Case 2:20-cv-07872-GW-PVC Document 365 Filed 05/06/24 Page 1 of 10 Page ID #:40542				
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16	UNITED STATES DISTRICT COURT			
17	FOR THE CENTRAL DIS	STRICT OF CALIFORNIA		
18	NantWorks, LLC, a Delaware limited	Case No. 2:20-CV-7872-GW-PVC		
19	liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company,			
20	Plaintiffs,	DEFENDANTS' CORRECTED UNOPPOSED APPLICATION TO		
21		FILE DOCUMENTS UNDER SEAL RELATED TO DEFEDANTS'		
22	VS.	MOTION FOR PARTIAL SUMMARY JUDGMENT ON		
23	BANK OF AMERICA CORPORATION, a Delaware	PLAINTIFFS' WILLFULNESS CLAIMS		
24	corporation, and BANK OF AMERICA, N.A., a national banking association,	Local Rule 79-5.2.2(b)		
25	Defendants.	[Filed concurrently with Declaration of		
26		Danielle Williams and Proposed		
27		Order]		
28				

TO THE COURT, PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

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

Document Description	Nature of Information to be Sealed
NantWorks's Corrected Third	Designated by Plaintiffs as "CONTAINS
Supplemental Responses and Objections	HIGHLY CONFIDENTIAL
to Defendants' Third Set of	INFORMATION SUBJECT TO
Interrogatories	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."
NANT_BOA00110555	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

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1	Document Description	Nature of Information to be Sealed
2		"HIGHLY CONFIDENTIAL –
3		ATTORNEYS' EYES ONLY."
4	Excerpts from the Opening Expert	Contains references and excerpts to
5	Report of Dr. Dan Schonfeld	documents designated by Bank of
6		America and Plaintiffs as "CONTAINS
7		HIGHLY CONFIDENTIAL
8		INFORMATION SUBJECT TO
9		PROTECTIVE ORDER" under the
10		parties' stipulated protective orders (Dkt.
11		Nos. 102, 210), and "HIGHLY
12		CONFIDENTIAL – ATTORNEYS'
13		EYES ONLY."
14	Excerpts from the Deposition of Dr. Dan	Contains references and excerpts to
15	Schonfeld	documents designated by Bank of
16		America as "CONTAINS HIGHLY
17		CONFIDENTIAL INFORMATION
18		SUBJECT TO PROTECTIVE ORDER"
19		under the parties' stipulated protective
20		orders (Dkt. Nos. 102, 210), and
21		"HIGHLY CONFIDENTIAL –
22		ATTORNEYS' EYES ONLY."
23	BOA00075345	Contains references and excerpts to
24		documents designated by Bank of
25		America as "CONTAINS HIGHLY
26		CONFIDENTIAL INFORMATION
27		SUBJECT TO PROTECTIVE ORDER"
28		

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Dogument Description	Nature of Information to be Sealed
Document Description	
	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_BOA0000026	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

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1	Document Description	Nature of Information to be Sealed
2	Document Description	SUBJECT TO PROTECTIVE ORDER"
3		
4		under the parties' stipulated protective
5		orders (Dkt. Nos. 102, 210), and
6		"HIGHLY CONFIDENTIAL –
7		ATTORNEYS' EYES ONLY."
8	BOFA00034102	Contains references and excerpts to
9		documents designated by Bank of
10		America as "CONTAINS HIGHLY
11		CONFIDENTIAL INFORMATION
12		SUBJECT TO PROTECTIVE ORDER"
12		under the parties' stipulated protective
13		orders (Dkt. Nos. 102, 210), and
15		"HIGHLY CONFIDENTIAL –
16		ATTORNEYS' EYES ONLY."
17	Excerpts from the Deposition of	Contains references and excerpts to
18	Matthew Calman	documents designated by Bank of
10		America and Plaintiffs as "CONTAINS
20		HIGHLY CONFIDENTIAL
20 21		INFORMATION SUBJECT TO
		PROTECTIVE ORDER" under the
22		parties' stipulated protective orders (Dkt.
23 24		Nos. 102, 210), and "HIGHLY
24 25		CONFIDENTIAL – ATTORNEYS'
25 26		EYES ONLY."
26 27	BOFA00034102	Contains references and excerpts to
27		documents designated by Bank of
28		

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