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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA
3 -----X
4 IN RE BANK OF AMERICA CALIFORNIA
5 UNEMPLOYMENT BENEFITS LITIGATION
6

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

-----X

7 VIDEOTAPED DEPOSITION of CARL PRY, taken by
8 the Plaintiff, pursuant to Notice, held via ZOOM, on May
9 16, 2025, at 11:03 a.m., before a Notary Public of the
10 State of New York.

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13 CONFIDENTIAL***

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15 JOB NO. 10163120
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Confidential
Carl Pry **In Re Bank of America CA Unemployment Benefits Litigation**

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

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17 STEPHANIE KATZ, ESQ.

18 SWIGART LAW GROUP
19 2221 Camino Del Rio S. Suite 308
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21 BY: ILLANA PLATKIEWIECZ, ESQ.

22 ALSO PRESENT:

23 AMARIS AKER-Videographer
24
25

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Carl Pry **In Re Bank of America CA Unemployment Benefits Litigation**

1 THE VIDEOGRAPHER: We are now on the
2 record. Today's date is May 16, 2025, and the
3 time is 11:03 a.m. This is the remote
4 deposition of Carl Pry via Zoom video
5 conference being taken in the matter of In Re
6 Bank of America California Unemployment
7 Benefits Litigation, pending in the court of
8 United States District Court Southern District
9 of California, Case No. 321 -- excuse me --
10 it's 3:21-md-02992-GPC-MSB. The witness is
11 appearing remotely from New York.

12 My name is Amaris Aker appearing for
13 Aptus Court Reporting, located at 401 West A
14 Street, suite 1680, San Diego, California
15 92101. I am the official videographer and this
16 is the only authorized video recording of the
17 deposition. The audio and video recording will
18 take place at all times unless all counsel
19 agree to go off the record.

20 Will counsel please identify yourselves
21 and state whom you represent, starting with the
22 noticing attorney.

23 MR. HOLLENBERG: Good morning, my name
24 is David Hollenberg of Cotchett, Pitre and
25 McCarthy on behalf of the plaintiffs.

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Carl Pry **In Re Bank of America CA Unemployment Benefits Litigation**

1 MS. HAGGANS: Good morning, Valerie
2 Haggans of Goodwin Procter on behalf of Bank of
3 America and the witness, and with me here today
4 is Marie MacCune and Stephanie Katz also from
5 our office.

6 THE VIDEOGRAPHER: The court reporter
7 today is Brooke Perry and she may now swear in
8 or affirm the deponent.

9 C A R L P R Y, the witness herein, having been first
10 duly sworn by a Notary Public of the State of New York,
11 was examined and testified as follows:

