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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION,

Case No. 3:21-md-02992-GPC-MSB

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May 8, 2025

10:10 1.m.

AN IN PERSON VIDEOTAPED DEPOSITION of
TERESA PESCE, an Expert herein, taken by
the respective parties, pursuant to Order,
before Larin Kaywood, a Notary Public for
and within the State of New York.

Job No.: 10163118

Teresa Pesce

In Re Bank of America CA Unemployment Benefits Litigation

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

COTCHETT, PITRE & MCCARTHY, LLP
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GOODWIN PROCTER, LLP
Attorneys for the Defendants
620 Eighth Avenue
New York, New York 10018
BY: VALERIE HAGGANS, ESQ.
ANNE BAYLY BUCK, ESQ.

Also Present: The Videographer, Richard
Morales

* * * * *

Teresa Pesce

In Re Bank of America CA Unemployment Benefits Litigation

THE VIDEOGRAPHER: Good morning. We are now on the record. Today's date is May 8th, 2025, and the time is 10:15 a.m. Eastern Time.

This is the video deposition of Teresa Pesce being taken in the matter of Bank of America California Unemployment Benefits Litigation.

This deposition is taking place at Goodwin Procter.

My name is Richard Morales, appearing for Aptus Court Reporting, located at 401 West A Street, Suite 1680, San Diego, California 92101. I'm the official videographer, and this is the only authorized video recording of the deposition.

The audio and video recording will take place at all times unless all counsel agree to go off the record.

All appearances will be noted on a stenographic record.

The court reporter today is

Teresa Pesce

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Larin Kaywood, and she may now swear
in the deponent.

T E R E S A P E S C E, having first been
duly sworn by a Notary Public for and
within the State of New York, upon being
examined, testified as follows:

THE REPORTER: Can I have your
first and last name for the record?

THE WITNESS: Teresa,
T-E-R-E-S-A. Last name, Pesce, P as
in Peter, E-S-C-E.

THE REPORTER: Got it. And
your address, please?

THE WITNESS: 12 Greenbriar
Lane, Wilton, Connecticut 06897.

THE REPORTER: And, Counsel,
whenever you are ready, you can start
your deposition.

EXAMINATION BY

MR. DANITZ:

Q. Good morning, Ms. Pesce.

A. Good morning.

Q. My name is Brian Danitz. I
represent the plaintiffs in this action.

Where are you currently

employed?

A. I'm employed for myself.

It's -- the company is called Terry Pesce & Co.

Q. You are here today because you were retained as an expert by Bank of America's attorneys, correct?

A. Yes.

Q. You are an expert in the area of financial crimes and anti-money laundering; is that correct?

A. Yes.

Q. You are not an expert in unemployment benefits programs?

A. No.

Q. Do you have experience consulting or advising regarding state or federal unemployment benefits programs?

A. No.

Q. You are not an expert in customer service?

A. No.

Q. You are not an expert in EFTA and Reg E?

A. No.

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Q. You are not an expert in claims processing under EFTA?

A. No.

Q. You have been deposed before, correct?

A. Yes.

Q. How many times?

A. This will be my fifth.

Q. And how many of those cases were you an expert for a financial institution?

A. All of them.

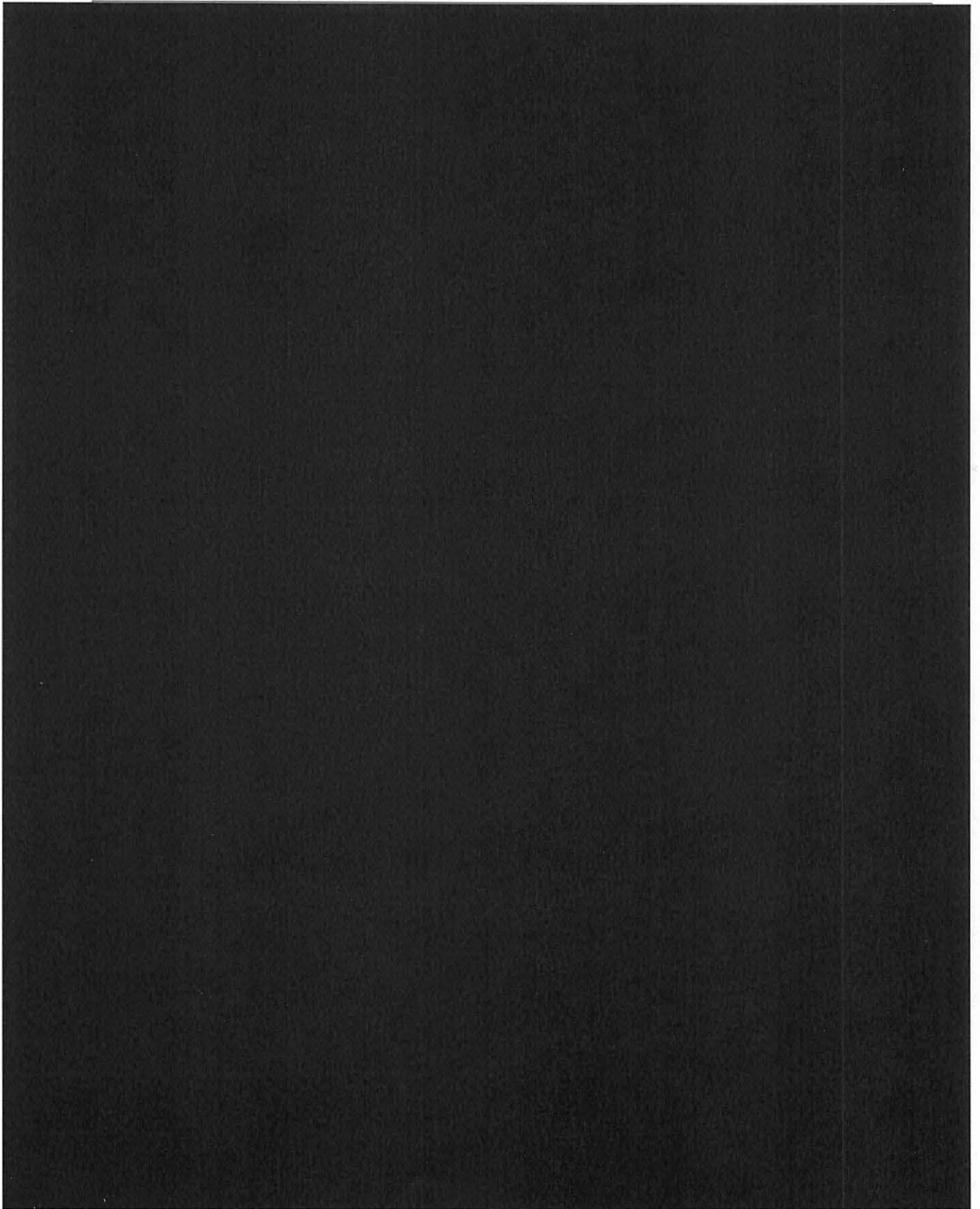
Q. And how many of them were you an expert for harmed consumers?

