

1 JAMES W. MCGARRY (pro hac vice)
2 *JMcGarry@goodwinlaw.com*
3 **GOODWIN PROCTER LLP**
4 100 Northern Avenue
5 Boston, MA 02210
6 Tel.: +1 617 570 1000
7 Fax: +1 617 523 1231

8 SABRINA M. ROSE-SMITH (pro hac vice)
9 *SRoseSmith@goodwinlaw.com*
10 MATTHEW L. RIFFEE (pro hac vice)
11 *MRiffee@goodwinlaw.com*
12 **GOODWIN PROCTER LLP**
13 1900 N Street, NW
14 Washington, DC 20036
15 Tel.: +1 202 346 4000
16 Fax: +1 202 346 4444

17 Attorneys for Defendant
18 BANK OF AMERICA, N.A.

19
20 **UNITED STATES DISTRICT COURT**
21 **SOUTHERN DISTRICT OF CALIFORNIA**
22 **SAN DIEGO DIVISION**

23 IN RE: BANK OF AMERICA
24 CALIFORNIA UNEMPLOYMENT
25 BENEFITS LITIGATION

Case No. 21-MD-02992-GPC-MSB

**DECLARATION OF STACEY
RUIZ IN SUPPORT OF
DEFENDANT'S MOTION FOR A
PROTECTIVE ORDER**

1 I, Stacey Ruiz, state and declare as follows:

2 1. I am an Assistant Vice President, for Bank of America, N.A. ("BANA")
3 in the above-captioned lawsuit.

4 2. In my capacity as Assistant Vice President, I have come to know
5 BANA's internal processes and procedures. I am also familiar with BANA's record
6 keeping processes and I have access to the business records maintained by BANA,
7 including those in connection with its employees (the "BANA Business Records").
8 My testimony in this declaration is on information and belief based on my review of
9 certain BANA Business Records, my review of transcripts taken in this case, and
10 public news articles, which reflect the employment history of the individuals
11 described herein. If called upon to do so, I could and would competently testify
12 thereto.

13 3. I make this declaration in support of BANA's Motion for a Protective
14 Order.

15 4. Bank of America, N.A. ("BANA") is a wholly owned subsidiary of
16 Bank of America Corporation ("BAC"). BAC is the holding company for 57
17 companies, including operations in all 50 states of the U.S and more than 35
18 countries, with more than 213,000 employees.

19 5. Brian Moynihan has been the Chair of BAC since October 2014 and has
20 been Chief Executive Officer ("CEO") since 2010.

21 6. Thomas Montag was BANA's second-in-line executive, with the title of
22 Chief Operating Officer ("COO") and President of Global Banking and Markets,
23 until December 2021, and is now the CEO of Rubicon Carbon.

24 **Employment of Certain Individuals at BANA During 2020-2021**

25 7. Shane Daniels was Head of Small Business Claims and Operations.

26 8. Robert Chestnut was a Regional Executive in Relationship
27 Management.

28 9. William Matthew Martin was a Senior Vice President in Fraud

1 Management.

2 10. Michael Letson was a Managing Director of Global Financial Crimes
3 ("GFC").

4 11. William Golden was an Operations Managing Director.

5 12. Jennifer Lennon was a Program Management Senior Vice President.

6 13. Renee Johnson led the Consumer Claims Resolution and Recovery
7 group.

8 14. Ryan Schwartz was a GFC specialist. In that role, Mr. Schwartz was
9 four reporting structures beneath the CEO.

10 15. Bradley Garfield was Head of Commercial Cards Product Management.

11 16. Anne Holt was Director of GFC.

12 17. Faiz Ahmad was

13 18. Melissa Ramirez was a business banking operations executive in
14 Commercial Card Fulfillment, Service, & Operations.

15 19. William Fox was the GFC Global Head. Prior to joining BANA, he
16 served as the former Director of the Financial Crimes Enforcement Network.

17 20. Jennifer Ehresman was Head of Consumer Client Protection.

18 21. Paul Simpson was Managing Director of Business Executive
19 Operations.

20 I declare under penalty of perjury under the laws of the United States that the
21 foregoing is true and correct. Executed on April 11, 2025, in

22 Rialto, CA.

23
24
25 By: Stacey Ruiz

26 BANK OF AMERICA, N.A.

27 Name: Stacey Ruiz

28 Title: Assistant Vice President

Date: April 11, 2025