12 THE REPORTER: Please state your name
13 for the record.

14 THE WITNESS: Carl Pry.

15 THE REPORTER: Please state your
16 address for the record.

17 THE WITNESS: 1245 West Road 1 South in
18 Chino Valley, AZ 86323.

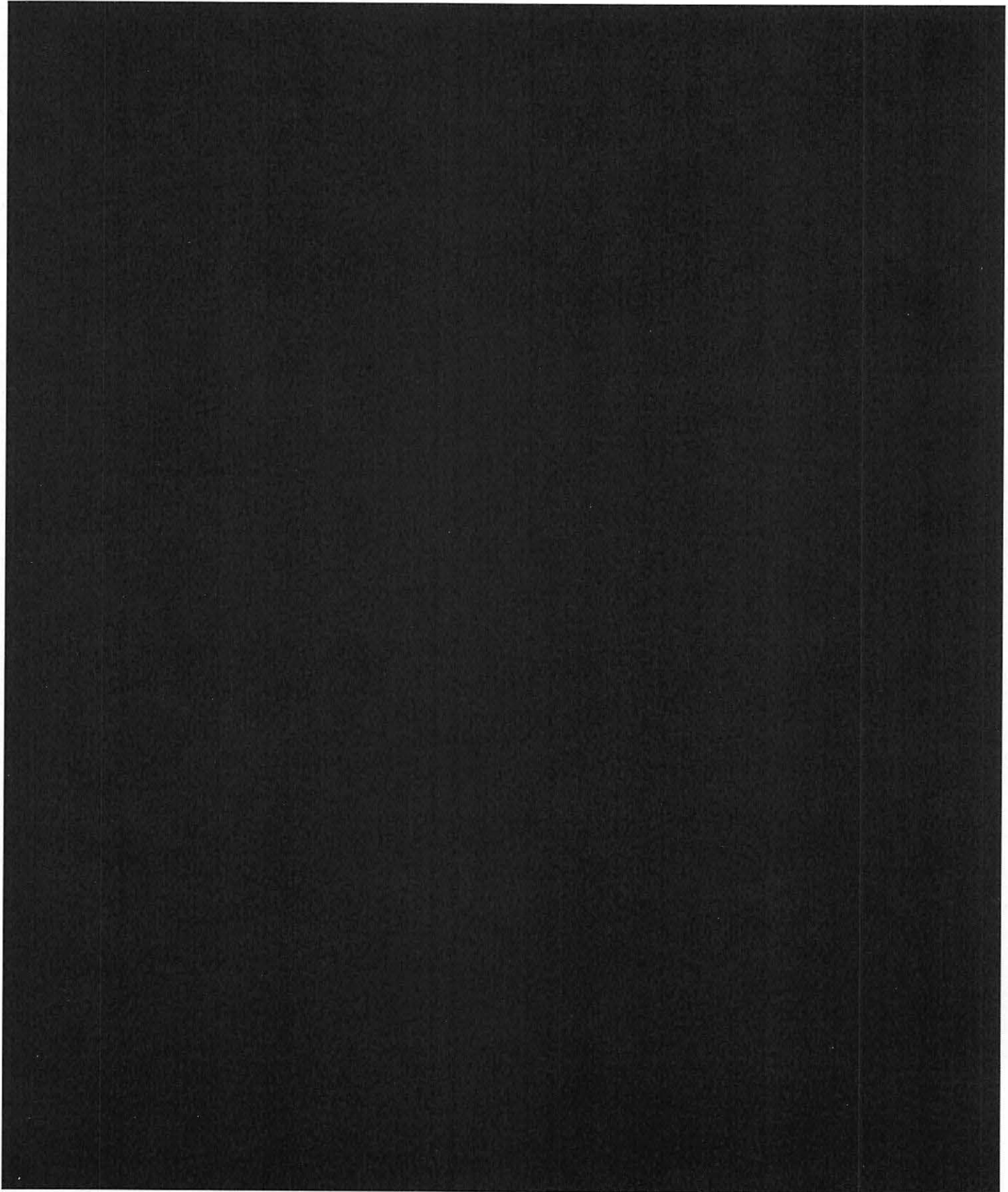
19 EXAMINATION BY

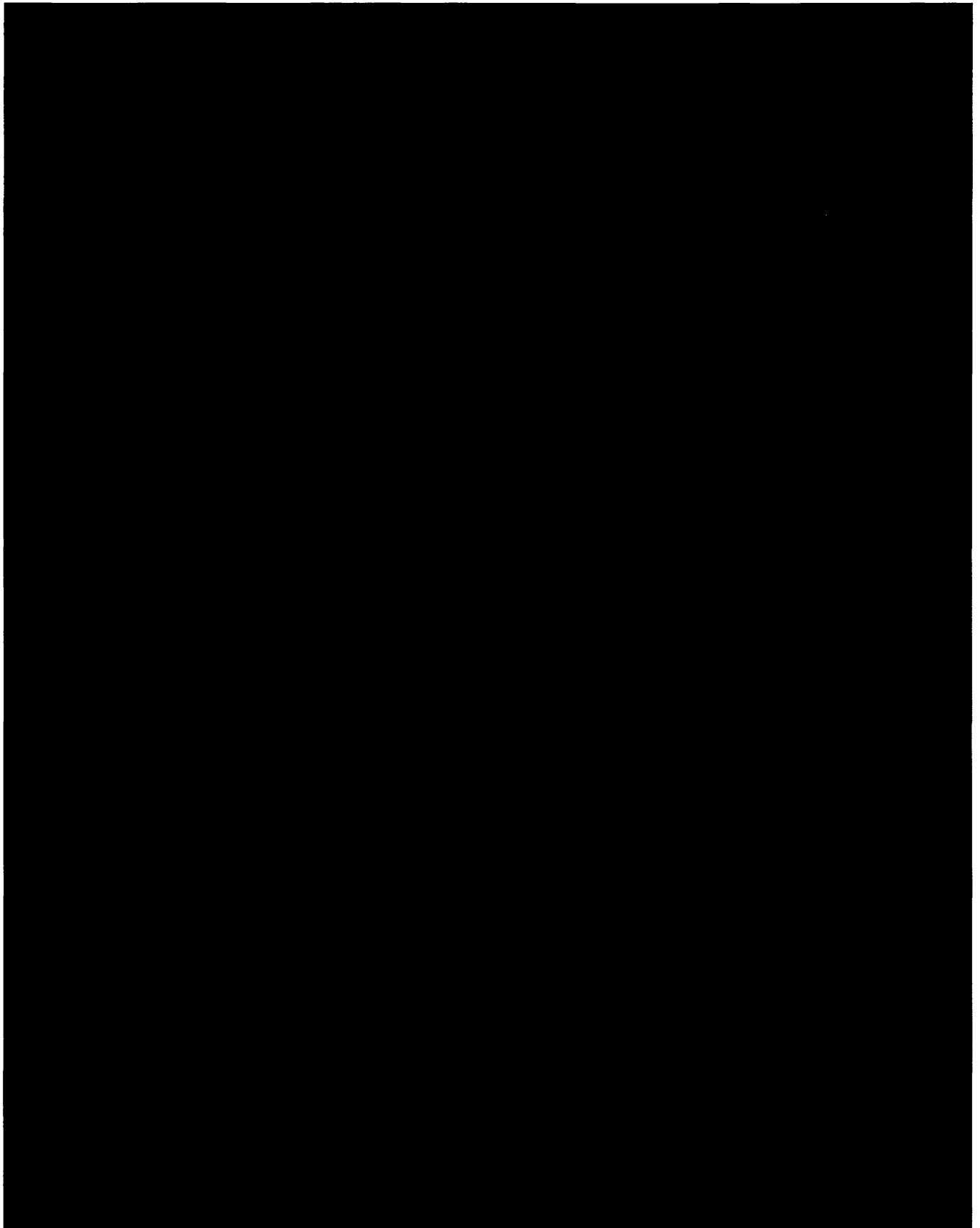
20 MR. HOLLENBERG:

