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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

**DECLARATION OF CONNIE K.
CHAN IN OPPOSITION TO MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

[ORAL ARGUMENT REQUESTED]

This Document Relates to All Actions

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

DECLARATION OF CONNIE K. CHAN

I, Connie K. Chan, hereby declare as follows:

1. I am a partner at the law firm of Altshuler Berzon LLP, co-lead counsel for Plaintiffs and the certified classes in this action. I submit this declaration in Opposition to Defendant Bank of America, N.A.'s (the "Bank") Motion for Partial Summary Judgment. I have personal knowledge of the facts set forth in this declaration and if called as a witness in this action, I could and would testify competently to these facts.

2. Attached hereto as **PX 1** is a true and correct copy of the Expert Report of J. Daniel Kreis dated March 4, 2025, and appendices thereto.

3. Attached hereto as **PX 2** is a true and correct copy of the Expert Report of Jane Cloninger dated March 4, 2025, and appendices thereto.

4. Attached hereto as **PX 3** is a true and correct copy of the Expert Report of Jay Minnucci dated March 4, 2025, and appendices thereto.

5. Attached hereto as **PX 4** is a true and correct copy of the Expert Report of William J. Abernathy, Jr. dated March 3, 2025, and appendices thereto.

6. Attached hereto as **PX 5** is a true and correct copy of the Expert Report of Greg J. Regan, CPA/CFF, CFE, dated March 4, 2025, and appendices thereto.

7. Attached hereto as **PX 6** is a true and correct copy of the Expert Report of David I. Levine dated March 4, 2025, and appendices thereto.

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

9. Attached hereto as **PX 8** is a true and correct copy of the Expert Rebuttal Report of J. Daniel Kreis dated April 4, 2025, and appendices thereto.

10. Attached hereto as **PX 9** is a true and correct copy of the Expert Rebuttal Report of William J. Abernathy Jr. dated April 3, 2025, and appendices thereto.

11. Attached hereto as **PX 10** is a true and correct copy of the Expert Rebuttal Report of Natalie Loebner dated April 4, 2025, and appendices thereto.

1 12. Attached hereto as **PX 11** is a true and correct copy of the Expert Rebuttal
2 Report of Jane Cloninger dated April 4, 2025, and appendices thereto.

3 13. Attached hereto as **PX 12** is a true and correct copy of excerpts from the
4 transcript of Plaintiffs' deposition of Defendant Bank of America, N.A.'s ("Defendant,"
5 "BANA," or the "Bank") Rule 30(b)(6) designee, Shane Daniels, taken on February 6,
6 2024 ("Daniels 30(b)(6) Deposition").

7 14. Attached hereto as **PX 13** is a true and correct copy of excerpts from the
8 transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, Robert Chestnut,
9 taken on February 8, 2024 ("Chestnut 30(b)(6) Deposition").

10 15. Attached hereto as **PX 14** is a true and correct copy of excerpts from the
11 transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, William ("Matt")
12 Martin, taken on February 14, 2024 ("Martin 30(b)(6) Deposition").

13 16. Attached hereto as **PX 15** is a true and correct copy of excerpts from the
14 transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, Michael Letson,
15 taken on February 16, 2024 ("Letson 30(b)(6) Deposition").

16 17. Attached hereto as **PX 16** is a true and correct copy of excerpts from the
17 transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, William Golden,
18 taken on February 22, 2024 ("Golden 30(b)(6) Deposition").

19 18. Attached hereto as **PX 17** is a true and correct copy of excerpts from the
20 transcript of Plaintiffs' deposition of the Bank's Rule 30(b)(6) designee, Jennifer Lennon,
21 taken on February 23, 2024 ("Lennon 30(b)(6) Deposition").

22 19. Attached hereto as **PX 18** is a true and correct copy of excerpts from the
23 transcript of Plaintiffs' deposition of Renee Johnson, taken on May 7, 2024 ("Johnson
24 Deposition").

25 20. Attached hereto as **PX 19** is a true and correct copy of excerpts from the
26 transcript of Plaintiffs' deposition of Ryan Schwartz, taken on December 4, 2024
27 ("Schwartz Deposition").
28

21. Attached hereto as **PX 20** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Brad Garfield, taken on December 10, 2024 ("Garfield Deposition").

22. Attached hereto as **PX 21** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Faiz Ahmad, taken on January 29, 2025 ("Ahmad Deposition").

23. Attached hereto as **PX 22** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of William J. Fox, taken on February 13, 2025 ("Fox Deposition").

24. Attached hereto as **PX 23** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Anne Holt, taken on January 8, 2025 ("Holt Deposition").

25. Attached hereto as **PX 24** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Jennifer Ehresman, taken on February 19, 2025 ("Ehresman Deposition").

26. Attached hereto as **PX 25** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Melissa Ramirez, taken on February 11, 2025 ("Ramirez Deposition").

27. Attached hereto as **PX 26** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Paul Simpson, taken on February 21, 2025 ("Simpson Deposition").

28. Attached hereto as **PX 27** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Thomas Montag, taken on September 24, 2025 ("Montag Deposition").

29. Attached hereto as **PX 28** is a true and correct copy of excerpts from the transcript of Plaintiffs' deposition of Brian Moynihan, taken on October 2, 2025 ("Moynihan Deposition").

1 30. Attached hereto as **PX 29** is a true and correct copy of excerpts from the
2 transcript of Plaintiffs' deposition of California Employment Development Department's
3 designee, Shameel Singh, taken on May 8, 2025 ("EDD Deposition").

4 31. Attached hereto as **PX 30** is a true and correct copy of excerpts from the
5 transcript of Plaintiffs' deposition of the Bank's expert, Teresa Pesce, taken on May 8,
6 2025 ("Pesce Deposition").

7 32. Attached hereto as **PX 31** is a true and correct copy of excerpts from the
8 transcript of Plaintiffs' deposition of the Bank's expert, Pamela Joseph, taken on May 12,
9 2025 ("Joseph Deposition").

10 33. Attached hereto as **PX 32** is a true and correct copy of excerpts from the
11 transcript of Plaintiffs' deposition of the Bank's expert, Carl Pry, taken on May 16, 2025
12 ("Pry Deposition").

13 34. Attached hereto as **PX 33** is a true and correct copy of excerpts of a
14 document titled, "Response to State of California Electronic Benefits Payments RFP Vol
15 I & II," dated July 10, 2015, which was marked Exhibit 26 to the Chestnut 30(b)(6)
16 Deposition.

