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Co-Lead Counsel for Plaintiffs and the Class

**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

**JOINT MOTION TO WITHDRAW
FILED DOCUMENTS: ECF NO.
633, 633-1, 633-2**

Judge: Hon. Gonzalo P. Curiel
Ctrm: 2D (2nd Floor)

This Document Relates to All Actions

1 The Parties jointly request that the Court order that the following documents be
2 withdrawn and removed from the docket:

- 3 1. ECF No. 633 (public redacted version of Plaintiffs' Memorandum of Points and
4 Authorities in Opposition to Defendant's Motion for Partial Summary Judgment
5 ("MPSJ Opposition"))
- 6 2. ECF No. 633-1 (public redacted version of Plaintiffs' Response to Defendant's
7 Statement of Undisputed Material Facts In Support of Motion for Partial
8 Summary Judgment ("RSUF"))
- 9 3. ECF No. 633-2 (public redacted version of Plaintiffs' Additional Statement of
10 Facts in Opposition to Motion for Partial Summary Judgment ("PASF"))

11 On January 9, 2026, Plaintiffs filed their Opposition to Defendant's Motion for
12 Partial Summary Judgment, including the three public redacted documents listed above,
13 accompanied by a motion to file under seal certain portions of Plaintiffs' MPSJ Opposition,
14 RSUF, and PASF (ECF 630).

15 On January 12, 2026, Defendant asserted that these documents required additional
16 redactions and requested that they be immediately withdrawn from the public docket.
17 Plaintiffs contacted the Court that same day and the dockets were temporarily blocked
18 while the parties met and conferred. The Parties disagreed about the Bank's requested
19 additional redactions, but after several meet and confer exchanges, the Parties reached a
20 compromise agreement regarding what additional material to provisionally redact and to
21 ask the Court to seal based on Defendant's assertions of confidentiality.

22 Now, therefore, the Parties jointly request that the Court order that ECF 633, 633-1
23 and 633-2 be withdrawn and removed from the docket. Good cause exists to protect
24 materials Defendant believes are confidential under the Stipulated Protective Order.

25 Subject to the Court's Order, Plaintiffs will file a revised motion to seal and revised
26 redacted versions of ECF 633, 633-1 and 633-2.

Respectfully submitted,

Dated: January 30, 2026

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Brian Danitz

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Dated: January 30, 2026

By: /s/ Lindsay E. Hoyle

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SIGNATURE ATTESTATION

Pursuant to section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I, Brian Danitz, attest that the other signatories listed, and on whose behalf this filing is submitted, concur in the filing content and have authorized this filing.

Dated: January 30, 2026

/s/ Brian Danitz

Brian Danitz