

1 JOSEPH W. COTCHETT (SBN 36324)

2 jcotchett@cpmlegal.com

3 BRIAN DANITZ (SBN 247403)

4 bdanitz@cpmlegal.com

5 KARIN B. SWOPE (Pro Hac Vice)

6 kswope@cpmlegal.com

7 VASTI S. MONTIEL (SBN 346409)

8 vmontiel@cpmlegal.com

9 CAROLINE A. YUEN (SBN 354388)

10 cyuen@cpmlegal.com

11 **COTCHETT, PITRE & McCARTHY, LLP**

12 840 Malcolm Road, Suite 200

13 Burlingame, CA 94010

14 Telephone: (650) 697-6000

15 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 JAY
MINNUCCI**

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 Jay Minnucci, which quote or otherwise refer to portions of the Expert Report of Jay Minnucci which Defendant Bank of America, N.A. (the "Bank") has designated Highly Confidential, excerpts of the deposition of Jay Minnucci which was designated Confidential by the Bank, Exhibit 8 to the Bank's deposition of Jay Minnucci which the Bank has designated Confidential in its entirety, and Exhibit 15 to the Bank's deposition of Jay Minnucci which the Bank has designated Confidential in its entirety.
2. Portions of the Expert Report of Jay Minnucci which the Bank has designated Highly Confidential.
3. Portions of the Expert Rebuttal Report of Jay Minnucci which refer to materials which the Bank has designated Highly Confidential.
4. Portions of the deposition of Jay Minnucci which the Bank has designated Confidential.
5. Exhibit 8 to the Bank's deposition of Plaintiffs' expert Jay Minnucci which the Bank has designated Confidential in its entirety.
6. Exhibit 15 to the Bank's deposition of Plaintiffs' expert Jay Minnucci which the Bank has designated Confidential in its entirety.

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

1
2 Dated: January 8, 2026

ALTSHULER BERZON LLP

3 By: /s/ Michael Rubin
4 MICHAEL RUBIN
5 STACEY M. LEYTON
6 CONNIE K. CHAN
7 JAMES BALTZER
8 KATHERINE G. BASS

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*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