Case		1 05/07/24 Page 1 of 10 Page ID #:42563
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15	and BANK OF AMERICA, N.A.	
16	UNITED STATES	DISTRICT COURT
16 17		DISTRICT COURT STRICT OF CALIFORNIA
	FOR THE CENTRAL DIS	
17	<b>FOR THE CENTRAL DIS</b> NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware	TRICT OF CALIFORNIA
17 18	<b>FOR THE CENTRAL DIS</b> NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company,	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
17 18 19	FOR THE CENTRAL DIS NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company, Plaintiffs,	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED
17 18 19 20	FOR THE CENTRAL DIS NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company, Plaintiffs, VS.	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
17 18 19 20 21	FOR THE CENTRAL DIS NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company, Plaintiffs, vs. BANK OF AMERICA	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
17 18 19 20 21 22	FOR THE CENTRAL DIS NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company, Plaintiffs, VS.	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
17 18 19 20 21 22 23	FOR THE CENTRAL DIS NantWorks, LLC, a Delaware limited liability company, and NANT HOLDINGS IP, LLC, a Delaware limited liability company, Plaintiffs, vs. BANK OF AMERICA	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
17 18 19 20 21 22 23 24	FOR THE CENTRAL DIS 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,	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
17 18 19 20 21 22 23 24 25 26 27	FOR THE CENTRAL DIS 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,	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO
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17 18 19 20 21 22 23 24 25 26 27 28 <b>DOC</b>	<text><text><text><text><text><text></text></text></text></text></text></text>	TRICT OF CALIFORNIA Case No. 2:20-CV-7872-GW-PVC DEFENDANTS' UNOPPOSED CORRECTED APPLICATION TO

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

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' Corrected Motion for Partial Summary Judgment as to Plaintiffs' Breach of Contract Claim (the "Breach of Contract Motion for Summary Judgment"):

9	Document Description	Nature of Information to be Sealed
10	Defendants' Corrected Notice of	Designated by Defendants
11	Motion, Corrected Memorandum of	as "HIGHLY CONFIDENTIAL–
12	Law, and Corrected Statement of	ATTORNEYS' EYES ONLY" under
13	Uncontroverted Facts.	the parties' stipulated protective
14		order(Dkt. No. 210). Plaintiffs do not
15		oppose sealing these documents in
16		their entirety.
17	Exhibit 1 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
18	of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
19	Breach of Contract Motion for	EYES ONLY" under the parties'
20	Summary Judgment: the April 27, 2010	stipulated protective order(Dkt. No.
21	Non-Disclosure Agreement, produced	210). Plaintiffs do not oppose sealing
22	at NANT_BOA00014229-232.	this exhibit in its entirety.
23	Exhibit 2 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
24	of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
25	Breach of Contract Motion for	EYES ONLY" under the parties'
26	Summary Judgment: the April 27, 2010	stipulated protective order(Dkt. No.
27	Non-Disclosure Agreement, produced	210). Plaintiffs do not oppose sealing
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# Case 2:20-cv-07872-GW-PVC Document 378 Filed 05/07/24 Page 3 of 10 Page ID #:42565

Document Description	Nature of Information to be Sealed
at NANT_BOA00127633-37.	this exhibit in its entirety.
Exhibit 3 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: Plaintiffs'	stipulated protective order (Dkt. No.
Corrected Third Supplemental	210). Plaintiffs do not oppose sealing
Objections and Responses to	this exhibit in its entirety.
Defendants' Third Set of	
Interrogatories.	
Exhibit 4 to the Corrected Declaration	Designated by Plaintiffs as
of Danielle Williams in Support of the	"CONTAINS HIGHLY
Breach of Contract Motion for	CONFIDENTIAL SOURCE CODE -
Summary Judgment: Excerpted Copy	ATTORNEYS' EYES ONLY" under
of the Expert Report of Dan Schonfeld,	the parties' stipulated protective order
Ph.D., Regarding the Infringement of	(Dkt. No. 210), and contains excerpts
the Asserted Claims.	of documents designated by Bank of
	America and third-party Mitek as
	"Highly Confidential – Attorneys"
	Eyes Only." Plaintiffs and Mitek do
	not oppose sealing this exhibit in its
	entirety.
Exhibit 5 to the Corrected Declaration	Designated by Defendants as "Highly
of Danielle Williams in Support of the	Confidential—Attorneys' Eyes Only'
Breach of Contract Motion for	and "Highly Confidential—Source
Summary Judgment: Declaration of	Code" under the parties' stipulated
Marwan Hassoun, Ph.D., which	protective order (Dkt. No. 210).

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# Case 2:20-cv-07872-GW-PVC Document 378 Filed 05/07/24 Page 4 of 10 Page ID #:42566

Document Description	Nature of Information to be Sealed
attaches as Exhibit A, a true and correct	Plaintiffs do not oppose sealing this
excerpted copy of the Rebuttal Expert	exhibit in its entirety.
Report of Marwan Hassoun, submitted	
March 19, 2024	
Exhibit 6 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: the October 31,	stipulated protective order (Dkt. No.
2011 Collaboration Research	210). Plaintiffs do not oppose sealing
Agreement ("CRA"), produced at	this exhibit in its entirety.
NANT_BOA0000026-113.	
Exhibit 7 to the Corrected Declaration	Designated by Defendants as
of Danielle Williams in Support of the	"HIGHLY CONFIDENTIAL-
Breach of Contract Motion for	ATTORNEYS' EYES ONLY" under
Summary Judgment: the CRA,	the parties' stipulated protective order
produced at BOFA00031002-31041.	(Dkt. No. 210). Plaintiffs do not
	oppose sealing this exhibit in its
	entirety.
Exhibit 8 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: the May 2, 2013	stipulated protective order (Dkt. No.
Non-Disclosure Agreement ("2013	210). Plaintiffs do not oppose sealing
NDA"), produced at	this exhibit in its entirety.
NANT_BOA00014234-37.	
Exhibit 9 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY

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# Case 2:20-cv-07872-GW-PVC Document 378 Filed 05/07/24 Page 5 of 10 Page ID #:42567

Document Description	Nature of Information to be Sealed
of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: the 2013 NDA,	stipulated protective order (Dkt. No.
produced at NANT_BOA00127638-	210). Plaintiffs do not oppose sealing
641.	this exhibit in its entirety.
Exhibit 10 to the Corrected Declaration	Designated by Plaintiffs as
of Danielle Williams in Support of the	"CONFIDENTIAL-ATTORNEYS"
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: Excerpted Copy	stipulated protective order (Dkt. No.
of the Expert Report of Patrick	210). Plaintiffs do not oppose sealing
Kennedy, Ph.D., Regarding Damages.	this exhibit in its entirety.
Exhibit 11 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: June 4, 2012 In8	stipulated protective order (Dkt. No.
ID, LLC Contribution Agreement,	210). Plaintiffs do not oppose sealing
produced at NANT_BOA00018657-	this exhibit in its entirety.
677.	
Exhibit 12 to the Corrected Declaration	Designated by Plaintiffs as
of Danielle Williams in Support of the	"CONFIDENTIAL-ATTORNEYS"
Breach of Contract Motion for	EYES ONLY" under the parties'
Summary Judgment: Excerpted Copy	stipulated protective order (Dkt. No.
of the Deposition of Dora Gruner.	210). Plaintiffs do not oppose sealing
	this exhibit in its entirety.
Exhibit 13 to the Corrected Declaration	Designated by Plaintiffs as "HIGHLY
of Danielle Williams in Support of the	CONFIDENTIAL-ATTORNEYS'

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