

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

BLITZSAFE TEXAS, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:15-CV-1274-JRG-RSP
	§	LEAD CASE
	§	
HONDA MOTOR CO., LTD.; AMERICAN	§	<u>JURY TRIAL DEMANDED</u>
HONDA MOTOR CO., INC.; HONDA OF	§	
AMERICA MANUFACTURING, INC.;	§	
HONDA MANUFACTURING OF ALABAMA,	§	
LLC; and HONDA MANUFACTURING OF	§	
INDIANA, LLC,	§	
	§	
Defendants.	§	
	§	

**UNOPPOSED MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR DEFENDANTS
TOYOTA MOTOR CORPORATION, TOYOTA MOTOR SALES, U.S.A., INC., TOYOTA
MOTOR MANUFACTURING, TEXAS, INC., TOYOTA MOTOR MANUFACTURING,
KENTUCKY, INC., AND TOYOTA MOTOR MANUFACTURING, MISSISSIPPI, INC.**

Defendants Toyota Motor Corporation, Toyota Motor Sales, U.S.A., Inc., Toyota Motor Manufacturing, Texas, Inc., Toyota Motor Manufacturing, Kentucky, Inc., and Toyota Motor Manufacturing, Mississippi, Inc. (collectively "Toyota") file this motion to withdraw Margaret Welsh as Counsel of Record for Toyota in case Nos. 2:15-cv-01277 and 2:15-cv-01274.

The withdrawal of Margaret Welsh will not delay this proceeding, and no prejudice will result to any party. Toyota will continue to be represented by Harry L. Gillam, Jr., J Thad Heartfield, William Mandir, John Rabena, Brian Shelton, Chandran Iyer, and Fadi Kiblawi.

The undersigned counsel has conferred with counsel for Plaintiff on this issue and Plaintiff has no objection to the withdrawal of Margaret Welsh as counsel for Toyota. Toyota consents to the withdrawal of Margaret Welsh as counsel of record in Case Nos. 2:15-cv-01277 and 2:15-cv-01274.

WHEREFORE, Defendant Toyota respectfully requests that this Court grant this Motion to Withdraw in its entirety and enter an Order permitting Margaret Welsh to withdraw from this action as counsel for Defendant Toyota, and that the clerk remove her name from the list of persons authorized to receive electronic notices in this matter.

Dated: January 13, 2017

/s/J. Thad Heartfield

J Thad Heartfield
The Heartfield Law Firm
2195 Dowlen Rd
Beaumont, TX 77706
State Bar No. 09346800
409-866-3318
Fax: 409-866-5789
Email: thad@heartfieldlawfirm.com

OF COUNSEL

SUGHRUE MION, PLLC
William H. Mandir (*pro hac vice*)
John F. Rabena (*pro hac vice*)
Brian K. Shelton (*pro hac vice*)
Fadi N. Kiblawi (*pro hac vice*)
Margaret M. Welsh (*pro hac vice*)
2100 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 293-7600

Attorneys for Toyota Motor Corporation, Toyota Motor Sales, U.S.A., Inc., Toyota Motor Manufacturing, Texas, Inc., Toyota Motor Manufacturing, Kentucky, Inc., and Toyota Motor Manufacturing, Mississippi, Inc.

CERTIFICATE OF SERVICE

I certify that on January 13, 2017, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

/s/ J. Thad Heartfield

J. Thad Heartfield