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9 10 11		Attorneys for Defendants BANK OF AMERICA CORPORATION and BANK OF AMERICA, N.A.
12	UNITED STATES DISTRICT COURT	
13	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
14151617	NANTWORKS, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company, Plaintiffs, vs.	Case No. 2:20-cv-07872-GW-PVC DEFENDANTS' NOTICE OF MOTION AND MOTION TO STRIKE CERTAIN OPINIONS IN DR. SCHONFELD'S OPENING EXPERT REPORT REGARDING INFRINGEMENT
18 19 20	BANK OF AMERICA CORPORATION, a Delaware corporation, and BANK OF AMERICA, N.A., a national banking association,	Date: May 2, 2024 Time: 8:30 am Courtroom: 9D
21 22	Defendants.	Judge: Honorable George H. Wu
23		
24	PUBLIC/REDACTED VERSION OF D	OCUMENT PROPOSED TO RE FILED
25	UNDER SEAL IN ITS ENTIRETY	
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on May 2, 2024 at 8:30 a.m., or as soon thereafter as the matter may be heard in Courtroom 9D, in the above-entitled Court, located at 350 West 1st Street, Los Angeles, CA, 90012, the Honorable George H. Wu presiding, Defendants Bank of America Corporation and Bank of America, N.A. (together "Defendants" or "Bank of America") hereby move this Court to strike portions of the Expert Report of Dr. Dan Schonfeld Regarding the Infringement of the Asserted Claims of U.S. Patent Nos. 9,031,278, 7,881,529, 7,899,252, 9,324,004, and 8,478,036 (the "Schonfeld Report," and the motion, "Schonfeld Motion to Strike"), pursuant to Rule 16 of the Federal Rules of Civil Procedure.

This Schonfeld Motion to Strike is based on the Notice of Motion, the Memorandum of Points and Authorities and supporting declarations, all pleadings, papers, and records filed in this action, and any further evidence that the Court may wish to consider at the hearing on this Schonfeld Motion to Strike.

This Schonfeld Motion to Strike is made following the conference of counsel pursuant to L.R. 7-3 which took place on March 5, 2024.

Dated: March 26, 2024

Respectfully submitted,

WINSTON & STRAWN LLP

By: /s/ Dustin J. Edwards

George C. Lombardi E. Danielle T. Williams Dustin J. Edwards

Attorneys for Defendants BANK OF AMERICA CORPORATION and BANK OF AMERICA, N.A.

