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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 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
CHLOE N. EAST**

Ctrm: 12A – 12th Floor

Judge: Hon. Gonzalo P. Curiel

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 Purported Expert Opinions of Chloe E. East.

8 4. Attached hereto as **HX 52** is a true and correct copy of excerpts of the
9 official transcript of BANA's deposition of Chloe Noel East, Ph.D., taken on May
10 15, 2025.

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

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

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14 /s/ Lindsay E. Hoyle
15 LINDSAY E. HOYLE
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