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11 Attorneys for Defendant
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 PAMELA**
20 **JOSEPH IN SUPPORT OF**
21 **DEFENDANT BANK OF**
22 **AMERICA, N.A.'S MOTION FOR**
23 **PARTIAL SUMMARY**
24 **JUDGMENT**

25 Date: April 17, 2026
26 Time: 1:30 p.m.
27 Ctrm: 12A – 12th Floor
28 Judge: Hon. Gonzalo P. Curiel

EXHIBITS FILED PROVISIONALLY UNDER
SEAL PURSUANT TO STIPULATED
PROTECTIVE ORDER

1 I, Pamela Joseph, declare and state as follows:

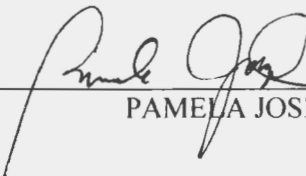
2 1. I am over 18 years of age and am competent to testify in this matter. I
3 make this declaration in support of Bank of America, N.A.'s (BANA) Motion for
4 Partial Summary Judgment.

5 2. I have been retained by BANA to serve as an expert in this case.

6 3. If called as a witness at trial, I would testify to each and all of the
7 opinions and statements contained in my March 4, 2025 Expert Report and my
8 April 4, 2025 Expert Report submitted in this matter (Expert Reports), true and
9 correct copies of which are attached to the Declaration of Laura G. Brys as Exhibits
10 12-A and 12-B respectively.

11 4. The contents of my Expert Reports are based on my personal knowledge,
12 education, training, academic research, and professional industry experience in the
13 electronic payments industry, as well as the information and documents made
14 available to me in this action, as listed in the report itself.

15 I, Pamela Joseph, declare under penalty of perjury that the foregoing is true
16 and correct. Executed on this 11th day of October 2025.

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19 PAMELA JOSEPH
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