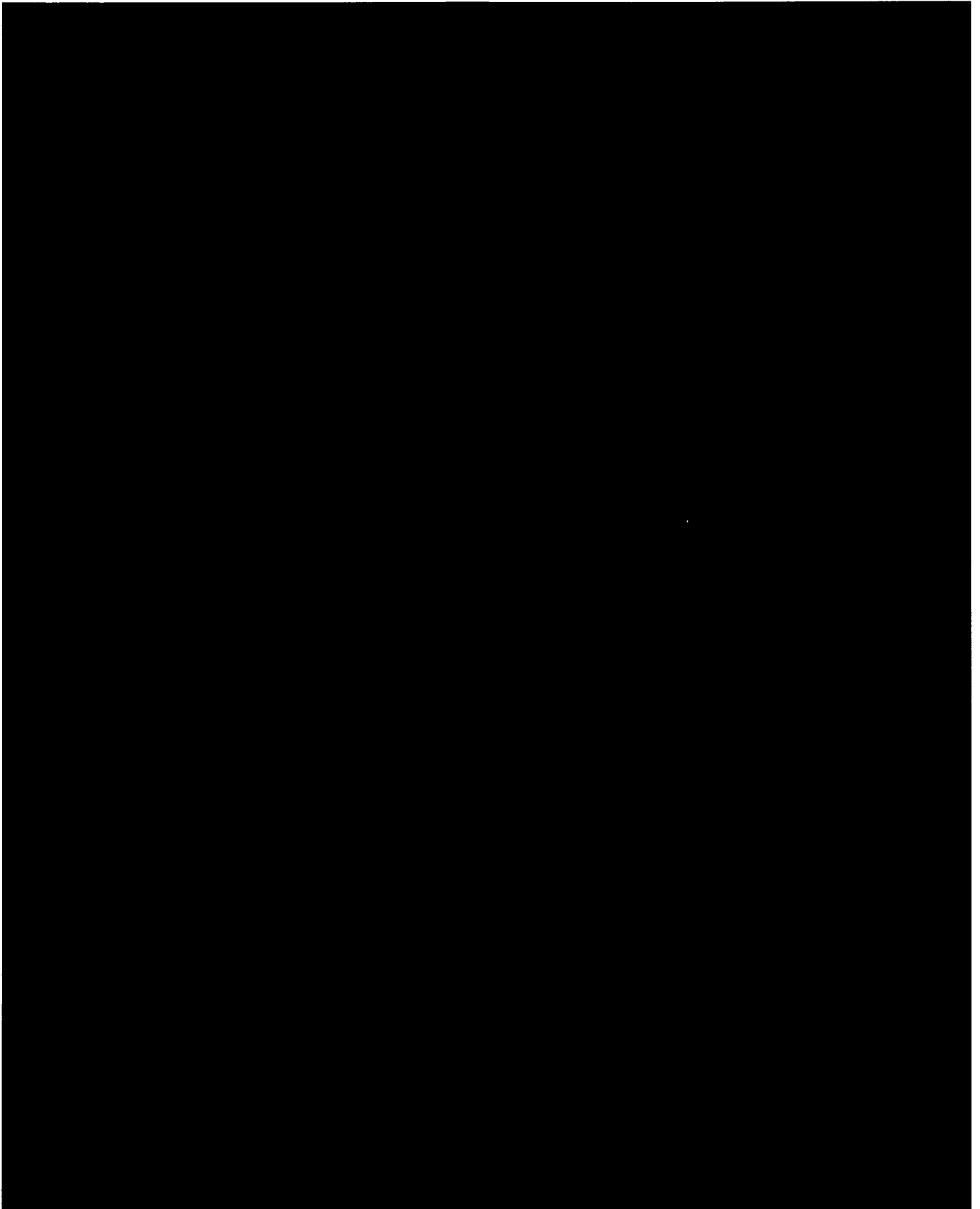
A. I was not an expert for harmed consumers. I have been contacted about being an expert on the plaintiff's side, but because of conflicts for my old employer, I was not able to take the matter.

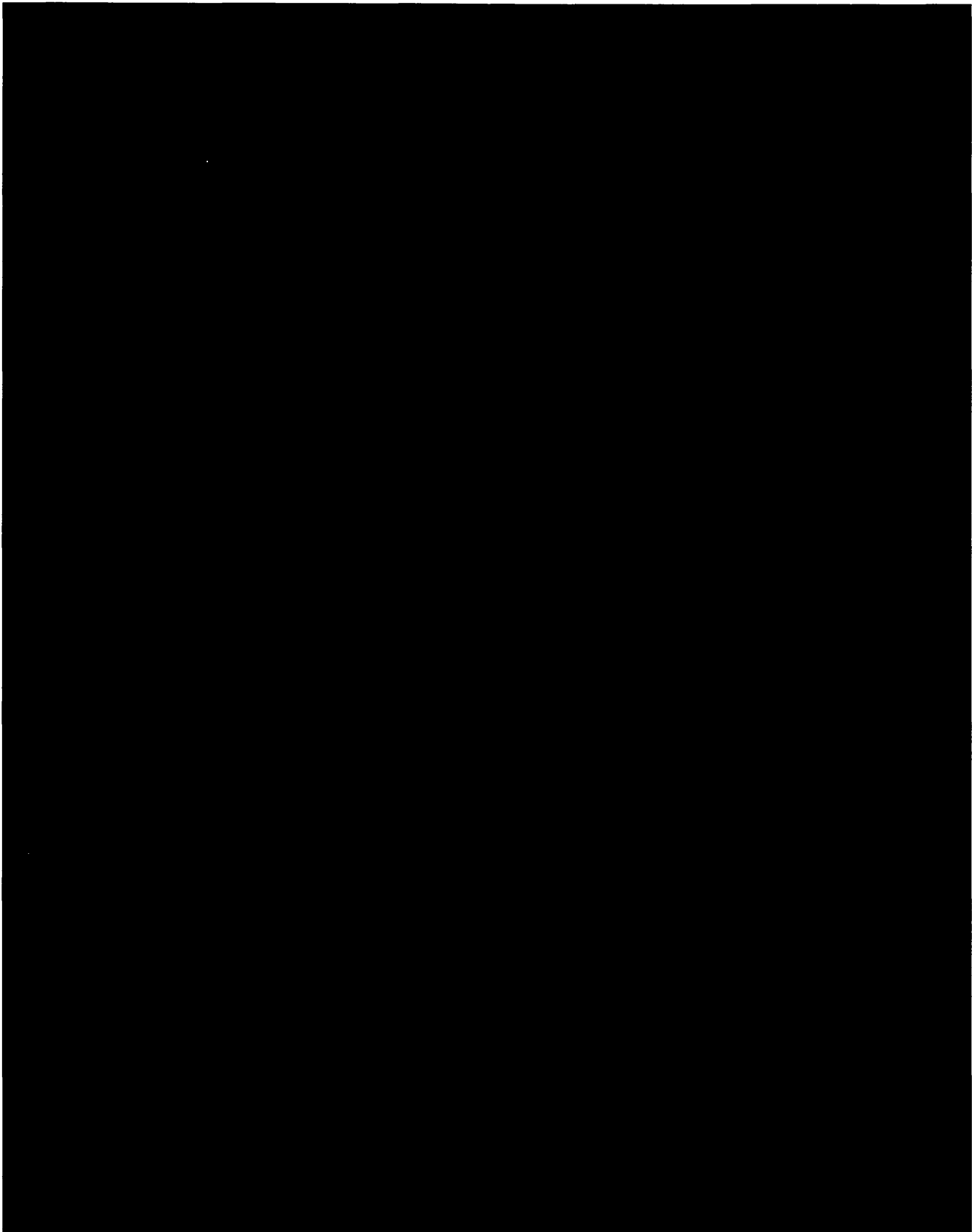
Q. You understand that you're under oath today?