17 35. Attached hereto as **PX 34** is a true and correct copy of a document the Bank
18 produced Bates-stamped BANA_EDD_MDL-00518186-91, a copy of which was marked
19 Exhibit 27 to the Chestnut 30(b)(6) Deposition, and the content of which was
20 subsequently reproduced by the Bank on the public docket, see DX 39 at -2286-2291..

21 36. Attached hereto as **PX 35** is a true and correct copy of a document produced
22 by the Bank in this action Bates-stamped BANA_EDD_MDL-00187047-60.

23 37. Attached hereto as **PX 36** is a true and correct copy of the Declaration of
24 Meiriely Amaral in Support of Plaintiffs' Motion for a Preliminary Injunction, filed at
25 ECF 64-1 in *Yick v. Bank of America*, Case No. 3:21-cv-00376-VC (N.D. Cal.) ("*Yick*")
26 ("Amaral Declaration"), and Exhibit 3 thereto, docketed at *Yick*, ECF 64-4.

27 38. Attached hereto as **PX 37** is a true and correct copy of Exhibit 4 to the
28

1 Amaral Declaration, docketed at *Yick*, ECF 64-5.

2 39. Attached hereto as **PX 38** is a true and correct copy of Exhibit 5 to the
3 Amaral Declaration, docketed at *Yick*, ECF 64-6.

4 40. Attached hereto as **PX 39** is a true and correct copy of a document produced
5 by the Bank in this action Bates-stamped BANA_EDD_MDL-00153666-75, which was
6 marked Exhibit 32 to the Chestnut 30(b)(6) Deposition.

7 41. Attached hereto as **PX 40** is a true and correct copy of excerpts from the
8 transcript of Defendant's deposition of Vanessa Rivera, taken on February 29, 2024
9 ("Rivera Deposition").

10 42. Attached hereto as **PX 41** is a true and correct copy of excerpts from the
11 transcript of Defendant's deposition of Lindsey McClure, taken on March 12, 2024
12 ("McClure Deposition").

13 43. Attached hereto as **PX 42** is a true and correct copy of a document produced
14 by the Bank in this action Bates-stamped BANA_EDD_MDL-00071231-35, which was
15 marked Exhibit 209 to the Garfield Deposition.

16 44. Attached hereto as **PX 43** is a true and correct copy of a document produced
17 by the Bank in this action Bates-stamped BANA_EDD_MDL-00452826-27, which was
18 marked Exhibit 69 to the Letson 30(b)(6) Deposition.

19 45. Attached hereto as **PX 44** is a true and correct copy of a document produced
20 by the Bank in this action Bates-stamped BANA_EDD_MDL-00421427-28, which was
21 marked Exhibit 357 to the Fox Deposition.

22 46. Attached hereto as **PX 45** is a true and correct copy of a document produced
23 by the Bank in this action Bates-stamped BANA_EDD_MDL-0071588-91, which was
24 marked Exhibit 29 to the Chestnut 30(b)(6) Deposition.

25 47. Attached hereto as **PX 46** is a true and correct copy of a document produced
26 by the Bank in this action Bates-stamped BANA_EDD_MDL-00705532-35, which was
27 marked Exhibit 30 to the Chestnut 30(b)(6) Deposition.
28

1 48. Attached hereto as **PX 47** is a true and correct copy of a document produced
2 by the Bank in this action Bates-stamped BANA_EDD_MDL-00139423-25, which was
3 marked Exhibit 202 to the Schwartz Deposition.

4 49. Attached hereto as **PX 48** is a true and correct copy of a document produced
5 by the Bank in this action Bates-stamped BANA_EDD_MDL-00077223-25, a copy of
6 which was marked Exhibit 25 to the Daniels 30(b)(6) Deposition.

7 50. Attached hereto as **PX 49** is a true and correct copy of a document produced
8 by the Bank in this action Bates-stamped BANA_EDD_MDL-00417555-58, which was
9 marked Exhibit 378 to the Ehresman Deposition.

10 51. Attached hereto as **PX 50** is a true and correct copy of a document produced
11 by the Bank in this action Bates-stamped BANA_EDD_MDL-00153421-22, which was
12 marked Exhibit 205 to the Garfield Deposition.

13 52. Attached hereto as **PX 51** is a true and correct copy of a transcript of an
14 excerpt of an audio file produced by the Bank in this action Bates-stamped
15 BANA_EDD_MDL-00718724, which was transcribed as described in the Declaration of
16 Kelly Koehnen Aristides in Support of Plaintiffs' Opposition to Motion for Partial
17 Summary Judgment, attached hereto as PX 298 ("Aristides Declaration").

18 53. Attached hereto as **PX 52** is a true and correct copy of a transcript of an
19 excerpt of an audio file produced by the Bank in this action Bates-stamped
20 BANA_EDD_MDL-00887519, which was transcribed as described in the Aristides
21 Declaration.

22 54. Attached hereto as **PX 53** is a true and correct copy of a transcript of an
23 excerpt of an audio file produced by the Bank in this action Bates-stamped
24 BANA_EDD_MDL-00888143, which was transcribed as described in the Aristides
25 Declaration.

26 55. Attached hereto as **PX 54** is a true and correct copy of a transcript of an
27 excerpt of an audio file produced by the Bank in this action Bates-stamped
28

1 BANA_EDD_MDL-00887900, which was transcribed as described in the Aristides
2 Declaration.

3 56. Attached hereto as **PX 55** is a true and correct copy of a transcript of an
4 excerpt of an audio file produced by the Bank in this action Bates-stamped
5 BANA_EDD_MDL-00887844, which was transcribed as described in the Aristides
6 Declaration.

7 57. Attached hereto as **PX 56** is a true and correct copy of a document produced
8 by the Bank in this action Bates-stamped BANA_EDD_MDL-00536398-406, and
9 subsequently reproduced by the Bank on the public docket, *see* ECF 328 at 3 n.3.

10 58. Attached hereto as **PX 57** is a true and correct copy of a document produced
11 by the Bank in this action Bates-stamped BANA_EDD_MDL-00167414-15, which was
12 marked Exhibit 210 to the Garfield Deposition.

13 59. Attached hereto as **PX 58** is a true and correct copy of a document produced
14 by the Bank in this action Bates-stamped BANA_EDD_MDL-00001312-30, which was
15 marked Exhibit 6 to the Daniels 30(b)(6) Deposition.

