

**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 THIRD SET OF
INTERROGATORIES NOS. 13-23**

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 August 8, 2016 they served their objections and responses to Plaintiff's third set of interrogatories on counsel for Plaintiff Blitzsafe Texas, LLC.

Dated: August 9, 2016

Respectfully submitted,

/s/ Deron R. Dacus

Deron R. Dacus
Texas State Bar No. 00790553
Peter A. Kerr
Texas State Bar No. 24076478
THE DACUS FIRM, P.C.
821 ESE Loop 323
Suite 430
Tyler, TX 75701
Telephone: (903) 705-1117
Facsimile: (903) 705-1117
Email: ddacus@dacusfirm.com
Email: pkerr@dacusfirm.com

Michael J. Lennon (admitted *pro hac vice*)
Sheila Mortazavi (admitted *pro hac vice*)
KENYON & KENYON LLP
One Broadway
New York, NY 10004-1007
Telephone: (212) 425-7200
Facsimile: (212) 425-5288
Email: mlennon@kenyon.com
Email: smortazavi@kenyon.com

Susan A. Smith (admitted *pro hac vice*)
KENYON & KENYON LLP
1500 K Street, N.W.
Washington D.C. 20005
Telephone: (202) 220-4200
Facsimile: (202) 220-4201
Email: ssmith@kenyon.com

Attorneys for Defendants VOLKSWAGEN
GROUP OF AMERICA, INC. and
VOLKSWAGEN GROUP OF AMERICA
CHATTANOOGA OPERATIONS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2016, a copy of the foregoing document was served via email on all counsel for plaintiff Blitzsafe Texas, LLC who are deemed to have consented to electronic service. Local Rule CV-5(d).

/s/ Deron R. Dacus

Deron R. Dacus