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

15
16 **UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 NANTWORKS, LLC, a Delaware
limited liability company, and
19 NANT HOLDINGS IP, LLC, a
Delaware limited liability company,

20 Plaintiffs,

21 vs.

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

25 Defendants.
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Case No. 2:20-cv-07872-GW-PVC

Judge: Hon. George H. Wu

DECLARATION OF E. DANIELLE T. WILLIAMS IN SUPPORT OF DEFENDANTS' OPPOSITION TO MOTION TO STRIKE PORTIONS OF THE EXPERT REPORT OF DR. NATHANIEL POLISH

Hon. George H. Wu
United States District Court Judge
Hearing Date: May 2, 2024
Time: 8:30 AM
Place: Courtroom 9D


DECLARATION OF E. DANIELLE T. WILLIAMS

I, E. Danielle T. Williams, hereby declare, under penalty of perjury as follows:

1. I am a partner at Winston & Strawn, LLP, counsel for the Defendants Bank of America Corporation and Bank of America, N.A. (“Defendants”) in this matter. I am over the age of eighteen years old, and I have personal knowledge of each and every fact stated in this declaration. If called to testify, I could testify competently thereto. I make this declaration in support of Defendants’ Opposition to Motion to Strike Portions of the Expert Report of Dr. Nathaniel Polish.

2. Attached hereto as Exhibit 1 is a copy of a copy of U.S. Pat. No 6,947,571 B1, Rhoads.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 28th day of March, 2024 in Winston-Salem, North Carolina.


/s/ _____
E. Danielle T. Williams

1 PROOF OF SERVICE

2 I certify that that on March 28, 2024, I caused a true and correct copy of the
3 foregoing document titled “Declaration of E. Danielle T. Williams in Support of
4 Defendants’ Opposition to Motion to Strike Portions of the Expert Report of Dr.
5 Nathaniel Polish” to be served via email to all counsel of record who have appeared for
6
7
8 Plaintiffs in this matter.

9 Dated: March 28, 2024

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11 By: /s/ E. Danielle T. Williams
12 E. Danielle T. Williams
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