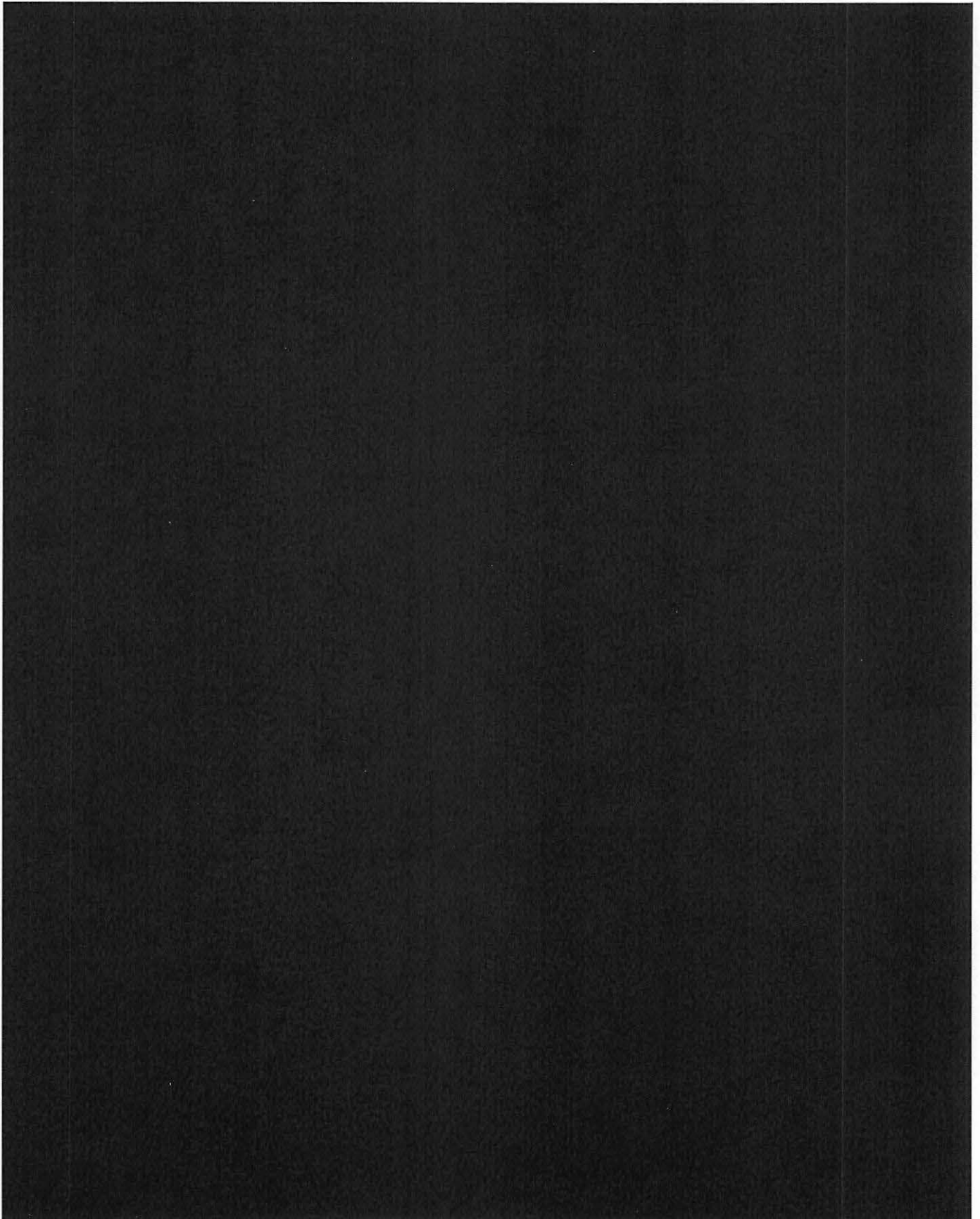
21 Q. Thank you. Good morning, Mr. Pry.

