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**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

**MOTION TO FILE DOCUMENTS
UNDER SEAL RE: PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO EXCLUDE CERTAIN
EXPERT OPINIONS OF
GREG J. REGAN**

Judge: Hon. Gonzalo P. Curiel
Ctrm: 2D (2nd Floor)

This Document Relates to All Actions

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

MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 79.2 and Section 12.5 of the Stipulated Protective Order (ECF 82) in this case and the Court's Civil Pretrial & Trial Procedures, Plaintiffs move to file under seal the following:

1. Portions of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which quote portions of the Court's Order Granting Class Certification that this Court previously ordered sealed. *See* ECF 494, 498.
2. Portions of the March 4, 2025 Expert Report of Greg J. Regan, attached as Exhibit A to the Declaration of James Baltzer in Support of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which have been designated confidential pursuant to the Stipulated Protective Order.
3. Portions of the August 29, 2024 Expert Report of Greg J. Regan, attached as Exhibit B to the Declaration of James Baltzer in Support of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, portions of which have been designated confidential pursuant to the Stipulated Protective Order.
4. The April 4, 2025 Expert Report of Victor Stango, attached as Exhibit C to the Declaration of James Baltzer in Support of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.
5. The April 4, 2025 Expert Report of Justin McCrary, attached as Exhibit D to the Declaration of James Baltzer in Support of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.

6. Portions of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which quote or discuss portions of the March 4, 2025 and August 29, 2024 Expert Reports of Greg J. Regan, portions of which have been designated confidential pursuant to the Stipulated Protective Order.

7. Portions of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which quote or discuss portions of the Expert Report of Victor Stango, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.

8. Portions of Plaintiffs' Opposition to Defendant's *Daubert* Motion to Exclude Certain Expert Opinions of Greg J. Regan, which quote or discuss portions of the Expert Report of Justin McCrary, which Defendant Bank of America, N.A. has designated highly confidential in its entirety.

Respectfully submitted,

Dated: January 8, 2025

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Brian Danitz
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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