

CORRECTED 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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APPENDIX

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

DEPONENT	DATE OF	DESIGNATION
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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