

**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.

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Case No. 2:15-cv-01274-JRG-RSP

JURY TRIAL DEMANDED

LEAD CASE

JOINT MOTION FOR ENTRY OF AGREED DOCKET CONTROL ORDER

Pursuant to the Court's Order of November 2, 2015 (Dkt. 29), the parties jointly and respectfully request that the Court enter the Proposed Docket Control Order, attached as Exhibit

A. The parties propose that the Deadline to File Proposed Protective Order and Comply with Paragraphs 1 and 3 of the Discovery Order (Initial and Additional Disclosures), which was set for December 29, 2015 in the Court's standard docket control order, be moved to January 12, 2016. Good cause exists for the proposed modification because the closure of several of the defendants' offices over the holidays will interfere with their ability to timely submit the required disclosures and to review and approve proposed revisions of the protective order.

Dated: December 22, 2015

Respectfully Submitted,

BROWN RUDNICK LLP

/s/ Peter Lambrianakos

Alfred R. Fabricant
Texas Bar No. 2219392
afabricant@brownrudnick.com
Lawrence C. Drucker
ldrucker@brownrudnick.com
Texas Bar No. 2303089
Peter Lambrianakos
Texas Bar No. 2894392
plambrianakos@brownrudnick.com
BROWN RUDNICK LLP
7 Times Square
New York, NY 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

**ATTORNEYS FOR PLAINTIFF BLITZSAFE
TEXAS, LLC**

/s/ Joseph M. Beauchamp

Joseph M. Beauchamp
Texas State Bar No. 24012266
jbeauchamp@jonesday.com

H. Albert Liou
Texas State Bar No. 24061608
aliou@jonesday.com

Erin C. Dickerman
edickerman@jonesday.com

JONES DAY
717 Texas Street, Suite 3300
Houston, Texas 77002-2712
Telephone: (832) 239-3939
Facsimile: (832) 239-3600

Joseph Melnik
California State Bar No. 255601
jmelnik@jonesday.com

JONES DAY
1755 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 739-3939
Facsimile: (650) 739-3900

Randy Akin
Texas State Bar No. 00954900
gra@randyakin.com
G.R. (RANDY) AKIN, P.C.
3400 W. Marshall Avenue, Suite 300
Longview, Texas 75604
Telephone: (903) 297-8929
Facsimile: (903) 297-9046

**ATTORNEYS FOR DEFENDANTS
AMERICAN HONDA MOTOR CO., INC.,
HONDA OF AMERICA MFG., INC., HONDA
MANUFACTURING OF ALABAMA, LLC,
and HONDA MANUFACTURING OF
INDIANA, LLC**

/s/ Paul R. Steadman

Paul R. Steadman
Illinois Bar No. 6238160
paul.steadman@dlapiper.com
Matthew D. Satchwell
Illinois Bar No. 6290672
matthew.satchwell@dlapiper.com
DLA PIPER LLP
203 N. LaSalle St., Suite 1900
Chicago, IL 60601-1293
Telephone: 312.368.2111
Facsimile: 312.236.7516 –

Jeffrey L. Johnson
Texas Bar No. 24029638
jeffrey.johnson@dlapiper.com

DLA PIPER LLP
1000 Louisiana, Suite 2800
Houston, Texas 77002
Telephone: (713) 425-8445
Facsimile: (713) 300-6045

Patrick S. Park
California Bar No. 246348
patrick.park@dlapiper.com

DLA PIPER LLP
20000 Avenue of the Stars, Suite 400
North Tower
Los Angeles, CA 90067
Telephone: 310.595.3000
Facsimile: 310.595.3300

**ATTORNEYS FOR DEFENDANTS HYUNDAI
MOTOR AMERICA, HYUNDAI MOTOR
MANUFACTURING ALABAMA, LLC, KIA
MOTORS AMERICA, INC., and KIA
MOTORS MANUFACTURING GEORGIA,
INC.**

/s/ Sean N. Hsu

Jeffrey S. Patterson
Texas Bar No. 15596700
jpatterson@hdbdlaw.com

Sean N. Hsu
Texas Bar No. 24056952
shsu@hdbdlaw.com

Theresa M. Dawson
Texas Bar No. 24065128
tdawson@hdbdlaw.com

HARTLINE DACUS BARGER DREYER LLP
8750 North Central Expressway
Suite 1600
Dallas, Texas 75231
Telephone: (214) 369-2100
Facsimile: (214) 369-2118

**ATTORNEYS FOR DEFENDANTS
NISSAN NORTH AMERICA, INC. and
NISSAN MOTOR CO., LTD.**

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