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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.

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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’ Reply In Support Of
5 Motion to Strike Portions of the Expert Report of Dr. Nathaniel Polish. This
6 application pertains to the following items:

- 7
- 8 • Plaintiffs’ Reply In Support Of Motion to Strike Portions of the Expert
9 Report of Dr. Nathaniel Polish (the “Reply In Support Of Motion To
10 Strike Dr. Polish”);

11

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

- 14 a) Plaintiffs’ Reply In Support Of Motion to Strike Portions of Expert Report of
15 Dr. Nathaniel Polish, submitted contemporaneously herewith, contains
16 quotations from, references to, and descriptions of statements made in
17 documents designated “Highly Confidential.”

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19 Pursuant to L.R. 79-5.2.2, NantWorks conferred with BoA and BoA
20 confirmed that they do not object sealing these materials to be filed with NantWorks’
21 Reply In Support Of Motion To Strike Dr. Polish.

22

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

- 25 i. Plaintiffs’ Reply In Support Of Motion to Strike Portions of the Expert
26 Report of Dr. Nathaniel Polish.
- 27
- 28

1 DATED: May 23, 2024

Respectfully submitted,

2 QUINN EMANUEL URQUHART &
3 SULLIVAN, LLP

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5 By /s/ Todd M. Briggs

6 James R. Asperger
7 Kevin P.B. Johnson
8 Todd M. Briggs
9 Eric Huang
Brice C. Lynch

10 Attorneys for Plaintiff, NANTWORKS,
11 LLC and NANT HOLDINGS IP, LLC
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