

**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.

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

LEAD CASE

JURY TRIAL DEMANDED

**PLAINTIFF BLITZSAFE TEXAS LLC'S RESPONSE IN OPPOSITION  
TO DEFENDANTS' MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF  
PROCESS**

Plaintiff Blitzsafe Texas, LLC ("Blitzsafe") hereby submits its Response in Opposition to Defendants' Motion to Dismiss for Insufficient Service of Process of Hyundai Motor Company ("HMC") and Kia Motors Corporation ("KMC") ("collectively, "Korean Named Defendants") (Dkt. 227).

**I. FACTUAL BACKGROUND**

Blitzsafe neither admits nor denies any of the factual allegations set forth in Defendants' brief except to admit that the Korean Named Defendants have not been served with process and that Blitzsafe has consented to the dismissal of its claims against the Korean Named Defendants without prejudice.

**II. DEFENDANTS MOTION IS MOOT BECAUSE BLITZSAFE HAS CONSENTED TO THE DISMISSAL OF ITS CLAIMS AGAINST THE KOREAN NAMED DEFENDANTS WITHOUT PREJUDICE**

Because Blitzsafe has consented to the dismissal of the Korean Named Defendants without prejudice, the present motion is moot and should be denied. Blitzsafe respectfully submits that the case caption should be amended accordingly.

**III. CONCLUSION**

For the foregoing reasons, Defendants' Motion Dismiss for Insufficient Service of Process is moot and should be denied.

Dated: December 2, 2016

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**ATTORNEYS FOR PLAINTIFF,  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who 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 this 2nd day of December, 2016.

/s/ Peter Lambrianakos  
Peter Lambrianakos