16 60. Attached hereto as **PX 59** is a true and correct copy of a document produced
17 by the Bank in this action Bates-stamped BANA_EDD_MDL-00004535-80, which was
18 marked Exhibit 5 to the Daniels 30(b)(6) Deposition.

19 61. Attached hereto as **PX 60** is a true and correct copy of documents produced
20 by the Bank in this action Bates-stamped BANA_EDD_MDL-00559693-94,
21 BANA_EDD_MDL-559893-926, and BANA_EDD_MDL-559979-80.

22 62. Attached hereto as **PX 61** is a true and correct copy of a document produced
23 by the Bank in this action Bates-stamped BANA_EDD_MDL-00006482-535, which was
24 marked Exhibit 181 to the Johnson Deposition.

25 63. Attached hereto as **PX 62** is a true and correct copy of a document produced
26 by the Bank in this action Bates-stamped BANA_EDD_MDL-00003887-911, which was
27 marked Exhibit 182 to the Johnson Deposition.

64. Attached hereto as **PX 63** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00290330-34, which was marked Exhibit 82 to the Letson 30(b)(6) Deposition.

65. Attached hereto as **PX 64** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169953-57, which was marked Exhibit 278 to the Holt Deposition.

66. Attached hereto as **PX 65** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00630749-53, which was marked Exhibit 186 to the Schwartz Deposition.

67. Attached hereto as **PX 66** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169912-15, which was marked Exhibit 84 to the Letson 30(b)(6) Deposition.

68. Attached hereto as **PX 67** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00416779-80, which was marked Exhibit 366 to the Ehresman Deposition.

69. Attached hereto as **PX 68** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00701418-22, which was marked Exhibit 410 to the Montag Deposition.

70. Attached hereto as **PX 69** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00225375-93, which was marked Exhibit 79 to the Letson 30(b)(6) Deposition.

71. Attached hereto as **PX 70** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00426407-11, which was marked Exhibit 224 to the Garfield Deposition.

72. Attached hereto as **PX 71** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00181661-63, which was marked Exhibit 368 to the Ehresman Deposition.

73. Attached hereto as **PX 72** is a true and correct copy of excerpts of Defendant's Responses and Objections to Plaintiffs' Sixth Set of Interrogatories.

74. Attached hereto as **PX 73** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00706201-03, which was marked Exhibit 216 to the Garfield Deposition.

75. Attached hereto as **PX 74** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00371658-59.

76. Attached hereto as **PX 75** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00695592-97, which was marked Exhibit 415 to the Moynihan Deposition.

77. Attached hereto as **PX 76** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00630836, which was marked Exhibit 190 to the Schwartz Deposition and Exhibit 416 to the Moynihan Deposition.

78. Attached hereto as **PX 77** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00371977, which was marked Exhibit 83 to the Letson 30(b)(6) Deposition.

79. Attached hereto as **PX 78** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00057704-12, which was marked Exhibit 149 to the Johnson Deposition.

80. Attached hereto as **PX 79** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00630837-38, which was marked Exhibit 192 to the Schwartz Deposition and Exhibit 277 to the Holt Deposition.

81. Attached hereto as **PX 80** is a true and correct copy of a document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-006125014-15, which was marked Exhibit 191 to the Schwartz Deposition.

82. Attached hereto as **PX 81** is a true and correct copy of a document produced

1 by the Bank in this action Bates-stamped BANA_EDD_MDL-0087749-51, which was
2 marked Exhibit 193 to the Schwartz Deposition and Exhibit 74 to the Letson Deposition.

3 83. Attached hereto as **PX 82** is a true and correct copy of a document produced
4 by the Bank in this action Bates-stamped BANA_EDD_MDL-00372012-13, which was
5 marked Exhibit 417 to the Moynihan Deposition.

6 84. Attached hereto as **PX 83** is a true and correct copy of a document produced
7 by the Bank in this action Bates-stamped BANA_EDD_MDL-00118367, which was
8 marked Exhibit 409 to the Moynihan Deposition.

9 85. Attached hereto as **PX 84** is a true and correct copy of a document produced
10 by the Bank in this action Bates-stamped BANA_EDD_MDL-0069488-90, which was
11 marked Exhibit 411 to the Montag Deposition.

12 86. Attached hereto as **PX 85** is a true and correct copy of a document produced
13 by the Bank in this action Bates-stamped BANA_EDD_MDL-00125058-59, which was
14 marked Exhibit 283 to the Holt Deposition.

15 87. Attached hereto as **PX 86** is a true and correct copy of a document produced
16 by the Bank in this action Bates-stamped BANA_EDD_MDL-00170045-47, which was
17 marked Exhibit 284 to the Holt Deposition.

18 88. Attached hereto as **PX 87** is a true and correct copy of a document produced
19 by the Bank in this action Bates-stamped BANA_EDD_MDL-00087766-69, which was
20 marked Exhibit 285 to the Holt Deposition.

21 89. Attached hereto as **PX 88** is a true and correct copy of a document produced
22 by the Bank in this action Bates-stamped BANA_EDD_MDL-00087779-80, which was
23 marked Exhibit 289 to the Holt Deposition.

24 90. Attached hereto as **PX 89** is a true and correct copy of a document produced
25 by the Bank in this action Bates-stamped BANA_EDD_MDL-00125177-79, a copy of
26 which was marked Exhibit 68 to the Letson 30(b)(6) Deposition.

27 91. Attached hereto as **PX 90** is a true and correct copy of a document produced
28

1 by the Bank in this action Bates-stamped BANA_EDD_MDL-00450516-18, which was
2 marked Exhibit 85 to the Letson 30(b)(6) Deposition.

3 92. Attached hereto as **PX 91** is a true and correct copy of a document produced
4 by the Bank in this action Bates-stamped BANA_EDD_MDL-00087760-65, which was
5 marked Exhibit 75 to the Letson 30(b)(6) Deposition.

6 93. Attached hereto as **PX 92** is a true and correct copy of a document produced
7 by the Bank in this action Bates-stamped BANA_EDD_MDL-00881823-28, which was
8 marked Exhibit 203 to the Schwartz Deposition.

