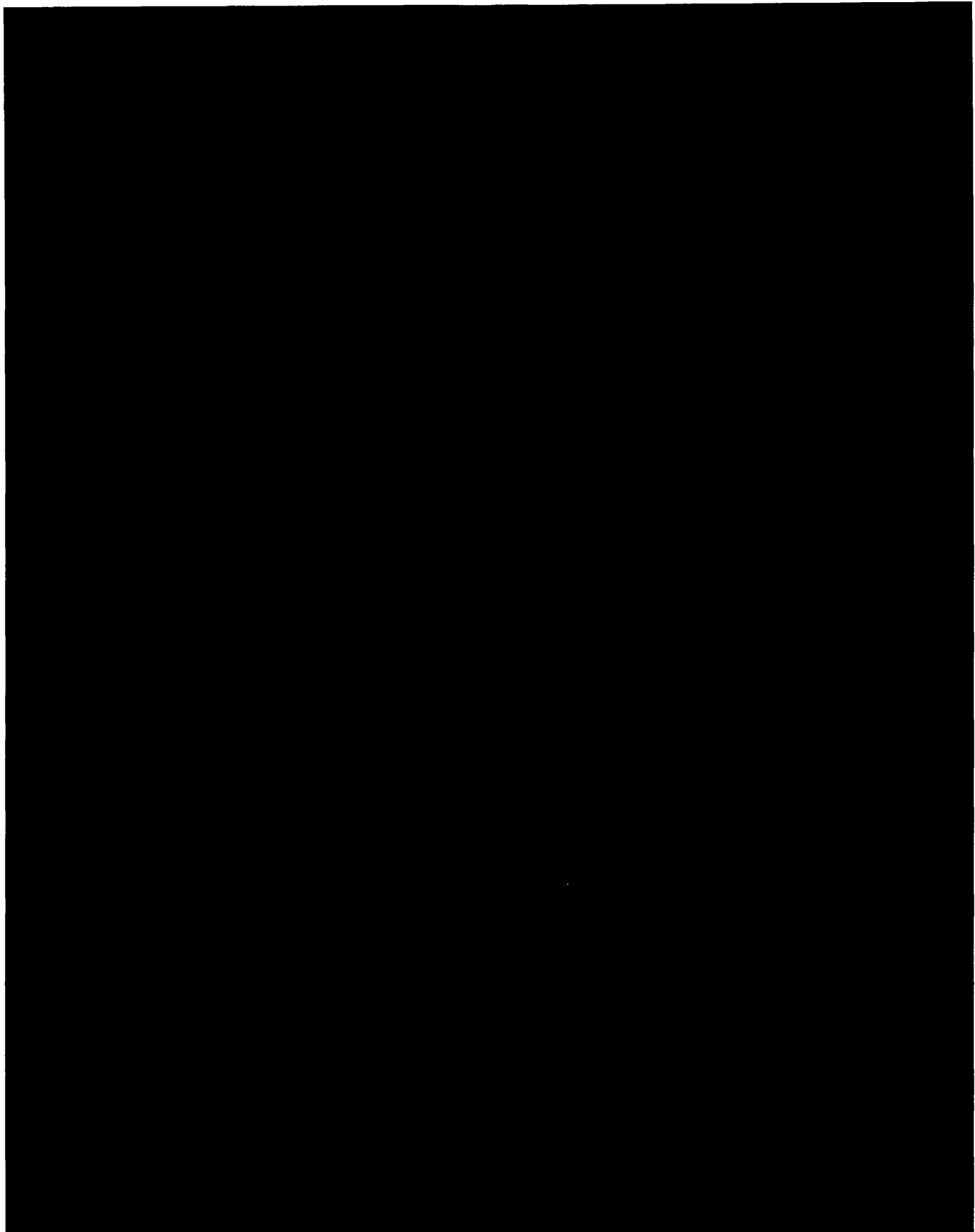
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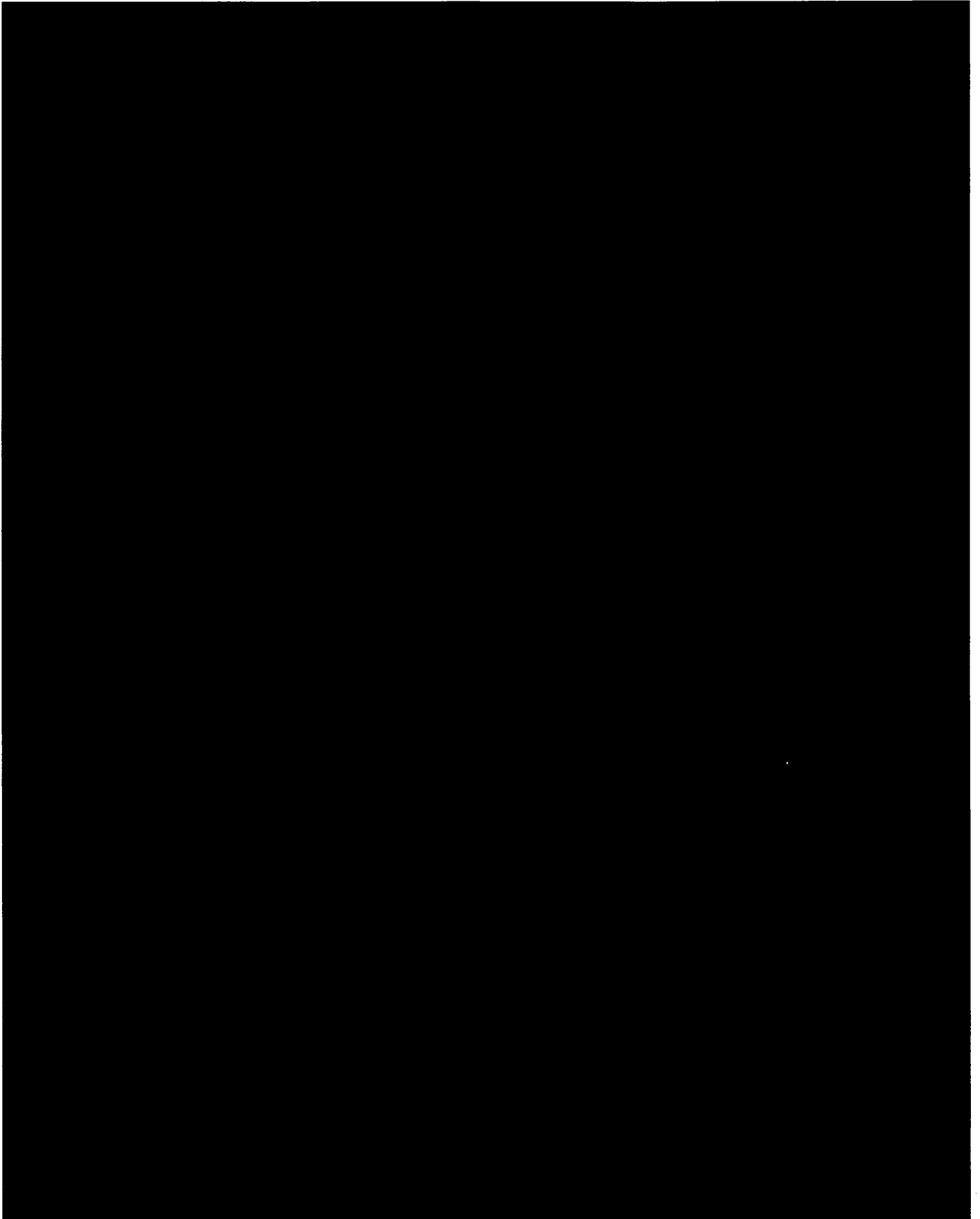


