

PX 31

IN THE 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

REMOTE VIDEOTAPED DEPOSITION OF  
PAMELA ANN JOSEPH

May 12, 2025  
11:11 a.m.

(All attendees appeared remotely via  
teleconferencing and/or videoconferencing.)

Elizabeth R. Hollingsworth, CCR B-1319

Job No.: 10163119

Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

CONNIE K. CHAN, Esquire  
COLIN C. JONES, Esquire  
Altshuler Berzon, LLP  
177 Post Street  
Suite 300  
San Francisco, California  
415.421.7151  
cchan@altber.com  
cjones@altber.com

On behalf of Bank of America, N.A.:

YVONNE W. CHAN, Esquire  
VICTORIA PETRIMOULX, Esquire  
Jones Day  
100 High Street  
21st Floor  
Boston, Massachusetts 02110  
617.960.3939  
ychan@jonesday.com  
vpetrimoulx@jonesday.com

On behalf of Individual Plaintiffs:

JOSHUA B. SWIGART, Esquire  
Swigart Law Group, APC  
2221 Camino Del Rio S  
Suite 308  
San Diego, California 92108  
866.219.3343  
josh@swigartlawgroup.com

Videographer:

Cole Holland

Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

(REPORTER'S NOTE: To the greatest extent possible, this transcript is an exact record of the above-referenced videotaped deposition. So that the attorneys and parties may rely on the transcript to accurately forecast the actual videotape, all words, including false starts, misstatements, and questions later stricken by the questioning attorney, have been included. Only those portions of the proceedings which were specifically designated as off-the-record discussions have been omitted.)

Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

Remote Videotaped Deposition of Pamela Ann Joseph

May 12, 2025

THE VIDEOGRAPHER: We are now on the record. Today's date is May 12th, 2025, and the time is 11:11 a.m.

This is the remote video deposition of Pamela Joseph via Zoom video conference being taken in the matter of In Re: Bank of America California, Unemployment Benefits Litigation on behalf of the Plaintiff. This is pending in the United States District Court, Southern District of California. This is Case No. 3:21-md-02992-GPC-MSB.

The witness is appearing remotely from Boston, Massachusetts.

My name is Cole Holland 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 this deposition. The audio and video recording will take place at all times unless all counsel agree to go off the record.

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

Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

MS. CONNIE CHAN: Good morning. Connie Chan of Altshuler Berzon on behalf of the Plaintiffs.

MS. YVONNE CHAN: Good morning. This is Yvonne Chan from Jones Day on behalf of the Defendant and the witness. And also with me today is my associate Victoria Petrimoulx also from Jones Day. Thank you.

THE VIDEOGRAPHER: The court reporter today is Libby Hollingsworth. And she may now swear in or affirm the deponent.

PAMELA ANN JOSEPH,  
being first duly sworn, was examined and testified as follows:

CROSS-EXAMINATION

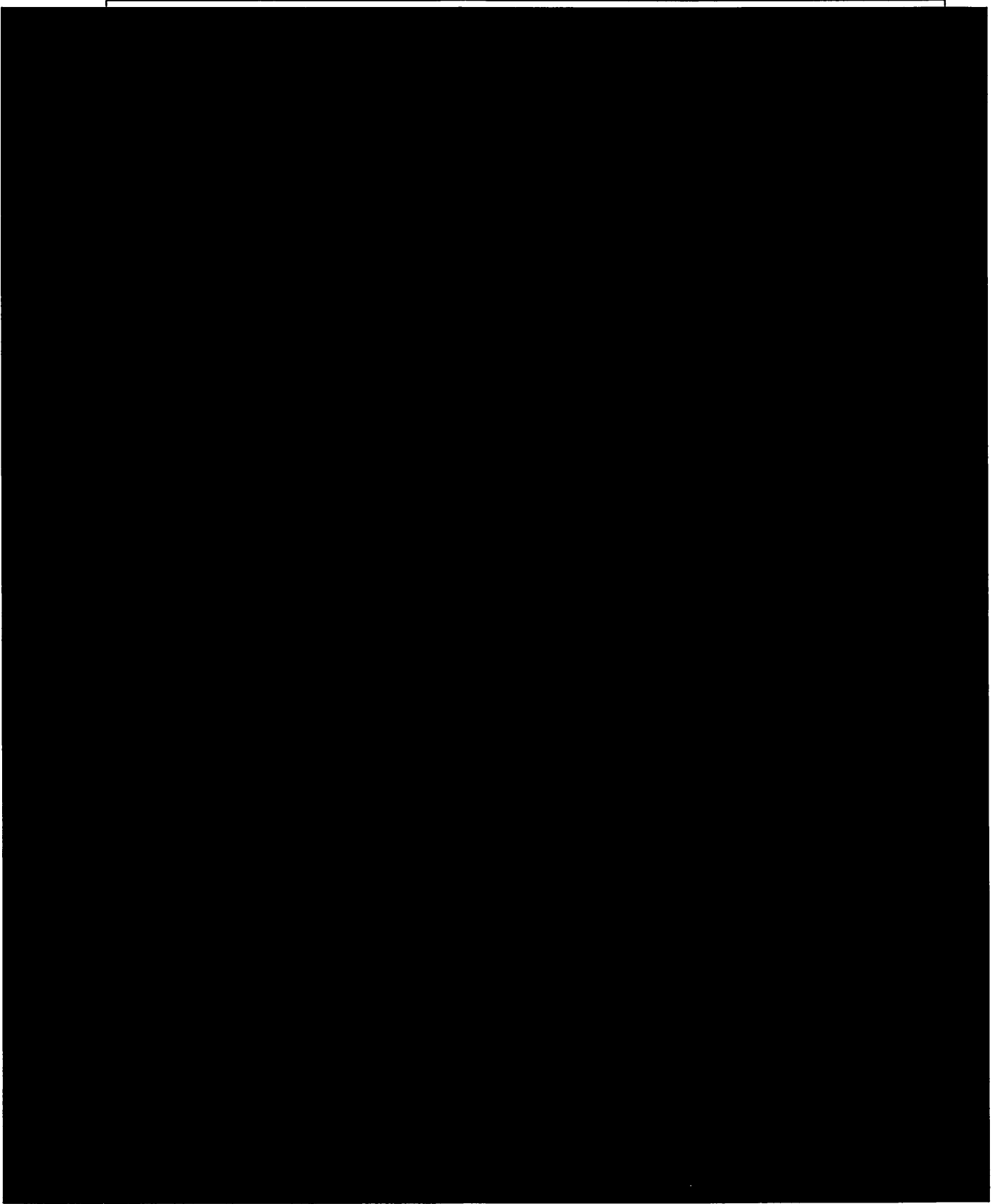
BY MS. CONNIE CHAN:

