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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 LINDSAY E.
HOYLE IN SUPPORT OF
DEFENDANT BANK OF AMERICA,
N.A.'S REPLY IN SUPPORT OF ITS
MOTION TO EXCLUDE THE
PURPORTED EXPERT OPINIONS OF
DAVID I. LEVINE (ECF 566)**

Ctrm: 12A – 12th Floor

Judge: Hon. Gonzalo P. Curiel

EXHIBIT FILED PROVISIONALLY UNDER SEAL
PURSUANT TO STIPULATED PROTECTIVE
ORDER

1 I, Lindsay E. Hoyle, state and declare as follows:

2 1. I am Counsel at Goodwin Procter LLP, and counsel of record for
3 Defendant Bank of America, N.A. (BANA) in the above-captioned lawsuit.

4 2. I have personal knowledge of the facts set forth in this declaration, and
5 if called upon to do so, I could and would competently testify thereto.

6 3. I make this declaration in support of BANA's Reply in Support of its
7 Motion to Exclude the Purported Expert Opinions of David I. Levine.

8 4. Attached hereto as **HX 40** is a true and correct copy of the Expert Report
9 of Victor Stango, and appendices thereto, dated April 4, 2025.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on February 20, 2026 in New York, New York.

12
13 /s/ Lindsay E. Hoyle

14 LINDSAY E. HOYLE
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