

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

BLITZSAFE TEXAS, LLC,	§	
Plaintiff,	§	
	§	NO. 2:15-CV-01274-JRG-RSP
v.	§	(LEAD CASE)
	§	
HONDA MOTOR CO., LTD., ET AL.,	§	
Defendants.	§	

**U.S. HONDA DEFENDANTS’ AND NISSAN DEFENDANTS’
NOTICE OF JOINDER TO VOLKSWAGEN’S MOTION TO STAY**

Defendants American Honda Motor Co., Inc., Honda of America Mfg., Inc., Honda Manufacturing of Alabama, LLC, Honda Manufacturing of Indiana, LLC, (collectively, “the U.S. Honda Defendants”) and Defendants Nissan North America, Inc. and Nissan Motor Co., Ltd. (collectively, “Nissan Defendants”), by and through the undersigned counsel hereby submit this joinder to Defendants Volkswagen Group of America, Inc.’s and Volkswagen Group of America Chattanooga Operations, LLC’s (collectively, “Volkswagen”) Motion to Stay (Dkt. No. 133), and incorporates herein, the arguments made by Volkswagen in their Motion to Stay, which was filed on August 15, 2016. Accordingly, the U.S. Honda Defendants and Nissan Defendants specifically join in support of the arguments made by Volkswagen in their Motion to Stay, as if fully set forth herein.¹ For the reasons set forth in the Motion to Stay, the U.S. Honda Defendants and Nissan Defendants respectfully request that the Court grant in the above-styled matter the same relief request by Volkswagen in their Motion to Stay, and grant such other and further relief as the Court deems just and proper.

¹ As noted in foot note 7 of Volkswagen’s motion, Blitzsafe served a preliminary election of asserted claims on the U.S. Honda Defendants and Nissan Defendants as well. Unlike Volkswagen, the U.S. Honda Defendants and Nissan Defendants do not contest Blitzsafe’s election. Nonetheless, all of the elected claims are subject to the pending petitions for *inter partes* review.

Dated: September 1, 2016

Respectfully submitted,

/s/ Joseph M. Beauchamp

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 1, 2016.

/s/ Joseph M. Beauchamp

Joseph M. Beauchamp

CERTIFICATE OF CONFERENCE

The undersigned hereby states that Sheila Mortazavi, counsel for Volkswagen, previously conferred with counsel for Plaintiff Blitzsafe Texas LLC regarding the subject matter of Volkswagen's motion, which the U.S. Honda Defendants and Nissan Defendants now seek to join, and Plaintiff was opposed to the relief requested.

/s/ Joseph M. Beauchamp

Joseph M. Beauchamp