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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

**MOTION TO FILE DOCUMENTS
UNDER SEAL RE: PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO EXCLUDE CERTAIN
EXPERT OPINIONS OF
DAVID I. LEVINE**

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 David I. Levine, which quote portions of the Court's Order Granting Class Certification that this Court previously ordered sealed (see ECF 494, 498), and contain information designated by the Bank as Confidential and/or Highly Confidential under the stipulated protective order.

Respectfully submitted,

Dated: January 8, 2026

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Brian Danitz

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Dated: January 8, 2026

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By: /s/ Michael Rubin

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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