

EXHIBIT A

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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Case No. 2:15-CV-1274-JRG-RSP

(LEAD CASE)

JURY TRIAL DEMANDED

FILED UNDER SEAL

**PLAINTIFF BLITZSAFE TEXAS, LLC’S INITIAL
WITNESS LIST DESIGNATIONS RELATIVE TO
VOLKSWAGEN GROUP OF AMERICA CHATTANOOGA OPERATIONS, LLC
AND VOLKSWAGEN GROUP OF AMERICA, INC.**

Pursuant to the Court’s Amended Docket Control Order (Dkt. 257), Plaintiff Blitzsafe Texas, LLC (“Blitzsafe”) serves this Trial Witness List for identification and categorization of trial witnesses.

At this time, Blitzsafe identifies the following witnesses that it intends to call live at Trial in alphabetical order by last name¹:

WITNESS	WILL CALL	MAY CALL
Becker, Ph.D., Stephen L.	X	
Kerr, Melanie		X
Lorsch, Dieter		X
Marlowe, Ira	X	

¹ In addition, Blitzsafe reserves the right to call all witnesses whose deposition testimony has been designated in lieu of designations in the event that those witnesses attend the trial in person.

WITNESS	WILL CALL	MAY CALL
McAlexander, Joseph	X	
Morales, Samuel		X

Blitzsafe reserves the right to modify, amend, or supplement this list prior to or during trial based on case developments, including but not limited to the right to: (1) not call some of the witnesses listed above, (2) call live or by deposition as its witnesses at trial any witness identified on Defendants' witness lists,(3) call live any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which Defendants object (including but not limited to custodians of records or authors of prior art), (4) add additional witnesses to testify live or by deposition, (5) introduce deposition testimony as impeachment evidence or in rebuttal, (6) call as live witnesses at trial the corporate representatives designated by Defendants to be excluded from the Rule, whether or not that person appears on Plaintiff's or Defendants' witness lists, or (7) change a witness from a live witness to a witness testifying by deposition, and vice versa.

Blitzsafe further reserves the right to supplement or modify this list (1) if any further depositions are taken in this matter, or (2) in response to rulings by the Court (including on any motions). Blitzsafe includes in this list individuals who may be listed on Defendants' witness list without prejudice to its right to object to Defendants' presentation of those witnesses at trial, the admissibility of all or part of those witnesses' testimony, or its right to move for the exclusion of those witnesses' testimony.

Dated: December 9, 2016

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 9, 2016 a true and correct copy of the above and foregoing document has been served by email on:

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