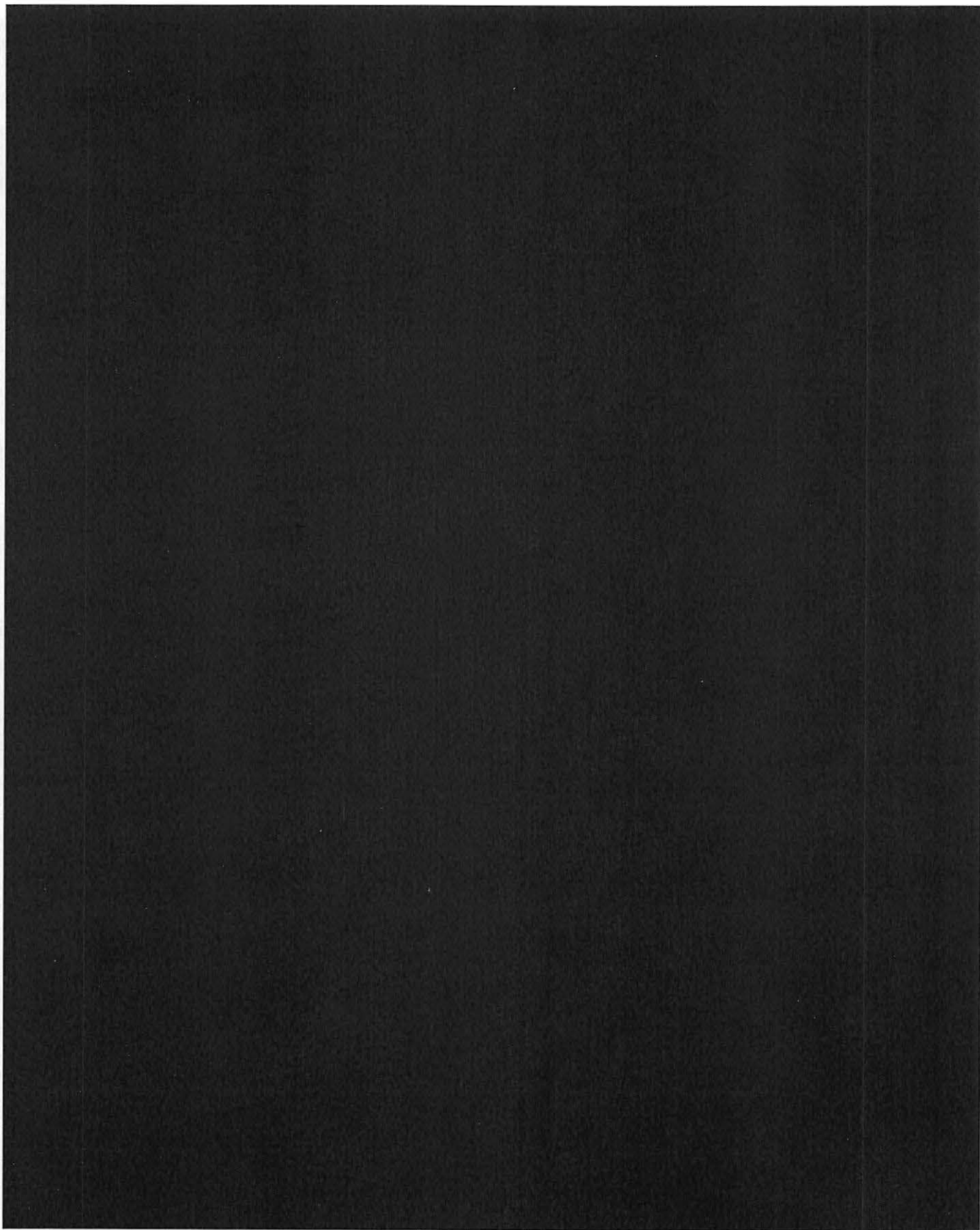
Q Good morning, Ms. Joseph. We met just a moment ago. Again, my name is Connie Chan, and I represent the Plaintiffs in this action. Thank you very much for being here today.

