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BANK OF AMERICA CORPORATION
and BANK OF AMERICA, N.A.

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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 STIPULATION TO
EXTEND CASE SCHEDULE**

Hon. George H. Wu

1 Plaintiffs NantWorks LLC and Nant Holdings IP, LLC (“NantWorks”) and
 2 Defendants Bank of America Corporation and Bank of America, N.A. (“Bank of
 3 America”), through their counsel of record, stipulate and agree as set forth below.

4 WHEREAS, NantWorks and Bank of America have been diligently engaged
 5 in discovery in this action, and many of the parties’ witnesses have already been
 6 deposed;

7 WHEREAS, the parties are continuing to work toward completing all
 8 remaining depositions, which are anticipated to be complete by mid-December due to
 9 witnesses’ personal matters and scheduling conflicts;

10 WHEREAS, the parties have agreed that the current case schedule should be
 11 altered. Pursuant to the Court’s directive during the November 9, 2023 status
 12 conference, the proposed schedule does not alter the dates of the pretrial conference
 13 or trial (Dkt. 285);

14 THEREFORE, the parties and respectfully request that the Court modify the
 15 case schedule as follows:¹

| Event | Current Date | Proposed Date |
|--|-------------------|-------------------|
| Deadline for NantWorks to supplement Interrogatory No. 6 | N/A | December 7, 2023 |
| Fact Discovery Complete | November 16, 2023 | December 15, 2023 |
| Opening Expert Reports | December 14, 2023 | January 30, 2024 |
| Rebuttal Expert Reports | February 8, 2024 | March 14, 2024 |
| Expert Discovery Complete | February 22, 2024 | March 28, 2024 |
| Summary Judgment & Daubert Motions due | March 14, 2024 | April 23, 2024 |

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¹ The previous schedule included a January 4, 2024 deadline for mediation and a post-mediation status conference on January 18, 2024. However, the parties already participated in mediation on October 31, 2023, and the Court held a post-mediation status conference on November 9, 2023. Accordingly, the proposed extended schedule does not contain deadlines for these two events.

| Event | Current Date | Proposed Date |
|---|-----------------------------|---------------|
| Oppositions to Summary Judgment & Daubert Motions due | April 4, 2024 | May 9, 2024 |
| Replies to Summary Judgment and Daubert Motions due | April 11, 2024 | May 16, 2024 |
| Hearing on Summary Judgment and Daubert Motions | April 25, 2024 | May 23, 2024 |
| Pretrial Conference | August 8, 2024 at 8:30 a.m. | No change |
| Jury Trial | August 20, 2024 at 9 a.m. | No change |

The parties submit the accompanying declaration of Eric Huang in support hereof and respectfully request that the Court enter the proposed order filed concurrently herewith.

Respectfully submitted,

Dated: November 21, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Eric Huang

Eric Huang
Attorneys for Plaintiffs
NANTWORKS, LLC AND NANT
HOLDINGS IP, LLC

Dated: November 21, 2023

WINSTON & STRAWN LLP

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

I, Eric Huang, am the ECF user whose ID and password were used to file this JOINT STIPULATION AND PROPOSED ORDER TO EXTEND CASE SCHEDULE. 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