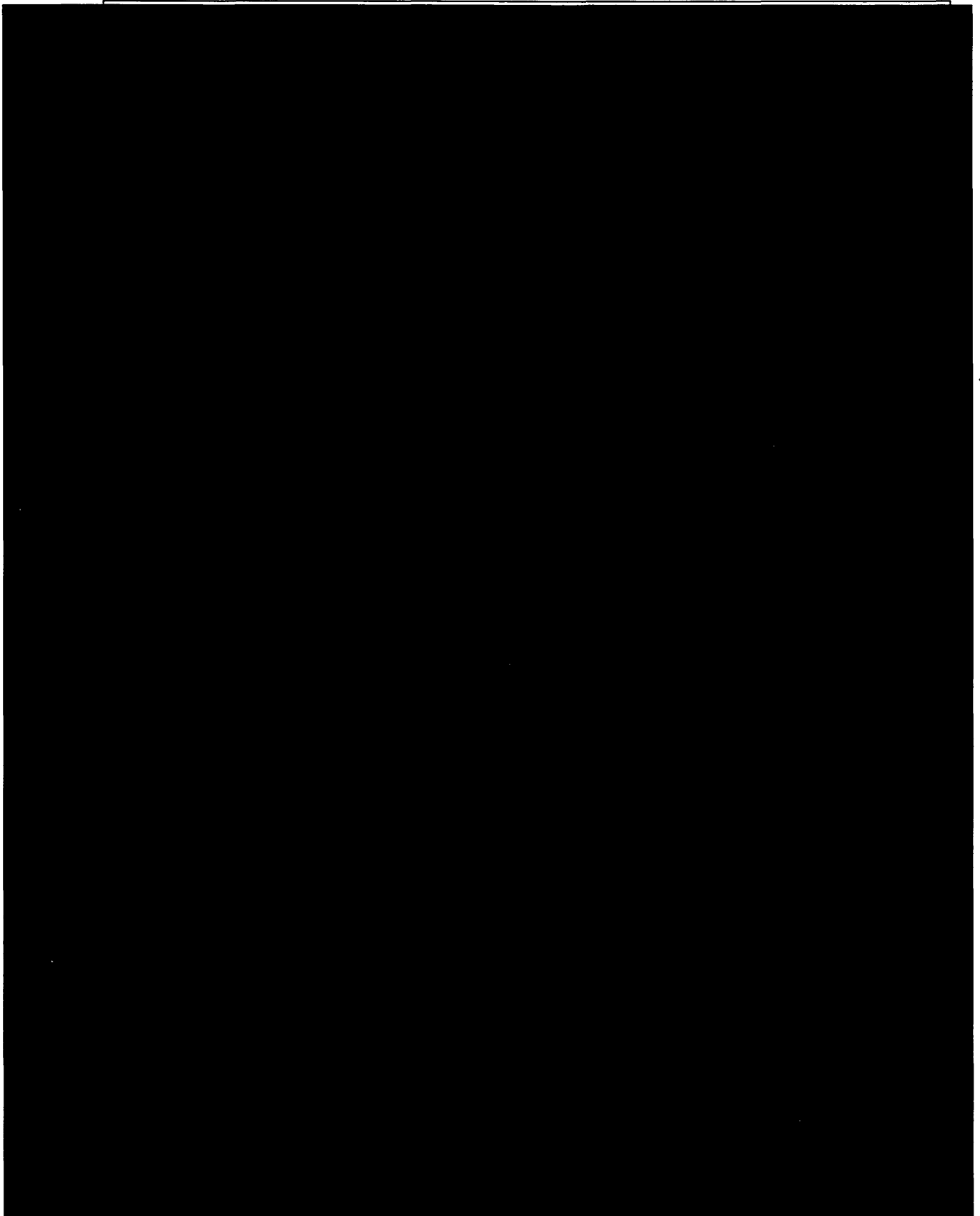


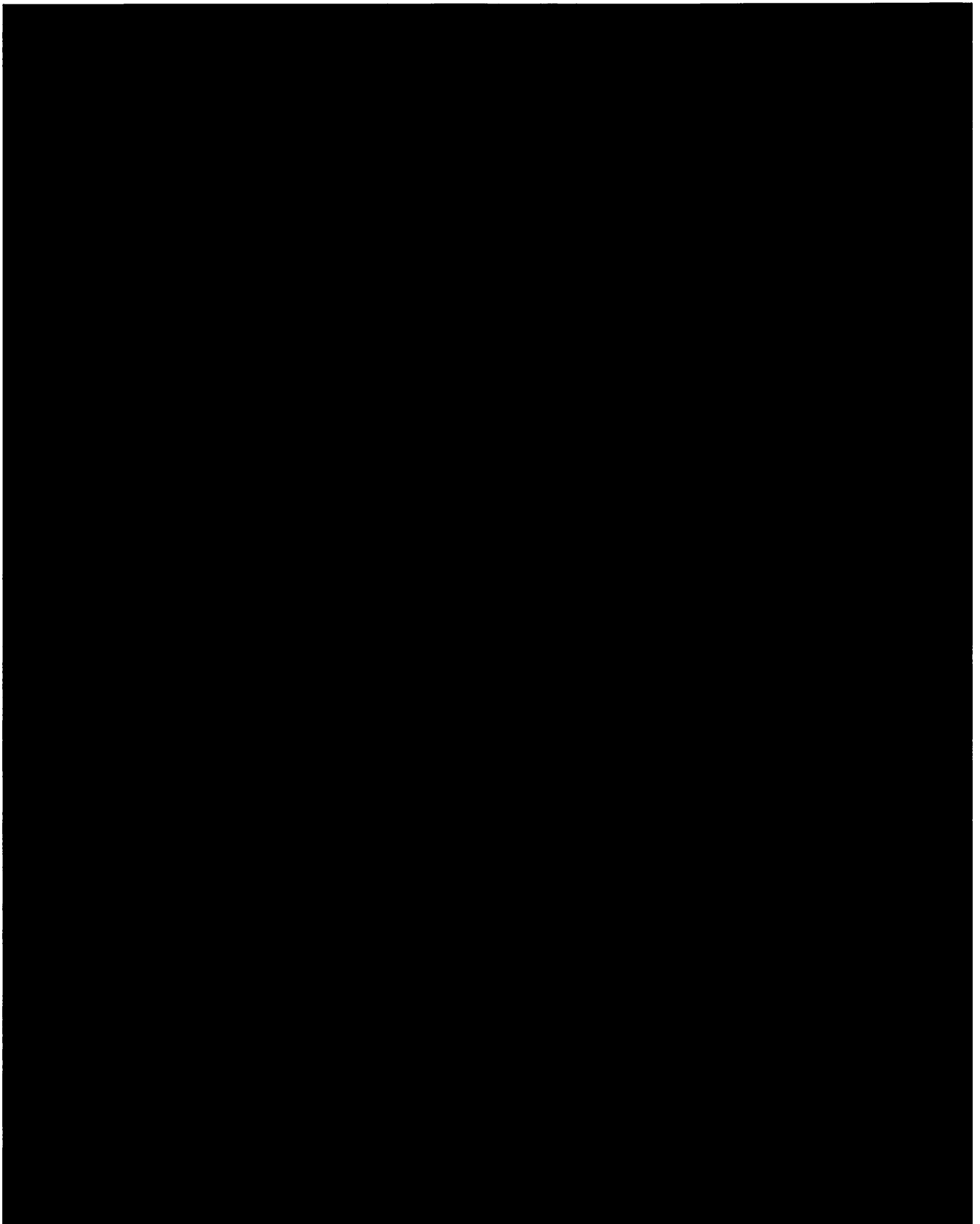


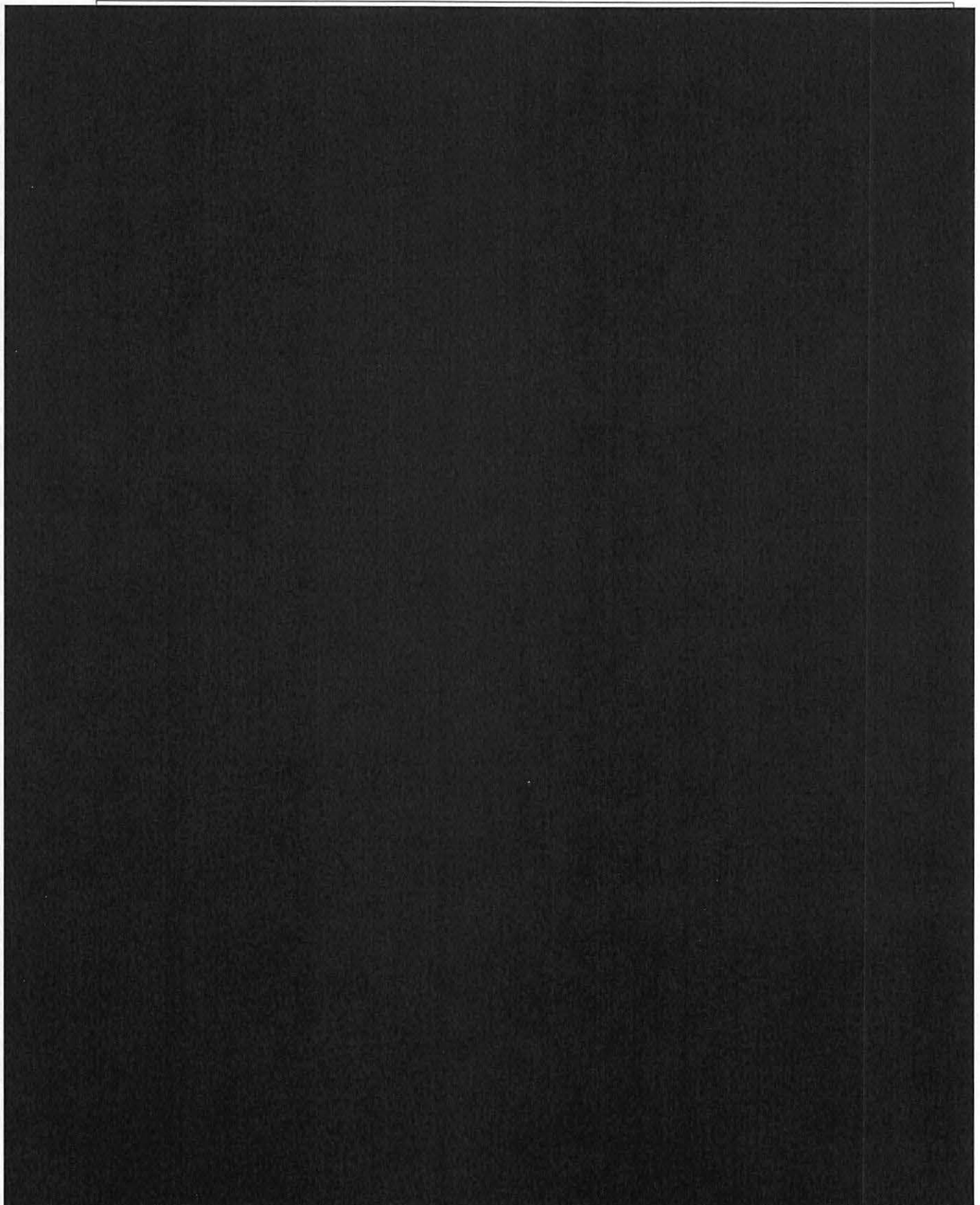


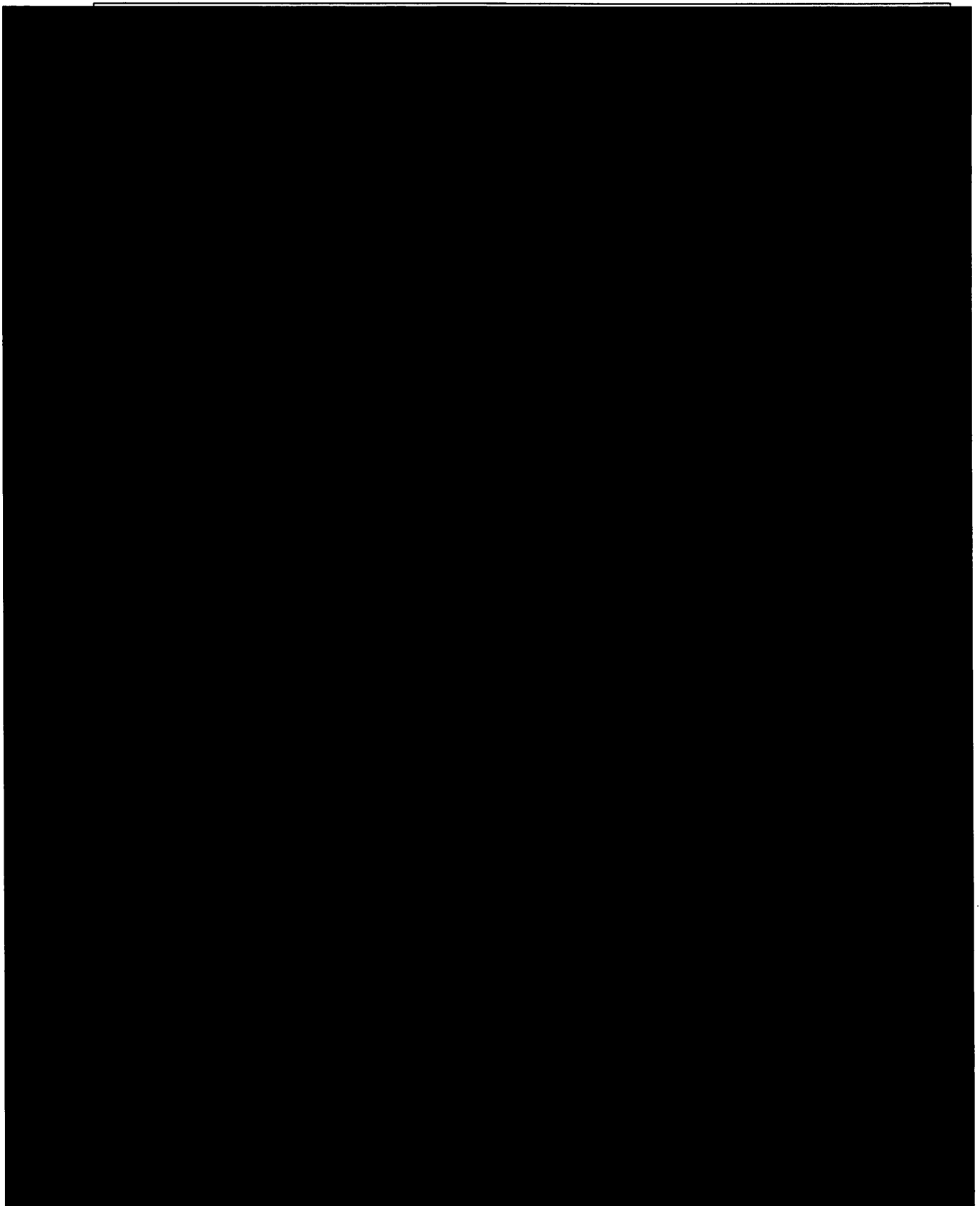


