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15 **UNITED STATES DISTRICT COURT**
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
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18 NANTWORKS, LLC, a Delaware
19 limited liability company, and NANT
HOLDINGS IP, LLC, a Delaware
20 limited liability company,

21 Plaintiffs,

22 vs.

23 BANK OF AMERICA
CORPORATION, a Delaware
24 corporation, and BANK OF
AMERICA, N.A., a national banking
25 association,

26 Defendants.
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CASE NO. 2:20-cv-7872-GW-PVC

JOINT STATUS REPORT

Hon. George H. Wu

1 Pursuant to the Court’s directive (Dkt. 282), Plaintiffs NantWorks LLC and
2 Nant Holdings IP, LLC (“NantWorks”) and Defendants Bank of America Corporation
3 and Bank of America, N.A. (“Bank of America”) jointly submit this status report in
4 advance of the post-mediation status conference on November 9, 2023.

5 The parties participated in in-person mediation with the Honorable Layn R.
6 Phillips (ret.) in Corona Del Mar, California on October 31, 2023. The parties were
7 unable to reach an agreement.

8 **Additional Update from Defendants**

9 The Parties are continuing to work toward completing all remaining
10 depositions, which due to conflicts are now anticipated to be complete by the end of
11 November, which is after the close of fact discovery.

12 Defendants are also still waiting for additional/supplemental discovery from
13 Plaintiffs relating to Plaintiffs’ alleged trade secrets (and pursuant to this Court’s
14 order), as well as relating to Google Analytics.

15 **Additional Update from Plaintiffs**

16 In addition to dates for the remaining depositions, Plaintiffs are also waiting for
17 witness designations from Defendants for numerous topics pursuant to Plaintiffs’
18 Rule 30(b)(6) deposition notice. Additionally, Defendants have yet to produce
19 relevant source code that Plaintiffs have requested. Given these outstanding issues,
20 an extension to the current case schedule may be necessary.

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1 Respectfully submitted,

2 Dated: November 6, 2023

 QUINN EMANUEL URQUHART &
 SULLIVAN, LLP

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By: /s/ Eric Huang
Eric Huang
Attorneys for Plaintiffs
NANTWORKS, LLC AND NANT
HOLDINGS IP, LLC

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8 Dated: November 6, 2023

 WINSTON & STRAWN LLP

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By: /s/ E. Danielle T. Williams
E. Danielle T. Williams
Attorneys for Defendants
BANK OF AMERICA CORPORATION
and BANK OF AMERICA, N.A.

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FILER'S ATTESTATION

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I, Eric Huang, am the ECF user whose ID and password were used to file this
JOINT STATUS REPORT. Pursuant to L.R. 5-4.3.4(a)(2), I hereby attest that
counsel for Defendants concurred in the content of this document and authorized the
filing of this document.

By: /s/ Eric Huang