

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

BLITZSAFE TEXAS, LLC,	§	
	§	
Plaintiff,	§	Case No. 2:15-CV-1274-JRG-RSP
	§	
v.	§	(LEAD CASE)
	§	
HONDA MOTOR CO., LTD., ET AL.,	§	
	§	
Defendants.	§	

BLITZSAFE TEXAS, LLC,	§	
	§	
Plaintiff,	§	Case No. 2:15-CV-1276-JRG-RSP
	§	
v.	§	(CONSOLIDATED CASE)
	§	
NISSAN NORTH AMERICA, INC. and NISSAN MOTOR CO., LTD.,	§	
	§	
Defendants.	§	

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Blitzsafe Texas, LLC and Defendants Nissan North America, Inc. and Nissan Motor Co., Ltd. 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 thirty (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: February 2, 2017

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**ATTORNEYS FOR DEFENDANTS
NISSAN NORTH AMERICA, INC. AND
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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 2nd day of February, 2017, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant
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