9 94. Attached hereto as **PX 93** is a true and correct copy of excerpts of
10 Defendant's Responses and Objections to Plaintiffs Yick's Fourth Set of Interrogatories,
11 served on Plaintiffs January 2, 2024, along with associated exhibits and verification,
12 which were marked Exhibits 143, 143-09, 143-10, and 143-11 to the Lennon 30(b)(6)
13 Deposition.

14 95. Attached hereto as **PX 94** is a true and correct copy of a document produced
15 by the Bank in this action Bates-stamped BANA_EDD_MDL-00570335-37, which was
16 marked Exhibit 233 to the Garfield Deposition and Exhibit 158 to the Johnson
17 Deposition.

18 96. Attached hereto as **PX 95** is a true and correct copy of a document produced
19 by the Bank in this action Bates-stamped BANA_EDD_MDL-00429789-95, which was
20 marked Exhibit 170 to the Johnson Deposition.

21 97. Attached hereto as **PX 96** is a true and correct copy of a document produced
22 by the Bank in this action Bates-stamped BANA_EDD_MDL-00706496-97, which was
23 marked Exhibit 420 to the Moynihan Deposition.

24 98. Attached hereto as **PX 97** is a true and correct copy of a document produced
25 by the Bank in this action Bates-stamped BANA_EDD_MDL-00876417, which was
26 marked Exhibit 319 to the Ahmad Deposition.

27 99. Attached hereto as **PX 98** is a true and correct copy of a document produced
28

1 by the Bank in this action Bates-stamped BANA_EDD_MDL-00293818-21, which was
2 marked Exhibit 89 to the Letson 30(b)(6) Deposition.

3 100. Attached hereto as **PX 99** is a true and correct copy of a document produced
4 by the Bank in this action Bates-stamped BANA_EDD_MDL-00162397, which was
5 marked Exhibit 361 to the Fox Deposition.

6 101. Attached hereto as **PX 100** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00570351, which
8 was marked Exhibit 371 to the Ehresman Deposition.

9 102. Attached hereto as **PX 101** is a true and correct copy of a document
10 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00497802-04.

11 103. Attached hereto as **PX 102** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00878451-52,
13 which was marked Exhibit 427 to the Moynihan Deposition.

14 104. Attached hereto as **PX 103** is a true and correct copy of a document
15 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00882977-79,
16 which was marked Exhibit 425 to the Moynihan Deposition.

17 105. Attached hereto as **PX 104** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00882712-19,
19 which was marked Exhibit 426 to the Moynihan Deposition.

20 106. Attached hereto as **PX 105** is a true and correct copy of a document
21 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-100634-79,
22 which was marked Exhibit 17 to the Daniels 30(b)(6) Deposition.

23 107. Attached hereto as **PX 106** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00158953, which
25 was marked Exhibit 18 to the Daniels 30(b)(6) Deposition.

26 108. Attached hereto as **PX 107** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00556536-37,
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1 which was marked Exhibit 92 to the Letson 30(b)(6) Deposition.

2 109. Attached hereto as **PX 108** is a true and correct copy of a document
3 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00143391-93,
4 which was marked Exhibit 94 to the Letson 30(b)(6) Deposition.

5 110. Attached hereto as **PX 109** is a true and correct copy of a document
6 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00076993-95,
7 which was marked Exhibit 373 to the Ehresman Deposition.

8 111. Attached hereto as **PX 110** is a true and correct copy of a document
9 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00510141-48,
10 which was marked Exhibit 137 to the Lennon 30(b)(6) Deposition.

11 112. Attached hereto as **PX 111** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00077127-28,
13 which was marked Exhibit 334 to the Ahmad Deposition.

14 113. Attached hereto as **PX 112** is a true and correct copy of a document
15 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00090640-47,
16 which was marked Exhibit 61 to the Martin 30(b)(6) Deposition.

17 114. Attached hereto as **PX 113** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00107261-66,
19 which was marked Exhibit 62 to the Martin 30(b)(6) Deposition.

20 115. Attached hereto as **PX 114** is a true and correct copy of a document
21 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00107327-35,
22 which was marked Exhibit 63 to the Martin 30(b)(6) Deposition.

23 116. Attached hereto as **PX 115** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00090683-86,
25 which was marked Exhibit 64 to the Martin 30(b)(6) Deposition.

26 117. Attached hereto as **PX 116** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00273305-07,
28

1 which was marked Exhibit 91 to the Letson 30(b)(6) Deposition.

2 118. Attached hereto as **PX 117** is a true and correct copy of an article published
3 by CalMatters on November 20, 2020 titled “How Bank of America Helped Fuel
4 California’s Unemployment Meltdown.”

5 119. Attached hereto as **PX 118** is a true and correct copy of a transcript of an
6 excerpt of an audio file produced by the Bank in this action Bates-stamped
7 BANA_EDD_MDL-00888326, which was transcribed as described in the Aristedes
8 Declaration.

9 120. Attached hereto as **PX 119** is a true and correct copy of a transcript of an
10 excerpt of an audio file produced by the Bank in this action Bates-stamped
11 BANA_EDD_MDL-00887608, which was transcribed as described in the Aristedes
12 Declaration.

13 121. Attached hereto as **PX 120** is a true and correct copy of a transcript of an
14 excerpt of an audio file produced by the Bank in this action Bates-stamped
15 BANA_EDD_MDL-00887001, which was transcribed as described in the Aristedes
16 Declaration.

17 122. Attached hereto as **PX 121** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00058621-28,
19 which was marked Exhibit 434 to the Moynihan Deposition.

20 123. Attached hereto as **PX 122** is a true and correct copy of a document
21 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00105556, which
22 was marked Exhibit 429 to the Moynihan Deposition.

23 124. Attached hereto as **PX 123** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00373787-88,
25 which was marked Exhibit 430 to the Moynihan Deposition.

26 125. Attached hereto as **PX 124** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00188717-18,
28

1 which was marked Exhibit 431 to the Moynihan Deposition.

2 126. Attached hereto as **PX 125** is a true and correct copy of a document
3 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00105900, which
4 was marked Exhibit 432 to the Moynihan Deposition.

5 127. Attached hereto as **PX 126** is a true and correct copy of the declaration of
6 class representative Plaintiff Kuang Ting Chong.

7 128. Attached hereto as **PX 127** is a true and correct copy of a document
8 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00870275-76,
9 which was marked Exhibit 435 to the Moynihan Deposition.

10 129. Attached hereto as **PX 128** is a true and correct copy of a document
11 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00284155, which
12 was marked Exhibit 436 to the Moynihan Deposition.

