

QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
Kevin P.B. Johnson (Bar No. 177129)  
kevinjohnson@quinnemanuel.com  
Todd M. Briggs (Bar No. 209282)  
toddbriggs@quinnemanuel.com  
Brice C. Lynch (Bar No. 288567)  
bricelynch@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, California 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
Eric Huang (*pro hac vice*)  
erichuang@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

Attorneys for Plaintiffs  
NANTWORKS, LLC and NANT HOLDINGS IP, LLC

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.

QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
James R. Asperger (Bar No. 83188)  
jimasperger@quinnemanuel.com  
Rachael McCracken  
rachaelmccracken@quinnemanuel.com  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017-2543  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

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

**DECLARATION OF  
BRICE C. LYNCH IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO  
STRIKE CERTAIN OPINIONS IN  
DR. SCHONFELD'S OPENING  
EXPERT REPORT REGARDING  
INFRINGEMENT**

1 I, Brice C. Lynch, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California  
3 and admitted before this Court. I am an attorney at Quinn Emanuel Urquhart &  
4 Sullivan, LLP, counsel for Plaintiffs NantWorks LLC and Nant Holding IP, LLC  
5 (“NantWorks”). I have personal knowledge of the facts set forth in this declaration,  
6 and if called as a witness I would testify competently to those facts.

7 2. Exhibit 1 is a true and correct copy of the deposition transcript of Charles  
8 Christopher Harbinson, dated October 19, 2023. The deposition and the transcript  
9 were designated “Contains Confidential Attorney Eyes Only Material. ”

10 3. Exhibit 2 is a true and correct copy of the Expert Report of James Storer,  
11 served on January 30, 2024. This was designated “Highly Confidential – Attorney  
12 Eyes Only.”

13 4. Exhibit 3 is a true and correct copy of the transcript of the Markman  
14 Hearing held in this action on September 23, 2021.

15 5. Exhibit 4 is a true and correct copy of the deposition transcript of Pavan  
16 Chayanam, dated October 10, 2023. The deposition and the transcript were  
17 designated “Highly Confidential Attorneys’ Eyes Only” and “Contains Highly  
18 Confidential Source Code.”

19 6. Exhibit 5 is a true and correct copy of the deposition transcript of Fred  
20 Fortaleza Fernandez, Jr., dated November 16, 2023. The deposition and the transcript  
21 were designated “Highly Confidential – Attorney Eyes Only” and “Highly  
22 Confidential Source Code.”

23 7. Exhibit 6 is a true and correct copy of a letter correspondence from  
24 counsel for defendants, Danielle T. Williams, to me dated February 23, 2024. The  
25 letter was designated as “Highly Confidential – Attorney’s Eyes Only.”

26 8. Exhibit 7 is a true and correct copy of the transcript of the hearing on  
27 Defendants’ Partial Motion to Dismiss Plaintiffs’ First Amended Complaint held in  
28 this action on February 25, 2021.

