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

12

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
- 16 a) Plaintiffs’ Supplemental Brief in Support of Plaintiffs’ Motion to Strike
17 Portions of the Opening Expert Report of Dr. Nathaniel Polish Regarding
18 Obviousness Combinations, submitted contemporaneously herewith, contains
19 quotations from, references to, and descriptions of statements made in
20 documents designated “Highly Confidential.”

21

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.

26

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

- 1 i. Plaintiffs' Supplemental Brief in Support of Plaintiffs' Motion to Strike
2 Portions of the Opening Expert Report of Dr. Nathaniel Polish
3 Regarding Obviousness Combinations.

4
5 DATED: June 13, 2024

Respectfully submitted,

6 QUINN EMANUEL URQUHART &
7 SULLIVAN, LLP

8
9 By /s/ Todd M. Briggs

10 James R. Asperger
11 Kevin P.B. Johnson
12 Todd M. Briggs
13 Eric Huang
14 Brice C. Lynch

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