13 130. Attached hereto as **PX 129** is a true and correct copy of a document
14 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00041664, which
15 was marked Exhibit 437 to the Moynihan Deposition.

16 131. Attached hereto as **PX 130** is a true and correct copy of a document
17 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00027088-89,
18 which was marked Exhibit 438 to the Moynihan Deposition.

19 132. Attached hereto as **PX 131** is a true and correct copy of a document
20 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00041705, which
21 was marked Exhibit 439 to the Moynihan Deposition.

22 133. Attached hereto as **PX 132** is a true and correct copy of a document
23 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00027124, which
24 was marked Exhibit 441 to the Moynihan Deposition.

25 134. Attached hereto as **PX 133** is a true and correct copy of a document
26 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00041795, which
27 was marked Exhibit 442 to the Moynihan Deposition.
28

1 135. Attached hereto as **PX 134** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00027231-32,
3 which was marked Exhibit 443 to the Moynihan Deposition.

4 136. Attached hereto as **PX 135** is a true and correct copy of a document
5 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00029021-22,
6 which was marked Exhibit 444 to the Moynihan Deposition.

7 137. Attached hereto as **PX 136** is a true and correct copy of a document
8 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00090721-26,
9 which was marked Exhibit 59 to the Martin 30(b)(6) Deposition.

10 138. Attached hereto as **PX 137** is a true and correct copy of a document
11 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00452786-802,
12 which was marked Exhibit 58 to the Martin 30(b)(6) Deposition.

13 139. Attached hereto as **PX 138** is a true and correct copy of a document
14 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00874570-71.

15 140. Attached hereto as **PX 139** is a true and correct copy excerpts of Revised
16 Exhibit 2 to Bank of America's Response to Plaintiffs' Interrogatories.

17 141. Attached hereto as **PX 140** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00571307-10.

19 142. Attached hereto as **PX 141** is a true and correct copy of a document
20 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00417487-90,
21 which was marked Exhibit 93 to the Letson 30(b)(6) Deposition.

22 143. Attached hereto as **PX 142** is a true and correct copy of a document
23 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00845906-08,
24 which was marked Exhibit 395 to the Simpson Deposition.

25 144. Attached hereto as **PX 143** is a true and correct copy of excerpts of a report
26 titled "Employment Development Department Strike Team Detailed Assessment &
27 Recommendations," which was marked Exhibit 36 to the Chestnut 30(b)(6) Deposition.
28

1 145. Attached hereto as **PX 144** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00071396-403,
3 which was marked Exhibit 249 to the Garfield Deposition.

4 146. Attached hereto as **PX 145** is a true and correct copy of excerpts of
5 Defendant's Responses and Objections to Plaintiffs' Fifth Set of Interrogatories.

6 147. Attached hereto as **PX 146** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00405158-60,
8 which was marked Exhibit 400 to the Simpson Deposition.

9 148. Attached hereto as **PX 147** is a true and correct copy of a document
10 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169898-99,
11 which was marked Exhibit 384 to the Simpson Deposition.

12 149. Attached hereto as **PX 148** is a true and correct copy of a document
13 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-000417555-58.

14 150. Attached hereto as **PX 149** is a true and correct copy of a document
15 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00631444-46.

16 151. Attached hereto as **PX 150** is a true and correct copy of a document
17 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00125919-23,
18 which was marked Exhibit 60 to the Martin 30(b)(6) Deposition.

19 152. Attached hereto as **PX 151** is a true and correct copy of a document
20 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00172236-44.

21 153. Attached hereto as **PX 152** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00118438, which
23 was marked Exhibit 105 to the Golden 30(b)(6) Deposition.

24 154. Attached hereto as **PX 153** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00106092-94,
26 which was marked Exhibit 104 to the Golden 30(b)(6) Deposition.

27 155. Attached hereto as **PX 154** is a true and correct copy of a document
28

1 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00876475-76,
2 which was marked Exhibit 369 to the Ehresman Deposition.

3 156. Attached hereto as **PX 155** is a true and correct copy of documents produced
4 by the Bank in this action Bates-stamped BANA_EDD_MDL-00411205, -00556094, -
5 00556122, -00556152, -00556324, -00558991, -00558996, -00559094, and 00559101
6 and documents produced by the Plaintiff in this action Bates-stamped PLFF00000008
7 and Yuan_A_00000003-4.

8 157. Attached hereto as **PX 156** is a true and correct copy of a document
9 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00719115, which
10 was marked Exhibit 103 to the Golden 30(b)(6) Deposition.

11 158. Attached hereto as **PX 157** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00881851-54,
13 which was marked Exhibit 407 to the Montag Deposition.

14 159. Attached hereto as **PX 158** is a true and correct copy of a document
15 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00090040-47.

16 160. Attached hereto as **PX 159** is a true and correct copy of a document
17 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00013086-93.

18 161. Attached hereto as **PX 160** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00013096-106.

20 162. Attached hereto as **PX 161** is a true and correct copy of a press release
21 published in Business Wire on September 30, 2014 titled "Bank of America Begins
22 Rollout of Chip Debit Cards," which was marked Exhibit 44 to the Martin 30(b)(6)
23 Deposition.

24 163. Attached hereto as **PX 162** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-000455617-19.

26 164. Attached hereto as **PX 163** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00205593-97.
28

1 165. Attached hereto as **PX 164** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00370150-55,
3 which was marked Exhibit 46 to the Martin 30(b)(6) Deposition.

4 166. Attached hereto as **PX 165** is a true and correct copy of a document
5 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00463207-10.

6 167. Attached hereto as **PX 166** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL- 00228914-15.

8 168. Attached hereto as **PX 167** is a true and correct copy of a document
9 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00495777-89,
10 which was marked Exhibit 15 to the Joseph Deposition.

11 169. Attached hereto as **PX 168** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00004996-5020.

13 170. Attached hereto as **PX 169** is a true and correct copy of a document
14 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00082602-06.

15 171. Attached hereto as **PX 170** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00170413-18.

17 172. Attached hereto as **PX 171** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00167019-24.

19 173. Attached hereto as **PX 172** is a true and correct copy of a document
20 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00401305-12.

21 174. Attached hereto as **PX 173** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00123235-36,
23 which was marked Exhibit 49 to the Martin 30(b)(6) Deposition.

24 175. Attached hereto as **PX 174** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00154042-44.

