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

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

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

20 Plaintiffs,

21 vs.

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

25 Defendants.  
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28

**Case No. 2:20-CV-7872-GW-PVC**

**DEFENDANTS' CORRECTED  
UNOPPOSED APPLICATION TO  
FILE DOCUMENTS UNDER SEAL  
RELATED TO DEFEDANTS'  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON  
PLAINTIFFS' WILLFULNESS  
CLAIMS**

Local Rule 79-5.2.2(b)

[Filed concurrently with Declaration of  
Danielle Williams and Proposed  
Order]

1 TO THE COURT, PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

2 NOTICE IS HEREBY GIVEN that, pursuant to Local Rule 79-5.2.2.(b),  
 3 Defendants Bank of America Corporation and Bank of America, N.A. (collectively,  
 4 “Defendants” or “Bank of America”), hereby request that this Court enter an order  
 5 permitting them to file under seal the materials described below that are filed in  
 6 connection with Defendants’ Motion for Partial Summary Judgment on Plaintiffs’  
 7 Willfulness Claims.

Document Description	Nature of Information to be Sealed
9 NantWorks’s Corrected Third 10 Supplemental Responses and Objections 11 to Defendants’ Third Set of 12 Interrogatories 13 14 15 16 17 18 19 20	Designated by Plaintiffs as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and contains references to documents and deposition testimony designated by Bank of America as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
21 NANT_BOA00110555 22 23 24 25 26 27 28	Contains references and excerpts to documents designated by Plaintiffs as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and

Document Description	Nature of Information to be Sealed
	“HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
Excerpts from the Opening Expert Report of Dr. Dan Schonfeld	Contains references and excerpts to documents designated by Bank of America and Plaintiffs as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
Excerpts from the Deposition of Dr. Dan Schonfeld	Contains references and excerpts to documents designated by Bank of America as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
BOA00075345	Contains references and excerpts to documents designated by Bank of America as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER”

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Document Description	Nature of Information to be Sealed
	under the parties' stipulated protective orders (Dkt. Nos. 102, 210), and "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."
NANT_BOA00150428	Contains references and excerpts to documents designated by Plaintiffs as "CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER" under the parties' stipulated protective orders (Dkt. Nos. 102, 210), and "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."
NANT_BOA00000026	Contains references and excerpts to documents designated by Plaintiffs as "CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER" under the parties' stipulated protective orders (Dkt. Nos. 102, 210), and "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."
NANT_BOA00125087	Contains references and excerpts to documents designated by Plaintiffs as "CONTAINS HIGHLY CONFIDENTIAL INFORMATION

Document Description	Nature of Information to be Sealed
	SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
BOFA00034102	Contains references and excerpts to documents designated by Bank of America as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
Excerpts from the Deposition of Matthew Calman	Contains references and excerpts to documents designated by Bank of America and Plaintiffs as “CONTAINS HIGHLY CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER” under the parties’ stipulated protective orders (Dkt. Nos. 102, 210), and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”
BOFA00034102	Contains references and excerpts to documents designated by Bank of

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