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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SAN DIEGO DIVISION

**IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION**

This Document Relates to All Actions

Case No. 3:21-md-02992-GPC-MSB

**DECLARATION OF KATHERINE
BASS IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO
EXCLUDE EXPERT OPINIONS OF
JANE CLONINGER**

Judge: Hon. Gonzalo P. Curiel

Ctrm: 12A

Date: April 17, 2026

1 transcript of Defendant's deposition of Plaintiff's expert witness Jane Cloninger, taken
2 on June 11, 2025.

3 11. Attached hereto as **Exhibit J** is a true and correct copy of excerpts of
4 Defendant's Responses and Objections to Plaintiff's Fourth Set of Interrogatories, served
5 on Plaintiffs January 2, 2024.

6 12. Attached hereto as **Exhibit K** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00166345.

8 13. Attached here to as **Exhibit L** is a true and correct copy of excerpts from the
9 transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, Shane Daniels,
10 taken on February 6, 2024.

11 14. Attached hereto as **Exhibit M** is a true and correct copy of Plaintiff Candace
12 Koole's Objections and Supplemental Responses to the Bank's First Set of
13 Interrogatories.

14 15. Attached hereto as **Exhibit N** is a true and correct copy of excerpts of the
15 Expert Rebuttal Report of Natalie Loebner, dated April 4, 2025.

16
17 I declare under penalty of perjury that that the foregoing is true and correct.

18 Executed this 8th day of January, 2026 in San Francsico, California

19
20 /s/ Katherine Bass

21 Katherine Bass
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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