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**REDACTED VERSION
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STIPULATED
PROTECTIVE ORDER**

Anne Holt**In Re Bank of America CA Unemployment Benefits Litigation**

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UNITED STATES DISTRICT COURT

2

SOUTHERN DISTRICT OF CALIFORNIA

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4

IN RE BANK OF AMERICA

Case No.

5

CALIFORNIA UNEMPLOYMENT

3:21-md-02292

6

BENEFITS LITIGATION

-GPC-MSB

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VIDEOTAPED DEPOSITION OF ANNE HOLT

13

Charlotte, North Carolina

14

January 8, 2025

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10:07 a.m.

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Reported by: Karen K. Kidwell, RMR, CRR

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Job Number: 10155338

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12 [REDACTED] was

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1 A. The urgency was we were very concerned, as
2 financial crimes nerds, that we were funding
3 organized crime, and we were trying to pool all of
4 our top talent to figure out what we could do to
5 mitigate it and stop it.

6 And the other element of the equation that
7 really wasn't discussed today is that EDD was not
8 very responsive or -- or helpful throughout the
9 process, so we felt an extreme burden on our side to
10 take action.

11 Q. And did the urgency that you just
12 testified to feeling, did that cause you or your team
13 to cut corners in your analysis in any way?

14 A. No.

15 Q. I want to ask you about Exhibit 271. And
16 I'm sorry that you have to rifle back through them to
17 find them. But there we are.

18 A. Some out of order. 271. Okay.

19 Q. Can you tell me whether this is related to
20 transaction or claim fraud?

21 A. One moment.

22 (Reading.) Okay. So this is -- this does
23 not appear to be related to the claims fraud. This
24 is transactional activity.

25 Q. Okay. Can you turn to Exhibit 272? You

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1 might have to rifle through them. I'd hand you mine,
2 but --

3 A. 272?

4 Q. That's okay. Take your time.

5 A. It must have been re-pulled out here.

6 Q. That's all right. Take your time to flip
7 through them.

8 A. I got it.

9 Q. Can you tell me whether this is related to
10 transactions filtering or claims filtering?

11 A. I've got to read it one more time.

12 Q. That's okay.

13 A. (Reading.) Transaction categories. This
14 is not related to the claims filter.

15 Q. And why were you -- why were you working
16 on filtering transactions?

17 [REDACTED]

18 [REDACTED]

19 Q. Okay. Can you turn to 274?

20 Do you see that document?

21 A. I do.

22 Q. In the middle of the e-mail on the first

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED]

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7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Q. Can you turn to Exhibit 282?

15 A. I've got it.

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 Q. Can you turn to page -- or to Exhibit 286,
2 please?

3 A. Got it.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

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1 STATE OF NORTH CAROLINA

2 COUNTY OF MECKLENBURG

3
4 I, Karen K. Kidwell, RMR, CRR, in and for
5 the State of North Carolina, do hereby certify that
6 there came before me on Wednesday, January 8, 2025, the
7 person hereinbefore named, who was by me duly sworn to
8 testify to the truth and nothing but the truth of her
9 knowledge concerning the matters in controversy in this
10 cause; that the witness was thereupon examined under
11 oath, the examination reduced to typewriting under my
12 direction, and the deposition is a true record of the
13 testimony given by the witness.

14 I further certify that I am neither attorney
15 or counsel for, nor related to or employed by, any
16 attorney or counsel employed by the parties hereto or
17 financially interested in the action.

18 This the 19th day of January, 2025.

19
20 

21 _____
22 Karen K. Kidwell, RMR, CRR
23 Notary Public #19971050142
24
25