

JOSEPH W. COTCHETT (SBN 36324)
jcotchett@cpmlegal.com

BRIAN DANITZ (SBN 247403)
bdanitz@cpmlegal.com

KARIN B. SWOPE (Pro Hac Vice)
kswope@cpmlegal.com

VASTI S. MONTIEL (SBN 346409)
vmontiel@cpmlegal.com

CAROLINE A. YUEN (SBN 354388)
cyuen@cpmlegal.com

COTCHETT, PITRE & McCARTHY, LLP

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Fax: (650) 697-0577

MICHAEL RUBIN (SBN 80618)

mrubin@altber.com

STACEY M. LEYTON (SBN 203827)

sleyton@altber.com

CONNIE K. CHAN (SBN 284230)

cchan@altber.com

JAMES BALTZER (SBN 332232)

jbaltzer@altber.com

KATHERINE BASS (SBN 344748)

kbass@altber.com

ALTSHULER BERZON LLP

177 Post Street, Suite 300

San Francisco, CA 94108

Telephone: (415) 421-7151

Fax: (415) 362-8064

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

**MOTION TO FILE DOCUMENTS
UNDER SEAL RE: PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO EXCLUDE CERTAIN
EXPERT OPINIONS OF
CHLOE N. EAST**

This Document Relates to All Actions

Date: April 17, 2026

Time: 1:30 p.m.

Judge: Hon. Gonzalo P. Curiel

Ctrm: 2D (2nd Floor)

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' Opposition to Defendant's Motion to Exclude Certain Expert Opinions of Chloe N. East, which refer to materials from portions of the Court's Order Granting Class Certification that this Court previously ordered sealed. *See* ECF 494, 498.

Respectfully submitted,

Dated: January 8, 2026

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Brian Danitz

JOSEPH W. COTCHETT
BRIAN DANITZ
KARIN B. SWOPE
BLAIR V. KITTLE
VASTI S. MONTIEL
CAROLINE A. YUEN
REGINA WANG

Dated: January 8, 2026

ALTSHULER BERZON LLP

By: /s/ Michael Rubin

MICHAEL RUBIN
STACEY M. LEYTON
CONNIE K. CHAN
JAMES BALTZER
KATHERINE G. BASS

*Co-Lead Counsel for Plaintiffs and
the Class*

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 8, 2026

/s/ Brian Danitz

BRIAN DANITZ