

**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 JURISDICTION, 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. Aptiv Services refused its concurrence in the relief requested in this motion.

Respectfully submitted,

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Dated: January 21, 2022

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EASTERN DISTRICT OF MICHIGAN  
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v.

BLITZSAFE TEXAS, LLC,

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

Hon. Denise Page Hood

JURY TRIAL DEMANDED

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

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