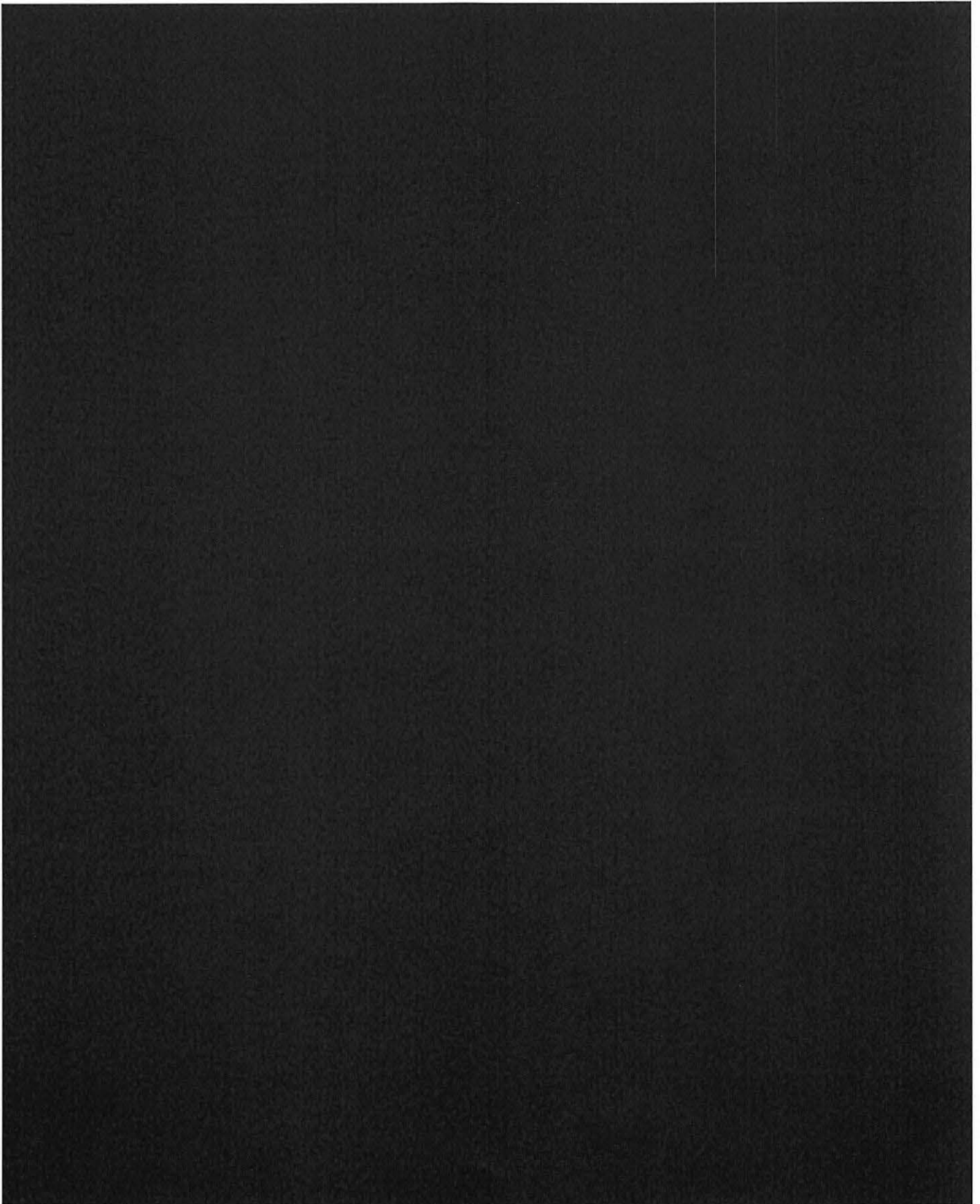
A. I do.

