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

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§	Case No. 2:15-CV-1274-JRG-RSP
§	LEAD CASE
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§	JURY TRIAL DEMANDED
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UNOPPOSED MOTION TO AMEND DOCKET CONTROL ORDER

COMES NOW Blitzsafe Texas, LLC ("Blitzsafe") and files this Unopposed Motion to Amend the Docket Control Order and respectfully shows the Court as follows:

On January 8, 2016 the court entered the Docket Control Order in this case (Dkt No. 56). Under the current Order the parties are to complete mediation by July 22, 2106. The parties agreed to use Judge David Folsom as the mediator in each case before the Court. The parties coordinated with Judge Folsom's office and were able to schedule all mediations in advance of the July 22, 2016 deadline except for the mediation between Blitzsafe and Defendants HYUNDAI MOTOR COMPANY, HYUNDAI MOTOR AMERICA, HYUNDAI MOTOR MANUFACTURING, ALABAMA, LLC; KIA MOTORS CORPORATION, KIA MOTORS AMERICA, INC., and KIA MOTORS MANUFACTURING GEORGIA, INC., (collectively "Hyundai/Kia Defendants") which has been scheduled for July 27, 2016. Due to Judge Folsom's



schedule and that of the parties, Blitzsafe and Hyundai/Kia were unable to schedule their mediation within the current deadline contained in the current Docket Control Order. The parties seek only to change the mediation deadline as it pertains to Blitzsafe and Hyundai/Kia as follows:

Default Date (Current)	Proposed Date (if not the Default Date)	New Date	
July 22, 2016		July 28, 2016 (Hyundai/Kia)	Deadline to Complete Mediation The parties are responsible for ensuring that a mediation report is filed no later than 5 days after the conclusion of mediation.

The purpose of this amendment to the Docket Control Order is not for delay but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Blitzsafe respectfully requests this Court grant this Unopposed Motion to Amend the Docket Control Order.

A proposed order is attached.

Dated: July 8, 2016 Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was electronically filed with the CM/ECF system per LR 5.1, and that all interested parties are being served with a true and correct copy of these documents via the CM/ECF system on July 8, 2016.

/s/ Jennifer Truelove
Jennifer Truelove

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Hyundai/Kia. regarding the relief sought in this Motion. Hyundai/Kia is not opposed to the relief sought in this Motion.

<u>/s/ Jennifer Truelove</u> Jennifer Truelove