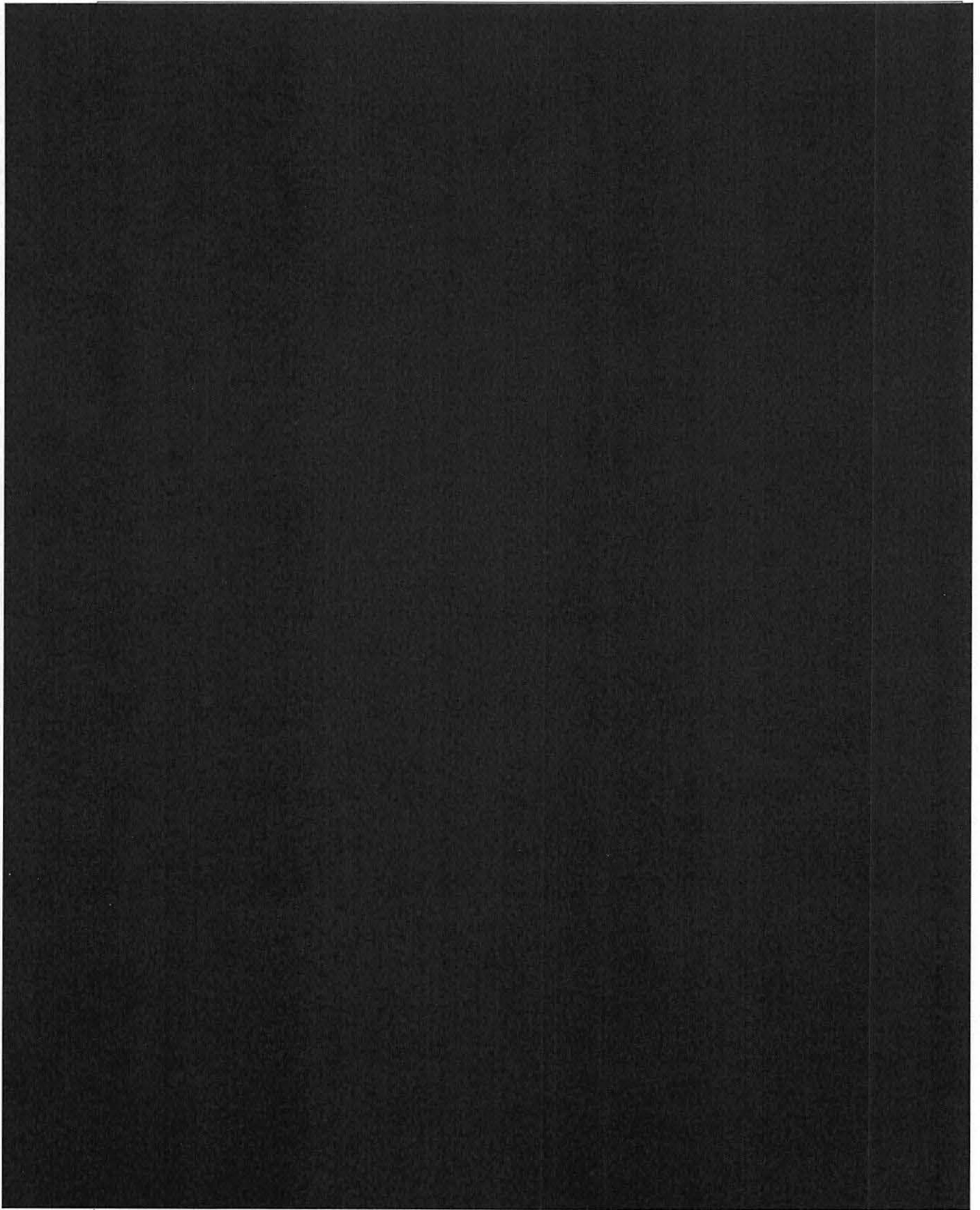


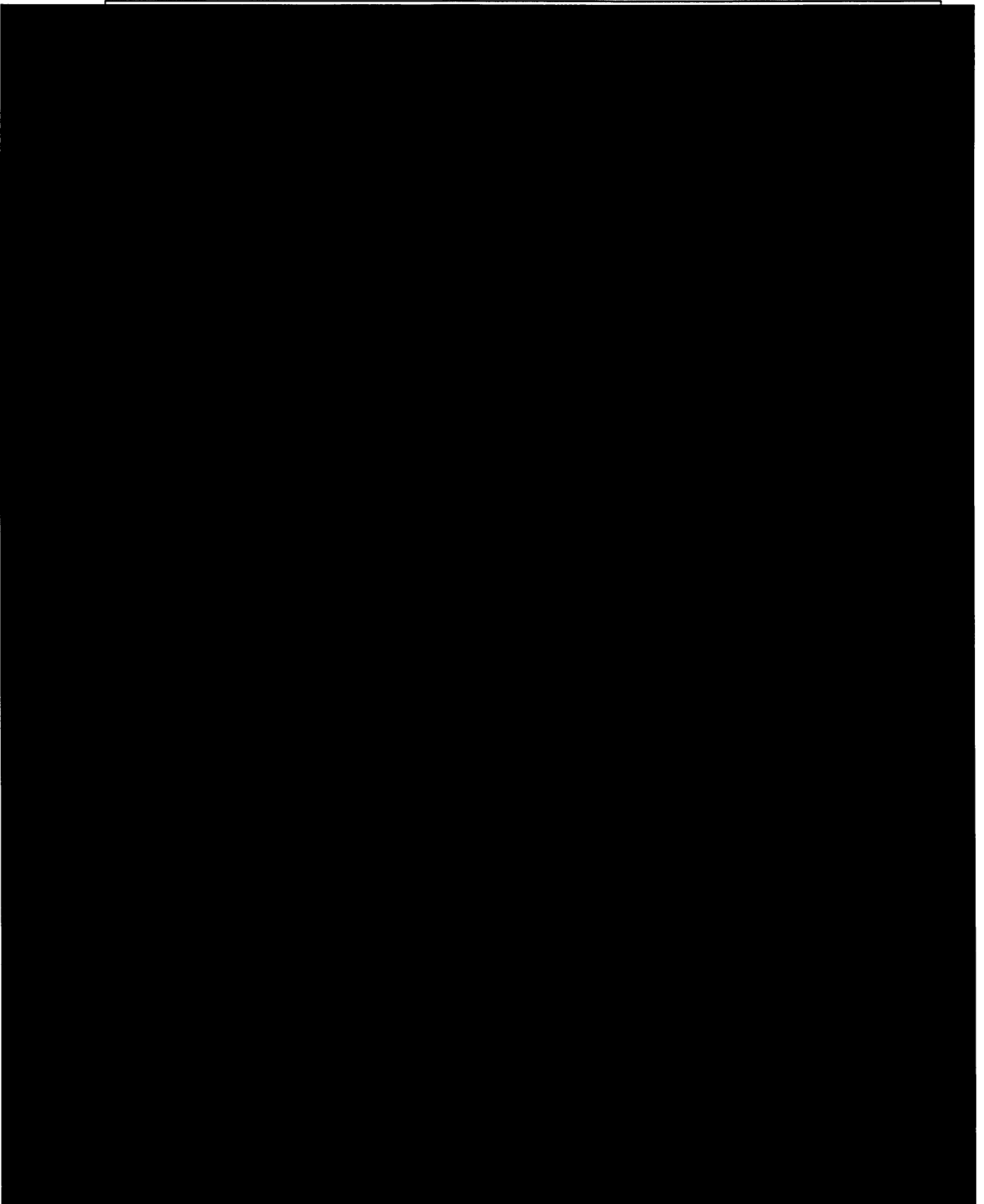


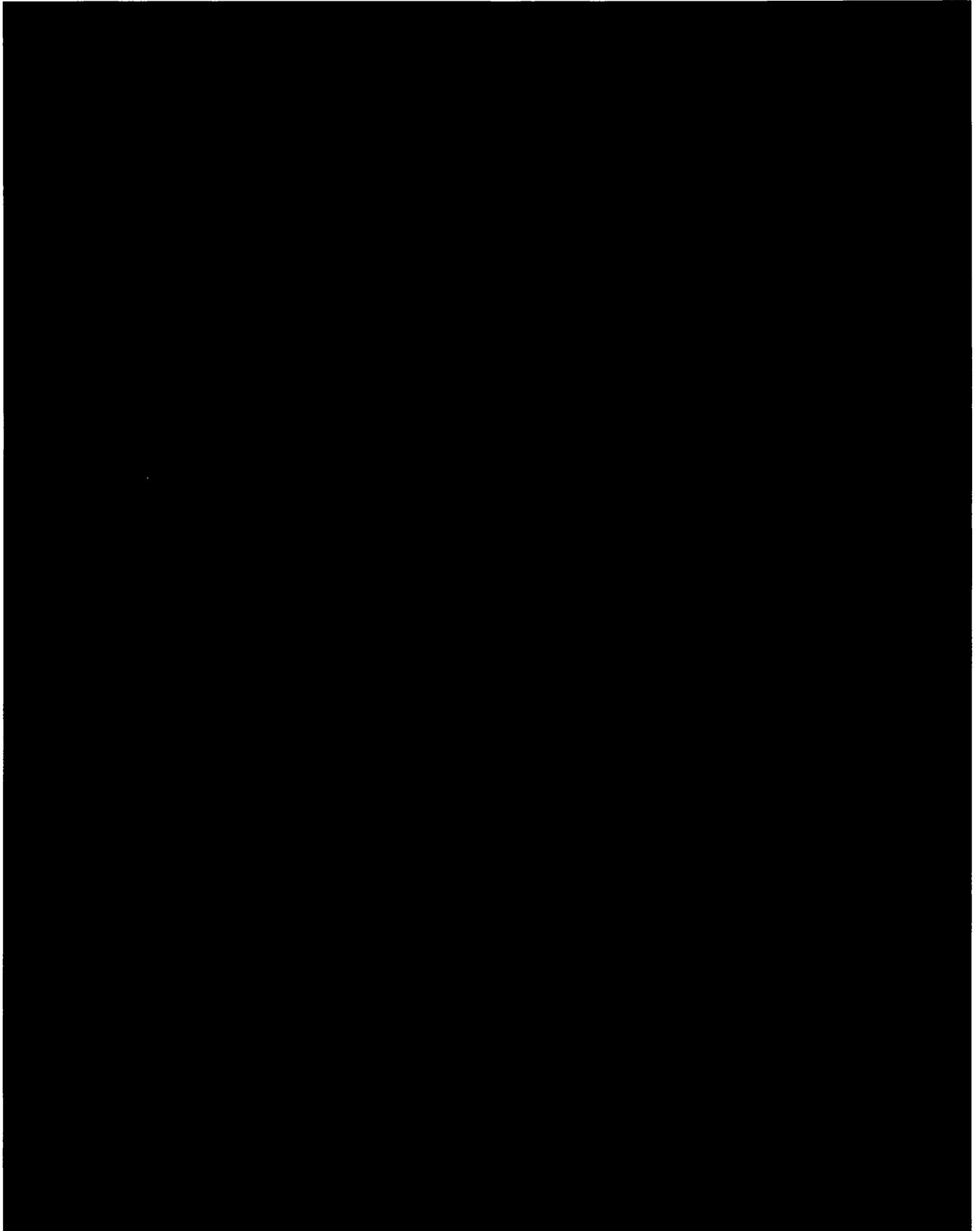


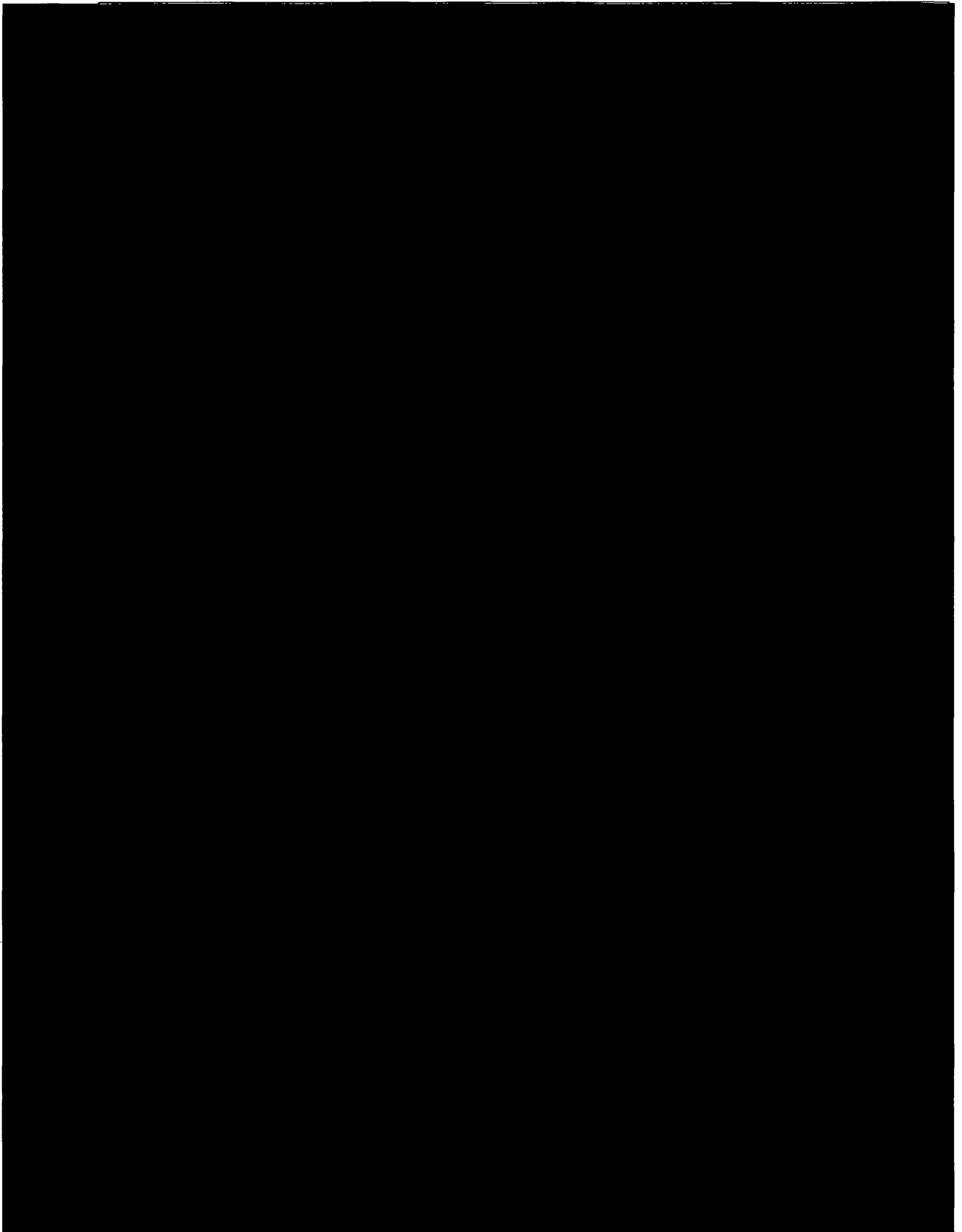


