

**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.

**Civil Action No. 2:15-cv-01274-JRG-RSP
(LEAD CASE)**

JURY TRIAL DEMANDED

v.

TOYOTA MOTOR CORPORATION ET AL

Defendants.

**Civil Action No. 2:15-cv-01277-JRG-RSP
(CONSOLIDATED CASE)**

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Blitzsafe Texas, LLC and Defendants Toyota Motor Corporation, Toyota Motor Sales USA, Inc., Toyota Motor Manufacturing Texas, Inc., Toyota Motor Manufacturing Kentucky, Inc., and Toyota Motor Manufacturing Mississippi, Inc. hereby file this Motion to Stay All Deadlines and Notice of Settlement.

All matters in controversy between the parties have been settled in principle. The Parties respectfully request a stay of all case deadlines for 30 days while the parties finalize a settlement agreement and file dismissal documents with the Court.

WHEREFORE, the parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: January 27, 2017

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Respectfully submitted,

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TEXAS, INC., TOYOTA MOTOR
MANUFACTURING KENTUCKY, INC.,
and TOYOTA MOTOR MANUFACTURING
MISSISSIPPI, INC.**

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 27th day of January, 2017, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Harry L. Gillam, Jr.

Harry L. Gillam, Jr.