26 176. Attached hereto as **PX 175** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00166345.
28

1 177. Attached hereto as **PX 176** is a true and correct copy of a document
2 produced by EDD in this action Bates-stamped EDD002375-79, which was marked
3 Exhibit 401 to the Simpson Deposition.

4 178. Attached hereto as **PX 177** is a true and correct copy of a document
5 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00104749-50,
6 which was marked Exhibit 398 to the Simpson Deposition.

7 179. Attached hereto as **PX 178** is a true and correct copy of a document
8 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00163307-08,
9 which was marked Exhibit 52 to the Martin 30(b)(6) Deposition.

10 180. Attached hereto as **PX 179** is a true and correct copy of a document
11 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00417363.

12 181. Attached hereto as **PX 180** is a true and correct copy of a document
13 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00297295, which
14 was marked Exhibit 262 to the Garfield Deposition.

15 182. Attached hereto as **PX 181** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00351839-40,
17 which was marked Exhibit 47 to the Martin 30(b)(6) Deposition.

18 183. Attached hereto as **PX 182** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00116001-02,
20 which was marked Exhibit 39 to the Chestnut 30(b)(6) Deposition.

21 184. Attached hereto as **PX 183** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00406993-7019.

23 185. Attached hereto as **PX 184** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00104742-46.

25 186. Attached hereto as **PX 185** is a true and correct copy of a document
26 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00124142, which
27 was marked Exhibit 40 to the Chestnut 30(b)(6) Deposition.

1 187. Attached hereto as **PX 186** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00352396-97,
3 which was marked Exhibit 51 to the Martin 30(b)(6) Deposition.

4 188. Attached hereto as **PX 187** is a true and correct copy of a document
5 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00357755-56.

6 189. Attached hereto as **PX 188** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00353033-35.

8 190. Attached hereto as **PX 189** is a true and correct copy of a document
9 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00678774-75,
10 which was marked Exhibit 23 to the Joseph Deposition.

11 191. Attached hereto as **PX 190** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00166417-19.

13 192. Attached hereto as **PX 191** is a true and correct copy of a document
14 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00297351-52.

15 193. Attached hereto as **PX 192** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00082642-50.

17 194. Attached hereto as **PX 193** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00431011-14.

19 195. Attached hereto as **PX 194** is a true and correct copy of a document
20 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00218256.

21 196. Attached hereto as **PX 195** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00166407-09.

23 197. Attached hereto as **PX 196** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00632771-74.

25 198. Attached hereto as **PX 197** is a true and correct copy of a document
26 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00172469-73,
27 which was marked Exhibit 53 to the Martin 30(b)(6) Deposition.

1 199. Attached hereto as **PX 198** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00171972-73.

3 200. Attached hereto as **PX 199** is a true and correct copy of a document
4 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00570314-15,
5 which was marked Exhibit 146 to the Johnson Deposition.

6 201. Attached hereto as **PX 200** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00057504-06,
8 which was marked Exhibit 45 to the Martin 30(b)(6) Deposition.

9 202. Attached hereto as **PX 201** is a true and correct copy of a document
10 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00059312-18.

11 203. Attached hereto as **PX 202** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00706212-14,
13 which was marked Exhibit 300 to the Ahmad Deposition.

14 204. Attached hereto as **PX 203** is a true and correct copy of a document
15 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00140411-16,
16 which was marked Exhibit 217 to the Garfield Deposition.

17 205. Attached hereto as **PX 204** is a true and correct copy of excerpts from
18 Defendant's Second Set of Responses and Objections to Plaintiffs' Seventh Set of
19 Interrogatories.

20 206. Attached hereto as **PX 205** is a true and correct copy of excerpts from
21 Revised Exhibit 3 to Defendant's Response to Plaintiffs' Interrogatories.

22 207. Attached hereto as **PX 206** is a true and correct copy of a document
23 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00087749-51,
24 which was marked Exhibit 74 to the Letson 30(b)(6) Deposition.

25 208. Attached hereto as **PX 207** is a true and correct copy of a document
26 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00125863-64,
27 which was marked Exhibit 86 to the Letson 30(b)(6) Deposition.
28

1 209. Attached hereto as **PX 208** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00162408, which
3 was marked Exhibit 239 to the Garfield Deposition.

4 210. Attached hereto as **PX 209** is a true and correct copy of the Preliminary
5 Injunction in *Yick v. Bank of America*, Case No. 21-cv-00376-VC, filed on June 2, 2021.

6 211. Attached hereto as **PX 210** is a true and correct copy of the Order
7 Re Preliminary Injunction in *Yick v. Bank of America*, Case No. 21-cv-00376-VC, filed
8 on May 17, 2021.

9 212. Attached hereto as **PX 211** is a true and correct copy of the Consumer
10 Financial Protection Bureau Consent Order against Bank of America, N.A., File No.
11 2022-CFPB-0004, filed on July 14, 2022.

12 213. Attached hereto as **PX 212** is a true and correct copy of the Office of the
13 Comptroller of the Currency Consent Order against Bank of America, N.A., File No. AA-
14 ENF-2022-21, filed on July 14, 2022.

15 214. Attached hereto as **PX 213** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00102554-77,
17 which was marked Exhibit 132 to the Lennon 30(b)(6) Deposition.

18 215. Attached hereto as **PX 214** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00003887-911,
20 which was marked Exhibit 182 to the Johnson Deposition.

21 216. Attached hereto as **PX 215** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00592324-30,
23 which was marked Exhibit 80 to the Letson 30(b)(6) Deposition.

24 217. Attached hereto as **PX 216** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00006482-535,
26 which was marked Exhibit 181 to the Johnson Deposition.

27 218. Attached hereto as **PX 217** is a true and correct copy of a document
28

1 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00663724-45,
2 which was marked Exhibit 14 to the Daniels 30(b)(6) Deposition.

3 219. Attached hereto as **PX 218** is a true and correct copy of excerpts of a
4 document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-
5 00013111-63, which was marked Exhibit 118 to the Golden 30(b)(6) Deposition.

6 220. Attached hereto as **PX 219** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00205620-29.

8 221. Attached hereto as **PX 220** is a true and correct copy of a document
9 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00012816-74.

10 222. Attached hereto as **PX 221** is a true and correct copy of a document
11 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-0087742-43,
12 which was marked Exhibit 81 to the Letson 30(b)(6) Deposition.

