

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

BLITZSAFE TEXAS, LLC,

Plaintiff,

v.

HONDA MOTOR CO., LTD., ET AL.,

Defendants.

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Case No. 2:15-CV-1274-JRG-RSP

(LEAD CASE)

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Blitzsafe Texas, LLC and Defendants Honda Motor Co., Ltd., American Honda Motor Co., Inc., Honda of America Manufacturing, Inc., Honda Manufacturing of Alabama, LLC and Honda Manufacturing of Indiana, LLC 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 7, 2017

BROWN RUDNICK LLP

JONES DAY

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AMERICA MANUFACTURING, INC.,
HONDA MANUFACTURING OF ALABAMA,
LLC AND HONDA MANUFACTURING OF
INDIANA, LLC**

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 7th 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
Alfred R. Fabricant