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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

**DECLARATION OF REGINA WANG
IN SUPPORT OF 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)

1 I, **REGINA WANG**, declare as follows:

2 1. I am an attorney at the law firm of Cotchett, Pitre & McCarthy, LLP, Co-Lead
3 Counsel for Plaintiffs and the Class in this multi-district litigation. I submit this declaration
4 in support of Plaintiffs' Opposition to Defendant's Motion to Exclude Certain Expert
5 Opinions of Chloe East. I have personal knowledge of the matters stated herein and, if
6 called as a witness, I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report
8 of Chloe N. East, and appendices thereto, dated March 4, 2025.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the
10 official transcript of BANA's deposition of Plaintiffs' expert Chloe N. East, taken on May
11 15, 2025.

12
13 I declare, under penalty of perjury, that the foregoing is true and correct. Executed
14 this 8th day of January 2026, at Burlingame, California.

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17 /s/ Regina Wang
18 REGINA WANG
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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