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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

**DECLARATION OF  
BRICE C. LYNCH REGARDING  
PLAINTIFFS' REPLY IN SUPPORT  
OF MOTION TO STRIKE  
PORTIONS OF THE REBUTTAL  
EXPERT REPORT OF DR. JAMES  
STORER**

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 A is a true and correct excerpted copy of Exhibit 1 of March 18,  
8 2022 Plaintiffs’ Revised Infringement Contentions titled, “Infringement of U.S.  
9 Patent 9,031,278 (the “’278 Patent”) by the Bank of America Accused Products”  
10 which has been designated “Highly Confidential - Attorney Eyes Only.”

11 3. Exhibit B is a true and correct excerpted copy of Exhibit 2 of March 18,  
12 2022 Plaintiffs’ Revised Infringement Contentions titled, “Infringement of U.S.  
13 Patent 7,881,529 (the “’529 Patent”) by the Bank of America Accused Products”  
14 which has been designated “Highly Confidential - Attorney Eyes Only.”

15 4. Exhibit C is a true and correct excerpted copy of Exhibit 3 of March 18,  
16 2022 Plaintiffs’ Revised Infringement Contentions titled, “Infringement of U.S.  
17 Patent 7,899,252 (the “’252 Patent”) by the Bank of America Accused Products”  
18 which has been designated “Highly Confidential - Attorney Eyes Only.”

19 5. Exhibit D is a true and correct excerpted copy of Exhibit 5 of March 18,  
20 2022 Plaintiffs’ Revised Infringement Contentions titled, “Infringement of U.S.  
21 Patent 9,324,004 (the “’004 Patent”) by the Bank of America Accused Products”  
22 which has been designated “Highly Confidential - Attorney Eyes Only.”

23 6. Exhibit E is a true and correct excerpted copy of Plaintiffs’ Corrected  
24 Third Supplemental Objections and Responses to Defendants Bank of America  
25 Corporation and Bank of America, N.A.’s Third Set of Interrogatories (Nos. 10-25)  
26 dated February 29, 2024. This document was designated as “Highly Confidential –  
27 Attorney’s Eyes Only.”  
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1 I declare under penalty of perjury under the laws of the United States of  
2 America and the State of California that the foregoing is true and correct, and that this  
3 declaration was executed in Walnut Creek, California, on May 23, 2024.

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7 By /s/ Brice C. Lynch  
8 Brice C. Lynch  
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