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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

**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 productive meet and confer discussions between counsel.
9 These discussions have led to the production of substantial materials, and the parties
10 are in discussions regarding the production of additional documents. These
11 discussions seem likely to lead to a near complete resolution of the present discovery
12 dispute. One of the questions that remains outstanding, and which TTEC continues
13 to review, concerns the types and completeness of information that were transferred
14 from TTEC to Bank of America during the relevant time period. The parties and
15 TTEC are currently involved in discussions surrounding such transfers of information.
16 The Court has granted two motions for extension of time to file a reply brief for the
17 reasons cited above, and Plaintiffs and TTEC would benefit from another such
18 extension.

19 In light of the foregoing, good cause exists to extend Plaintiffs’ April 5, 2024
20 deadline to file their reply papers to April 29, 2024. Accordingly, the Court should
21 grant this unopposed motion and issue the accompanying proposed order extending
22 Plaintiffs’ April 5, 2024 deadline to file their reply papers to April 29, 2024.

23 Dated: April 6, 2024

Respectfully submitted,

24 BOTTINI & BOTTINI, INC.

25 s/ Aaron P. Arnzen

26 Aaron P. Arnzen

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

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Dated: April 6, 2024

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