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NANTWORKS, LLC and NANT HOLDINGS IP, LLC

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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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17 NANTWORKS, LLC, a Delaware
limited liability company, and NANT
18 HOLDINGS IP, LLC, a Delaware
limited liability company,

19 Plaintiffs,

20 vs.

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

24 Defendants.
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CASE NO. 2:20-cv-7872-GW-PVC

**PLAINTIFFS' APPLICATION TO
FILE DOCUMENTS UNDER SEAL**

Judge: Hon. George H. Wu
Ctrm: 9D

1 **PLEASE TAKE NOTICE** that pursuant to Civil Local Rule 79-5, Plaintiffs
2 NantWorks, LLC, and Nant Holdings IP, LLC (collectively, “NantWorks”),
3 respectfully submit this application to the Court for an order sealing the materials
4 described below that are filed in connection with Plaintiffs’ Opposition to Defendants’
5 Motion to Exclude Certain Opinions of Dan Schonfeld (“Opposition to Motion to
6 Exclude”). This application pertains to the following items:

- 7 • Plaintiffs’ Opposition to Motion to Exclude;
- 8 • Exhibits 1 to the Declaration of Brice C. Lynch in Support of Plaintiffs’
9 Opposition to Motion to Exclude.

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11 As set forth in the Declaration of Brice C. Lynch in Support of Plaintiffs’
12 Application to File Under Seal submitted herewith, the material described above are:

- 13 a) the Expert Report of Cathy Glassman served on January 30, 2024, which was
14 designated “Highly Confidential – Attorney Eyes Only”;
- 15 b) Plaintiffs’ Opposition to Defendants’ Motion to Exclude, which contains
16 quotations from, references to, and descriptions of statements made in the
17 document referenced above in (a) and other documents currently under seal.

18 Pursuant to L.R. 79-5.2.2, NantWorks conferred with BoA and BoA
19 confirmed that they do not object sealing these materials to be filed with NantWorks’
20 Opposition to Motion to Strike.

21 Accordingly, NantWorks respectfully requests for an order permitting that the
22 following documents be filed under seal:

- 23 i. Plaintiffs’ Opposition to Motion to Exclude;
- 24 ii. Exhibit 1 to the Declaration of Brice C. Lynch in Support of Plaintiffs’
25 Opposition to Motion to Exclude.

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1 DATED: May 17, 2024

Respectfully submitted,

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By /s/ Todd M. Briggs

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