

**REDACTED VERSION OF DOCUMENT PROPOSED  
TO BE FILED UNDER SEAL**

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)  
bricelynch@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 (admitted *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

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.  
25

CASE NO. 2:20-cv-7872-GW-PVC

**PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' NOTICE OF  
MOTION AND SUPPLEMENTAL  
AND AMENDED MEMORANDUM  
OF LAW IN SUPPORT OF  
DEFENDANTS' MOTION TO  
EXCLUDE CERTAIN DAMAGES-  
RELATED OPINIONS OF DAN  
SCHONFELD, PH.D. AND  
PATRICK KENNEDY, PH.D.**