

1 Told JOSEPH W. COTCHETT (SBN 36324) jcotchett@cpmlegal.com
2 BRIAN DANITZ (SBN 247403) bdanitz@cpmlegal.com
3 KARIN B. SWOPE (Pro Hac Vice) kswope@cpmlegal.com
4 VASTI S. MONTIEL (SBN 346409) vmontiel@cpmlegal.com
5 CAROLINE A. YUEN (SBN 354388) cyuen@cpmlegal.com
6 **COTCHETT, PITRE & McCARTHY, LLP**
7 840 Malcolm Road, Suite 200
8 Burlingame, CA 94010
9 Telephone: (650) 697-6000
10 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

11 *Co-Lead Counsel for Plaintiffs and the Proposed Class*

12
13
14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16
17 **IN RE BANK OF AMERICA**
18 **CALIFORNIA UNEMPLOYMENT**
19 **BENEFITS LITIGATION**

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

**INDEX OF EXHIBITS TO
DECLARATION OF KATHERINE
BASS IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
DAUBERT MOTION TO EXCLUDE
CERTAIN OPINIONS OF JANE
CLONINGER**

Judge: Hon. Gonzalo P. Curiel
Ctrm: 2D (2nd Floor)
Date: April 17, 2026
Time: 1:30 p.m.

20
21
22
23
24
25
26 This Document Relates to All Actions
27
28

INDEX OF EXHIBITS TO BASS DECLARATION

Bass Ex. #	Document Description	Confidentiality Designation
A	Expert Report of Jane Cloninger, dated March 4, 2025.	Contains Conf./ AEO Material
B	Expert Rebuttal Report of Jane Cloninger, dated April 4, 2025	Contains Conf./ AEO Material
C	Expert Report of Pamela Joseph, dated April 4, 2025	Conf./AEO
D	Plaintiff Roland Oosthuizen's Supplemental Objections and Response to the Bank's First Set of Interrogatories	Contains Conf./ AEO Material
E	Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, William ("Matt") Martin, taken on February 14, 2024	Contains Conf./ AEO Material
F	Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, Michael Letson, taken on February 16, 2024	Contains Conf./ AEO Material
G	Document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00452826.	Conf./ AEO
H	Document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00630754	Conf./ AEO
I	Excerpts from the transcript of Defendant's deposition of Plaintiff's expert witness Jane Cloninger, taken on June 11, 2025	Contains Conf./ AEO Material
J	Excerpts of Defendant's Responses and Objections to Plaintiff's Fourth Set of Interrogatories, served on Plaintiffs January 2, 2024	Conf./ AEO
K	Document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00166345.	Conf./ AEO
L	Excerpts from the transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, Shane Daniels, taken on February 6, 2024	Contains Conf./ AEO Material

M	Plaintiff Candace Koole's Objections and Supplemental Responses to the Bank's First Set of Interrogatories	Contains Conf./ AEO Material
N	Excerpts of the Expert Rebuttal Report of Natalie Loebner, dated April 4, 2025	Contains Conf./ AEO Material