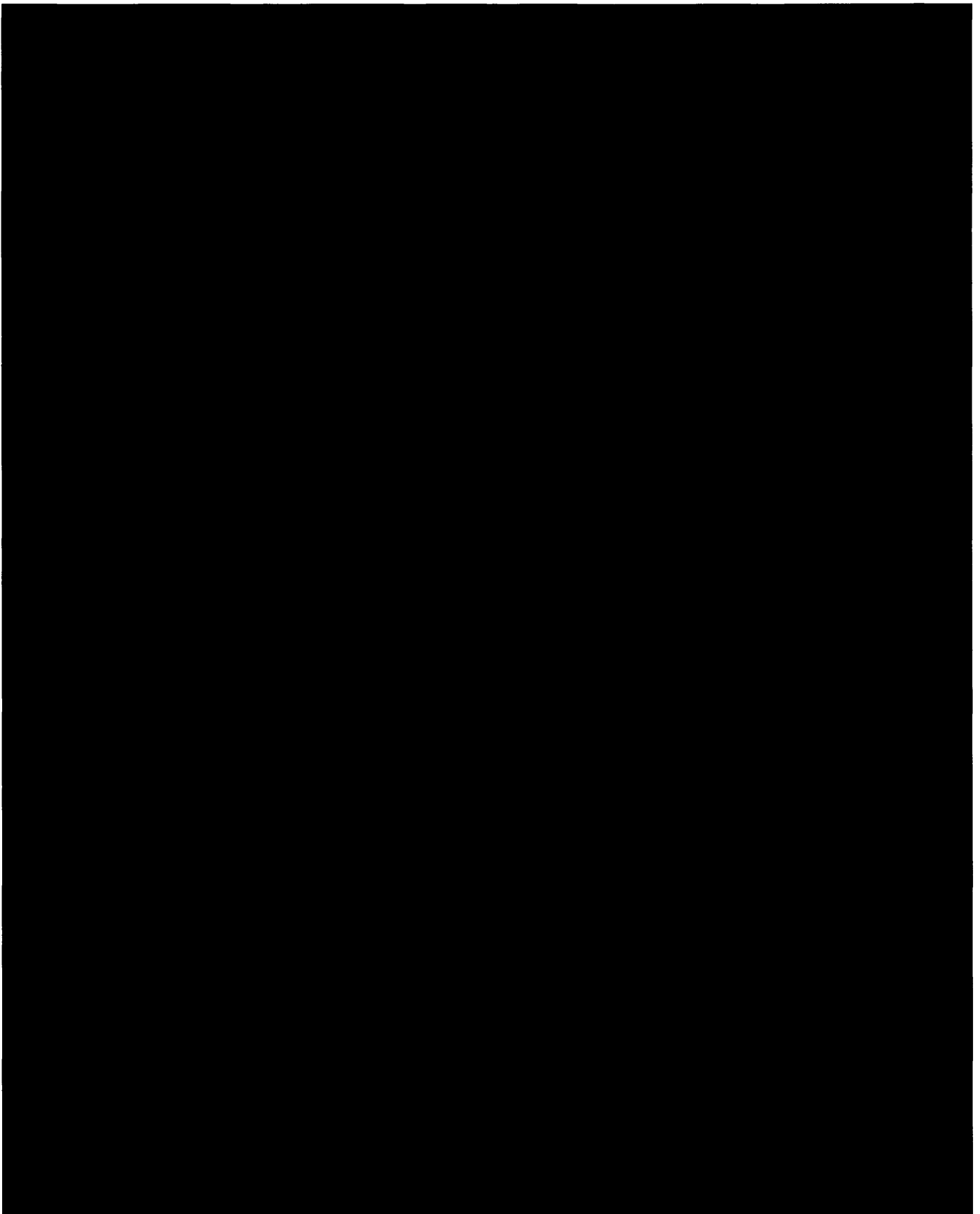
22 A. Good morning.

23 Q. My name is Dave Hollenberg. As you heard, I
24 represent the plaintiffs. You're here today because you
25 were retained as an expert by Bank of America attorneys;









C E R T I F I C A T E

STATE OF NEW YORK)

) ss.:

COUNTY OF QUEENS)

I, BROOKE E. PERRY, a Notary Public
within and for the State of New York, do hereby
certify:

That CARL PRY, 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 such 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 hereunto set
my hand this 16th day of May, 2025.

