

JOSEPH W. COTCHETT (SBN 36324)
jcotchett@cpmlegal.com
BRIAN DANITZ (SBN 247403)
bdanitz@cpmlegal.com
KARIN B. SWOPE (Pro Hac Vice)
kswope@cpmlegal.com
ANDREW F. KIRTLEY (SBN 328023)
akirtley@cpmlegal.com
COTCHETT, PITRE & McCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Fax: (650) 697-0577

MICHAEL RUBIN (SBN 80618)
mrubin@altber.com
STACEY M. LEYTON (SBN 203827)
sleyton@altber.com
MATTHEW MURRAY (SBN 271461)
mmurray@altber.com
CONNIE K. CHAN (SBN 284230)
cchan@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 Proposed Class
(Additional Counsel Listed Below)*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION**

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

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

**JOINT MOTION RE: EXTENSION
OF PAGE LIMITS ON MOTION
TO DISMISS**

This Document Relates to All Actions

1 WHEREAS, on July 20, 2021, the Court ordered that the memorandum of
2 points and authorities in support of any motion to dismiss must be no longer than
3 40 pages; Plaintiffs' response to any motion to dismiss must be no longer than 40
4 pages; and any reply must be no longer than 20 pages (Dkt. No. 48);

5 WHEREAS, on August 17, 2021, Plaintiffs filed a Master Consolidated
6 Complaint (Dkt. No. 72) setting forth allegations and claims by 25 Class Plaintiffs
7 and 230 Individual Plaintiffs;

8 WHEREAS, on October 1, 2021, Defendant Bank of America, N.A.
9 ("Defendant") filed a Motion to Dismiss Plaintiffs' Master Consolidated Complaint
10 (Dkt. No. 84);

11 WHEREAS, on October 1, 2021, Defendant filed a 40-page memorandum of
12 points and authorities in support of its motion to dismiss, which raises arguments
13 concerning the allegations of the 25 Class Plaintiffs and the 230 Individual
14 Plaintiffs, accompanied by a 10-page appendix (Dkt. No 84-1);

15 WHEREAS, the Parties have met and conferred and agree that the page limit
16 for Plaintiffs' Opposition to Defendant's Motion to Dismiss should be extended by
17 10 pages, and the page limit for Defendant's Reply in support of its Motion to
18 Dismiss should be extended by 5 pages;

19 NOW THEREFORE, the parties in the above-captioned actions, by their
20 undersigned counsel, JOINTLY MOVE the Court to enter the Proposed Order
21 accompanying this joint motion.

22 **COTCHETT, PITRE & MCCARTHY, LLP**

23 Dated: November 5, 2021

By: /s/ Brian Danitz

24 JOSEPH W. COTCHETT

25 BRIAN DANITZ

26 KARIN SWOPE

ANDREW F. KIRTLEY

27 *Co-Lead Counsel for Plaintiffs and the*
28 *Proposed Class*

ALTSHULER BERZON LLP

Dated: November 5, 2021 By: /s/ Michael Rubin

MICHAEL RUBIN
STACEY M. LEYTON
MATTHEW MURRAY
CONNIE K. CHAN

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

GOODWIN PROCTER LLP

Dated: November 5, 2021 By: /s/ Yvonne W. Chan

LAURA A. STOLL
DAVID R. CALLAWAY
JAMES W. MCGARRY
YVONNE W. CHAN
THOMAS M. HEFFERON

Counsel for Defendant Bank of America

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I, Brian Danitz, hereby certify that the content of this document is acceptable to all the signatories herein and that I have obtained counsel's authorization to affix their electronic signatures to this document.

/s/ Brian Danitz

BRIAN DANITZ