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

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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
16

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

- 7
- 8 • Plaintiffs’ Reply In Support Of Motion to Strike Portions of the Rebuttal
9 Expert Report of Dr. James Storer (the “Reply In Support Of Motion To
10 Strike Dr. Storer”);
 - 11 • Exhibits A-E to the Declaration of Brice C. Lynch in Support of Plaintiffs’
12 Reply In Support Of Motion To Strike Dr. Storer.

13

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

- 16 a) Exhibits A-D are excerpts of Plaintiffs’ Revised Infringement Contentions
17 from March 18, 2022, which have been designated “Highly Confidential -
18 Attorney Eyes Only.”
- 19 b) Exhibit E is an expert from Plaintiff’s February 29, 2024 Corrected Third
20 Supplemental Response to BoA’s Third Rogs, which has been designated
21 “Highly Confidential - Attorney Eyes Only.”
- 22 c) Plaintiffs’ Reply In Support Of Motion to Strike Portions of the Rebuttal
23 Expert Report of Dr. James Storer, submitted contemporaneously herewith,
24 which contains quotations from, references to, and descriptions of statements
25 made in the documents referenced above in (a) and (b).
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1 Pursuant to L.R. 79-5.2.2, NantWorks conferred with BoA and BoA
2 confirmed that they do not object sealing these materials to be filed with NantWorks’
3 Reply In Support Of Motion To Strike Dr. Storer.

4
5 Accordingly, NantWorks respectfully requests for an order permitting that the
6 following documents be filed under seal:

- 7 i. Plaintiffs’ Reply In Support Of Motion to Strike Portions of the
8 Rebuttal Expert Report of Dr. James Storer;
9 ii. Exhibits A-E to the Declaration of Brice C. Lynch in Support of
10 Plaintiffs’ Reply In Support Of Motion To Strike Dr. Storer.

11
12 DATED: May 23, 2024

Respectfully submitted,

13 QUINN EMANUEL URQUHART &
14 SULLIVAN, LLP

15
16 By /s/ Todd M. Briggs

17 James R. Asperger
18 Kevin P.B. Johnson
19 Todd M. Briggs
20 Eric Huang
21 Brice C. Lynch

22 Attorneys for Plaintiff, NANTWORKS,
23 LLC and NANT HOLDINGS IP, LLC
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