

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

**BLITZSAFE TEXAS, LLC,**

Plaintiff,

v.

**HONDA MOTOR CO., LTD., ET AL.,**

Defendants

CASE NO. 2:15-CV-1274-JRG-RSP

**LEAD CASE**

**JURY TRIAL DEMANDED**

**DECLARATION OF PATRICK S. PARK IN SUPPORT OF MOTION TO DISMISS  
FOR INSUFFICIENT SERVICE OF PROCESS**

I, Patrick S. Park, hereby declare and state as follows:

1. I am counsel of record for Defendants Hyundai Motor America (“HMA”), Hyundai Motor Manufacturing Alabama, LLC (“HMMA”) (collectively, “Hyundai”), Kia Motors America, Inc. (“KMA”), and Kia Motors Manufacturing Georgia, Inc. (“KMMG”) (collectively, “Kia”), and the facts in my declaration are based upon my personal knowledge.

2. Attached as Exhibit A are true and correct copy of the correspondence to Blitzsafe’s counsel, dated May 4, 2016.

I declare under penalty of perjury under the laws of the United States that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true.

Dated: 11/7/2016

/s/ Patrick S. Park  
Patrick S. Park