

DX 13

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10 Attorneys for Defendant
11 **BANK OF AMERICA, N.A.**

12
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 STEPHEN**
20 **HINDLE IN SUPPORT OF**
21 **DEFENDANT BANK OF**
22 **AMERICA, N.A.'S MOTION FOR**
23 **PARTIAL SUMMARY JUDGMENT**

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

28 EXHIBITS FILED PROVISIONALLY UNDER
SEAL PURSUANT TO STIPULATED
PROTECTIVE ORDER

1 I, Stephen Hindle, declare and state as follows:

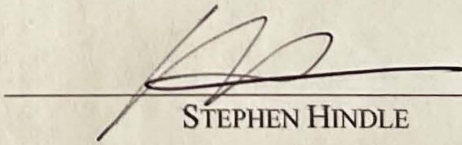
2 1. I am over 18 years of age and am competent to testify in this matter. I make
3 this declaration in support of Defendant Bank of America, N.A.'s (BANA) Motion
4 for Partial Summary Judgment.

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 Rebuttal Report submitted in
8 this matter (Expert Report), a true and correct copy of which is attached to the
9 Declaration of Laura G. Brys as DX 13-A.

10 4. The contents of my Expert Report are based on my personal knowledge,
11 education, training, academic research, and professional industry experience working
12 with call centers for a variety of institutions including large banks, as well as the
13 information and documents made available to me in this action, as listed in the report
14 itself.

15 I, Stephen Hindle, declare under penalty of perjury that the foregoing is true
16 and correct. Executed on this 10th day of October 2025.

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STEPHEN HINDLE