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

**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-7872-GW-PVC

**DEFENDANTS' CORRECTED
UNOPPOSED APPLICATION TO
FILE DOCUMENTS UNDER SEAL
RELATED TO DEFENDANTS'
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
<p>9 NantWorks’s Corrected Third</p> <p>10 Supplemental Responses and Objections</p> <p>11 to Defendants’ Third Set of</p> <p>12 Interrogatories</p>	<p>Designated by Plaintiffs as “CONTAINS</p> <p>HIGHLY CONFIDENTIAL</p> <p>INFORMATION SUBJECT TO</p> <p>PROTECTIVE ORDER” under the</p> <p>parties’ stipulated protective orders (Dkt.</p> <p>Nos. 102, 210), and contains references</p> <p>to documents and deposition testimony</p> <p>designated by Bank of America as</p> <p>“HIGHLY CONFIDENTIAL –</p> <p>ATTORNEYS’ EYES ONLY.”</p>
<p>21 NANT_BOA00110555</p>	<p>Contains references and excerpts to</p> <p>documents designated by Plaintiffs as</p> <p>“CONTAINS HIGHLY</p> <p>CONFIDENTIAL INFORMATION</p> <p>SUBJECT TO PROTECTIVE ORDER”</p> <p>under the parties’ stipulated protective</p> <p>orders (Dkt. Nos. 102, 210), and</p>

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”

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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