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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED PURSUANT TO STIPULATED PROTECTIVE ORDER

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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 WILLIAM M. MARTIN 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

FILED PROVISIONALLY UNDER SEAL PURSUANT TO STIPULATED PROTECTIVE ORDER

I, William M. Martin, hereby declare as follows:

1. I am employed by Defendant Bank of America, N.A. (BANA), a party to this action, as Senior Vice President of Fraud Operations and a Prepaid Fraud Operations Executive. I make this declaration based upon personal knowledge and belief, upon BANA's records maintained in the ordinary course and scope of business, and upon information gathered from other BANA employees within the scope of their responsibilities.. If called to testify as to any of the matters set forth in this declaration, I could and would competently testify thereto.

2. In my capacity as Program Management Executive in Prepaid Unemployment, and in my prior role as Senior Fraud Policy Manager in Prepaid Unemployment, my responsibilities include leading the prepaid fraud operations team, analyzing fraud associated with unauthorized transaction claims, and identifying characteristics of those claims in order to detect and prevent future fraud. In my current role, I also function as the Head of the Prepaid Fraud Operations team. In the past, I was also responsible for commercial, prepaid, and treasury fraud operations, which included similar responsibilities but for commercial and treasury products in addition to prepaid.

3. In my current and prior roles, I have been directly and personally involved in the development and implementation of BANA's fraud detection capabilities and efforts, including its use of anti-fraud strategies in State unemployment insurance (UI) programs, including California's Employment Development Department (EDD) UI program. Specifically, I am familiar with the [redacted]

BANA's Use of the Fraud Filter to [redacted] Certain Accounts

4. As a reasonable control to help keep BANA from being used as a means of fraud, BANA has historically used and continues to use tactics to [redacted]

5. When BANA first implemented the fraud detection strategy referred to as the "Fraud Filter" on September 28, 2020, [redacted]

6. By early 2021, [redacted] In an effort to allow potentially legitimate EDD cardholders to more efficiently regain access to their accounts, as of March 18, 2021, BANA [redacted]. In doing

so, [redacted]

7. [redacted]

Background on EMV Chip Technology

8. EMV chip technology can deter certain types of third-party fraud, but it does not eradicate all fraudulent transactions. For example, EMV chip technology does not prevent first-party benefits enrollment fraud, card-not-present fraudulent transactions, or the fraudulent use of the card if lost or stolen.

9. While EMV chip technology makes it more difficult to create counterfeit cards, it does not prevent the [redacted].

10. EMV chip technology [redacted]

[redacted]

[redacted]

11. After receiving approval from California EDD, in July 2021, BANA began issuing [redacted] EDD prepaid debit cards with EMV chip technology. [redacted]. A true and accurate copy of an email dated August 31, 2021 that I sent concerning [redacted] is attached as an Exhibit to the Declaration of Laura G. Brys **as DX 181,** Bates stamped BANA_EDD_MDL-00654305. [redacted]

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

WILLIAM M. MARTIN