#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

APTIV SERVICES US, LLC,

Plaintiff,

v.

BLITZSAFE TEXAS, LLC,

Defendant.

Case No. 2:21-cv-12040-DPH-APP

Hon. Denise Page Hood

JURY TRIAL DEMANDED

## DEFENDANT'S MOTION TO DISMISS COMPLAINT FOR DECLARATORY JUDGMENT FOR LACK OF PERSONAL AND SUBJECT MATTER JURIDICTION, OR IN THE ALTERNATIVE, TO DISMISS OR TRANSFER UNDER THE FIRST-TO-FILE RULE

Defendant Blitzsafe Texas, LLC ("Blitzsafe Texas") respectfully moves this Court to dismiss Aptiv Services US, LLC's ("Aptiv Services") Complaint for Declaratory Judgment for lack of personal jurisdiction and lack of subject matter jurisdiction or, in the alternative, dismiss this case under the first-to-file rule or transfer the case to the Eastern District of Texas.

Pursuant to Local Rule 7.1, the parties discussed this issue and their respective positions on a telephonic conference on January 21, 2022. April Services refused its concurrence in the relief requested in this motion.



## Respectfully submitted, MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: <u>s/ Jeffrey A. Crapko</u>

Jeffrey A. Crapko (P78487) 150 West Jefferson, Suite 2500

Detroit, MI 48226

Telephone: (248) 267-3237 crapko@millercanfield.com *Counsel for Defendant* 

Dated: January 21, 2022



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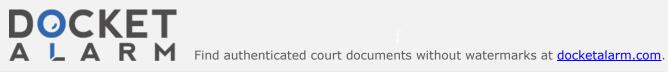
JURY TRIAL DEMANDED

DEFENDANT'S BRIEF IN SUPPORT OF ITS MOTION
TO DISMISS COMPLAINT FOR DECLARATORY JUDGMENT
FOR LACK OF PERSONAL AND SUBJECT MATTER JURIDICTION,
OR IN THE ALTERNATIVE, TO DISMISS OR
TRANSFER UNDER THE FIRST-TO-FILE RULE



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