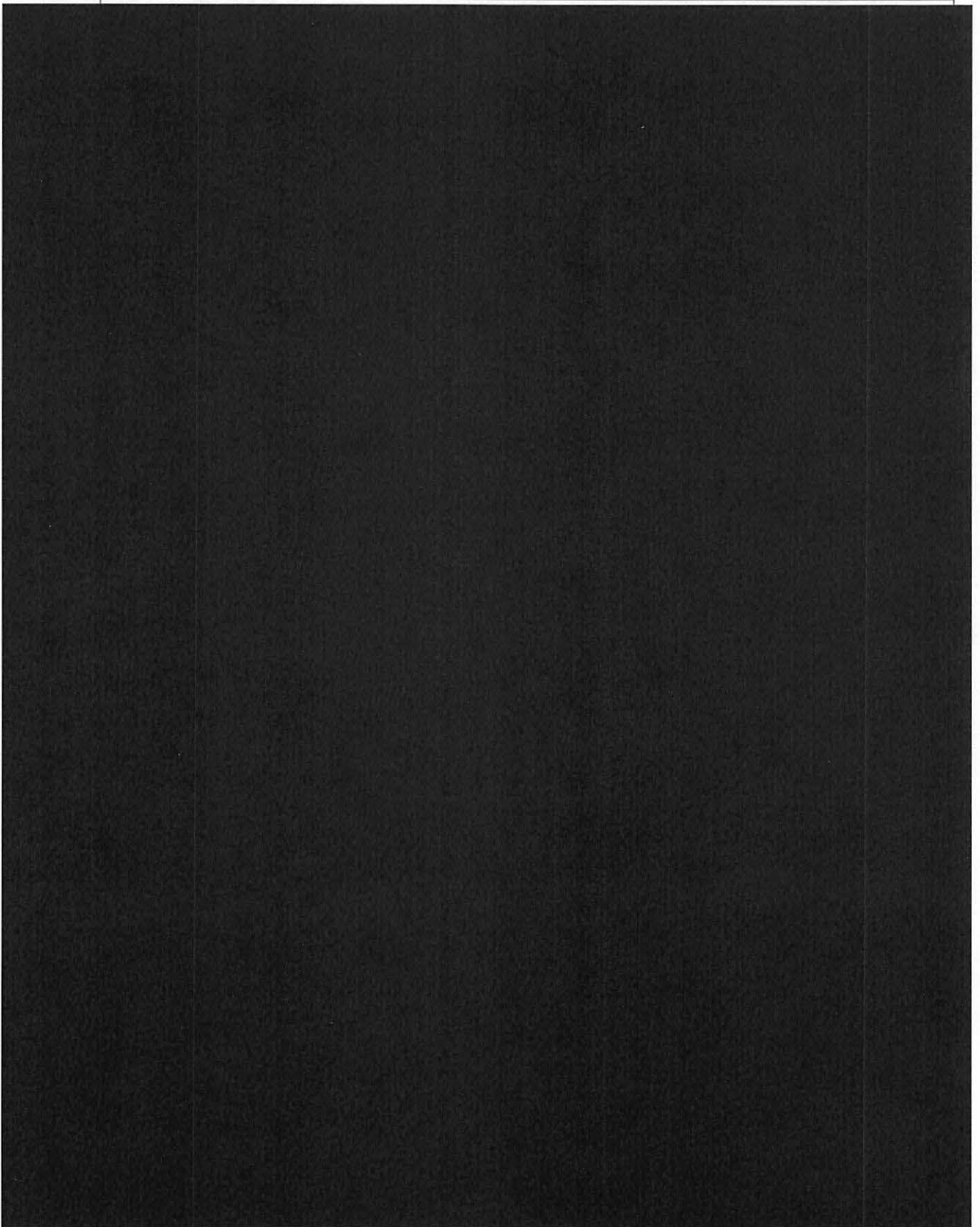


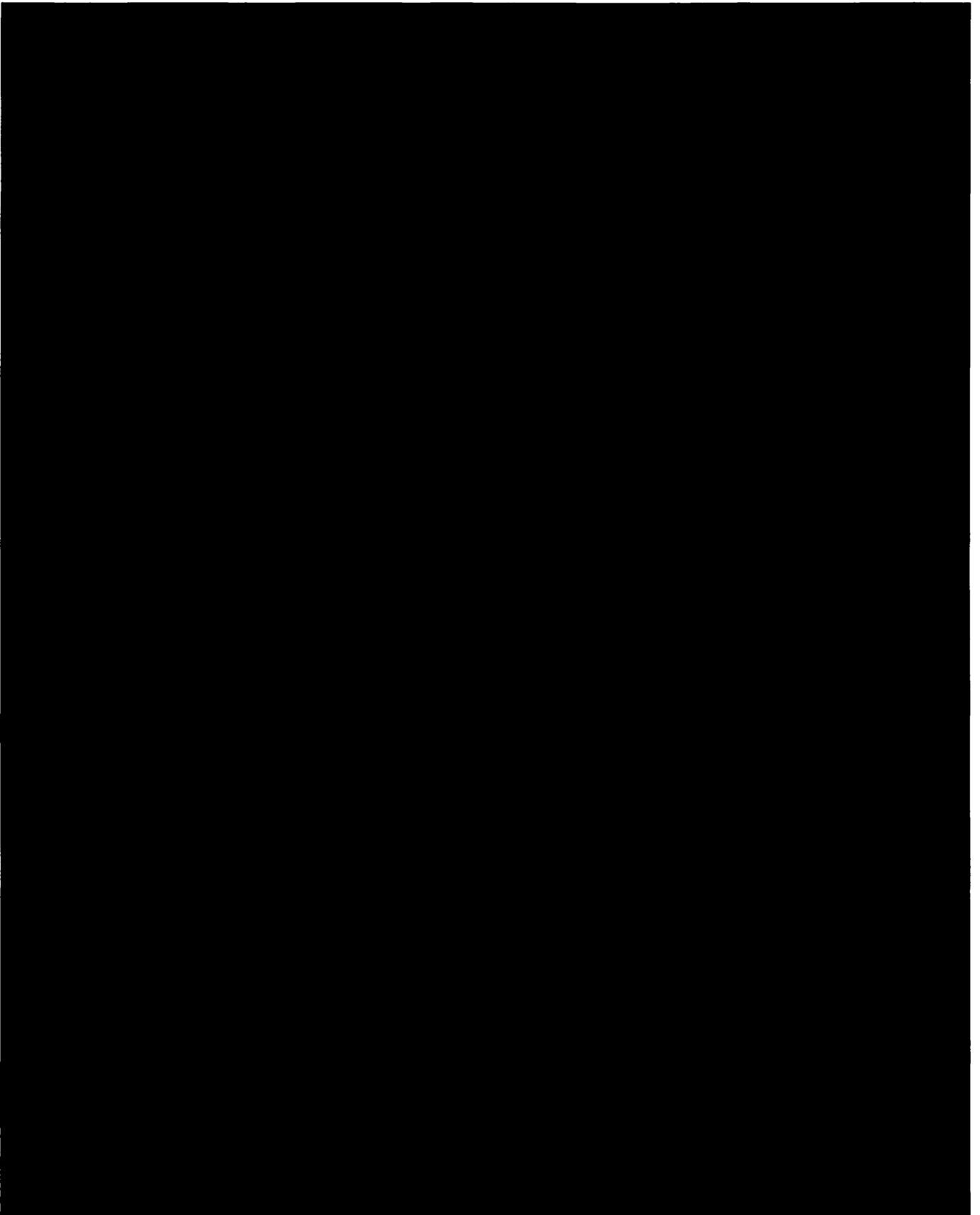


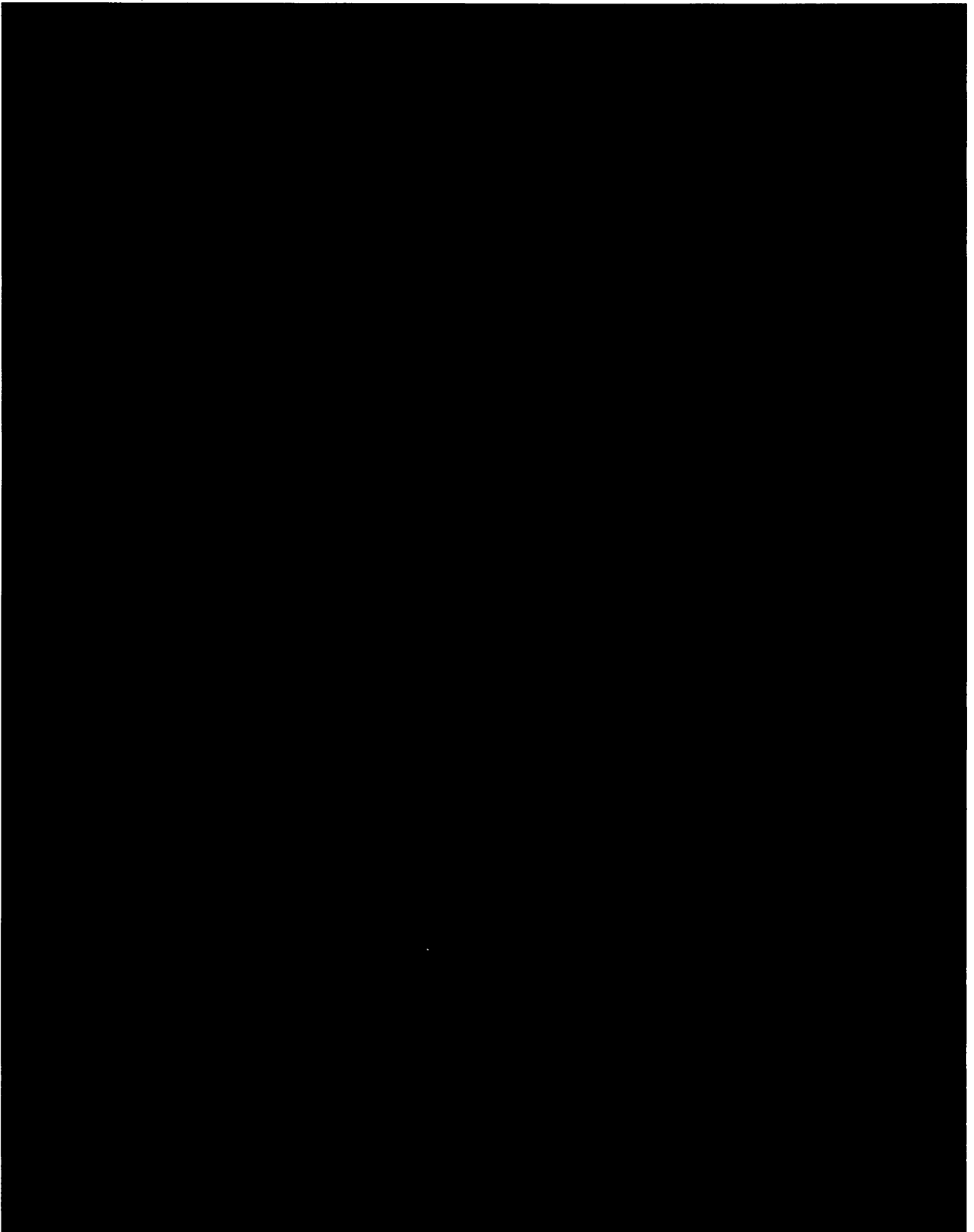


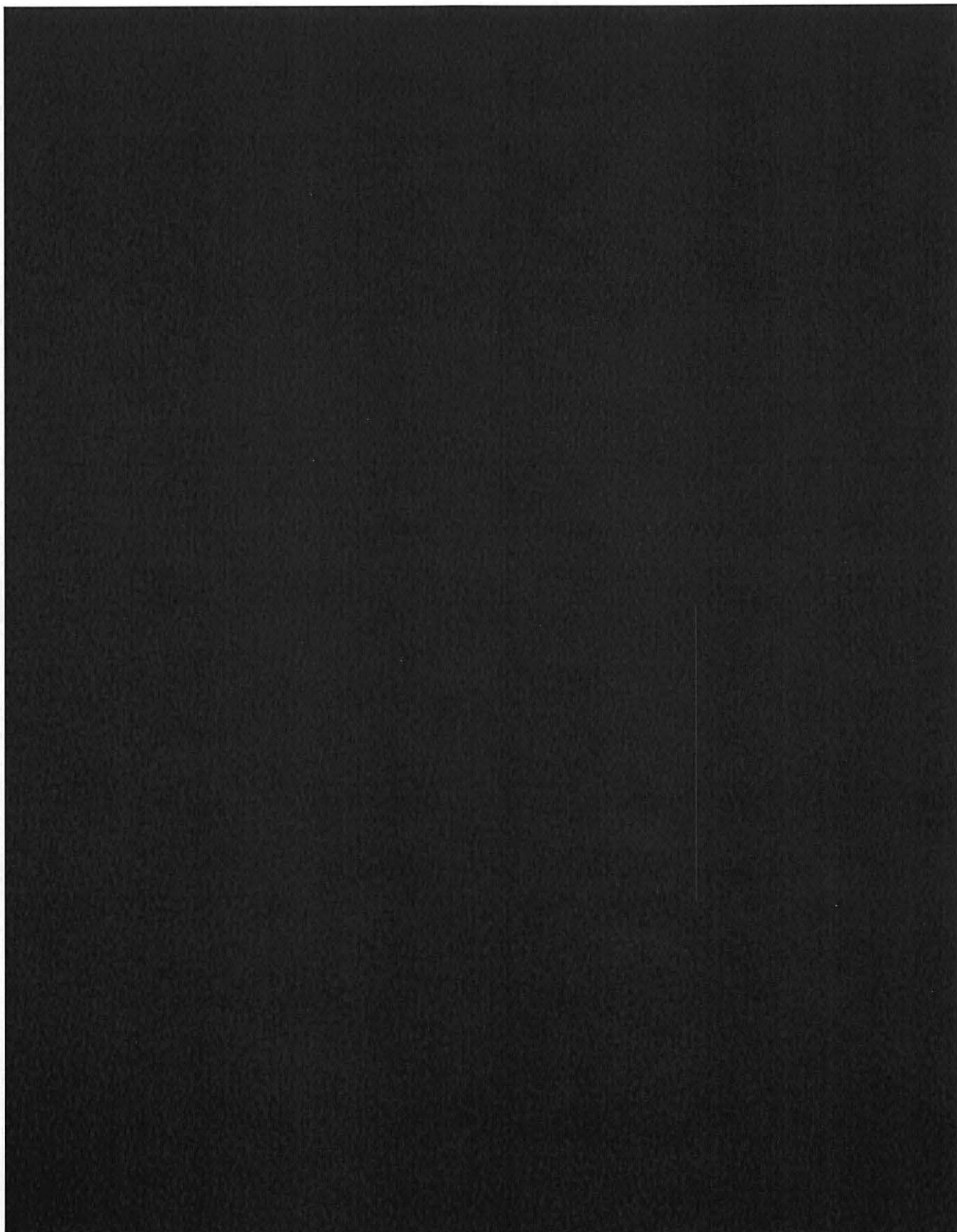


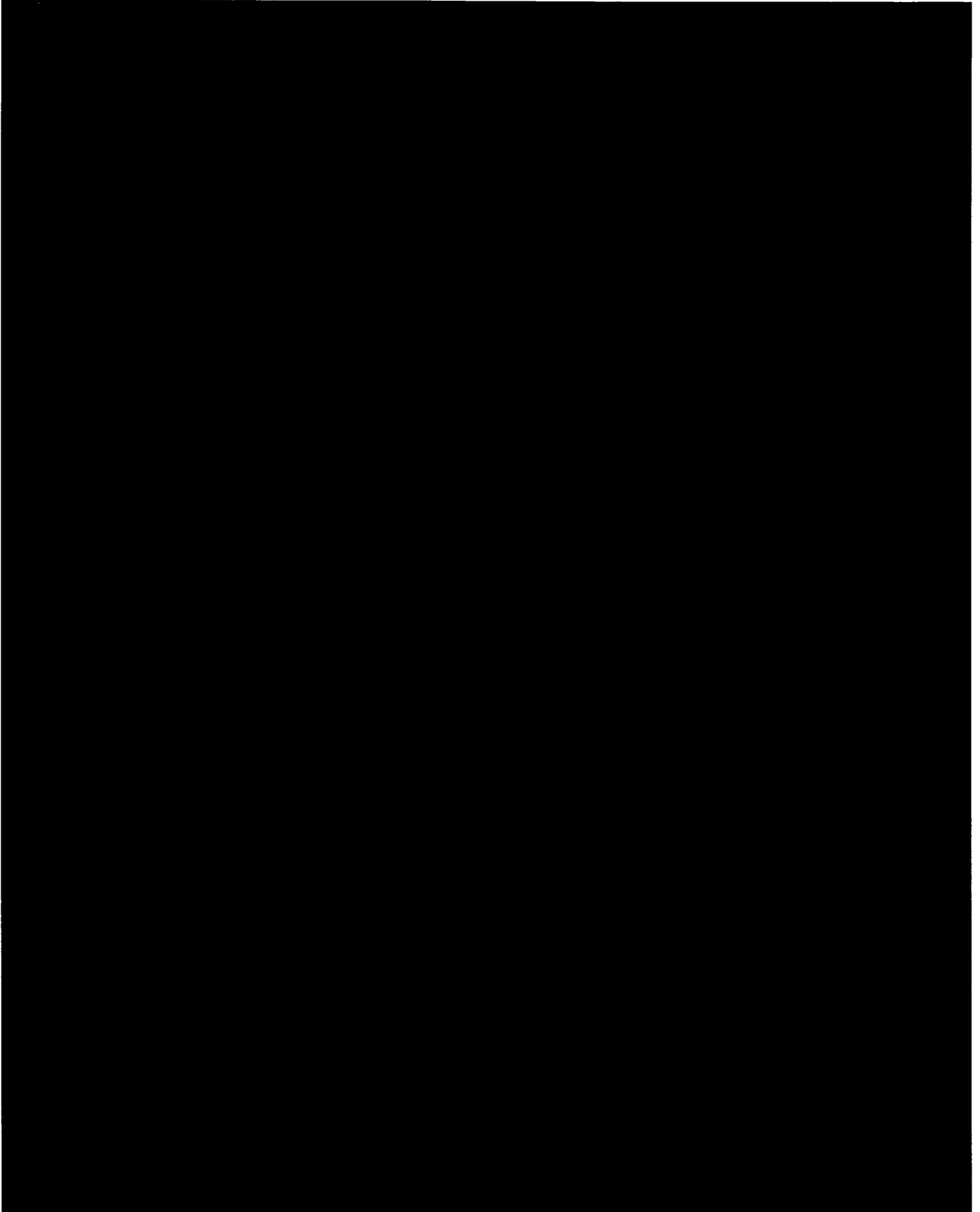


