

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BLITZSAFE TEXAS, LLC,

Plaintiff,

v.

**VOLKSWAGEN GROUP OF AMERICA,
INC. and VOLKSWAGEN GROUP OF
AMERICA CHATTANOOGA
OPERATIONS, LLC,**

Defendants.

No. 2:15-cv-01278-JRG-RSP

CONSOLIDATED INTO

No. 2:15-cv-01274-JRG-RSP

JURY TRIAL DEMANDED

**NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES OF DEFENDANTS
VOLKSWAGEN GROUP OF AMERICA, INC. AND VOLKSWAGEN GROUP
OF AMERICA CHATTANOOGA OPERATIONS, LLC TO PLAINTIFF'S
SECOND SET OF COMMON INTERROGATORIES (NOS. 9-12)**

Pursuant to paragraph 7 of the court's Discovery Order (D.E. 80), defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC notify the court that on May 16, 2016 they served their objections and responses to Plaintiff's second set of common interrogatories (nos. 9-12) on counsel for plaintiff Blitzsafe Texas, LLC.

Dated: May 17, 2016

Respectfully submitted,

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By /s/ Deron R. Dacus

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VOLKSWAGEN GROUP OF AMERICA
CHATTANOOGA OPERATIONS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2016 a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Deron R. Dacus