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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.
25

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

**NANTWORKS' NOTICE OF
UPDATED MEMORANDUM IN
SUPPORT OF MOTION TO
EXCLUDE CERTAIN EXPERT
OPINIONS AND TESTIMONY OF
DAWN HALL AND DR. JAMES
STORER**

1 PLEASE TAKE NOTICE that Plaintiffs NantWorks LLC and Nant Holding
2 IP, LLC (“NantWorks”) submitted an updated memorandum in support of its Motion
3 to Exclude Certain Expert Opinions and Testimony of Dawn Hall and Dr. James
4 Storer (“Motion to Exclude”) (Dkt. 334).

5 NantWorks filed its original Motion to Exclude on May 3, 2024 pursuant to the
6 case schedule. However, as noted in NantWorks’ original motion, Bank of America
7 contended that Ms. Hall was not available to be deposed prior to the May 3, 2024
8 deadline for filing *Daubert* motions, such that NantWorks was unable to include her
9 testimony in its May 3, 2024 filing. *See* Dkt. 337-1 at 1, n.1.¹ The original supporting
10 memorandum (Dkt. 337-1) is now replaced with the version filed today (Dkt. 482-1).

11 NantWorks received the final transcript for Ms. Hall’s May 17, 2024 deposition
12 on May 24, 2024 and promptly supplemented and amended its original memorandum
13 of law to incorporate Ms. Hall’s testimony and include additional authority based
14 thereon. If it would be helpful to the Court, NantWorks can provide a redline showing
15 the changes that have been made to its original memorandum.

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27 ¹ Bank of America also served an “errata” making substantive changes to Ms.
28 Hall’s report on April 30, 2024, just prior to the deadline for filing *Daubert* motions.
Err. 8 (April 30, 2024 Errata to Hall Dep. Dep’t.)

1 DATED: May 30, 2024

Respectfully submitted,

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By /s/ Rachael McCracken

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