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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
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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’ Supplemental Brief in
5 Support of Plaintiffs’ Motion to Strike Portions of the Opening Expert Report of Dr.
6 Nathaniel Polish Regarding Obviousness Combinations. This application pertains
7 to the following items:

- 8 • Plaintiffs’ Supplemental Brief in Support of Plaintiffs’ Motion to Strike
9 Portions of the Opening Expert Report of Dr. Nathaniel Polish Regarding
10 Obviousness Combinations.

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

- 15 a) Plaintiffs’ Supplemental Brief in Support of Plaintiffs’ Motion to Strike
16 Portions of the Opening Expert Report of Dr. Nathaniel Polish Regarding
17 Obviousness Combinations, submitted contemporaneously herewith, contains
18 quotations from, references to, and descriptions of statements made in
19 documents designated “Highly Confidential.”
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22 Pursuant to L.R. 79-5.2.2, NantWorks conferred with BoA and BoA
23 confirmed that they do not object sealing these materials to be filed with NantWorks’
24 Response to Defendants’ Statement of Genuine Disputes Regarding Plaintiffs’
25 Motion for Partial Summary Judgment of No Invalidity Based on Prior Art.

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

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i. Plaintiffs’ Supplemental Brief in Support of Plaintiffs’ Motion to Strike Portions of the Opening Expert Report of Dr. Nathaniel Polish Regarding Obviousness Combinations.

DATED: June 13, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Todd M. Briggs

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

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