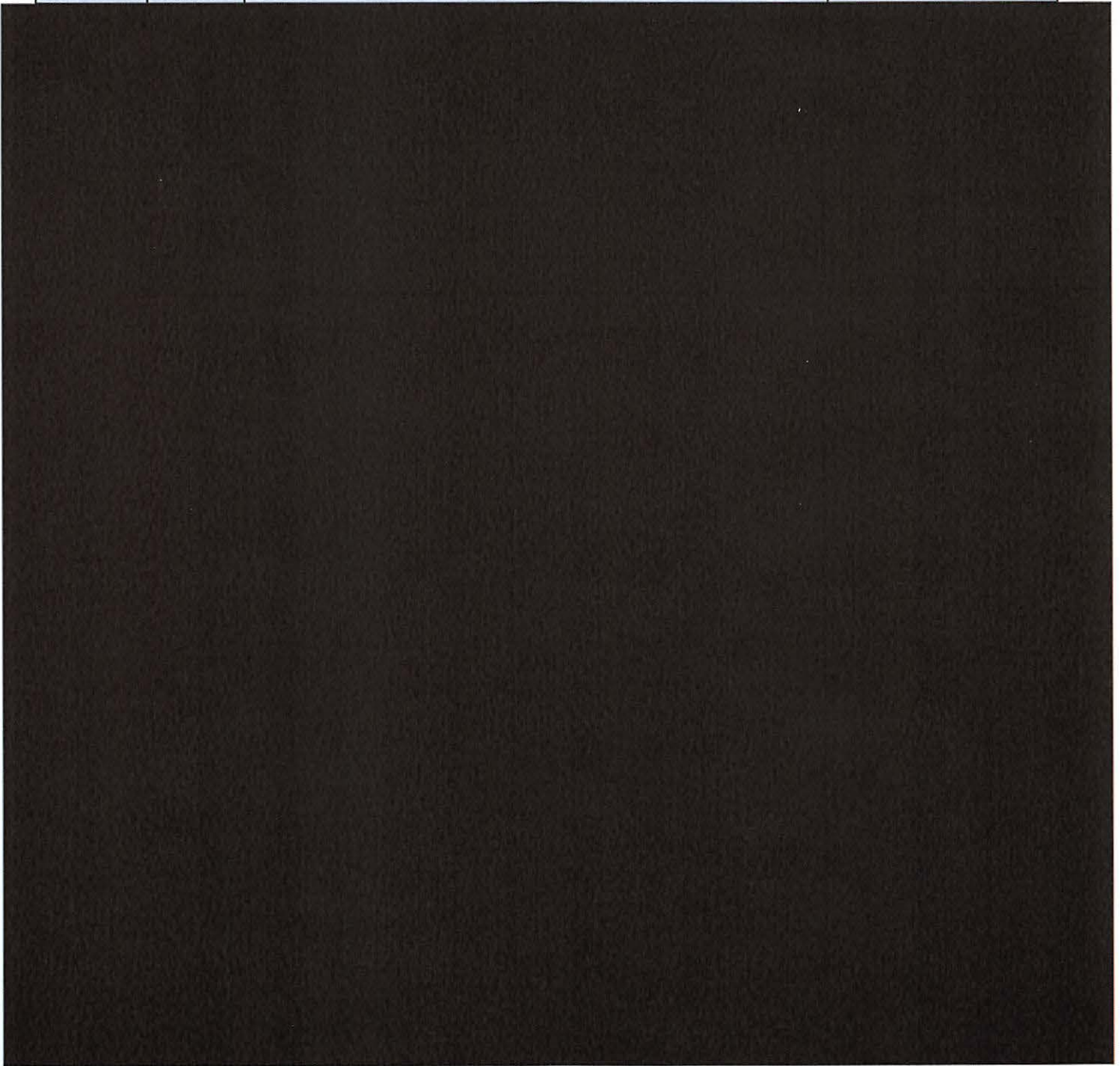
Brooke E. Perry

BROOKE E. PERRY

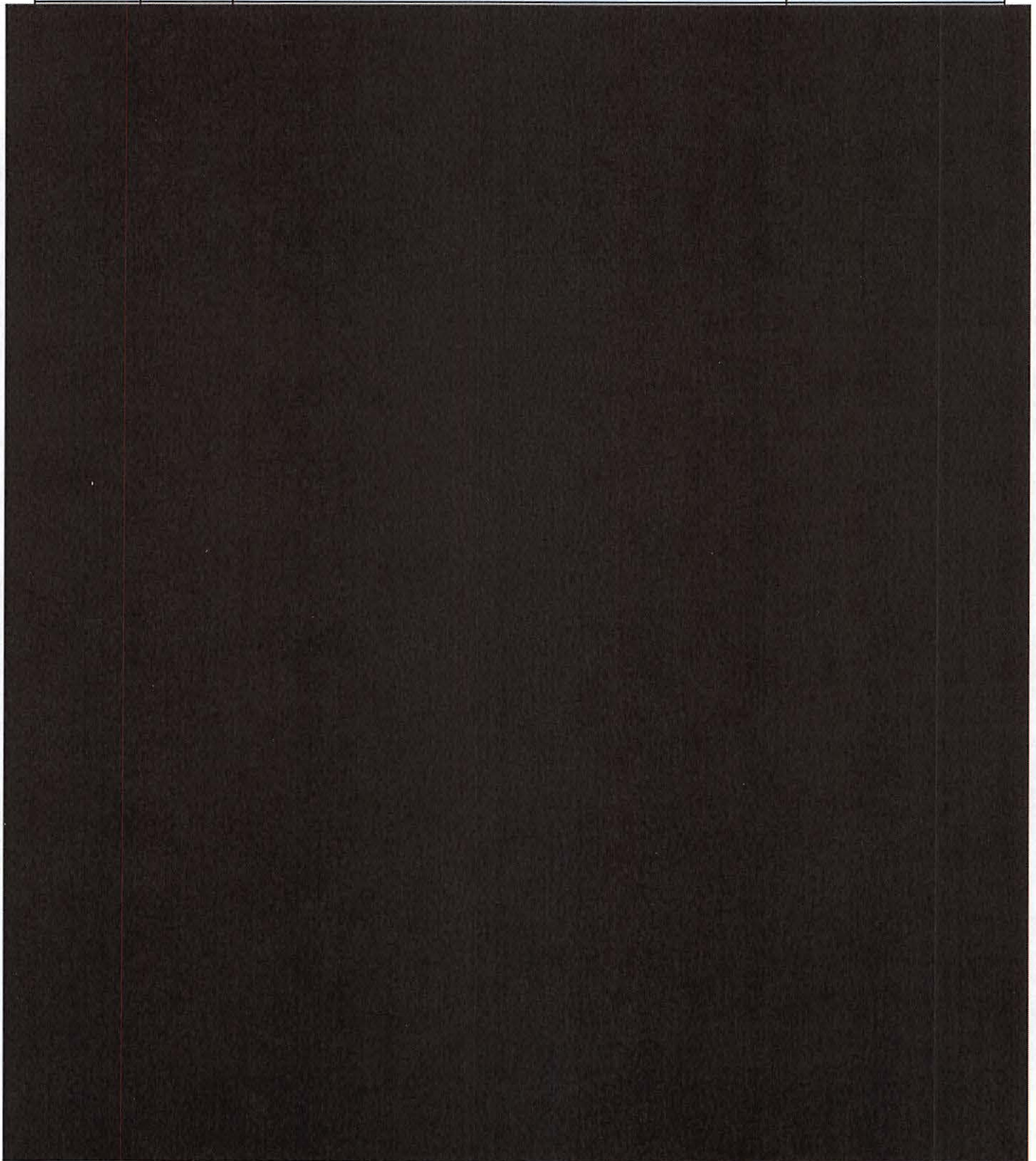
In re Bank of America California Unemployment Benefits Litigation
Case No. 3:21-MD-02992-GPC-MSB