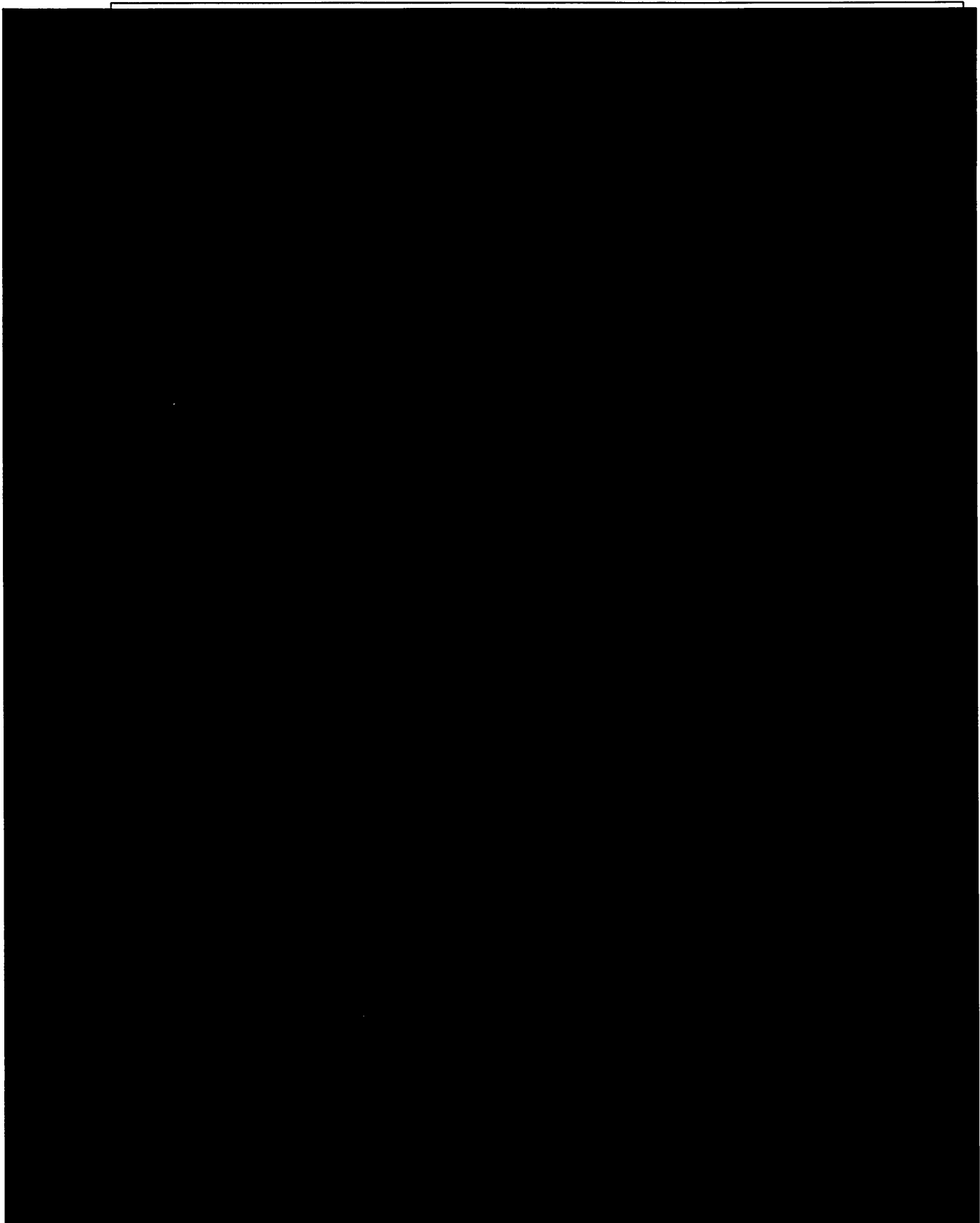
You are here today because you were retained as an expert by Bank of America's attorneys in this matter; correct?

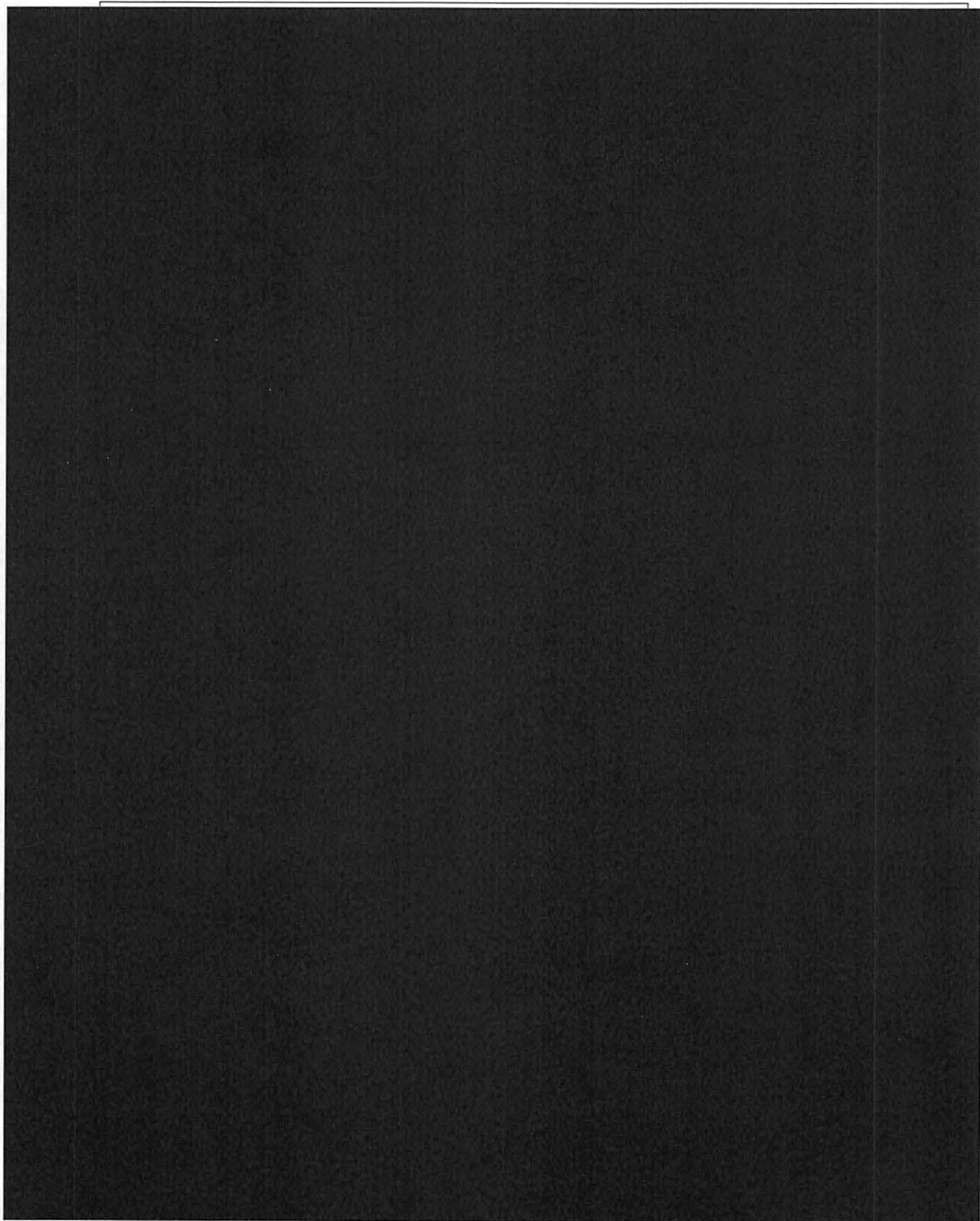
A Correct.

