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18 **BANK OF AMERICA, N.A.**

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

IN RE: BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION

Case No. 21-MD-02992-GPC-MSB

DECLARATION OF LAURA G. BRYN
IN SUPPORT OF DEFENDANT BANK
OF AMERICA, N.A.'S REPLY IN
SUPPORT OF ITS MOTION FOR
PARTIAL SUMMARY JUDGMENT
(ECF 589)

Ctrm: 12A – 12th Floor

Judge: Hon. Gonzalo P. Curiel

1 I, Laura G. Brys, state and declare as follows:

2 1. I am an attorney licensed to practice before this Court.

3 2. I am a senior attorney at Goodwin Procter LLP, and counsel of record
4 for Defendant Bank of America, N.A. (BANA) in the above-captioned lawsuit.

5 3. I have personal knowledge of the facts set forth in this declaration, and
6 if called upon to do so, I could and would competently testify thereto.

7 4. I make this declaration in support of BANA's Reply in Support of its
8 Motion for Partial Summary Judgment (ECF 589).

9 **Expert Declarations and Reports**

10 5. Attached hereto as **Exhibit 185** is a true and correct copy of the
11 Declaration of Victor Stango in Support of Defendant's Reply in Support of its
12 Motion for Partial Summary Judgment dated February 19, 2026.¹

13 **Deposition Transcripts**

14 6. Attached hereto as **Exhibit 186** is a true and correct copy of excerpts of
15 the official transcript of Plaintiffs' deposition of Faiz A. Ahmad, taken on January
16 29, 2025.

17 7. Attached hereto as **Exhibit 187** is a true and correct copy of excerpts of
18 the official transcript of Plaintiffs' deposition of Shane Daniels, taken on February 6,
19 2024.

20 8. Attached hereto as **Exhibit 188** is a true and correct copy of excerpts of
21 the official transcript of Plaintiffs' deposition of Jennifer Ehresman, taken on
22 February 19, 2025.

23 9. Attached hereto as **Exhibit 189** is a true and correct copy of excerpts of
24 the official transcript of Plaintiffs' deposition of Anne Holt, taken on January 8, 2025.

25 _____
26 ¹ For purposes of this Reply and the Opposition to Plaintiffs' motion to exclude
27 (ECF 659), the numbers contained in Paragraphs in 6a.-6b. of the Stango Decl. (HX
28 185) supersede the numbers reflected in Decl. of Lindsay E. Hoyle in Support of
Defendant Bank of America, N.A.'s Opposition to Plaintiffs' *Daubert* Motion to
Exclude Certain Testimony of Victor Stango (ECF 659-1), which reflected the
number of claims at issue as opposed to the total number to class members, some of
whom filed multiple claims.

