

**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

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

InfoNation, Inc. (“InfoNation”) 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 InfoNation.

### **ARGUMENT**

InfoNation 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 the lawsuit. InfoNation also separately filed its own Response to Plaintiffs’ Statement of Violations of the Drivers’ Privacy Protection Act and Supplement to Consolidated Motion to Dismiss on Common Issues (“InfoNation’s Supplement”). That Supplement explained that InfoNation’s motion to dismiss included all grounds in the Consolidated Motion, as well as the ground that Plaintiffs are impermissibly contesting InfoNation’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 InfoNation’s Supplement contending that InfoNation 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). InfoNation files this Reply to emphasize that it made no “boilerplate” allegations in either its motion to dismiss or in its supplemental response; rather, InfoNation 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 InfoNation’s certification to the State of Texas. The DPPA does not authorize this.

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



**CERTIFICATE OF SERVICE**

I hereby certify that on 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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