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12 Attorneys for Plaintiffs
NANTWORKS, LLC and NANT HOLDINGS IP, LLC

14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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

19 Plaintiffs,

20 vs.

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

24 Defendants.

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

**DECLARATION OF DAN
SCHONFELD, PH.D.**

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1 I, Dan Schonfeld, Ph.D., declare as follows:

2 1. I have been retained to serve as an expert in this action on behalf of
3 Plaintiffs NantWorks, LLC and Nant Holdings IP, LLC (collectively, “Plaintiffs” or
4 “NantWorks”).

5 2. As part of my work on this matter, I have prepared and submitted two
6 reports:


7 1) January 30, 2024 EXPERT REPORT OF DAN SCHONFELD,
8 PH.D., REGARDING THE INFRINGEMENT OF THE
9 ASSERTED CLAIMS OF U.S. PATENT NOS. 9,031,278,
10 7,881,529, 7,899,252, 9,324,004, AND 8,478,036 (a true and correct
11 copy is attached as Exhibit 1)

12 2) March 19, 2024 REBUTTAL EXPERT REPORT OF DAN
13 SCHONFELD, PH.D., REGARDING THE VALIDITY OF AND
14 NON-INFRINGEMENT ALTERNATIVES TO THE ASSERTED
15 CLAIMS OF U.S. PATENT NOS. 9,031,278, 7,881,529, 7,899,252,
16 9,324,004, AND 8,478,036 (a true and correct copy is attached as
17 Exhibit 2)

18 3. I declare under penalty of perjury under the laws of the United States
19 that the facts stated in Exhibits A and B are true and correct to the best of my
20 knowledge, information, and belief.

21 I declare under penalty of perjury under the laws of the United States that the
22 foregoing is true and correct, to the best of my knowledge, information, and belief,
23 and that this Declaration was executed in Washington, D.C., on May 3, 2024.

24 Executed on May 3, 2024.

25
26 By 
27 Dan Schonfeld
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