UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	
	)	
BABY MATTERS, LLC	)	CPSC DOCKET NO. 13-1
	)	
	)	HON. WALTER J. BRUDZINSKI
Respondent.	)	Administrative Law Judge
	)	
	)	

MOTION REQUESTING AN ENLARGEMENT OF TIME

COMES NOW Complaint Counsel for the U.S. Consumer Product Safety Commission ("Complaint Counsel"), and moves, pursuant to 16 C.F.R. § 1025.32(b), for an enlargement of time to respond to Baby Matters' First Interrogatories and Baby Matters' First Request for Production of Documents and Things (collectively, "Discovery Requests") filed by Respondent on December 26, 2012. Complaint Counsel's response to the Discovery Requests is due on January 31, 2013. Complaint Counsel estimates that there are over 8,000 emails and over 1,000 documents that are potentially responsive to Respondent's Discovery Requests, and Complaint Counsel is working diligently to collect, process, and, where appropriate, produce the requested information to Respondent.

Moreover, Complaint Counsel has filed a Motion for Leave to Amend the Complaint, and requests that the Court rule on that Motion before Discovery is underway. The original complaint was filed on December 4, 2012, and an extension of time to respond to discovery requests will not prejudice the defendant, nor unduly delay these proceedings.

Complaint Counsel requests a short continuance of 45 days in order to respond fully to Respondent's Discovery Requests.

DATE: January 25, 2013

Respectfully requested,

Kelly Moore

Kelly Moore, Trial Attorney
Daniel Vice, Trial Attorney
Mary B. Murphy, Assistant General Counsel
Division of Compliance
Office of the General Counsel
U.S. Consumer Product Safety Commission
Bethesda, MD 20814
Tel: (301) 504-7809

Complaint Counsel for
U.S. Consumer Product Safety Commission
Bethesda, MD 20814

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	
	)	CPSC DOCKET NO. 13-1
BABY MATTERS, LLC	)	
	)	HON. WALTER J. BRUDZINSKI
Respondent.	)	Administrative Law Judge

ORDER

UPON CONSIDERATION of the Motion of Complaint Counsel for the U.S. Consumer Product Safety Commission Requesting an Enlargement of Time, for good cause shown, Complaint Counsel's motion is hereby granted.

ORDERED that Complaint Counsel for the U.S. Consumer Product Safety Commission be granted an additional 45 days to respond to respond to the Interrogatories and Requests for Production of Documents and Things filed by Respondent Baby Matters, LLC.

DATE: January __, 2013.

SO ORDERED:

HON. WALTER J. BRUDZINSKI
Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing on all parties and participants of record in these proceedings by mailing, postage prepaid a copy to each on January 25, 2013.

Baby Matters, LLC
531 Winston Way
Berwyn, PA 19312

Raymond G. Mullady, Jr.
Blank Rome LLP
Watergate
600 New Hampshire Avenue NW
Washington, DC 20037
Counsel for Baby Matters, LLC
Mullady@blankrome.com

Hon. Walter J. Brudzinski
U.S. Coast Guard
1 South Street, Battery Park Building
Room 216
New York, NY 10004-1466
Timothy.A.O'Connell@uscg.mil

Kelly Moore

Kelly Moore, Trial Attorney
Complaint Counsel for
U.S. Consumer Product Safety Commission