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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

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

Plaintiffs,

vs.

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

Defendants.

**Case No. 2:20-cv-07872-GW-PVC**

Hon. George H. Wu

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' APPLICATION TO  
FILE DOCUMENTS UNDER SEAL**

1 Upon consideration of the Defendants BANK OF AMERICA CORPORATION  
2 and BANK OF AMERICA, N.A.’s (collectively, “Defendants”) Application to File  
3 Under Seal, and for good cause shown, the Court hereby rules as follows:

4 IT IS HEREBY ORDERED that Defendants’ Application to File Under Seal is  
5 GRANTED and the following documents and portions of documents may be filed  
6 under seal.

| Document Description   | Nature of Information to be Sealed   |
|--|--|
| Exhibit 1 to the Declaration of Danielle Williams in Support of the Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by Plaintiffs in its entirety as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” and “HIGHLY CONFIDENTIAL – SOURCE CODE,” and contains excerpts of documents designated by Bank of America and third-party Mitek as “Highly Confidential – Attorneys’ Eyes Only.” Plaintiffs and Mitek do not oppose sealing this exhibit in its entirety. |
| Exhibit 2 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents     | Designated by Defendants as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210).   |
| Exhibit 3 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted                                    | Designated by Defendants as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the parties’ stipulated protective orders (Dkt. Nos.  |

| Document Description   | Nature of Information to be Sealed  |
|--|---|
| Claims of the Asserted Patents   | 102, 210).  |
| Exhibit 4 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by Defendants’ in its entirety as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” and “HIGHLY CONFIDENTIAL – SOURCE CODE,” and contains excerpts of documents designated by Bank of America and third-party Mitek as “Highly Confidential – Attorneys’ Eyes Only.” Plaintiffs and Mitek do not oppose sealing this exhibit in its entirety. |
| Exhibit 5 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by Defendants as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210).  |
| Exhibit 6 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by Defendants as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210).  |
| Exhibit 7 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by third-party Mitek as “Highly Confidential – Attorneys’ Eyes Only.” Plaintiffs and Mitek do not oppose sealing this exhibit in its entirety.   |

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| Document Description   | Nature of Information to be Sealed   |
|--|--|
| Exhibit 8 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by Defendants in its entirety as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” Plaintiffs do not oppose sealing this exhibit in its entirety. |
| Exhibit 9 to the Declaration of Danielle Williams in Support of Defendants’ Motion for Partial Summary Judgment of Non-infringement of the Asserted Claims of the Asserted Patents | Designated by Defendants in its entirety as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” Plaintiffs do not oppose sealing this exhibit in its entirety. |

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

By \_\_\_\_\_

Honorable George H. Wu  
United States District Judge