

DX 2

**REDACTED VERSION OF
DOCUMENT SOUGHT TO
BE SEALED PURSUANT TO
STIPULATED
PROTECTIVE ORDER**

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12 **BANK OF AMERICA, N.A.**

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
15 **SAN DIEGO DIVISION**

16 IN RE: BANK OF AMERICA
17 CALIFORNIA UNEMPLOYMENT
18 BENEFITS LITIGATION

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

19 **DECLARATION OF WILLIAM**
20 **GOLDEN IN SUPPORT OF**
21 **DEFENDANT BANK OF AMERICA,**
22 **N.A.'S MOTION FOR PARTIAL**
23 **SUMMARY JUDGMENT**

24 Date: April 17, 2026
25 Time: 1:30 p.m.
26 Ctrm: 2D – 2nd Floor
27 Judge: Hon. Gonzalo P. Curiel

28 FILED PROVISIONALLY UNDER SEAL
PURSUANT TO STIPULATED PROTECTIVE
ORDER

1 I, William Golden, hereby declare as follows:

2 1. I am employed by Defendant Bank of America, N.A. (BANA) as a
3 Managing Director. I make this declaration based upon personal knowledge and
4 belief, upon BANA's records maintained in the ordinary course and scope of business,
5 and upon information gathered from other BANA employees within the scope of their
6 responsibilities. If called to testify as to any of the matters set forth in this declaration,
7 I could and would competently testify thereto.

8 2. Between approximately July 2020 and November 2021, my
9 responsibilities included oversight of call center operations for BANA's state
10 unemployment insurance (UI) benefit prepaid card programs, including the call center
11 operations serving the UI benefits program managed by California Employment
12 Development Department (EDD).

13 3. While overseeing call center operations, I regularly reviewed and am
14 familiar with data metrics detailing performance of the various call centers supporting
15 the UI program. These metrics included [REDACTED]

16 [REDACTED]
17 [REDACTED] This data was collected both
18 internally and by vendors hired by BANA to support the call centers, including TTEC
19 ACT, and Sykes. *See infra* 2, 5.

20 4. While overseeing call center operations, I also regularly reviewed reports
21 showing the [REDACTED]

22 [REDACTED]
23 **BANA's UI Prepaid Call Centers**

24 5. During the period when I was responsible for overseeing the call center
25 operations for BANA's state UI benefit prepaid card programs, [REDACTED]

26 [REDACTED]
27 [REDACTED] My understanding is that this was based on the respective responsibilities
28 of EDD and BANA as set forth in the Bank's agreement with EDD.

1 6. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 7. In March 2020, in the BANA UI prepaid Fraud and Claims Call Centers

9 and the Main Call Center for California, approximately [REDACTED] Full Time Equivalents

10 (FTE) received approximately [REDACTED] calls, with average wait times of [REDACTED].¹

11 By May 2020, call volumes had increased to [REDACTED] across all BANA UI prepaid

12 call centers, and eventually peaked at over [REDACTED] calls in September 2020. *See*

13 DX 173; DX 174; DX 25; DX 24. Over the period of one year, spanning March 1,

14 2020 through February 28, 2021, BANA call center vendor TTEC, *see infra* 5, alone

15 received over [REDACTED]. DX 25.

16 8. To meet the unprecedented spike in call volumes, the Bank engaged

17 additional call center resources through existing Bank vendors (ACT, TTEC, and

18 Sykes). The vendors the Bank engaged were well-known to and vetted by the Bank,

19 and had reliably provided similar resources for many years.

20

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22 ¹ FTE refers to the number of 40 hours worked in 1 week. For example, 4 customer

23 service representatives (CSRs) each working 10 hours in the same week would

24 account for 1 single FTE. Available to work is defined as logged into the phone taking

25 a call or available to take a call. [REDACTED]

26 [REDACTED], true and accurate copies of which

27 are attached as exhibits to the Declaration of Laura G. Brys (Brys Decl.) as DX 172,

28 DX 173, and DX 174. [REDACTED]

[REDACTED] in response to a subpoena served by Plaintiffs on TTEC,

a true and accurate copy of which is attached to the Brys Decl. as DX 25 and [REDACTED]

[REDACTED] in response to a subpoena served on ACT by

Plaintiffs, a true and accurate copy of which is attached to the Brys Decl. as DX 24.

1 9. Beginning in March 2020, due to health and safety concerns caused by
2 the pandemic, call center agents transitioned to a work-from-home environment. This
3 created new technology, training, and data security challenges, as it [REDACTED]

4 [REDACTED]
5 [REDACTED]
6 10. Around the same time, the COVID-19 pandemic and related shelter-in-
7 place orders across the United States caused many state and local governments to shut
8 down. This often made it impossible to [REDACTED]
9 [REDACTED]. In order to keep up with hiring demands and fully staff BANA’s call centers
10 so as to better assist consumers, [REDACTED]

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 11. As soon as government services resumed, [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 12. As a result of BANA’s efforts, BANA was able to grow its UI prepaid
24 call center staffing from [REDACTED] FTE² in March 2020 to over [REDACTED] FTE by December
25 2020. *See* DX 173; DX 174; DX 25; DX 24.

26
27
28 ² Note, this total reflects the average FTE working in the Fraud and Claims Call
Centers as well as the Main Call Center for California in March 2020.

1 13. In addition to securing the necessary staffing and resources required to
2 normalize call volumes quickly, [REDACTED]

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

8 **Claims Call Center Staffing Metrics**

9 14. In March 2020, the Claims Call Center employed approximately [REDACTED] FTEs
10 and was able to respond to calls within an average of approximately [REDACTED].
11 Between March and October 2020, the Claims Call Center experienced a [REDACTED]
12 [REDACTED] in daily call volume, from an average of [REDACTED] calls per week, to as
13 many as [REDACTED] per week in May 2020, and peaked at more than [REDACTED] per week in
14 October 2020 (which was a more than [REDACTED] from pre-pandemic demand).
15 See DX 173.

16 15. In response, in late summer and early fall of 2020, BANA expanded call
17 center capacity with a focus on [REDACTED]
18 [REDACTED]
19 [REDACTED]. By December 2020, [REDACTED]
20 [REDACTED] DX 173.

21 16. During the Customer Service Class (Claims Class) period (September
22 13, 2020 through November 21, 2020) BANA [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED] were produced in this
27 litigation, true and accurate copies of which are attached to the Brys Decl. as DX 45;
28 DX 48; DX 49.

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 17. BANA call center vendors were [REDACTED]
[REDACTED]
[REDACTED] true and correct copies of which are attached to the Brys Decl.
4 as DX 44 and DX 47 .

5 18. Whenever I [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

12 19. Between August 2020 and November 2020, it generally took about
13 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

17 20. Although some callers experienced extended wait times during spikes in
18 call volumes, those spikes were not avoidable under these circumstances given the
19 impact of the global pandemic. [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]. DX 173.

23
24 I declare under the penalty of perjury that the foregoing is true and correct.
25 Executed on this 15th day of October, 2025.

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27 
28

WILLIAM GOLDEN