

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

BLITZSAFE TEXAS, LLC,

Plaintiff,

v.

**VOLKSWAGEN GROUP OF AMERICA,
INC. and VOLKSWAGEN GROUP OF
AMERICA CHATTANOOGA
OPERATIONS, LLC,**

Defendants.

No. 2:15-cv-01278-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS VOLKSWAGEN GROUP OF AMERICA, INC. AND VOLKSWAGEN
GROUP OF AMERICA CHATTANOOGA OPERATIONS, LLC'S
RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC disclose as follows:

Volkswagen Group of America Chattanooga Operations, LLC is a subsidiary of Volkswagen Group of America, Inc., which is a subsidiary of Volkswagen AG, a publicly-held German corporation.

Dated: September 11, 2015

Respectfully submitted,

Deron R. Dacus
Texas State Bar No. 00790553
THE DACUS FIRM, P.C.
821 ESE Loop 323
Suite 430
Tyler, TX 75701
Telephone: (903) 705-1117
Facsimile: (903) 705-1117
Email: ddacus@dacusfirm.com

Michael J. Lennon (admitted *pro hac vice*)
Sheila Mortazavi (admitted *pro hac vice*)
KENYON & KENYON LLP
One Broadway
New York, NY 10004-1007
Telephone: (212) 425-7200
Facsimile: (212) 425-5288
Email: mlennon@kenyon.com
Email: smortazavi@kenyon.com

Susan A. Smith (admitted *pro hac vice*)
KENYON & KENYON LLP
1500 K Street, N.W.
Washington D.C. 20005
Telephone: (202) 220-4200
Facsimile: (202) 220-4201
Email: ssmith@kenyon.com

By /s/ Deron R Dacus

Attorneys for Defendants VOLKSWAGEN
GROUP OF AMERICA, INC. and
VOLKSWAGEN GROUP OF AMERICA
CHATTANOOGA OPERATIONS, LLC

CERTIFICATE OF SERVICE

I hereby certify that this 11th day of September, 2015, a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Deron R Dacus