

JOSEPH W. COTCHETT (SBN 36324)
jcotchett@cpmlegal.com

BRIAN DANITZ (SBN 247403)
bdanitz@cpmlegal.com

KARIN B. SWOPE (Pro Hac Vice)
kswope@cpmlegal.com

VASTI S. MONTIEL (SBN 346409)
vmontiel@cpmlegal.com

CAROLINE A. YUEN (SBN 354388)
cyuen@cpmlegal.com

COTCHETT, PITRE & McCARTHY, LLP

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Fax: (650) 697-0577

MICHAEL RUBIN (SBN 80618)
mrubin@altber.com

STACEY M. LEYTON (SBN 203827)
sleyton@altber.com

CONNIE K. CHAN (SBN 284230)
cchan@altber.com

JAMES BALTZER (SBN 332232)
jbaltzer@altber.com

KATHERINE BASS (SBN 344748)
kbass@altber.com

ALTSHULER BERZON LLP

177 Post Street, Suite 300

San Francisco, CA 94108

Telephone: (415) 421-7151

Fax: (415) 362-8064

Co-Lead Counsel for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE BANK OF AMERICA
CALIFORNIA UNEMPLOYMENT
BENEFITS LITIGATION**

Case No. 3:21-md-02992-GPC-MSB

**DECLARATION OF REGINA WANG
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO EXCLUDE CERTAIN
EXPERT OPINIONS OF JAY
MINNUCCI**

This Document Relates to All Actions

Date: April 17, 2026
Time: 1:30 p.m.
Judge: Hon. Gonzalo P. Curiel
Ctrm: 2D (2nd Floor)

1 I, **REGINA WANG**, declare as follows:

2 1. I am an attorney at the law firm of Cotchett, Pitre & McCarthy, LLP, Co-Lead
3 Counsel for Plaintiffs and the Class in this multi-district litigation. I submit this declaration
4 in support of Plaintiffs' Opposition to Defendant's Motion to Exclude Certain Expert
5 Opinions of Jay Minnucci. I have personal knowledge of the matters stated herein and, if
6 called as a witness, I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report
8 of Jay Minnucci, and appendices thereto, dated March 4, 2025.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the
10 official transcript of BANA's deposition of Plaintiffs' expert Jay Minnucci, taken on April
11 23, 2025.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of the Expert Rebuttal
13 Report of Jay Minnucci, and appendix thereto, dated November 21, 2024.

14 5. Attached hereto as **Exhibit 4** is a true and correct copy of Exhibit 8 to
15 BANA's deposition of Plaintiffs' expert Jay Minnucci, taken on April 23, 2025.

16 6. Attached hereto as **Exhibit 5** is a true and correct copy of Exhibit 15 to
17 BANA's deposition of Plaintiffs' expert Jay Minnucci, taken on April 23, 2025.

18
19 I declare, under penalty of perjury, that the foregoing is true and correct. Executed
20 this 8th day of January 2026, at Burlingame, California.

21
22
23 /s/ Regina Wang
24 REGINA WANG
25
26
27
28

SIGNATURE ATTESTATION

Pursuant to section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I, Brian Danitz, attest that the other signatories listed, and on whose behalf this filing is submitted, concur in the filing content and have authorized this filing.

Dated: January 8, 2026

/s/ Brian Danitz

BRIAN DANITZ