

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

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In the matter of )	
MAXFIELD AND OBERTON HOLDINGS, LLC )	CPSC DOCKET 12-1
ZEN MAGNETS, LLC )	CPSC DOCKET 12-2
STAR NETWORKS USA, LLC )	CPSC DOCKET 13-2
Respondents. )	(Consolidated)
_____ )	

**REQUEST TO PARTICIPATE IN THE PROCEEDING AS A NON-PARTY  
PARTICIPANT AND FOR LEAVE TO FILE AN OPPOSITION TO COMPLAINT  
COUNSEL'S MOTION FOR LEAVE TO AMEND COMPLAINT  
BY FEBRUARY 28, 2013**

Craig Zucker respectfully requests leave to participate in these proceedings as a non-party with an interest in the proceedings, pursuant to the Commission's regulations, 16 C.F.R. § 1025.17(b)<sup>1</sup>. Mr. Zucker has an interest in these proceedings because, on February 11, 2013, Complaint Counsel filed a motion for leave to amend the complaint in CPSC Docket 12-1 to add Mr. Zucker as a respondent.<sup>2</sup> The court having not ruled upon Complaint Counsel's motion to amend or considered Mr. Zucker's contemplated objection thereto, Mr. Zucker is not a party to the proceedings at this time. Mr. Zucker seeks leave to participate in order to provide the Court with his views and arguments as to why Complaint Counsel's motion should be denied.

<sup>1</sup> Mr. Zucker's request for leave to participate as a nonparty Participant is not intended to waive his objections to any assertion of jurisdiction over him by this Court.

<sup>2</sup> Complaint Counsel's motion also seeks to amend the complaint in Docket 12-2. Mr. Zucker takes no position as to that proposed amendment, and does not intend to address that issue in his opposition to the motion to amend the complaint in Docket 12-1.

No other party in this proceeding can adequately represent Mr. Zucker's interests in responding to Complaint Counsel's motion. Mr. Zucker would be uniquely affected by an Order of this Court granting Complaint Counsel's motion to add him as a respondent. His participation would be consistent with the Commission's rules favoring participation in adjudications, particularly when the person's participation "can be expected to assist the Presiding Officer and the Commission in rendering a fair and equitable resolution" of the issues. 16 C.F.R. § 1025.17(e).

Granting Mr. Zucker's motion will not unreasonably delay these proceedings. Mr. Zucker proposes to file his opposition on or before February 28, 2013.<sup>3</sup>

For these reasons, and in order to place his views before the Court before Complaint Counsel's motion is considered, Mr. Zucker requests leave to participate as a non-party Participant in these proceedings and for leave to file an opposition to Complaint Counsel's motion by Thursday, February 28, 2013.

Respectfully submitted,

Dated: February 20, 2013

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<sup>3</sup> Mr. Zucker has not yet been served with Complaint Counsel's motion. Without waiving Mr. Zucker's objection to the Court's jurisdiction, undersigned counsel spoke with Complaint Counsel on February 19, 2013, and consented to accept service of the motion.