

1 QUINN EMANUEL URQUHART
& SULLIVAN, LLP
2 Kevin P.B. Johnson (Bar No. 177129)
kevinjohnson@quinnemanuel.com
3 Todd M. Briggs (Bar No. 209282)
toddbriggs@quinnemanuel.com
4 Brice C. Lynch (Bar No. 288567)
bricelynych@quinnemanuel.com
5 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
6 Telephone: (650) 801-5000
Facsimile: (650) 801-5100

QUINN EMANUEL URQUHART
& SULLIVAN, LLP
James R. Asperger (Bar No. 83188)
jimasperger@quinnemanuel.com
Rachael McCracken
rachaelmccracken@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

7 QUINN EMANUEL URQUHART
& SULLIVAN, LLP
8 Eric Huang (*pro hac vice*)
erichuang@quinnemanuel.com
9 51 Madison Avenue, 22nd Floor
New York, New York 10010
10 Telephone: (212) 849-7000
11 Facsimile: (212) 849-7100

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’ Memorandum of Law in
5 Support of Plaintiffs’ Motion to Clarify Claim Construction. This application
6 pertains to the following items:

- 7
- 8 • Memorandum of Law in Support of Plaintiffs’ Motion to Clarify Claim
9 Construction.

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

- 13
- 14 a) Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion to Clarify
15 Claim Construction, submitted contemporaneously herewith, contains
16 quotations from, references to, and descriptions of statements made in
17 documents designated “Highly Confidential.”

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19 Pursuant to L.R. 79-5.2.2, NantWorks conferred with BoA and BoA
20 confirmed that they do not object to sealing NantWorks’ Memorandum of Law in
21 Support of Plaintiffs’ Motion to Clarify Claim Construction.

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

- 25 i. Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion to
26 Clarify Claim Construction.
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DATED: June 17, 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