

George C. Lombardi (*pro hac vice*)
 glombardi@winston.com
 WINSTON & STRAWN LLP
 35 West Wacker Drive
 Chicago, IL 60601-9703
 Telephone: (312) 558-5600
 Facsimile: (312) 558-5700

Dustin J. Edwards (*pro hac vice*)
 dedwards@winston.com
 WINSTON & STRAWN LLP
 800 Capitol St., Suite 2400
 Houston, TX 77002-2925
 Telephone: (713) 651-2600
 Facsimile: (713) 651-2700

E. Danielle T. Williams (*pro hac vice*)
 dwilliams@winston.com
 WINSTON & STRAWN LLP
 300 South Tryon Street, 16th Floor
 Charlotte, NC 28202
 Telephone: (704) 350-7700
 Facsimile: (704) 350-7800

Diana Hughes Leiden (SBN: 267606)
 dhleiden@winston.com
 WINSTON & STRAWN LLP
 333 S. Grand Avenue, 38th Floor
 Los Angeles, CA 90071-1543
 Telephone: (213) 615-1700
 Facsimile: (213) 615-1750

Michael S. Elkin (*pro hac vice*)
 melkin@winston.com
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, NY 10166
 Telephone: (212) 294-6700
 Facsimile: (212) 294-4700

Attorneys for Defendants
 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
 REGARDING PLAINTIFFS'
 FAILURE TO COMPLY WITH 35
 U.S.C. § 287(a)**

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 Regarding
 7 Plaintiffs’ Failure to Comply with 35 U.S.C. § 287(a).

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>Plaintiffs do not oppose sealing this</p> <p>exhibit in its entirety.</p>
<p>21 Excerpts from the Deposition of Orang</p> <p>22 Dialameh</p>	<p>Contains references and excerpts to</p> <p>documents designated by Bank of</p> <p>America and 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>

Document Description	Nature of Information to be Sealed
	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_BOA00125087	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.”
BOFA00064630	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."
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."
NANT_BOA001100555	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."
Excerpts from the Deposition of Eric Gray	Contains references and excerpts to documents designated by Bank of America and Plaintiffs as "CONTAINS

Document Description	Nature of Information to be Sealed
	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 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 Mark Kokes	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.”

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.