

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

\_\_\_\_\_  
In the Matter of )

ZEN MAGNETS, LLC, )

Respondent. )  
\_\_\_\_\_

) CPSC Docket No. 12-2

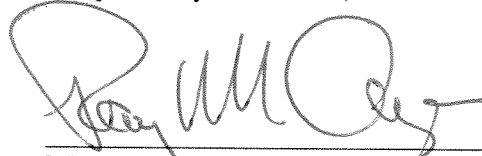
) Hon. Dean C. Metry  
) Administrative Law Judge

**COMPLAINT COUNSEL'S MOTION**  
**TO STRIKE RESPONDENT'S PROPOSED EXPERTS**  
**DAVID A. RICHTER AND BOYD EDWARDS**

Pursuant to 16 C.F.R. §1025.23, Complaint Counsel hereby moves this Court to strike the depositions, reports and prospective trial testimony of Respondent's proposed experts, David A. Richter, Ph.D., and Boyd Edwards, Ph.D. A review of Dr. Richter's and Dr. Edwards' qualifications illustrates that they are not qualified by knowledge, skill, experience, training or education to be experts in the area of educational use of small rare earth magnets (SREMs). Complaint Counsel respectfully submits that the Court should preclude the testimony of these witnesses at the hearing of this matter for the reasons set forth in the accompanying memorandum.

This Motion is based upon the accompanying memorandum of points and authorities, statement of facts, exhibits, and the records of this case.

Respectfully submitted,



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Mary B. Murphy, Assistant General Counsel  
Jennifer Argabright, Trial Attorney  
Daniel Vice, Trial Attorney  
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