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11 Attorneys for Defendant
12 **BANK OF AMERICA, N.A.**

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
15 **SAN DIEGO DIVISION**

16 IN RE: BANK OF AMERICA
17 CALIFORNIA UNEMPLOYMENT
18 BENEFITS LITIGATION

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

**DECLARATION OF LINDSAY E.
HOYLE IN SUPPORT OF
DEFENDANT BANK OF
AMERICA, N.A.'S MOTION TO
EXCLUDE PURPORTED
EXPERT OPINIONS OF GREG J.
REGAN**

Date: April 17, 2026
Time: 1:30 p.m.
Ctrm: 12A – 12th Floor
Judge: Hon. Gonzalo P. Curiel

EXHIBITS FILED PROVISIONALLY UNDER
SEAL PURSUANT TO STIPULATED
PROTECTIVE ORDER

1 I, Lindsay E. Hoyle, state and declare as follows:

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

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

6 3. I make this declaration in support of BANA's Motion to Exclude the
7 Purported Expert Opinions of Greg J. Regan.

8 4. Attached hereto as **Exhibit 28** is a true and correct copy of the CFPB
9 Consent Order, dated July 14, 2022.

10 5. Attached hereto as **Exhibit 29** is a true and correct copy of the OCC
11 Consent Order, dated July 14, 2022.

12 6. Attached hereto as **Exhibit 30** is a true and correct copy of excerpts from
13 the official transcript of Plaintiffs' deposition of BANA's 30(b)(6) designee, Jennifer
14 Lennon, taken on February 23, 2024.

15 7. Attached hereto as **Exhibit 31** is a true and correct copy of BANA's
16 Remediation Plan, a document produced by BANA in this action Bates stamped
17 BANA_EDD_MDL-00102554.

18 8. Attached hereto as **Exhibit 34** is a true and correct copy of the Expert
19 Rebuttal Report of Justin McCrary, and appendices thereto, dated April 4, 2025.

20 9. Attached hereto as **Exhibit 35** is a true and correct copy of the Expert
21 Report of David I. Levine, and appendices thereto, dated March 4, 2025.

22 10. Attached hereto as **Exhibit 37** is a true and correct copy of excerpts from
23 Plaintiff Stephanie Moore's Supplemental Objections and Responses to Bank of
24 America, N.A.'s First Set of Interrogatories, dated January 29, 2024.

25 11. Attached hereto as **Exhibit 39** is a true and correct copy of excerpts from
26 the official transcript of BANA's deposition of Expert Greg Regan, taken on May
27 19, 2025.

28

12. Attached hereto as **Exhibit 40** is a true and correct copy of the Expert Report of Victor Stango, and appendices thereto, dated April 4, 2025.

13. Attached hereto as **Exhibit 41** is a true and correct copy of the Expert Report of Greg Regan, and appendices thereto, dated March 4, 2025.

14. Attached hereto as **Exhibit 42** is a true and correct copy of excerpts from BANA's Second Set of Responses and Objections to Plaintiff Yick's Seventh Set of Interrogatories, dated April 23, 2024.

15. Attached hereto as **Exhibit 43** is a true and correct copy of excerpts from Plaintiff Roland Oosthuizen's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of Interrogatories, dated January 29, 2024.

16. Attached hereto as **Exhibit 44** is a true and correct copy of excerpts from Plaintiff J. Michael Willrich's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of Interrogatories, dated January 29, 2024.

17. Attached hereto as **Exhibit 45** is a true and correct copy of excerpts from Plaintiff Alex Yuan's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of Interrogatories, and exhibits thereto, dated January 29, 2024.

18. Attached hereto as **Exhibit 46** is a true and correct copy of excerpts from Plaintiff Vanessa Rivera's Objections and Supplemental Responses to Bank of America, N.A.'s First Set of Interrogatories, dated January 29, 2024.

19. Attached hereto as **Exhibit 47** is a true and correct copy of excerpts from the official transcript of Plaintiff's deposition of BANA's Rule 30(b)(6) designee, Robert A. Chestnut, taken on February 8, 2024.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 17, 2025, in Old Greenwich, CT.

/s/ Lindsay E. Hoyle
LINDSAY E. HOYLE