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Attorneys for Defendants
BANK OF AMERICA CORPORATION
and BANK OF AMERICA, N.A.

12 **UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 NANTWORKS, LLC, a Delaware
limited liability company, and
15 NANT HOLDINGS IP, LLC, a
Delaware limited liability company,

16 Plaintiffs,

17 vs.

18 BANK OF AMERICA
19 CORPORATION, a Delaware
corporation, and BANK OF
20 AMERICA, N.A., a national banking
association,

21 Defendants.
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Case No. 2:20-cv-07872-GW-PVC

**DECLARATION OF DUSTIN J.
EDWARDS IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO STRIKE
PORTIONS OF THE REBUTTAL
EXPERT REPORT OF DR. JAMES
STORER**

DECLARATION OF DUSTIN J. EDWARDS

I, Dustin J. Edwards, hereby declare, under penalty of perjury as follows:

1. I am a partner at Winston & Strawn, LLP, counsel for the Defendants Bank of America Corporation and Bank of America, N.A. (“Defendants”) in this matter. I am over the age of eighteen years old, and I have personal knowledge of each and every fact stated in this declaration. If called to testify, I could testify competently thereto. I make this declaration in support of Defendants’ Opposition to Plaintiffs’ Motion to Strike Portions of the Rebuttal Expert Report of Dr. James Storer.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from Plaintiffs’ First Set of Interrogatories to Defendants, date February 11, 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the March 29, 2024 Deposition of James A. Storer.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from Defendants’ Objections and Responses to Plaintiffs’ First Set of Interrogatories (1–16), dated April 5, 2021.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the October 10, 2023 Deposition of Pavan Chayanam.

6. Attached hereto as Exhibit 5 is a true and correct copy of Defendants Bank of America Corporation and Bank of America, N.A.’s Fifth Set of Interrogatories to Plaintiffs (No. 29), dated October 18, 2021.

7. Attached hereto as Exhibit 6 is a true and correct copy of Defendants’ October 17, 2023 Supplemental Objections and Responses to Plaintiffs’ First Set of Interrogatories (Nos. 4–5), dated October 17, 2023.

8. Attached hereto as Exhibit 7 is a true and correct copy of Exhibit 6 to Plaintiffs NantWorks, LLC, and Nant Holdings IP, LLC, Preliminary Final Infringement Contentions – ’036 Final Infringement Claim Chart, dated August 31, 2023.

9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs’ Second

1 Supplemental Objections and Responses to Defendants Bank of America Corporation
2 and Bank of America, N.A.'s Fifth Set of Interrogatories (29), dated December 20,
3 2023.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Executed on this 17th day of May, 2024 in Houston, Texas.
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7 /s/ Dustin J. Edwards
8 Dustin J. Edwards
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CERTIFICATE OF SERVICE
United States District Court for the Central District of California
NantWorks LLC et al. v. Bank of America Corporation, et al.
Case No. 2:20-cv-7872-GW-PVC

I hereby certify that, on May 17, 2024, all counsel of record in the attached service list who have consented to electronic service are being served with a copy of this document and all counsel of record who have appeared in this case are being served with a copy of the foregoing via email.

/s/ Dustin J. Edwards
Dustin J. Edwards

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SERVICE LIST
United States District Court for the Central District of California
Nantworks, LLC, et al. v. Bank of America Corporation, et al.
Case No. 2:20-cv-07872-GW-PVC

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