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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’ 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.

22

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.
- 27
- 28

1  
2 DATED: June 17, 2024

Respectfully submitted,

3 QUINN EMANUEL URQUHART &  
4 SULLIVAN, LLP

5  
6 By /s/ Todd M. Briggs

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

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