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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-GPC-MSB

**MOTION TO FILE DOCUMENTS
UNDER SEAL**

Judge: Hon. Gonzalo P. Curiel
Ctrm: 2D (2nd Floor)

This Document Relates to All Actions

MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 79.2 and Section 12.5 of the Stipulated Protective Order (ECF 82) in this case and the Court's Civil Pretrial & Trial Procedures, Plaintiffs move to file under seal the following:

1. Portions of Plaintiffs' Memorandum of Points and Authorities in support of Plaintiffs' *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which quote portions of the Court's Order Granting Class Certification that this Court previously ordered sealed. *See* ECF 494, 498.
2. The April 4, 2025 Expert Report of Victor Stango, attached as Exhibit 1 to the Declaration of James Baltzer in Support of Plaintiffs' *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.
3. Excerpts of the May 30, 2025 Deposition of Victor Stango, attached as Exhibit 3 to the Declaration of James Baltzer in Support of Plaintiffs' *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which Defendant Bank of America, N.A. has designated confidential in its entirety.
4. Portions of Plaintiffs' Memorandum of Points of Authorities in support of Plaintiffs' *Daubert* Motion to Exclude Certain Testimony of Victor Stango, which quote or discuss portions of the Expert Report of Victor Stango, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.

Respectfully submitted,

Dated: October 17, 2025

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Brian Danitz
JOSEPH W. COTCHETT
BRIAN DANITZ
KARIN B. SWOPE
VASTI S. MONTIEL
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1 Dated: October 17, 2025

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3 By: /s/ Connie K. Chan

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6 JAMES BALTZER

7 *Co-Lead Counsel for Plaintiffs and the Class*

SIGNATURE ATTESTATION

Pursuant to section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I, Brian Danitz, attest that the other signatories listed, and on whose behalf this filing is submitted, concur in the filing content and have authorized this filing.

Dated: October 17, 2025

/s/ *Brian Danitz*

Brian Danitz