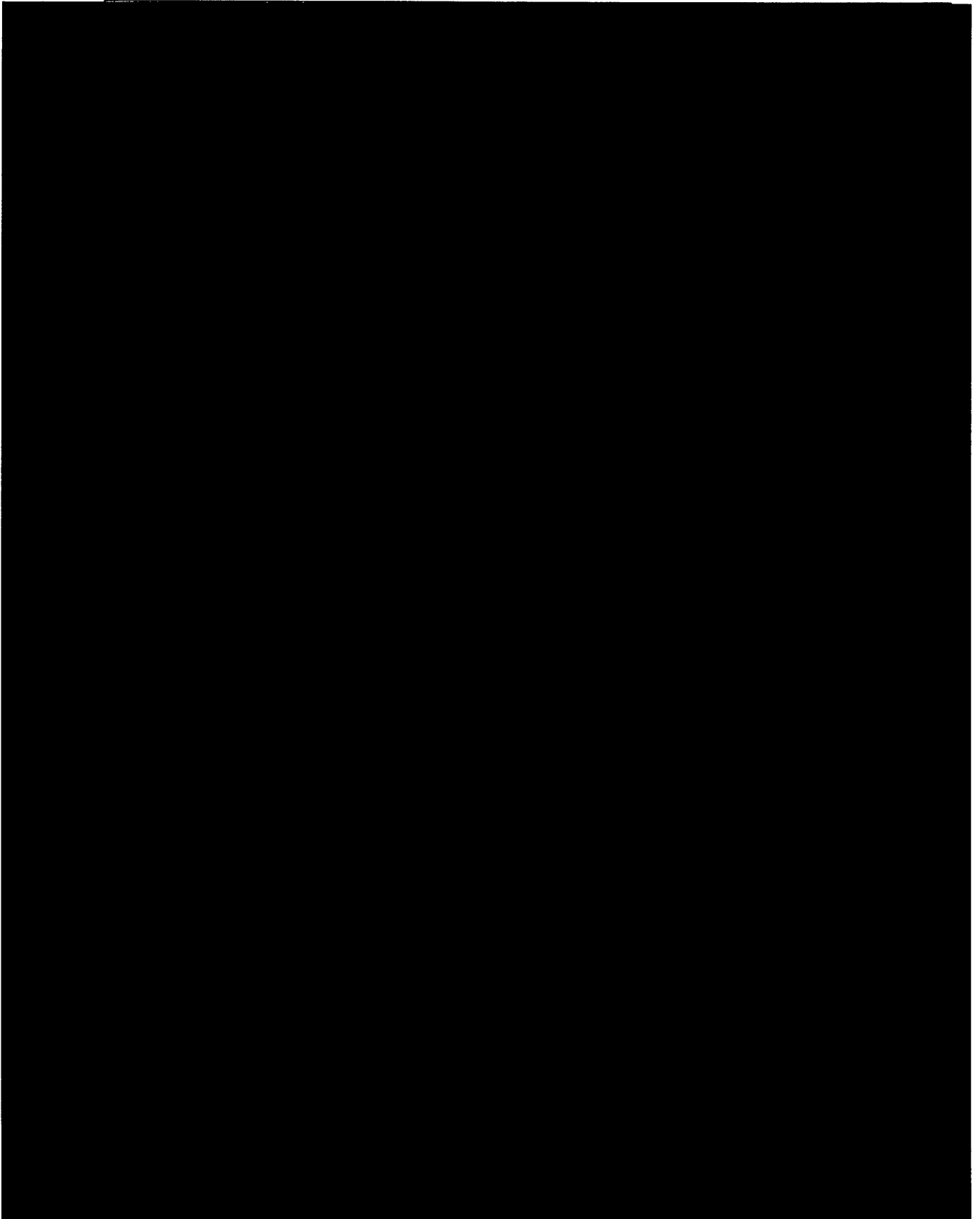
Q. And you'll remain under oath throughout the day.

