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**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

**MOTION TO FILE DOCUMENTS
UNDER SEAL**

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

This Document Relates to All Actions

MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 79.2 and Section 12.5 of the Stipulated Protective Order (ECF 82) in this case and the Court's Civil Pretrial & Trial Procedures, Plaintiffs move to file under seal the following:

1. Portions of Plaintiffs' Reply Memorandum of Points and Authorities in Support of its *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which quote portions of the Court's Order Granting Class Certification that this Court previously ordered sealed. *See* ECF 494, 498.
2. Portions of Plaintiffs' Reply Memorandum of Points and Authorities in Support of its *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which quote or discuss portions of the Expert Report of Victor Stango, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.
3. Portions of Plaintiffs' Reply Memorandum of Points and Authorities in Support of its *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which quote or discuss portions of the March 4, 2025 and August 29, 2024 Expert Reports of Greg J. Regan, portions of which have been designated confidential pursuant to the Stipulated Protective Order.
4. Portions of Plaintiffs' Reply Memorandum of Points and Authorities in Support of its *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which quote or discuss portions of the Bank's Opposition to Plaintiffs' *Daubert* Motion to Exclude Certain Testimony of Victor Stango, portions of which have been designated confidential pursuant to the Stipulated Protective Order.

Respectfully submitted,

Dated: February 20, 2026

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By: /s/ Brian Danitz
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Dated: February 20, 2026

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