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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-LAB-MSB

The Honorable Michael S. Berg

**Plaintiffs' Unopposed Motion for
Extension of Time to File Reply
Papers in Further Support of Motion
to Compel Compliance with
Subpoena for the Production of
Documents**

This Document Relates to All Actions

1 Plaintiffs hereby respectfully move for an order extending their deadline to file
2 reply papers in further support of their motion to compel compliance with subpoena
3 for the production of documents. In support of this motion, Plaintiffs state as follows:

4 Plaintiffs' motion to compel third party TTEC Government Solutions, LLC's
5 ("TTEC") to comply with a subpoena for the production of documents, and TTEC's
6 opposition brief, have led to meet and confer discussions between counsel. These
7 discussions seem likely to lead to at least a partial, and perhaps a complete, resolution
8 of the present discovery dispute. Much will depend on what the parties and TTEC
9 learn about the types and completeness of data and other information that were
10 transferred from TTEC to Bank of America during the relevant time period. The
11 parties and TTEC are currently involved in discussions surrounding such transfers of
12 data and information. TTEC's counsel has informed the undersigned that TTEC does
13 not oppose this motion.

14 In light of the foregoing, good cause exists to extend Plaintiffs' March 1, 2024
15 deadline to file their reply papers to March 11, 2024. Accordingly, the Court should
16 grant this unopposed motion and issue the accompanying proposed order extending
17 Plaintiffs' March 1, 2024 deadline to file their reply papers to March 11, 2024.

18 Dated: March 1, 2024

Respectfully submitted,

BOTTINI & BOTTINI, INC.

s/ *Aaron P. Arnzen*

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