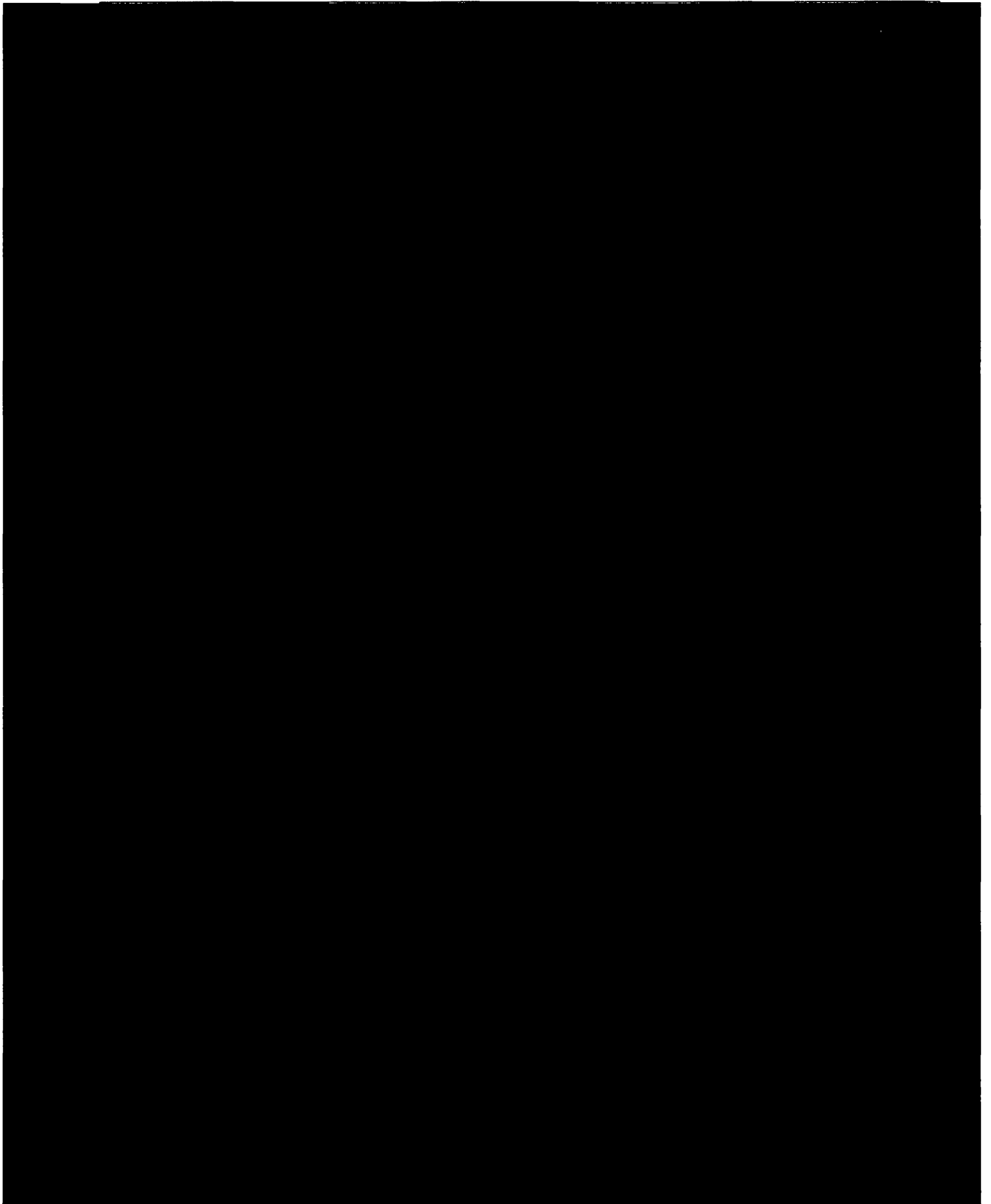


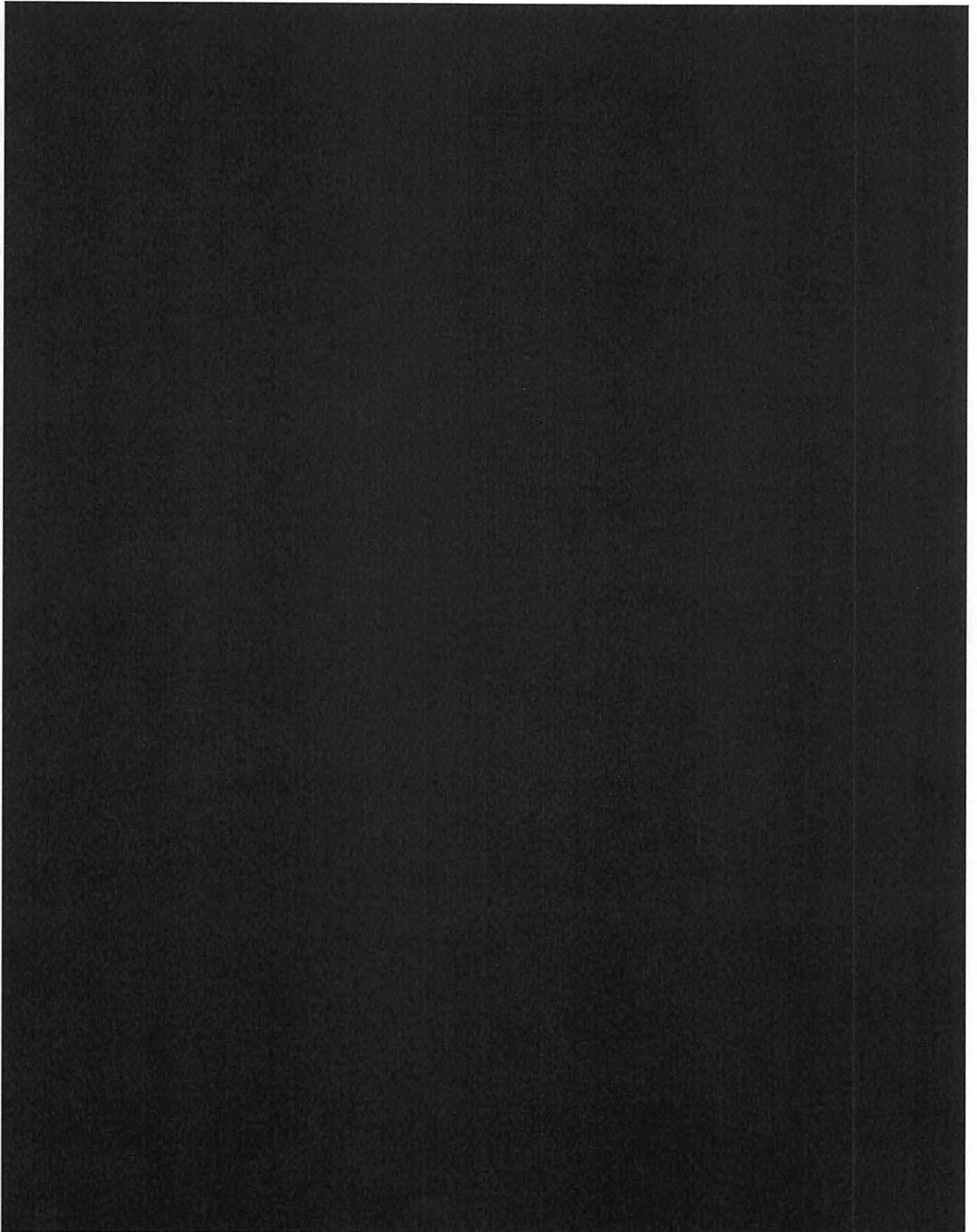


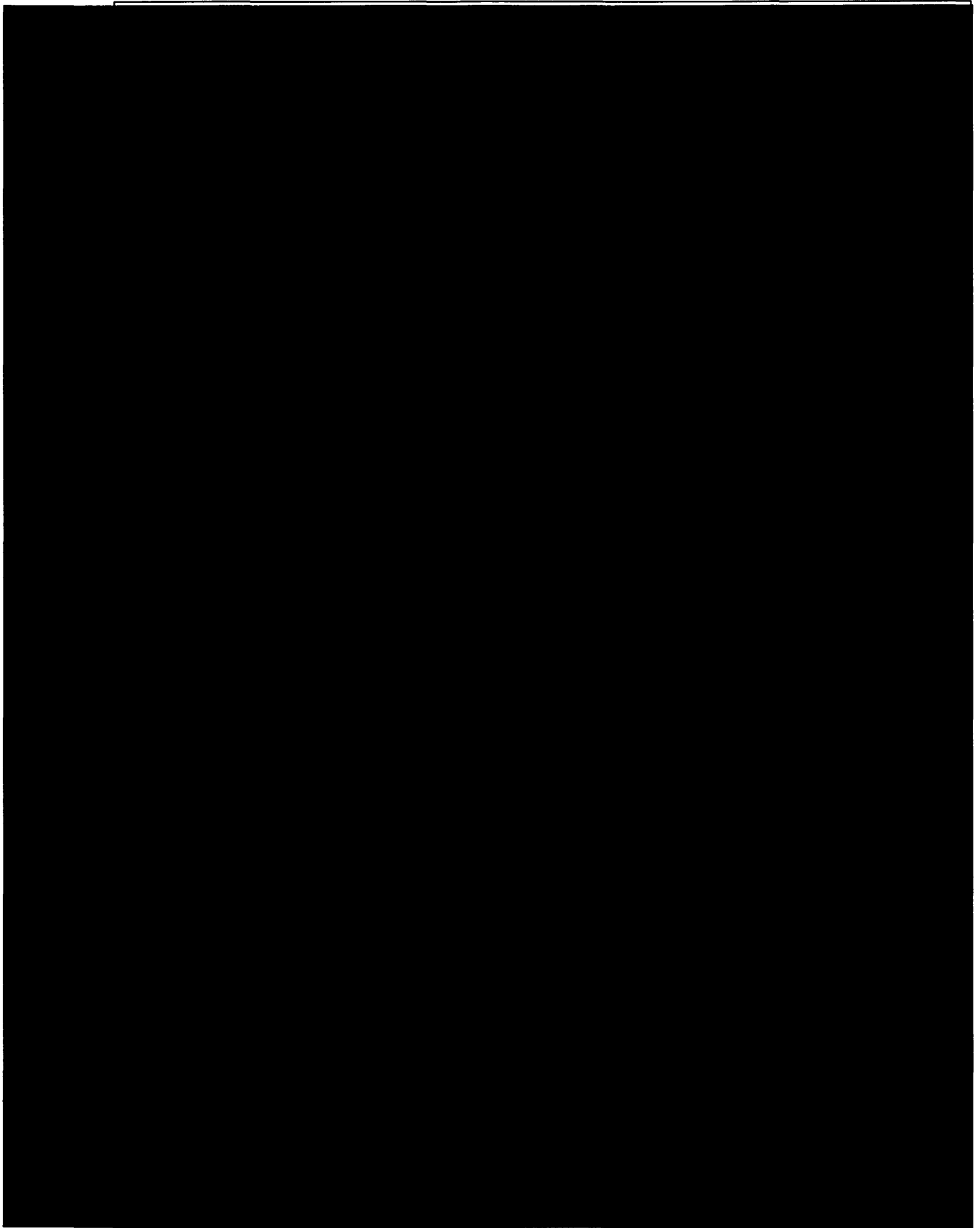


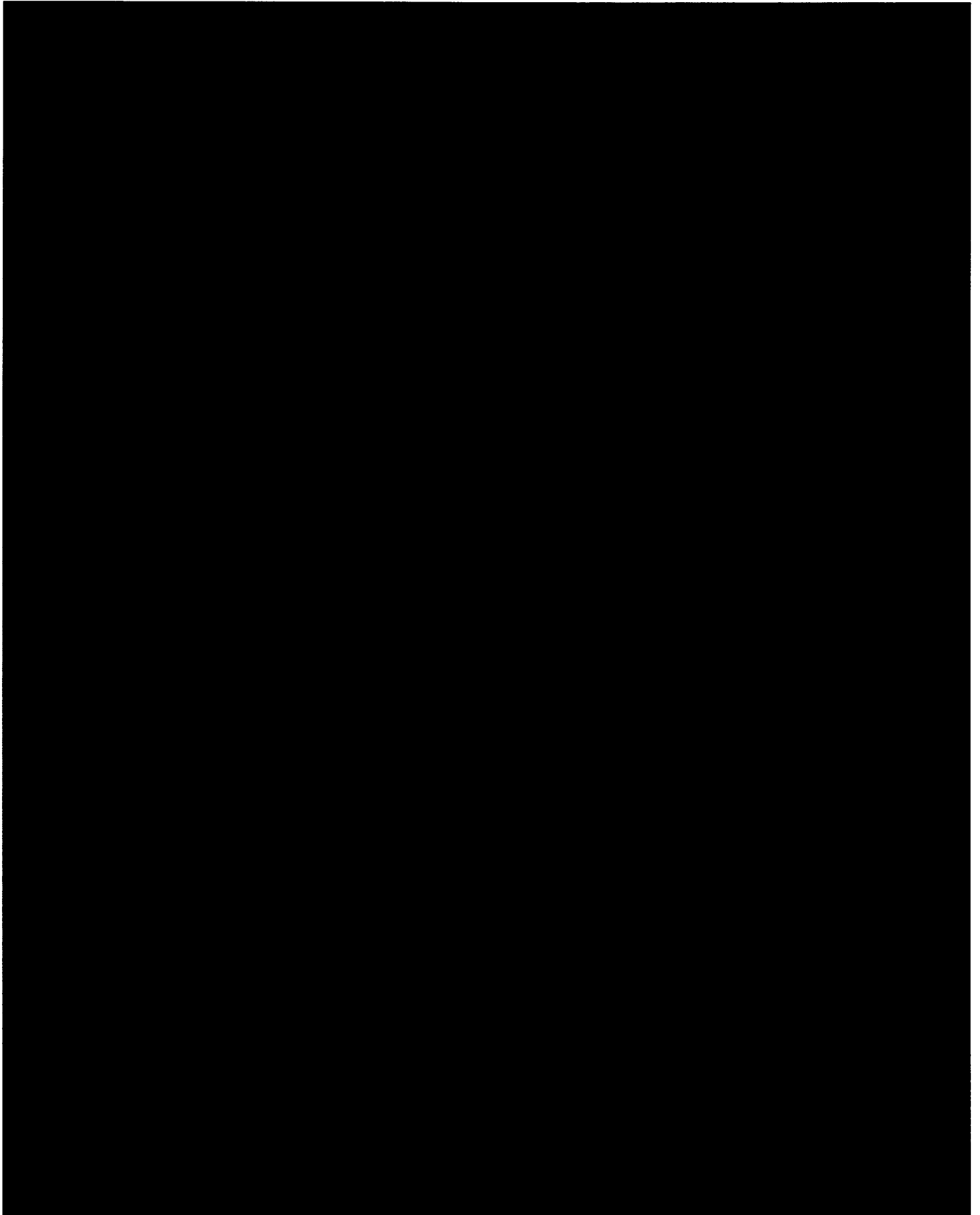


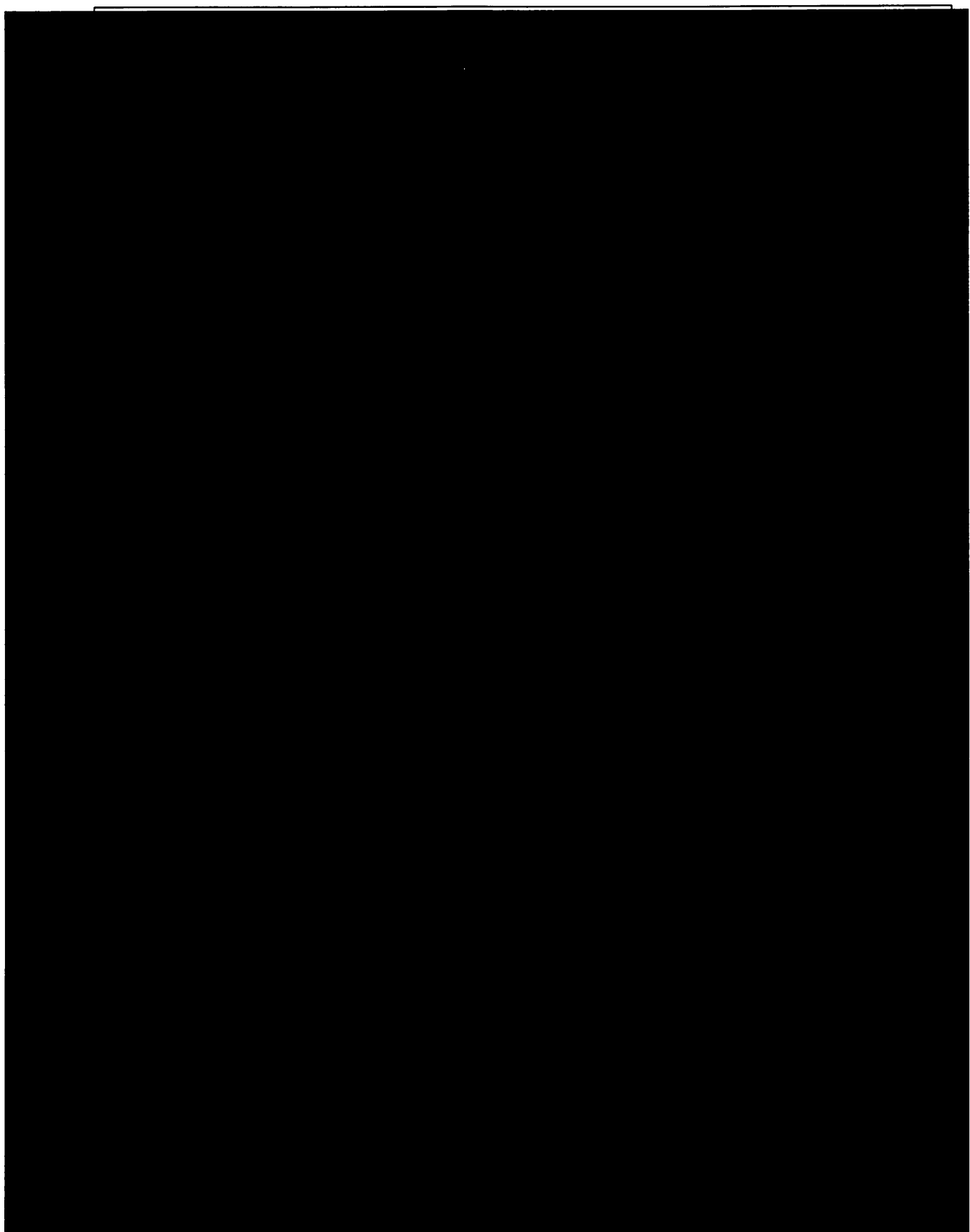


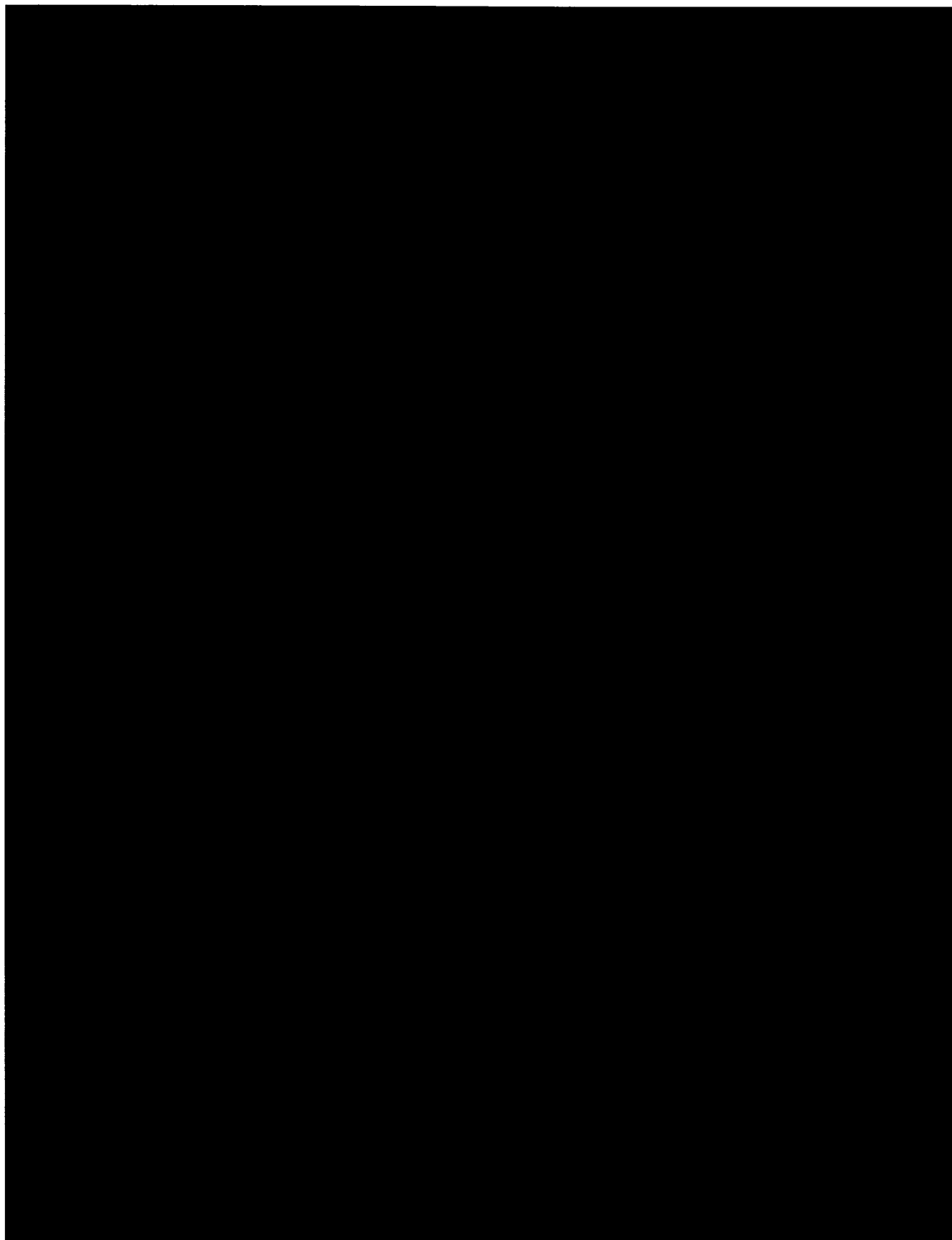












C E R T I F I C A T E

STATE OF NEW YORK)

:ss

COUNTY OF SUFFOLK)

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

That the witness whose examination is
hereinbefore set forth was duly sworn and
that such an examination is a true record
of the testimony given by such a witness.

I further certify that I am not
related to any of these parties to this
action by blood or marriage, and that I am
not in any way interested in the outcome of
this matter.