Errata for Deposition of Carl Pry, May 16, 2025

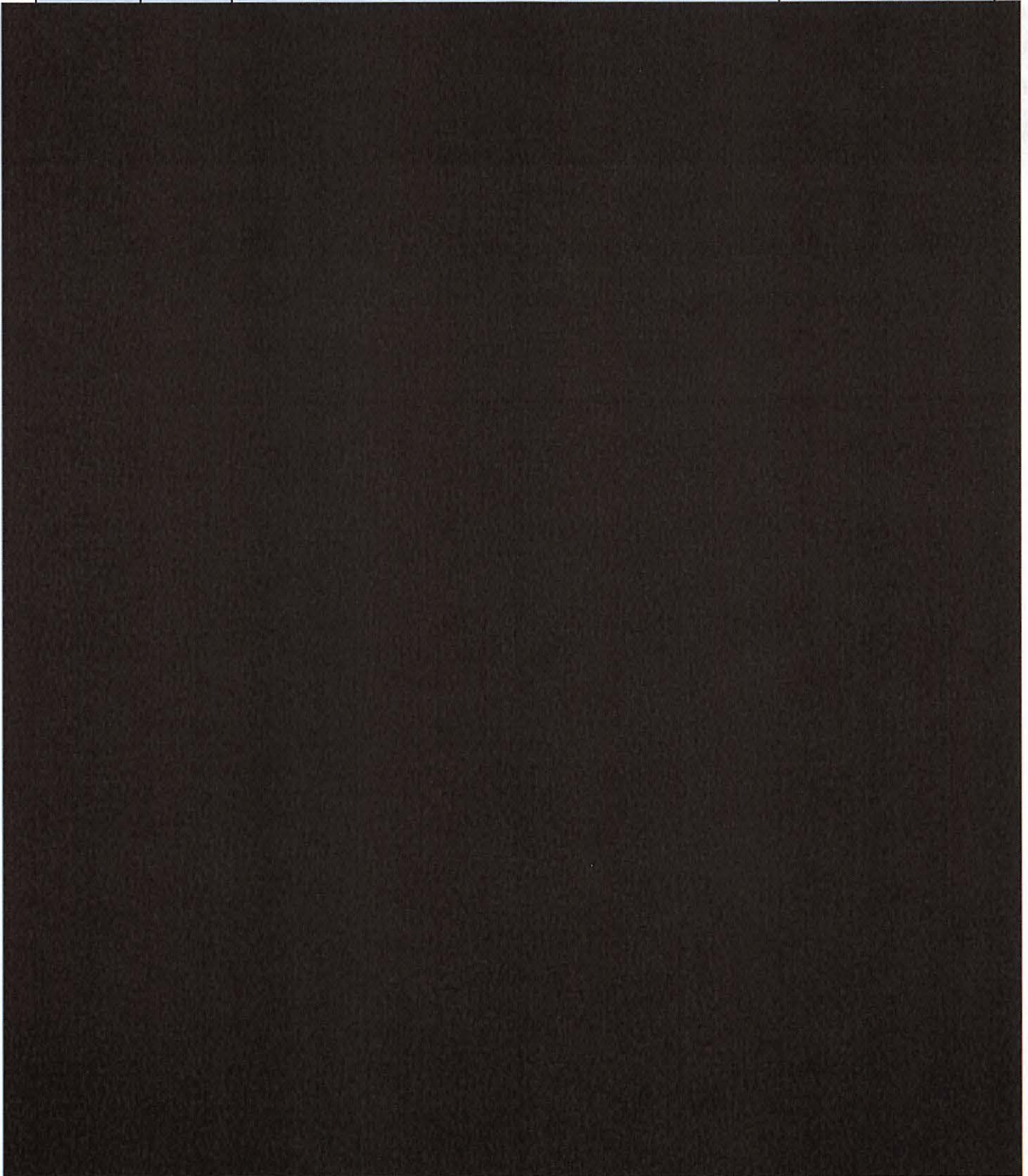
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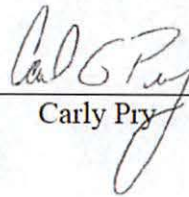


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In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. I have listed my changes on the above Errata Sheet, listing page and line numbers. I request that these changes be entered 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 3rd day of July, 2025.



Carly Pry