

DX 10

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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 RUSSELL
CRONAN IN SUPPORT OF
DEFENDANT BANK OF
AMERICA, N.A.'S MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

Date: April 17, 2026

Time: 1:30 p.m.

Ctrm: 12A – 12th Floor

Judge: Hon. Gonzalo P. Curiel

EXHIBITS FILED PROVISIONALLY UNDER
SEAL PURSUANT TO STIPULATED
PROTECTIVE ORDER

1 I, Russell Cronan, 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 March 4, 2025 Expert Report and my April 4, 2025
8 Expert Rebuttal Report submitted in this matter (Expert Reports), true and correct
9 copies of which are attached to the Declaration of Laura G. Brys as DX 10-A and 10-
10 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
13 banking regulatory enforcement and compliance, including compliance with
14 Regulation E, as well as the information and documents made available to me in this
15 action, as listed in the report itself.

16 I, Russell Cronan, declare under penalty of perjury that the foregoing is true
17 and correct. Executed on this 13th day of October 2025.

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21 _____
22 RUSSELL CRONAN
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