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12 Attorneys for Plaintiffs  
NANTWORKS, LLC and NANT HOLDINGS IP, LLC

13  
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

**DECLARATION OF  
BRICE C. LYNCH IN SUPPORT OF  
PLAINTIFFS' SUPPLEMENTAL  
BRIEF IN OPPOSITION TO  
DEFENDANTS' CONSOLIDATED  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT OF NON-  
INFRINGEMENT AND NO  
WILLFULNESS**

1 I, Brice C. Lynch, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California  
3 and admitted before this Court. I am an attorney at Quinn Emanuel Urquhart &  
4 Sullivan, LLP, counsel for Plaintiffs NantWorks LLC and Nant Holding IP, LLC  
5 (“NantWorks”). I have personal knowledge of the facts set forth in this declaration,  
6 and if called as a witness I would testify competently to those facts.

7 2. Exhibit Q is a true and correct copy of the Supplemental Expert Report  
8 of Dan Schonfeld, Ph.D., Regarding the Infringement of the Asserted Claims, dated  
9 June 13, 2024.

10 3. Exhibit R is a true and correct copy of the Supplemental Rebuttal Expert  
11 Report of James Storer, Ph.D., dated June 17, 2024.

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13 I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct, and that this declaration was executed  
15 in Walnut Creek, California on June 18, 2024.

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19 By /s/ Brice C. Lynch  
20 Brice C. Lynch

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