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KRUSE TECHNOLOGY PARTNERSHIP

IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

KRUSE TECHNOLOGY PARTNERSHIP, Plaintiff/Counterdefendant, v. DMAX, LTD. Defendant/Counterclaimant. AND RELATED COUNTERCLAIM	Civil Action No. SACV09-458 JVS (RNBx) Hon. James V. Selna **KRUSE TECHNOLOGY PARTNERSHIP'S NOTICE OF MOTION TO CONSOLIDATE RELATED ACTIONS** Date: Dec. 14, 2009 Time: 3:00 p.m. Location: Ctrm 10C

KRUSE TECHNOLOGY PARTNERSHIP, Plaintiff, v. ISUZU MOTORS LIMITED, ISUZU NORTH AMERICA CORPORATION, and ISUZU COMMERCIAL TRUCK OF AMERICA, INC., Defendants. AND RELATED COUNTERCLAIM	Civil Action No. SACV 09-3710 JVS (RNBx)
KRUSE TECHNOLOGY PARTNERSHIP, Plaintiff/Counterdefendant, v. GENERAL MOTORS COMPANY, Defendant/Counterclaimant. AND RELATED COUNTERCLAIM	Civil Action No. SACV09-4970 JVS (MLGx)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Pursuant to Local Rule 6-1, Plaintiff/Counterdefendant Kruse Technology Partnership ("Kruse") hereby moves the Court for an order consolidating the related actions *Kruse Technology Partnership v. DMAX, Ltd*, (SACV 09-458 JVS), *Kruse Technology Partnership v. Isuzu Motors Limited, et al*. (SACV 09-3710 JVS) and *Kruse Technology Partnership v. General Motors Company* (SACV 09-4970 JVS). This motion is made following the parties' good faith efforts to resolve this dispute without Court action. The pre-filing conference of counsel Pursuant to Local Rule 7-3 was held on November 10, 2009.

This motion is made pursuant to the Memorandum of Points and Authorities and Declaration of Marko R. Zoretic filed concurrently herewith. The motion will be heard Monday, December 14, 2009, at 3:00 p.m. in Courtroom 10C, 411 West Fourth Street, Santa Ana, California, or at such other time as the Court directs.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: November 20, 2009 By: */s/ David G. Jankowski*

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