

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

SHARON TAYLOR, ET AL. CIVIL ACTION NO. 2:07cv00001
VERSUS JUDGE DONALD E. WALTER
ACXIOM CORPORATION, ET AL.

AND

SHARON TAYLOR, ET AL. CIVIL ACTION NO. 2:07cv00013
VERSUS JUDGE DONALD E. WALTER
ACS STATE & LOCAL SOLUTIONS,
INC., ET AL.

AND

SHARON TAYLOR, ET AL. CIVIL ACTION NO. 2:07cv00014
VERSUS JUDGE DONALD E. WALTER
TEXAS FARM BUREAU MUTUAL
INSURANCE COMPANY, ET AL.

AND

SHARON TAYLOR, ET AL. CIVIL ACTION NO. 2:07cv00017
VERSUS JUDGE DONALD E. WALTER
SAFEWAY, INC., ET AL.

AND

SHARON TAYLOR, ET AL. CIVIL ACTION NO. 2:07cv00018
VERSUS JUDGE DONALD E. WALTER
BIOMETRIC ACCESS COMPANY, ET
AL.

AND

SHARON TAYLOR, ET AL. CIVIL ACTION NO. 2:07cv00410
VERSUS JUDGE DONALD E. WALTER
FREEMAN PUBLISHING COMPANY

**ZEBEC DATA SYSTEMS, INC.'S REPLY TO PLAINTIFFS' RESPONSE TO
SUPPLEMENT TO CONSOLIDATED MOTION TO DISMISS ON COMMON ISSUES**

Zebec Data Systems, Inc. (“Zebec”) files this Reply to Plaintiffs’ Response to Supplement to Consolidated Motion to Dismiss on Common Issues and will demonstrate that this Court should dismiss all claims against Zebec.

ARGUMENT

Zebec joined in the Consolidated Motion to Dismiss on Common Issues and Response to Plaintiffs’ Statement of Violations (“Consolidated Motion”) filed on April 18, 2008. This Consolidated Motion set forth numerous bases for the Court to dismiss this lawsuit. Zebec also filed a separate Response to Plaintiffs’ Statement of Violations of the Drivers’ Privacy Protection Act and Supplement to Consolidated Motion to Dismiss on Common Issues (“Zebec’s Supplement”). Zebec’s Supplement pointed out that its motion to dismiss included all grounds in the Consolidated Motion, as well as the ground that Plaintiffs are impermissibly contesting Zebec’s certification to the State of Texas that it acquired motor vehicle records for purposes permitted by the DPPA.

Plaintiffs filed a separate Response to Zebec’s Supplement contending that Zebec did not raise “any issues that were not addressed in Plaintiffs’ Response to Defendants’ Consolidated Motion to Dismiss on Common Issues” and only made “boilerplate” allegations in the Supplement (Plaintiffs’ Resp. at 1). Zebec files this Reply to emphasize that it made no “boilerplate” allegations in either its motion to dismiss or in its supplemental response; rather, Zebec emphasized that it seeks dismissal based on all grounds in its motion to dismiss and in the Consolidated Motion, as well as the ground that the Plaintiffs are impermissibly attacking Zebec’s certification to the State of Texas. The DPPA does not authorize this.

Zebec also joins the Consolidated Reply on behalf of all Defendants filed separately.

CERTIFICATE OF SERVICE

I hereby certify that on the May 15, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the following:

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