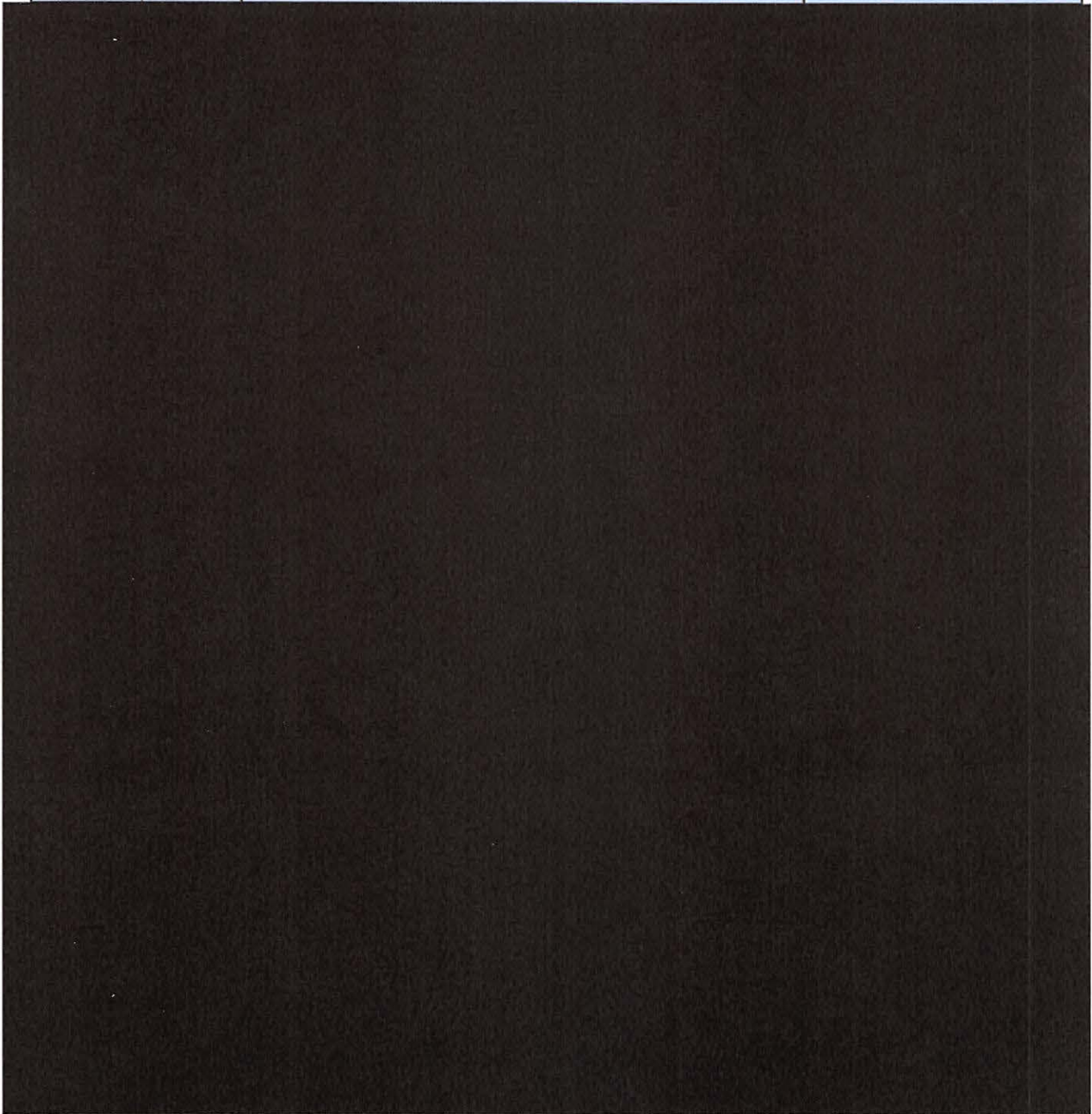
IN WITNESS WHEREOF, I have hereunto
set my hand this 8th day of May, 2025.

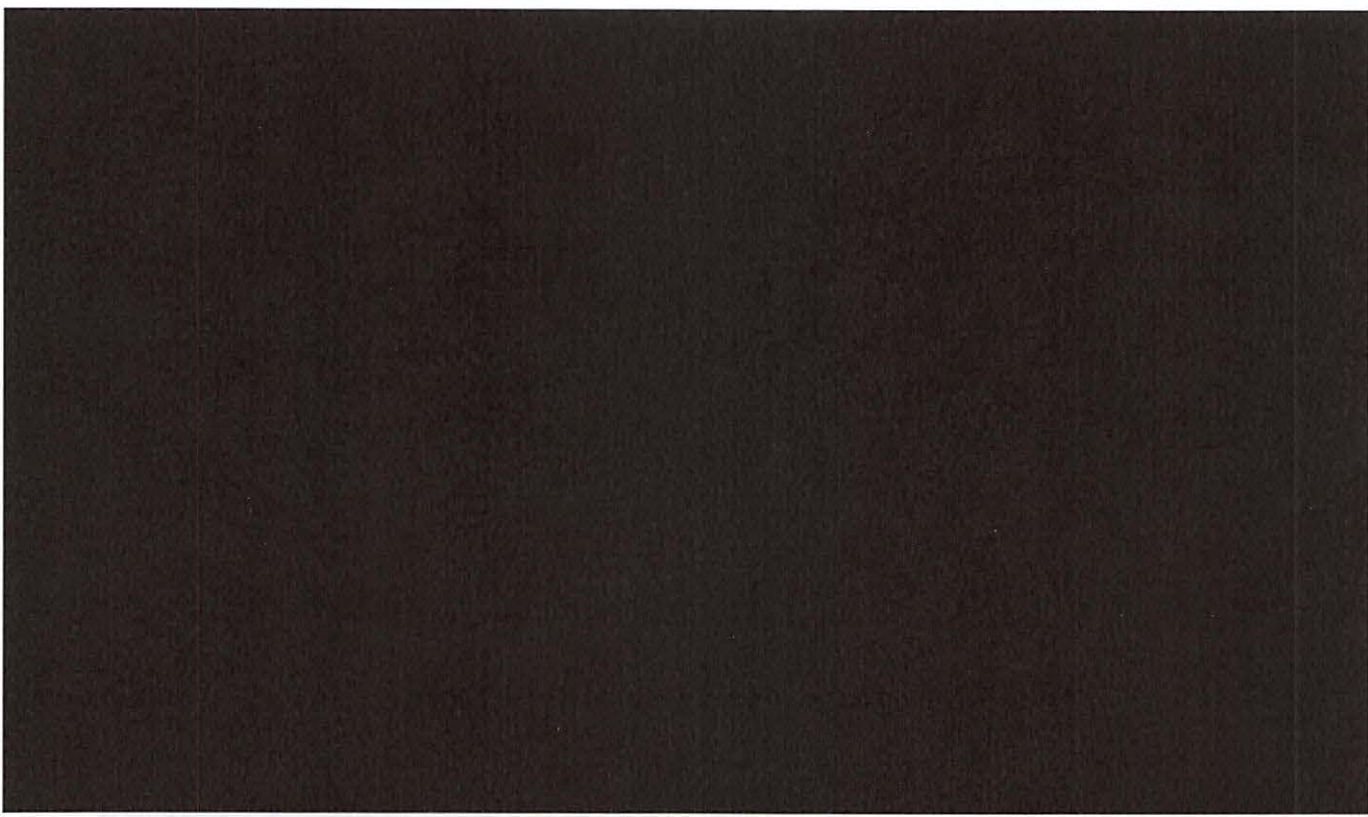
Larin Kaywood

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Errata for Deposition of Teresa Pesce, May 8, 2025

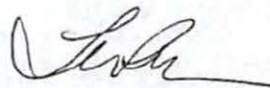
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In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. I have listed my changes on the above Errata Sheet, listing page and line numbers. I request that these changes be entered 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 26th day of August, 2025.



Teresa Pesce