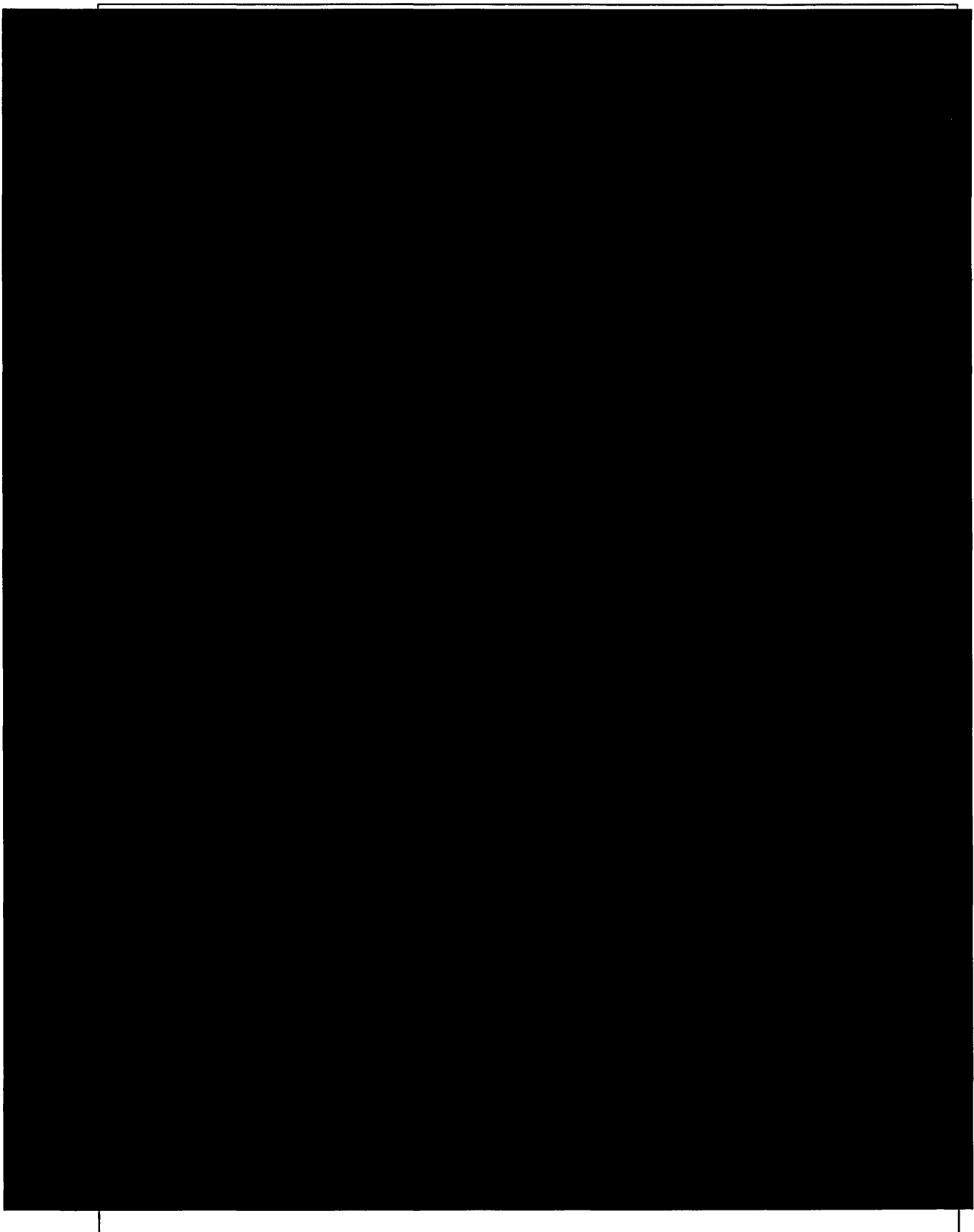
Q Have you been deposed before?

