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

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

IN RE: BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION

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

**DECLARATION OF TERESA A.
PESCE IN SUPPORT OF
DEFENDANT BANK OF
AMERICA, N.A.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Date: April 17, 2026
Time: 1:30 p.m.
Ct rm: 12A – 12th Floor
Judge: Hon. Gonzalo P. Curiel

EXHIBITS FILED PROVISIONALLY UNDER
SEAL PURSUANT TO STIPULATED
PROTECTIVE ORDER

1 I, Teresa A. Pesce, declare and state as follows:

2 1. I am over 18 years of age and am competent to testify in this matter. I
3 make this declaration in support of Defendant Bank of America, N.A.'s (BANA)
4 Motion for Partial Summary Judgment.

5 2. I have been retained by Goodwin Procter LLP, counsel for BANA to serve
6 as an expert in this case.

7 3. If called as a witness at trial, I would testify to each and all of the opinions
8 and statements contained in my March 4, 2025 Expert Report and my April 4, 2025
9 Expert Report submitted in this matter (Expert Reports), true and correct copies of
10 which are attached to the Declaration of Laura G. Brys as Exhibits 11-A and 11-B
11 respectively.

12 4. The contents of my Expert Reports are based on my personal knowledge,
13 education, training, research, and professional industry experience in the field of
14 financial-crimes, regulatory enforcement, and compliance, as well as the information
15 and documents made available to me in this action, as referenced in the Expert
16 Reports.

17 I, Teresa A. Pesce, declare under penalty of perjury that the foregoing is true
18 and correct. Executed on this 13 day of October 2025.

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TERESA A. PESCE