13 223. Attached hereto as **PX 222** is a true and correct copy of a document
14 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00426935-39,
15 which was marked Exhibit 241 to the Garfield Deposition.

16 224. Attached hereto as **PX 223** is a true and correct copy of a document
17 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00001199.

18 225. Attached hereto as **PX 224** is a true and correct copy of excerpts from a
19 document titled, "Response to State of California Electronic Benefits Payment |
20 Solicitation RFP No. 65466, Vol I – EBP Service Proposal MASTER COPY," dated July
21 10, 2015, which was marked Exhibit 26 to the Chestnut 30(b)(6) Deposition.

22 226. Attached hereto as **PX 225** is a true and correct copy of excerpts from a
23 document titled, "The US Contact Center Decision-Makers Guide 2021."

24 227. Attached hereto as **PX 226** is a true and correct copy of the Declaration of
25 class representative Plaintiff Vanessa Rivera ("Rivera Declaration").

26 228. Attached hereto as **PX 227** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00159489-94.
28

1 229. Attached hereto as **PX 228** is a true and correct copy of a document
2 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00037137.

3 230. Attached hereto as **PX 229** is a true and correct copy of a document
4 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-0057488-90,
5 which was marked Exhibit 294 to the Holt Deposition.

6 231. Attached hereto as **PX 230** is a true and correct copy of excerpts from the
7 transcript of Defendant's deposition of Azuri Moon, taken on February 27, 2024 ("Moon
8 Deposition").

9 232. Attached hereto as **PX 231** is a true and correct copy of excerpts from the
10 transcript of Defendant's deposition of Roland Oosthuizen, taken on March 29, 2024
11 ("Oosthuizen Deposition").

12 233. Attached hereto as **PX 232** is a true and correct copy of excerpts from the
13 transcript of Defendant's deposition of J. Daniel Kreis, taken on May 5, 2025 ("Kreis
14 Deposition").

15 234. Attached hereto as **PX 233** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00076931-47,
17 which was marked Exhibit 280 to the Holt Deposition.

18 235. Attached hereto as **PX 234** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00426660, which
20 was marked Exhibit 312 to the Montag Deposition.

21 236. Attached hereto as **PX 235** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169902-04,
23 which was marked Exhibit 274 to the Holt Deposition.

24 237. Attached hereto as **PX 236** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00102786-87,
26 which was marked Exhibit 269 to the Holt Deposition.

27 238. Attached hereto as **PX 237** is a true and correct copy of a document
28

1 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-0070242-47,
2 which was marked Exhibit 301 to the Ahmad Deposition.

3 239. Attached hereto as **PX 238** is a true and correct copy of a document
4 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00491410-14,
5 which was marked Exhibit 348 to the Ramirez Deposition.

6 240. Attached hereto as **PX 239** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00127312-15,
8 which was marked Exhibit 349 to the Ramirez Deposition.

9 241. Attached hereto as **PX 240** is a true and correct copy of a document
10 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00200628-32,
11 which was marked Exhibit 250 to the Garfield Deposition.

12 242. Attached hereto as **PX 241** is a true and correct copy of a document
13 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00881951-68,
14 which was marked Exhibit 414 to the Moynihan Deposition.

15 243. Attached hereto as **PX 242** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00293818-21,
17 which was marked Exhibit 423 to the Moynihan Deposition.

18 244. Attached hereto as **PX 243** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00105271-72,
20 which was marked Exhibit 428 to the Moynihan Deposition.

21 245. Attached hereto as **PX 244** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00127417-20,
23 which was marked Exhibit 108 to the Golden Deposition.

24 246. Attached hereto as **PX 245** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00870098-101.

26 247. Attached hereto as **PX 246** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00371949-50,
28

1 which was marked Exhibit 306 to the Montag Deposition and Exhibit 387 to the Simpson
2 Deposition.

3 248. Attached hereto as **PX 247** is a true and correct copy of a document
4 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00372031-46,
5 which was marked Exhibit 303 to the Ahmad Deposition.

6 249. Attached hereto as **PX 248** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00417271-72,
8 which was marked Exhibit 174 to the Johnson Deposition.

9 250. Attached hereto as **PX 249** is a true and correct copy of a document
10 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00426935-39,
11 which was marked Exhibit 372 to the Ehresman Deposition.

12 251. Attached hereto as **PX 250** is a true and correct copy of Plaintiff
13 Oosthuizen's Supplemental Objections and Responses to Bank of America, N.A.'s First
14 Set of Interrogatories.

15 252. Attached hereto as **PX 251** is a true and correct copy of Plaintiff Koole's
16 Supplemental Objections and Responses to Bank of America, N.A.'s First Set of
17 Interrogatories.

18 253. Attached hereto as **PX 252** is a true and correct copy of Plaintiff Moon's
19 Supplemental Objections and Responses to Bank of America, N.A.'s First Set of
20 Interrogatories.

21 254. Attached hereto as **PX 253** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00674360-64.

23 255. Attached hereto as **PX 254** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169847-51,
25 which was marked Exhibit 76 to Letson's 30(b)(6) Deposition.

26 256. Attached hereto as **PX 255** is a true and correct copy of Plaintiff Kuang Ting
27 Chong's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of
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1 Interrogatories.

2 257. Attached hereto as **PX 256** is a true and correct copy of Plaintiff Stephanie
3 Moore's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of
4 Interrogatories.

5 258. Attached hereto as **PX 257** is a true and correct copy of Plaintiff Alex
6 Yuan's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of
7 Interrogatories.

8 259. Attached hereto as **PX 258** is a true and correct copy of a letter dated
9 January 26, 2021 providing Notice of Violations of The California Consumer Privacy Act
10 on behalf of Roland Oosthuizen and Rosemary Mathews.

11 260. Attached hereto as **PX 259** is a true and correct copy of Plaintiff Lindsay
12 McClure's Supplemental Objections and Responses to Bank of America, N.A.'s First Set
13 of Interrogatories.

14 261. Attached hereto as **PX 260** is a true and correct copy of Plaintiff Vanessa
15 Rivera's Supplemental Objections and Responses to Bank of America, N.A.'s First Set of
16 Interrogatories.

17 262. Attached hereto as **PX 261** is a true and correct copy of excerpts from
18 BANA's Verified Responses & Objections to Plaintiffs Third Set of Interrogatories,
19 which was marked Exhibit 139 to the Lennon 30(b)(6) Deposition.

