

# EXHIBIT B

**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.**

No. 2:15-cv-01278-JRG-RSP

CONSOLIDATED INTO

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

JURY TRIAL DEMANDED

**DEFENDANTS VOLKSWAGEN GROUP OF AMERICA, INC. AND VOLKSWAGEN  
GROUP OF AMERICA CHATTANOOGA OPERATIONS, LLC'S OPENING  
IDENTIFICATION OF TRIAL WITNESSES AND DEPOSITION DESIGNATIONS**

Pursuant to the Court's Amended Docket Control Order (D.I. 286), Defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC (collectively, "Defendants" or "VWGoA") hereby provide their Opening Identification of Trial Witnesses and Deposition Designations. (Witnesses without contact information below may be contacted through the undersigned counsel.)

A. Preliminary Identification of Trial Witnesses VWGoA Will Call

1. DIETER LOERSCH  
Audi AG  
Ingolstadt, Germany
2. SCOTT ANDREWS  
Cogenia Partners, LLC  
915 Western Ave.  
Petaluma, CA 94952

B. Preliminary Identification of Trial Witnesses VWGoA May Call by Deposition Designations (See Appendix)

1. IRA MARLOWE  
Blitzsafe Texas, LLC
2. EDWARD FISCHER  
1 Cobblewood Road  
Blairstown, NJ 07825

Dated: December 9, 2016

Respectfully submitted,

/s/ Michael S. Turner

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VOLKSWAGEN GROUP OF AMERICA  
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**APPENDIX**

**VOLKSWAGEN GROUP OF AMERICA, INC. AND VOLKSWAGEN GROUP OF AMERICA CHATTANOOGA OPERATIONS, LLC'S DEPOSITION DESIGNATIONS**

<b>DEPONENT</b>	<b>DATE OF</b>	<b>DESIGNATION</b>
Marlowe, Ira	9/12/2016, 9/13/2016	10:25–12:4
		21:9–16
		23:14–17
		24:20–26:4
		42:3–45:13
		58:5–14
		130:16–131:15
		132:2–17
		168:23–169:10
		194:7–196:13
		198:4–200:2
		202:25–203:18
		217:16–218:3
		232:12–17
		297:15–299:20
		301:21–302:9
		315:17–25
		442:21–447:7

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