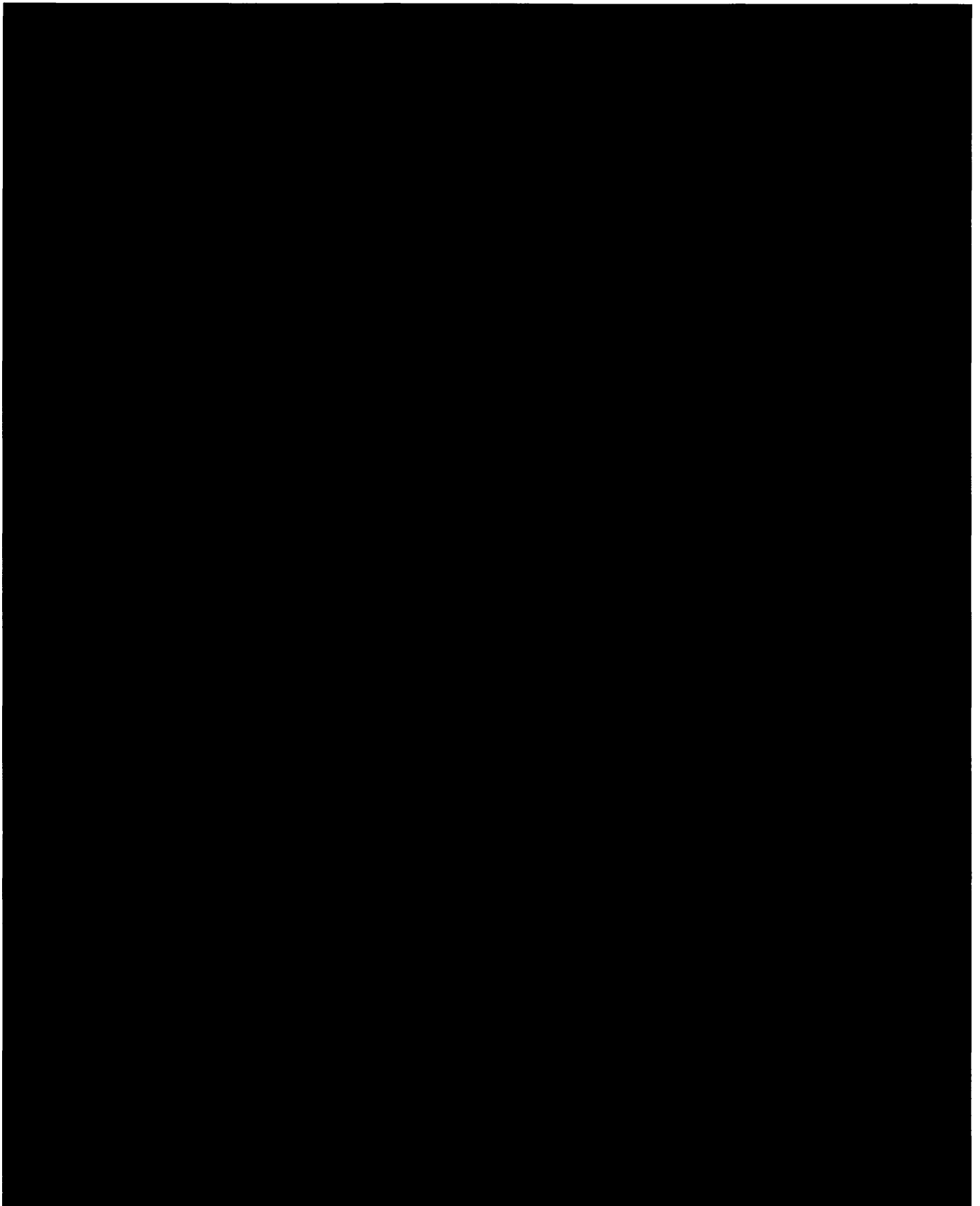


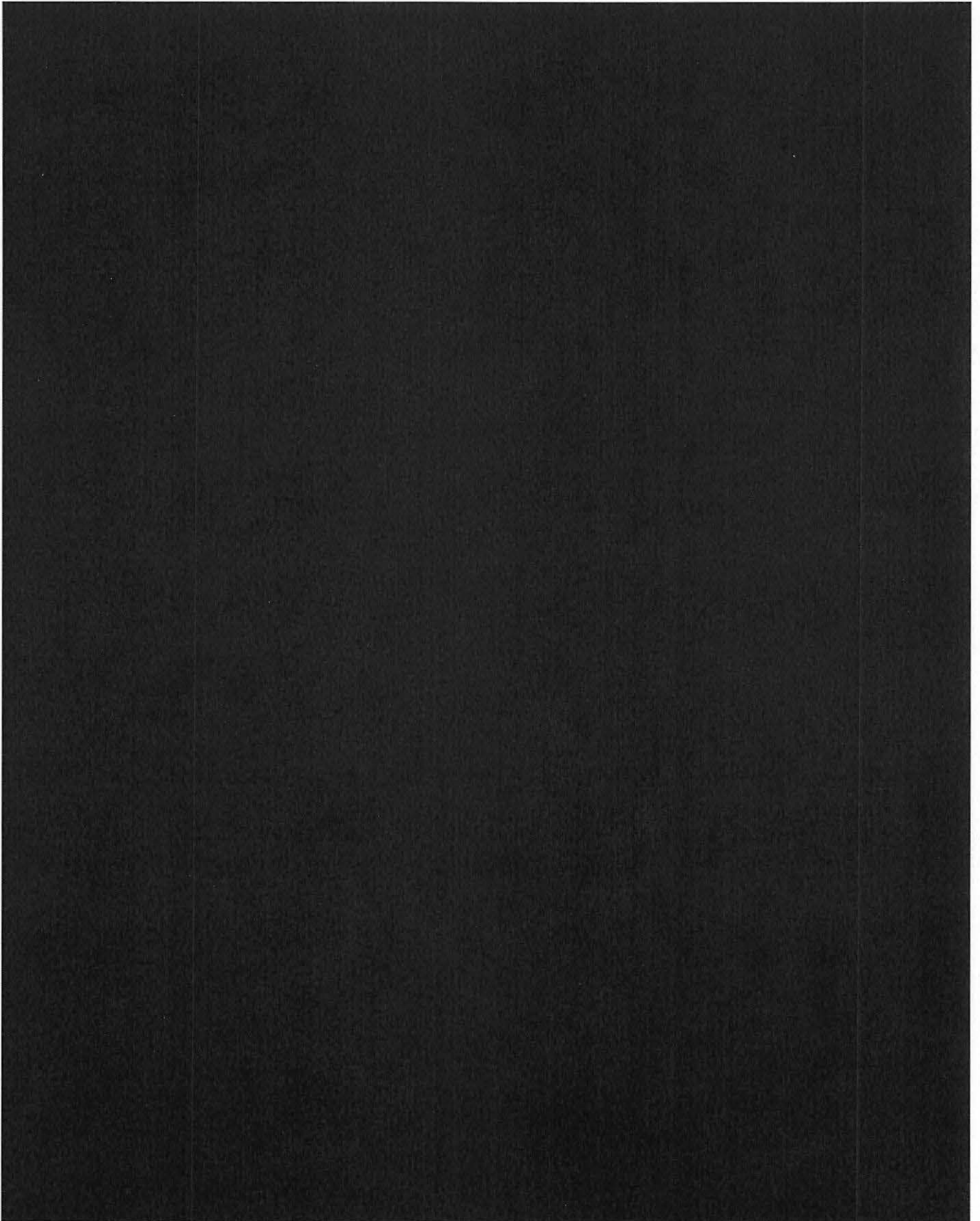


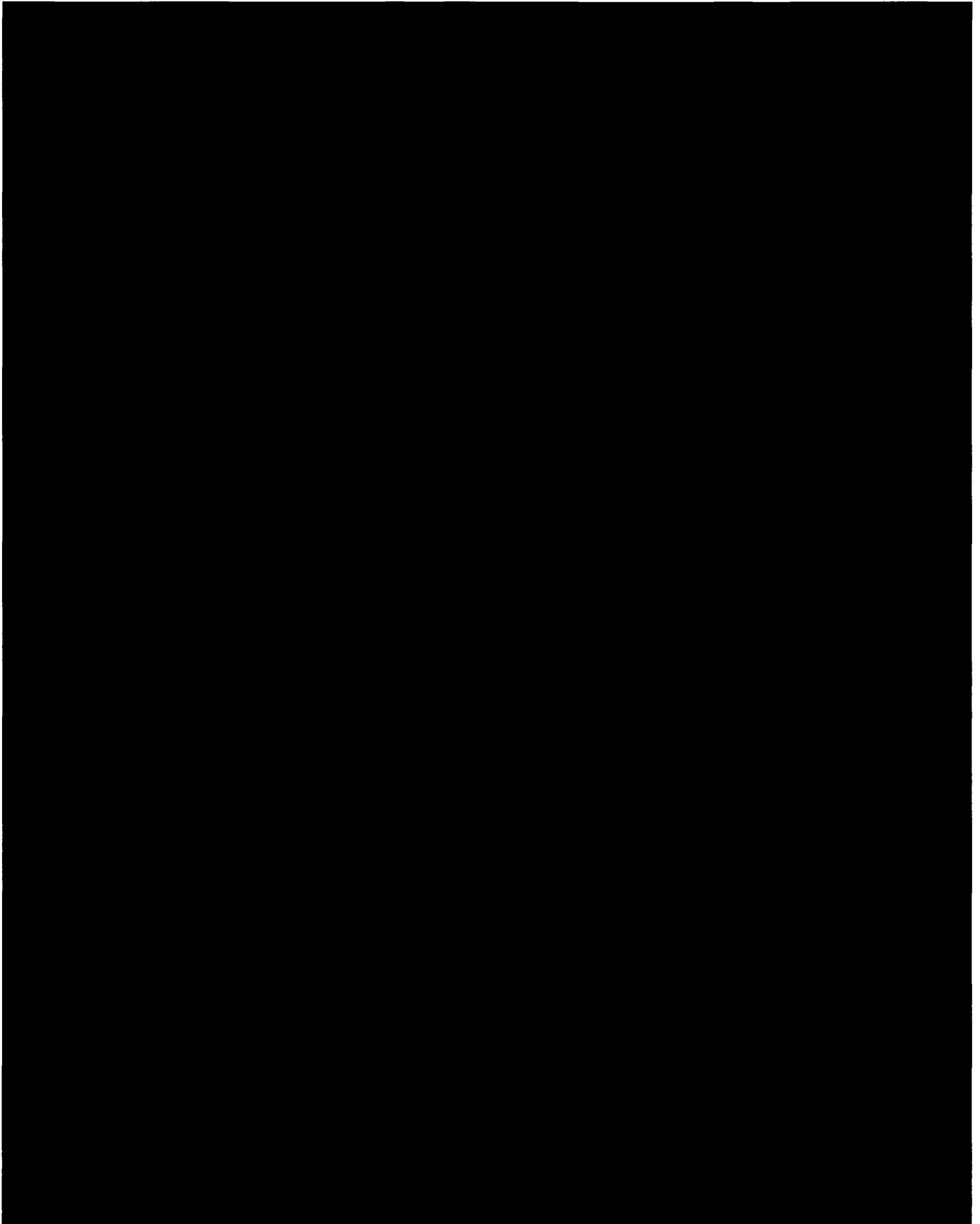












1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California do hereby certify:

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

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a federal case,
13 before completion of the proceedings, review of the
14 transcript [X] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or any of the parties.

18 IN WITNESS WHEREOF, I have this date subscribed
19 my name.

20

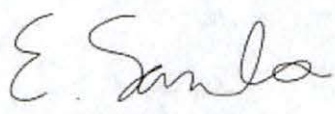
21 Dated: 22nd of May, 2025

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EMILY SAMELSON,
CSR No. 14043