20 263. Attached hereto as **PX 262** is a true and correct copy of a document
21 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00087775-78,
22 which was marked Exhibit 286 to the Holt Deposition.

23 264. Attached hereto as **PX 263** is a true and correct copy of the Expert Class
24 Certification Report of Greg J. Regan, CPA/CFF, CFE, dated August 29, 2024, and
25 appendices thereto.

26 265. Attached hereto as **PX 264** is a true and correct copy of a document
27 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00090695-98,
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1 which was marked Exhibit 55 to the Martin 30(b)(6) Deposition.

2 266. Attached hereto as **PX 265** is a true and correct copy of a document
3 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169948-52.

4 267. Attached hereto as **PX 266** is a true and correct copy of a document
5 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00159382-83,
6 which was marked Exhibit 375 to the Ehresman Deposition.

7 268. Attached hereto as **PX 267** is a true and correct copy of a document
8 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00077066-69,
9 which was marked Exhibit 377 to the Ehresman Deposition.

10 269. Attached hereto as **PX 268** is a true and correct copy of a document
11 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00171972-73.

12 270. Attached hereto as **PX 269** is a true and correct copy of a document
13 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00698454-55,
14 which was marked Exhibit 21 to the Joseph Deposition.

15 271. Attached hereto as **PX 270** is a true and correct copy of a document
16 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00883605-32,
17 which was marked Exhibit 445 to the Moynihan Deposition.

18 272. Attached hereto as **PX 271** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00874614-15,
20 which was marked Exhibit 446 to the Moynihan Deposition.

21 273. Attached hereto as **PX 272** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00874614-15,
23 which was marked Exhibit 419 to the Moynihan Deposition.

24 274. Attached hereto as **PX 273** is a true and correct copy of a document
25 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00127437-41,
26 which was marked Exhibit 351 to the Ramirez Deposition.

27 275. Attached hereto as **PX 274** is a true and correct copy of a document
28

1 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00062175-82,
2 which was marked Exhibit 352 to the Ramirez Deposition.

3 276. Attached hereto as **PX 275** is a true and correct copy of a document
4 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00646320-35,
5 which was marked Exhibit 353 to the Ramirez Deposition.

6 277. Attached hereto as **PX 276** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00714619-21,
8 which was marked Exhibit 359 to the Fox Deposition.

9 278. Attached hereto as **PX 277** is a true and correct copy of a document
10 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00347350.

11 279. Attached hereto as **PX 278** is a true and correct copy of a document
12 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00087718-20,
13 which was marked Exhibit 188 to the Schwartz Deposition.

14 280. Attached hereto as **PX 279** is a true and correct copy of the Office of the
15 Comptroller of the Currency (“OCC”) Civil Money Penalty Order against Bank of
16 America, N.A., File No. AAENF-2022-22, filed on July 14, 2022.

17 281. Attached hereto as **PX 280** is a true and correct copy of a document
18 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00169161, which
19 was marked Exhibit 243 to the Garfield Deposition.

20 282. Attached hereto as **PX 281** is a true and correct copy of a document
21 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00071120-25,
22 which was marked Exhibit 248 to the Garfield Deposition.

23 283. Attached hereto as **PX 282** is a true and correct copy of a document
24 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00371656-57.

25 284. Attached hereto as **PX 283** is a true and correct copy of a document
26 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00631430-31.

27 285. Attached hereto as **PX 284** is a true and correct copy of excerpts from
28

1 BANA's Verified Revised Second Supplemental Responses & Objections to Plaintiffs
2 First Set of Interrogatories, which was marked Exhibit 136 to the Lennon 30(b)(6)
3 Deposition.

4 286. Attached hereto as **PX 285** is a true and correct copy of a document
5 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-0057837-78.

6 287. Attached hereto as **PX 286** is a true and correct copy of a document
7 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00719116.

8 288. Attached hereto as **PX 287** is a true and correct copy of a document
9 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00102937.

10 289. Attached hereto as **PX 288** is a true and correct copy of excerpts from a
11 document titled, "The US Contact Center Decision-Makers Guide 2021."

12 290. Attached hereto as **PX 289** is a true and correct copy of a document
13 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00406128-30,
14 which was marked Exhibit 96 to the Letson 30(b)(6) Deposition.

15 291. Attached hereto as **PX 290** is a true and correct copy of excerpts from
16 BANA's Verified Responses & Objections to Plaintiffs' Fourth Set of Interrogatories,
17 which was marked Exhibit 143 to the Lennon 30(b)(6) Deposition.

18 292. Attached hereto as **PX 291** is a true and correct copy of a document
19 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00012790, which
20 was marked Exhibit 15 to the Daniels 30(b)(6) Deposition.

21 293. Attached hereto as **PX 292** is a true and correct copy of a document
22 produced by the Bank in this action Bates-stamped BANA_EDD_MDL-00874835,
23 00885638-39, which was marked Exhibit 271 to the Holt Deposition and Exhibit 185 to
24 the Schwartz Deposition.

25 294. Attached hereto as **PX 293** is a true and correct copy of the Declaration of
26 class representative Plaintiff Stephanie Moore ("Moore Declaration").

27 295. Attached hereto as **PX 294** is a true and correct copy of the Declaration of
28

1 proposed class representative Plaintiff Alex Yuan (“Yuan Declaration”).

2 296. Attached hereto as **PX 295** is a true and correct copy of the Declaration of
3 class representative Plaintiff Candace Koole (“Koole Declaration”).

4 297. Attached hereto as **PX 296** is a true and correct copy of the Declaration of
5 class representative Plaintiff Azuri Moon (“Moon Declaration”).

6 298. Attached hereto as **PX 297** is a true and correct copy of an excerpt of a
7 document produced by the Bank in this action Bates-stamped BANA_EDD_MDL-
8 00060339.

9 299. Attached hereto as **PX 298** is a true and correct copy of the Declaration of
10 Kelly Koehnen Aristides in Support of Plaintiffs’ Opposition to Motion for Partial
11 Summary Judgment.

12 300. Attached hereto as **PX 299** is a true and correct copy of the Declaration of
13 class representative Lindsey McClure (“McClure Declaration”).

14 I declare under penalty of perjury that that the foregoing is true and correct.
15 Executed this 9th day of January, 2026 in Burlingame, California.

16 s/ Connie K. Chan
17 Connie K. Chan
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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 9, 2026

/s/ Brian Danitz

Brian Danitz