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NANTWORKS, LLC and NANT HOLDINGS IP, LLC

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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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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’ Response to Declarations
5 Provided by Defendants Regarding The 2010 Non-Disclosure Agreement. This
6 application pertains to the following items:

- 7 • Plaintiffs’ Response to Declarations Provided by Defendants Regarding
8 The 2010 Non-Disclosure Agreement;
- 9 • Declaration of Orang Dialameh and Exhibit 1;
- 10 • Declaration of Brice Lynch in Support of Plaintiffs’ Response to
11 Declarations Provided by Defendants Regarding the 2010 Non-
12 Disclosure Agreement;
- 13 • Exhibits 1 through 4 to the Declaration of Brice Lynch.

14 As set forth in the Declaration of Brice C. Lynch in Support of Plaintiffs’
15 Application to File Under Seal submitted herewith, the documents listed above
16 contain or refer to information that has been designated “Highly Confidential –
17 Attorneys Eyes Only” by the parties and/or “Confidential” by the parties.

18 Pursuant to L.R. 79-5.2.2, NantWorks conferred with Defendants Bank of
19 America Corporation and Bank of America, N.A. (collectively, Bank of America”),
20 and Bank of America confirmed that they do not object to sealing these materials to
21 be filed with Plaintiffs’ Response to Declarations Provided by Defendants Regarding
22 The 2010 Non-Disclosure Agreement.

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

- 25 i. Plaintiffs’ Response to Declarations Provided by Defendants
26 Regarding The 2010 Non-Disclosure Agreement;
- 27 ii. Declaration of Orang Dialameh and Exhibit 1;
- 28 iii. Declaration of Brice Lynch in Support of Plaintiffs’ Response to
 Declarations Provided by Defendants Regarding the 2010 Non-
 Disclosure Agreement;
- iv. Exhibits 1 through 4 to the Declaration of Brice Lynch.

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DATED: August 22, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART &
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By /s/ Brice C. Lynch

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