

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Case No. 25-cv-8520 (JSR)

**LEAD PLAINTIFF'S NOTICE OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT,
PRELIMINARY CERTIFICATION OF A SETTLEMENT CLASS, AND
APPROVAL OF NOTICE PLAN**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Stipulation of Settlement with exhibits, and all prior pleadings and proceedings had herein, Lead Plaintiff Jane Doe, by and through her attorneys, hereby moves the Court, before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York for entry of the [Proposed] Order Granting Preliminary Approval Pursuant to Fed. R. Civ. P. 23(e)(1) and Permitting Notice to the Class, agreed upon by all parties: (1) granting preliminary approval of the proposed Settlement; and (2) approving the form and manner of giving notice of the proposed Settlement to the Class. Defendant does not oppose the motion.

The Court will hold a hearing to consider the settlement proposal at 11 a.m. on April 2, 2026, in courtroom 14B of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York City, New York.

Dated: March 27, 2026

Respectfully Submitted,

/s/ David Boies

David Boies
Andrew Villacastin
Rachael Schafer
Boies Schiller Flexner LLP
55 Hudson Yards
New York, NY
Telephone: (212) 446-2300
Fax: (212) 446-2350
Email: dboies@bsfllp.com
Email: avillacastin@bsfllp.com
Email: rschafer@bsfllp.com

Sigrid McCawley
Daniel Crispino
Megan Nyman
Andrea Guzman
Boies Schiller Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33316
Telephone: (954) 356-0011
Fax: (954) 356-0022
Email: smccawley@bsfllp.com
Email: dcrispino@bsfllp.com
Email: mnyman@bsfllp.com
Email: aguzman@bsfllp.com

Jessica Lim
Boies Schiller Flexner LLP
2029 Century Park East, Suite 1520
Los Angeles, CA 90067
Telephone: (213) 995-5745
Email: jlim@bsfllp.com

Bradley J. Edwards
Brittany N. Henderson
Dean Kaire
Edwards Henderson
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301
Telephone: (954) 524-2820
Fax: (954) 524-2822
Email: brad@cvlf.com
Email: brittany@cvlf.com
Email: dean@cvlf.com

Counsel for Plaintiff Jane Doe