

**DX 9**

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17 Attorneys for Defendant  
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 CARL PRY 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 – 12<sup>th</sup> Floor  
Judge: Hon. Gonzalo P. Curiel

EXHIBITS FILED PROVISIONALLY UNDER  
SEAL PURSUANT TO STIPULATED  
PROTECTIVE ORDER

1 I, Carl Pry, declare and state as follows:

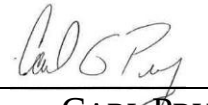
2 1. I am over 18 years of age and am competent to testify in this matter. I make  
3 this declaration in support of Defendant Bank of America, N.A.'s (BANA) Motion  
4 for Partial Summary Judgment.

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 opinions  
7 and statements contained in my April 4, 2025 Expert Report submitted in this matter  
8 (Expert Report), a true and correct copy of which is attached to the Declaration of  
9 Laura G. Brys as DX 9-A.

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

14 I, Carl Pry, declare under penalty of perjury that the foregoing is true and  
15 correct. Executed on this 10<sup>th</sup> day of October 2025.

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19 CARL PRY  
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