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19 [*ADDITIONAL COUNSEL LISTED IN SIGNATURE BLOCK*]

20 **UNITED STATES DISTRICT COURT**
21 **SOUTHERN DISTRICT OF CALIFORNIA**
22 **SAN DIEGO DIVISION**

23 IN RE: BANK OF AMERICA
24 CALIFORNIA UNEMPLOYMENT
25 BENEFITS LITIGATION

26 *This Document Relates to All Actions*

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

**DECLARATION OF LAURA G.
BRYN IN SUPPORT OF BANK OF
AMERICA, N.A.'S MOTION TO
DECERTIFY THE CLASSES**

Ctrm: 12A – 12TH Floor

Judge: Hon. Gonzalo P. Curiel

DECLARATION OF LAURA G. BRYs

I, Laura G. Brys, state and declare as follows:

1. I am an attorney licensed to practice before this Court.

2. I am a senior attorney at Goodwin Procter LLP, attorneys of record for Defendant Bank of America, N.A. (BANA) in this action.

3. I make this declaration in support of BANA's Motion to Decertify the Classes. I have personal knowledge of the matters set forth in this Declaration, and if called upon to do so, I could and would competently testify thereto.

4. Attached hereto as **Exhibit 1** is a true and correct copy of the official transcript from the Motion for Class Certification hearing on January 17, 2025.

5. Attached hereto as **Exhibit 2** is a true and correct copy of the official transcript from the Status Conference hearing on May 28, 2026.

6. Attached hereto as **Exhibit 3** is a true and correct copy of an Alert Memorandum by the United States Department of Labor Office of Inspector General, dated February 22, 2021.

7. Attached hereto as **Exhibit 4** is a true and correct copy of an Alert Memorandum by the United States Department of Labor Office of Inspector General, dated May 28, 2026.

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

Executed on this 8th day of June, 2026.

/s/ Laura G. Brys

LAURA G. BRYs