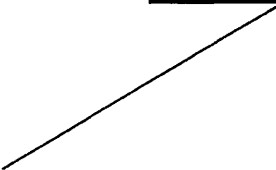
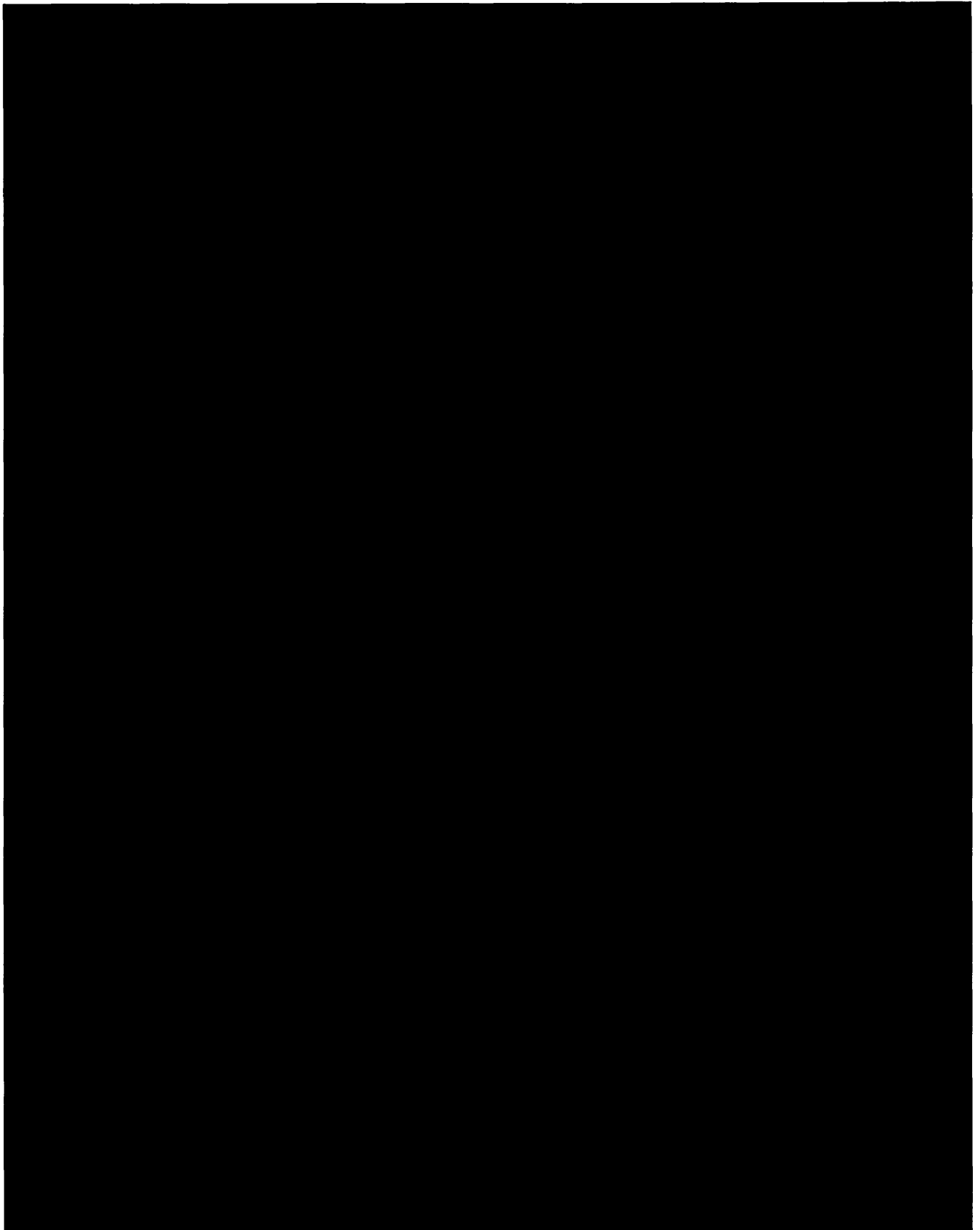


