

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

CAUSE NOS. 2:07-cv-00001, 2:07-cv-00013, 2:07-cv-00014, 2:07-cv-00017, 2:07-cv-00018, 2:07-cv-00410

SHARON TAYLOR, *et al.*,

Plaintiffs,

v.

ACXIOM., *et al.*,

Defendants.

§  
§  
§  
§  
§  
§  
§

JUDGE: DONALD WALTER

**RESPONSE TO DEFENDANT ZEBEC DATA SYSTEMS INC.'S RESPONSE TO PLAINTIFFS' STATEMENT OF VIOLATIONS OF THE DRIVERS' PRIVACY PROTECTION ACT AND SUPPLEMENT TO CONSOLIDATED MOTION TO DISMISS ON COMMON ISSUES**

**RESPONSE TO DEFENDANT ZEBEC DATA SYSTEMS INC.'S RESPONSE TO PLAINTIFFS' STATEMENT OF VIOLATIONS OF THE DRIVERS' PRIVACY PROTECTION ACT AND SUPPLEMENT TO CONSOLIDATED MOTION TO DISMISS ON COMMON ISSUES**

Plaintiffs, By And Through Their Undersigned Counsel, Hereby File Their Response To Defendant Zebec Data Systems Inc.'s Response To Plaintiffs' Statement Of Violations Of The Drivers' Privacy Protection Act and Supplement To Consolidated Motion To Dismiss On Common Issues, and In Support Thereof,<sup>1</sup> State:

It appears that this Defendant has not raised any issues that were not addressed in Plaintiffs Response to Defendants' Consolidated Motion to Dismiss on Common Issues.

The arguments presented by this Defendant are boilerplate in nature and have been fully addressed in Plaintiffs' Response to Defendants' Consolidated Motion to Dismiss on Common Issues. Plaintiffs hereby refer to that Response and all arguments contained therein.

---

<sup>1</sup>As with Defendants, Plaintiffs also rely on all arguments previously made in response to this Defendant's previously filed Motions to Dismiss.

For these reasons, as well as those previously presented to the Court in response to this Defendant's original Motion to Dismiss, Plaintiffs contend that this Defendant's Motion to Dismiss should be denied.

Respectfully submitted,

**THE COREA FIRM, P.L.L.C.**

/Jeremy R. Wilson/

Thomas M. Corea  
Texas Bar No. 24037906  
Jeremy R. Wilson  
Texas Bar No. 24037722  
The Republic Center  
325 North St. Paul Street, Suite 4150  
Dallas, Texas 75201  
Telephone: (214)953-3900  
Facsimile: (214)953-3901

**OTSTOTT & JAMISON, P.C.**

George A. Otstott  
Texas Bar No. 15342000  
Ann Jamison  
Texas Bar No. 00798278  
Two Energy Square  
4849 Greenville Avenue, Suite 1620  
Dallas, Texas 75206  
Telephone: (214)522-9999  
Facsimile: (214)828-4388

**THE MANN FIRM**

James Mark Mann  
Texas Bar No. 12926150  
300 W. Main  
Henderson, TX 75652  
(903) 657-8540  
Fax: (903) 657-6003

**CERTIFICATE OF SERVICE**

I certify that on May 9th, 2008, I electronically filed the above Motion with the Clerk of the Court using CM/ECF and that the Motion has been forwarded by CM/ECF to all counsel of record.

/Jeremy R. Wilson/  
Jeremy R. Wilson