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11 Attorneys for Defendant
12 **BANK OF AMERICA, N.A.**

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
15 **SAN DIEGO DIVISION**

16 IN RE: BANK OF AMERICA
17 CALIFORNIA UNEMPLOYMENT
18 BENEFITS LITIGATION

Case No. 21-MD-02992-GPC-MSB

**DECLARATION OF LINDSAY E.
HOYLE IN SUPPORT OF
DEFENDANT BANK OF
AMERICA, N.A.'s MOTION TO
EXCLUDE PURPORTED
EXPERT OPINIONS OF JAY
MINNUCCI**

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, 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 Motion to Exclude the
7 Purported Expert Opinions of Jay Minnucci.

8 4. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from
9 BANA’s Responses and Objections to Plaintiff Yick’s Fifth Set of Interrogatories,
10 dated February 2, 2024.

11 5. Attached hereto as **Exhibit 11** is a true and correct copy of the Expert
12 Report of Jay Minnucci, and appendices thereto, dated March 4, 2025.

13 6. Attached hereto as **Exhibit 11.A** is a true and correct copy of a
14 document produced by BANA in this action Bates stamped BANA_EDD_MDL-
15 00719115.

16 7. Attached hereto as **Exhibit 12** is a true and correct copy of a document
17 produced by BANA in this action Bates stamped BANA_EDD_MDL-00871377.

18 8. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from
19 the official transcript of Plaintiffs’ deposition of BANA’s Rule 30(b)(6) designee,
20 William Golden, taken on February 22, 2024.

21 9. Attached hereto as **Exhibit 14** is a true and correct copy of a document
22 produced by BANA in this action Bates stamped BANA_EDD_MDL-00534403.

23 10. Attached hereto as **Exhibit 15** is a true and correct copy of a publicly
24 available handbook by ContactBabel titled “The US Contact Center Decision-
25 Makers’ Guide 2021,” dated 2021.

26 11. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from
27 the official transcript of BANA’s deposition of Plaintiffs’ expert Jay Minnucci, taken
28 on April 23, 2025.

1 12. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from
2 the official transcript of Plaintiffs' deposition of Jennifer Ehresman, taken on
3 February 19, 2025.

4 13. Attached hereto as **Exhibit 18** is a true and correct copy of the Expert
5 Report of Teresa A. Pesce, and appendices thereto, dated March 4, 2025.

6 14. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts from
7 the official transcript of Plaintiffs' deposition of BANA's Rule 30(b)(6) designee,
8 Shane Daniels, taken on February 6, 2024.

9 15. Attached hereto as **Exhibit 20** is a true and correct copy of a document
10 produced by BANA in this action Bates stamped BANA_EDD_MDL-00416783.

11 16. Attached hereto as **Exhibit 21** is a true and correct copy of Exhibit 8 to
12 BANA's deposition of Plaintiffs' expert Jay Minnucci, taken on April 23, 2025.

13 17. Attached hereto as **Exhibit 22** is a true and correct copy of a publicly
14 available handbook by ContactBabel titled "US Contact Center Verticals: Finance,"
15 dated 2024.

16 18. Attached hereto as **Exhibit 23** is a true and correct copy of Exhibit 15
17 to BANA's deposition of Plaintiffs' expert Jay Minnucci, taken on April 23, 2025.

18 19. Attached hereto as **Exhibit 24** is a true and correct copy of the Expert
19 Report of Stephen Hindle, and appendices thereto, dated April 4, 2025.

20 20. Attached hereto as **Exhibit 25** is a true and correct copy of a document
21 produced by BANA in this action Bates stamped BANA_EDD_MDL-00493780.

22 21. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts from
23 the official transcript of Plaintiffs' deposition of Faiz A. Ahmad, taken on January
24 29, 2025.

25 22. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts from
26 the official transcript of Plaintiffs' deposition of Bradley Garfield, taken on
27 December 10, 2024.

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1 I declare under penalty of perjury that the foregoing is true and correct.
2 Executed on October 17, 2025, in Old Greenwich, CT.

3 /s/ Lindsay E. Hoyle

4 LINDSAY E. HOYLE
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