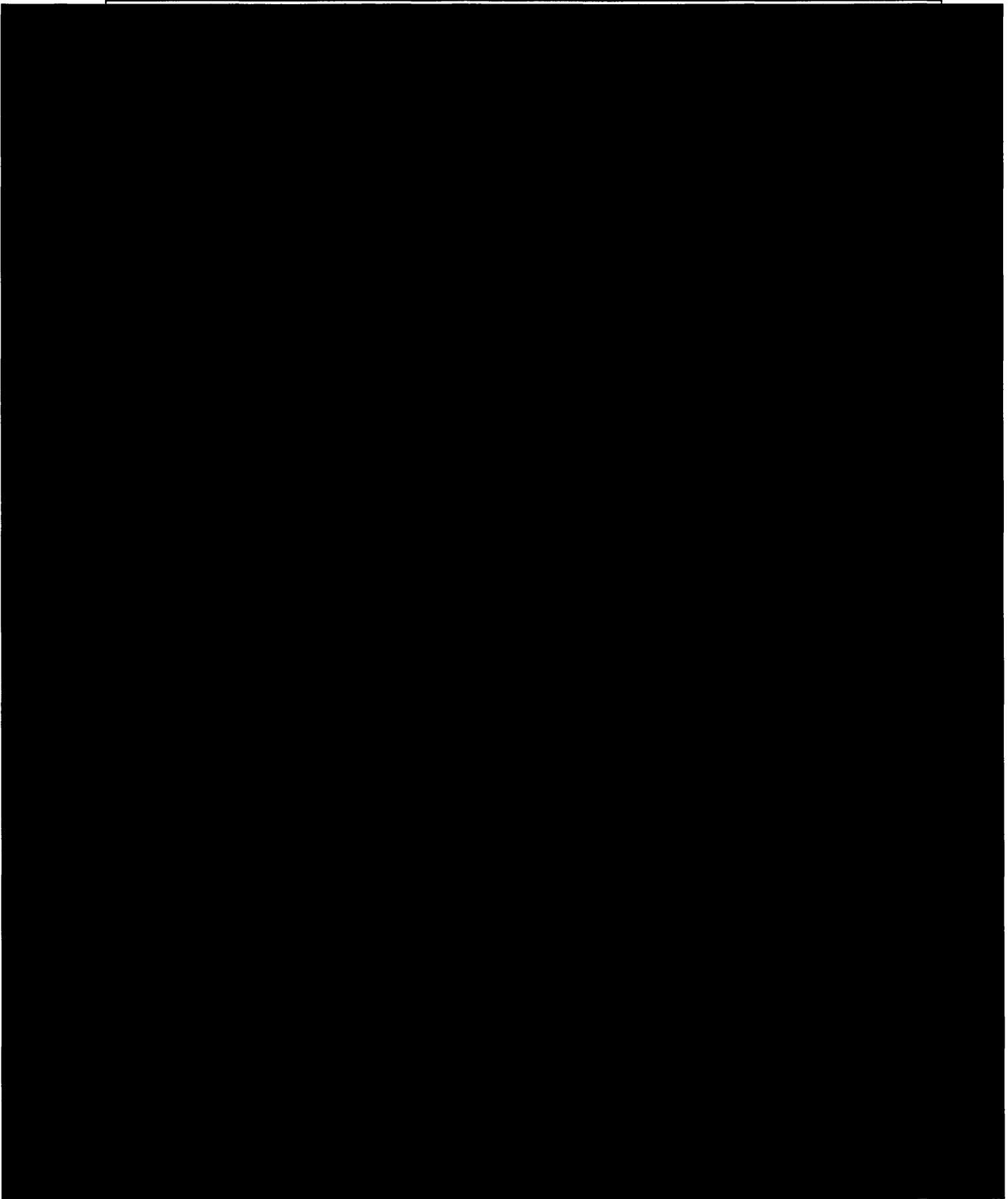


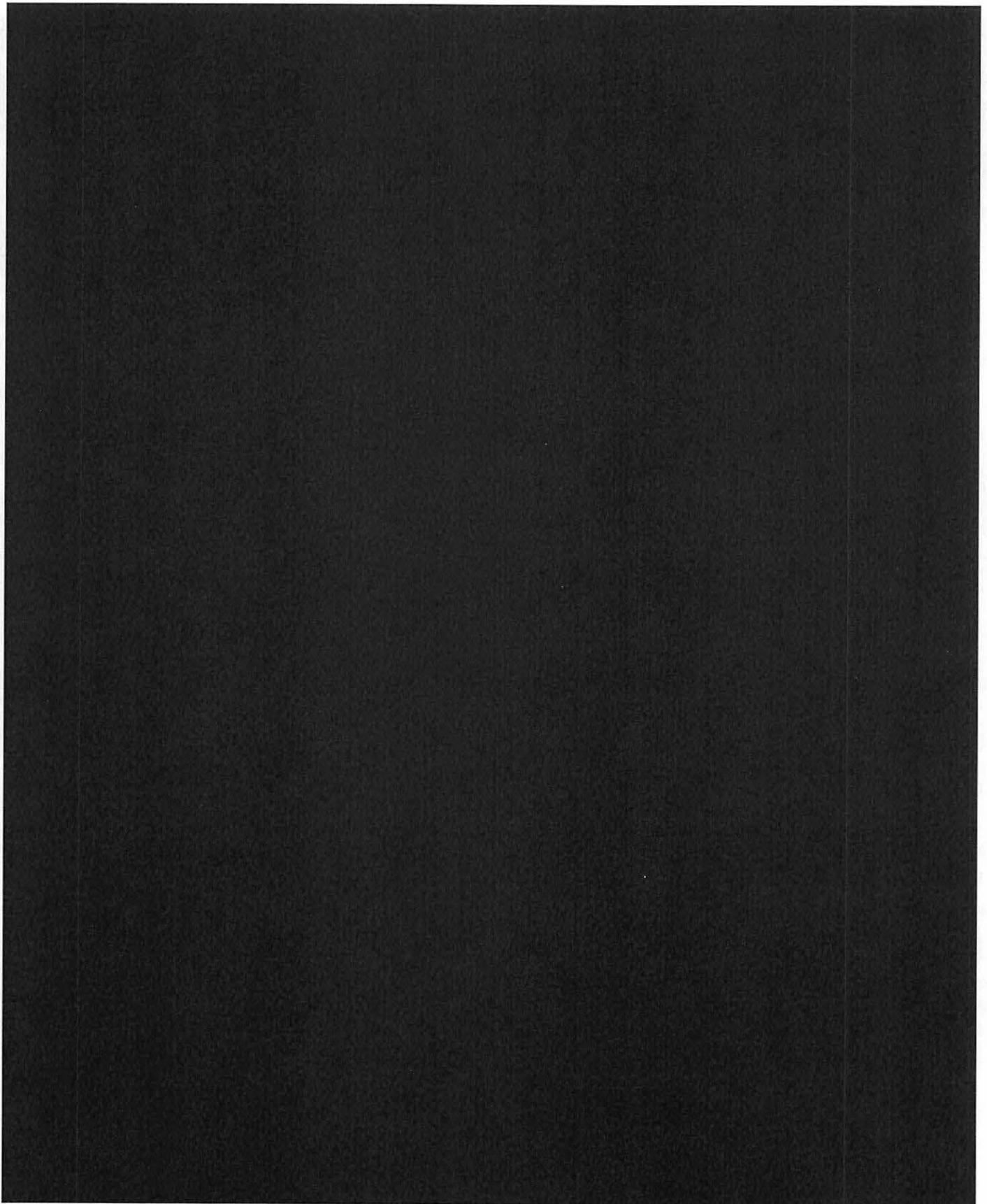


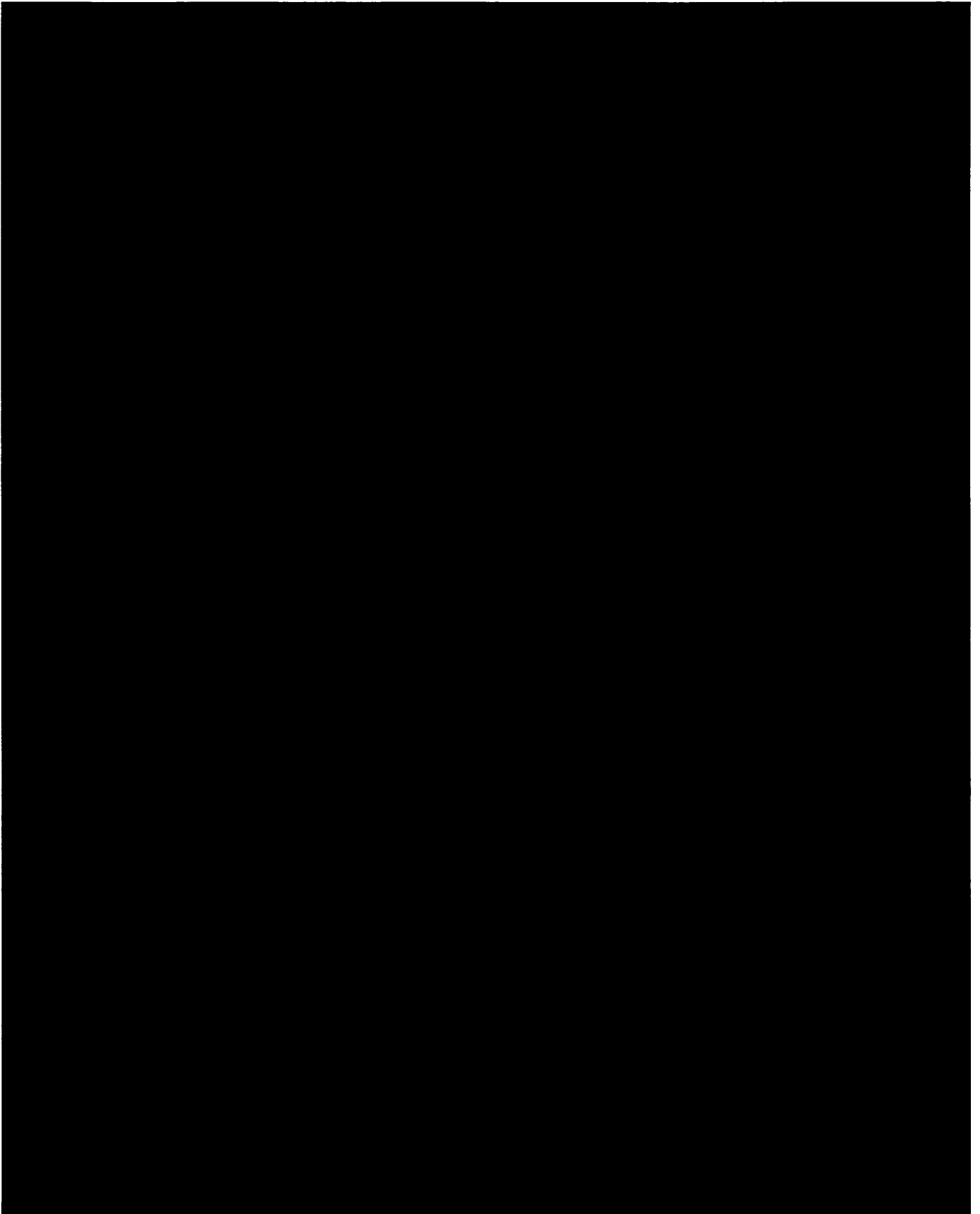


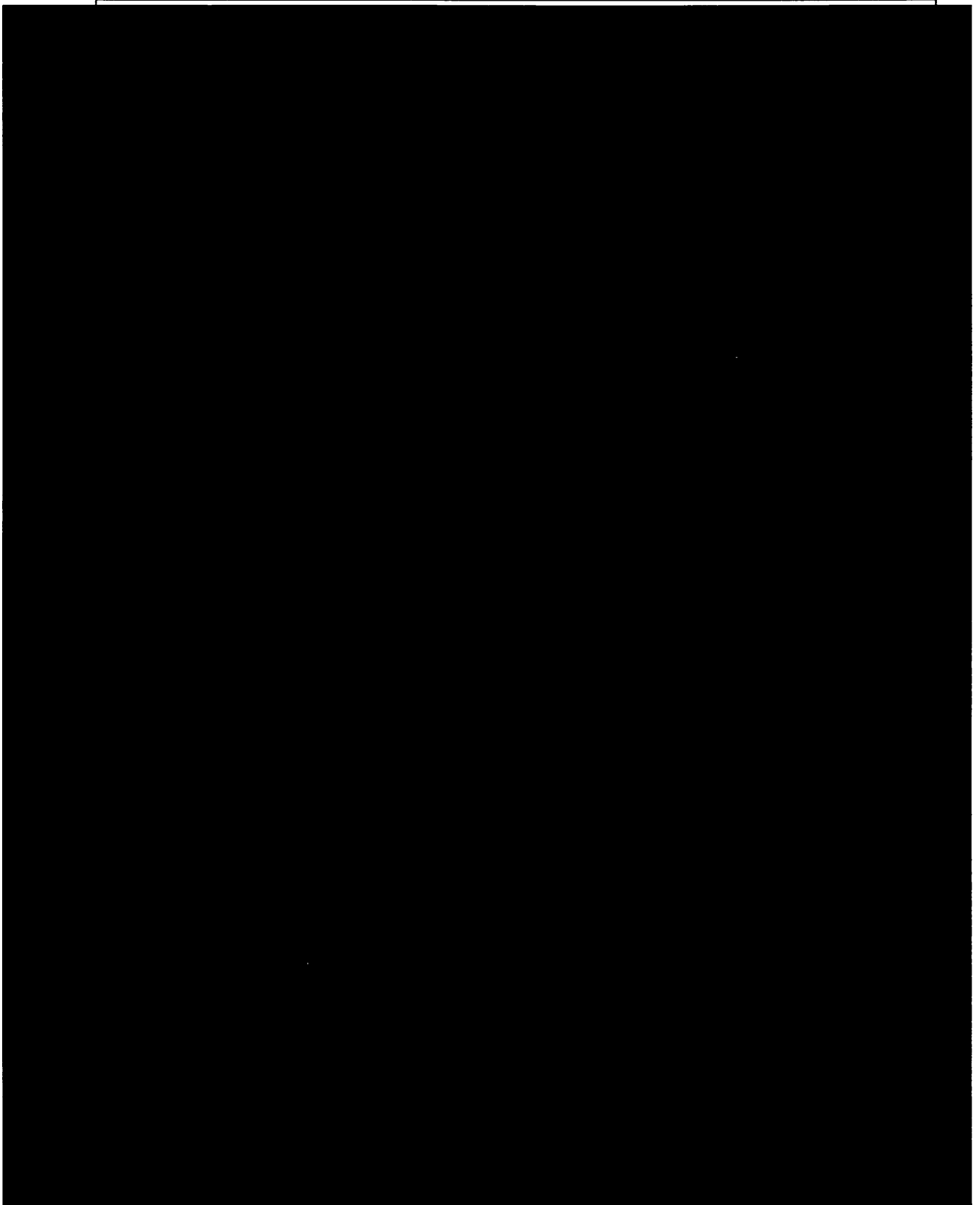












COURT REPORTER CERTIFICATE

STATE OF GEORGIA:

COUNTY OF DEKALB:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the proceedings were reduced to typewriting under my direction and control; that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said deposition; and I further certify that I am not of kin or counsel to the parties in the case; am not in the employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This, the 28th day of May, 2025.



Elizabeth R. Hollingsworth, CCR B-1319

Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

DECLARATION UNDER PENALTY OF PERJURY

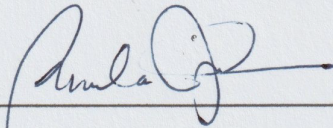
Case Name: In Re Bank of America CA Unemployment Benefits  
Litigation

Date of Deposition: 05/12/2025

Job No.: 10163119

I, PAMELA ANN JOSEPH, hereby certify  
under penalty of perjury under the laws of the State of  
Massachusetts that the foregoing is true and correct.

