

BOTTINI & BOTTINI, INC.
Francis A. Bottini, Jr. (SBN 175783)
Albert Y. Chang (SBN 296065)
Aaron P. Arnzen (SBN 218272)
7817 Ivanhoe Avenue, Suite 102
La Jolla, California 92037
Telephone: (858) 914-2001
Facsimile: (858) 914-2002
E-mail: fbottini@bottinilaw.com
achang@bottinilaw.com
aarnzen@bottinilaw.com

Counsel for Class Representative Plaintiff Lindsay McClure

[Additional Counsel Listed Below]

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

**Joint 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 and third party TTEC Government Solutions, LLC (“TTEC”)
2 respectfully and jointly move for an order extending Plaintiffs’ deadline to file reply
3 papers in further support of their motion to compel compliance with subpoena for the
4 production of documents. In support of this motion, Plaintiffs and TTEC state as
5 follows:

6 Plaintiffs’ motion to compel third party TTEC Government Solutions, LLC’s
7 (“TTEC”) to comply with a subpoena for the production of documents, and TTEC’s
8 opposition brief, have led to meet and confer discussions between counsel. These
9 discussions seem likely to lead to at least a partial, and perhaps a complete, resolution
10 of the present discovery dispute. One of the central questions that remains
11 outstanding, and which TTEC continues to review, concerns the types and
12 completeness of data and other information that were transferred from TTEC to Bank
13 of America during the relevant time period. The parties and TTEC are currently
14 involved in discussions surrounding such transfers of data and information. The Court
15 has granted one motion for extension of time to file a reply brief for the reasons cited
16 above, and Plaintiffs and TTEC would benefit from another such extension.

17 In light of the foregoing, good cause exists to extend Plaintiffs’ March 11, 2024
18 deadline to file their reply papers to March 20, 2024. Accordingly, the Court should
19 grant this unopposed motion and issue the accompanying proposed order extending
20 Plaintiffs’ March 11, 2024 deadline to file their reply papers to March 20, 2024.

21 Dated: March 11, 2024

Respectfully submitted,

BOTTINI & BOTTINI, INC.

23 s/ Aaron P. Arnzen

Aaron P. Arnzen

24 Francis A. Bottini, Jr. (SBN 175783)

25 Albert Y. Chang (SBN 296065)

26 Aaron P. Arnzen (SBN 218272)

7817 Ivanhoe Avenue, Suite 102

La Jolla, CA 92037

27 Telephone: 858/914-2001

28 Facsimile: 858/914-2002

Email: fbottini@bottinilaw.com
aarnzen@bottinilaw.com
achang@bottinilaw.com

Counsel for Class Representative Plaintiff Lindsay McClure

COTCHETT, PITRE & MCCARTHY, LLP
Joseph W. Cotchett (SBN 36324)
Brian Danitz (SBN 247403)
Karin B. Swope (*Pro Hac Vice*)
Andrew F. Kirtley (SBN 328023)
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Email: jcotchett@cpmlegal.com
bdanitz@cpmlegal.com
kswope@cpmlegal.com
akirtley@cpmlegal.com

ALTSHULER BERZON LLP
Michael Rubin (SBN 80618)
Stacey M. Leyton (SBN 203827)
Matthew Murray (SBN 271461)
Connie K. Chan (SBN 284230)
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Email: mrubin@altber.com
sleyton@altber.com
mmurray@altber.com
cchan@altber.com

Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

Dated: March 11, 2024

PERKINS COIE LLP
By: /s/ Jasmine Wetherell (w/ authorization)
Jasmine Wetherell
1888 Century Park East Suite 1700
Los Angeles, CA 90067-1721
Phone: 1.310.788.3294
Email: JWetherell@perkinscoie.com

Attorney for Non-Party TTEC Government Solutions, LLC