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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

Civil Action No. 21-MD-02992-GPC-MSB

IN RE: BANK OF AMERICA CALIFORNIA
UNEMPLOYMENT BENEFITS LITIGATION

VIDEO DEPOSITION OF CHLOE NOEL EAST, Ph.D.
May 15, 2025

APPEARANCES:

ON BEHALF OF THE PLAINTIFFS:

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1 A. Yes, I believe I did. And I believe the 11:51AM
2 reason I did not focus on this in my report is that many 11:51AM
3 of the points this paper makes are similar to the points 11:51AM
4 in Exhibit 10. 11:51AM

5 Q. Which is an article by Ganong. 11:51AM

6 A. Yes. 11:51AM

7 Q. Okay. After reviewing and refreshing your 11:51AM
8 recollection regarding the statements in Exhibit 12, are 11:51AM
9 you aware that due to expanded UI and stimulus payments, 11:51AM
10 unemployed households with incomes under 1,000 per month 11:51AM
11 received replacement rates of over 300 percent? 11:51AM

12 A. Yes. 11:51AM

13 Q. Okay. Are you aware that survey data 11:52AM
14 indicates that U.S. households reported spending only 11:52AM
15 approximately 40 percent of their first stimulus check 11:52AM
16 with 30 percent saved and another 30 percent used to pay 11:52AM
17 down debt? 11:52AM

18 MS. HUNSICKER: Objection. Assumes facts. 11:52AM

19 A. Can you show me the reference for that? 11:52AM

20 Q. (By Ms. Brys) Yes, I can. This will be 11:52AM
21 Exhibit 13. 11:52AM

22 (Exhibit Number 13 was marked.) 11:52AM

23 A. Do you want to mark this? Does it matter? 11:52AM

24 Q. Oh. Oh. Oh. I took the wrong -- 11:52AM

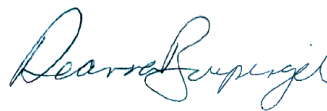
25 MS. BRYs: There's no sticker. 11:52AM

1 CERTIFICATE OF COURT REPORTER

2 I, DEANNA BAYSINGER, a Registered Professional
3 Reporter and Notary Public within and for the State of
4 Colorado, commissioned to administer oaths, do hereby
5 certify that previous to the commencement of the
6 examination, the witness was duly sworn by me to testify
7 the truth in relation to matters in controversy between
8 the said parties; that the said deposition was taken in
9 stenotype by me at the time and place aforesaid and was
10 thereafter reduced to typewritten form by me; and that
11 the foregoing is a true and correct transcript of my
12 stenotype notes thereof.

13 That I am not an attorney nor counsel nor in
14 any way connected with any attorney or counsel for any of
15 the parties to said action nor otherwise interested in the
16 outcome of this action.

17 My commission expires: November 8, 2026.

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21 DEANNA BAYSINGER

22 Registered Professional Reporter

23 Notary Public, State of Colorado
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