Executed this 25 day of  
June, 2025, at \_\_\_\_\_.



PAMELA ANN JOSEPH

NOTARIZATION (If Required)

State of \_\_\_\_\_

County of \_\_\_\_\_

Subscribed and sworn to (or affirmed) before me on

this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,

by \_\_\_\_\_, proved to me on the

basis of satisfactory evidence to be the person

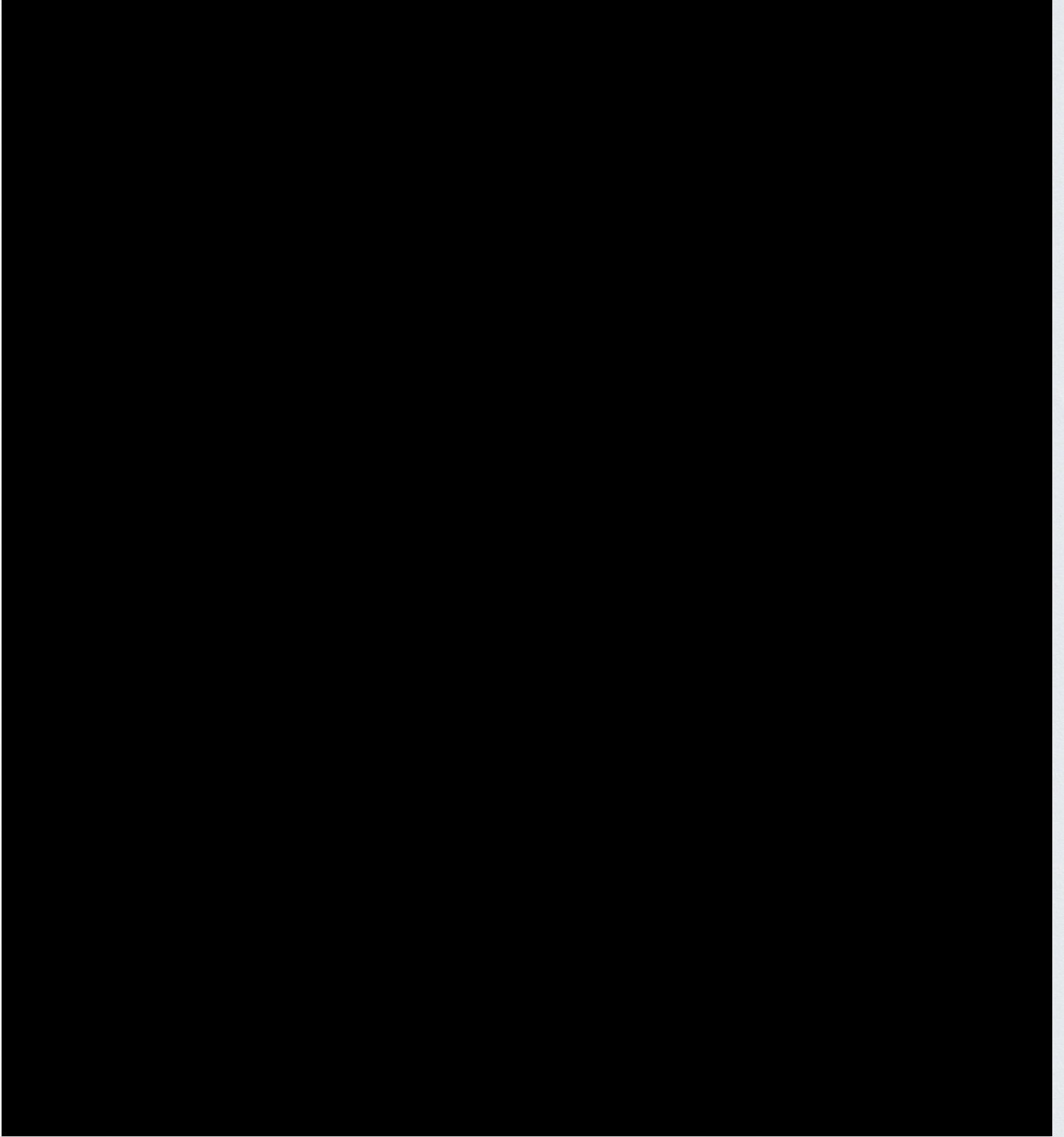
who appeared before me.

Signature: \_\_\_\_\_ (Seal)

Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits Litigation

1 DEPOSITION ERRATA SHEET  
2 Case Name: In Re Bank of America CA Unemployment Benefits  
3 Litigation  
4 Name of Witness: Pamela Ann Joseph  
5 Date of Deposition: 05/12/2025  
Job No.: 10163119  
Reason Codes: 1. To clarify the record.  
2. To conform to the facts.  
3. To correct transcription errors.



Pamela Ann Joseph

In Re Bank of America CA Unemployment Benefits

## 1 DEPOSITION ERRATA SHEET

2 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

3 From \_\_\_\_\_ to \_\_\_\_\_

4 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

5 From \_\_\_\_\_ to \_\_\_\_\_

6 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

7 From \_\_\_\_\_ to \_\_\_\_\_

8 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

9 From \_\_\_\_\_ to \_\_\_\_\_

10 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

11 From \_\_\_\_\_ to \_\_\_\_\_

12 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

13 From \_\_\_\_\_ to \_\_\_\_\_

14 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

15 From \_\_\_\_\_ to \_\_\_\_\_

16 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

17 From \_\_\_\_\_ to \_\_\_\_\_

18 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

19 From \_\_\_\_\_ to \_\_\_\_\_

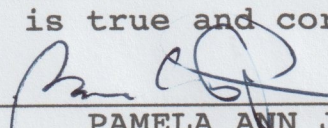
20 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

21 From \_\_\_\_\_ to \_\_\_\_\_

22 \_\_\_\_\_ Subject to the above changes, I certify that the  
transcript is true and correct23 \_\_\_\_\_ No changes have been made. I certify that the  
transcript is true and correct.

24

25

  
PAMELA ANN JOSEPH