

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)	CPSC DOCKET 12-1
)	CPSC DOCKET 12-2
)	CPSC DOCKET 13-2
MAXFIELD AND OBERTON HOLDINGS, LLC)	(Consolidated)
ZEN MAGNETS, LLC)	
STAR NETWORKS USA, LLC)	Hon. Dean C. Metry
)	Administrative Law Judge
Respondents.)	
)	

RESPONDENT CRAIG ZUCKER’S STATUS REPORT CONCERNING DISCOVERY

Respondent Craig Zucker (“Respondent” or “Mr. Zucker”) submits this the status report pursuant the orders dated April 1, 2014 and April 3, 2014 requesting an update on the status of discovery.

I. Completed Discovery

A. Mr. Zucker has served Complaint Counsel with Interrogatories, Requests for Production of Documents and Requests for Admissions, to which Complaint Counsel has served responses. Complaint Counsel’s responses to written discovery are the subject of motions to compel filed by Mr. Zucker, described infra.

B. Complaint Counsel has served Mr. Zucker with Interrogatories, Requests for Production of Documents and Requests for Admissions, to which Mr. Zucker has served responses. Some of Mr. Zucker’s responses to Complaint Counsel’s Requests for Production of Documents are the subject of a motion to compel filed by Complaint Counsel, described infra.

II. Pending Motions and Applications

A. Presently pending before the Court are the following filed on behalf of Mr. Zucker:

1. Respondent Craig Zucker's Motion to Compel Complaint Counsel's Responses to Respondent's Amended First Set of Interrogatories to Consumer Product Safety Commission (filed March 31, 2014).

2. Respondent Craig Zucker's Motion to Compel Complaint Counsel's Responses to Respondent's First Set of Requests for Production of Documents to Consumer Product Safety Commission (filed March 31, 2014).

3. Respondent Craig Zucker's Motion to Compel Complaint Counsel's Responses to Respondent's First Set of Requests for Admissions to Consumer Product Safety Commission (filed March 31, 2014).

4. Respondent Craig Zucker's First Application for Leave to Take Depositions (Re-Filed) (filed April 1, 2014).

B. In addition, presently pending before the Court is the following motion filed by Complaint Counsel, to which Mr. Zucker intends to file a timely response:

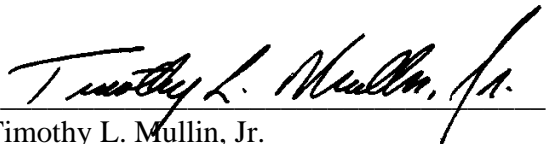
1. Motion to Compel Discovery (filed March 31, 2014).

III. Other Matters Relating to Discovery

A. In response to Mr. Zucker's First Application for Leave to Take Depositions (Re-Filed), Complaint Counsel has proposed producing three named witnesses and "expert testimony" to cover some of the topics proposed by Mr. Zucker, and has indicated it believes some of the topics proposed by Mr. Zucker for deponents are not relevant to this proceeding. We will continue to work with Complaint Counsel to attempt to streamline the depositions, but to date it appears that Complaint Counsel will object to Mr. Zucker's Application and it will require ruling by the Court after briefing by the parties.

B. Complaint Counsel has scheduled a telephone conference call to confer regarding the pending motions to compel filed by Mr. Zucker and Complaint Counsel, and counsel for Mr. Zucker will participate in that conference to see if issues raised by the motions to compel can be resolved without action by the Court.

Dated: April 4, 2014


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Co-Counsel for Respondent, Craig Zucker

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April, 2014, a true and correct copy of the foregoing Respondent Craig Zucker's Status Report Concerning Discovery was served on all parties and participants of record in these proceedings in the following manner:

Original and three copies by U.S. mail, and one copy by electronic mail, to the Secretary of the U.S. Consumer Product Safety Commission:

Todd A. Stevenson
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
tstevenson@cpsc.gov

One copy by U.S. mail and one copy by electronic mail to the Presiding Officer for *In the Matter of Maxfield and Oberton Holdings, LLC*, CPSC Docket No. 12-1; *In the Matter of Zen Magnets, LLC*, CPSC Docket No. 12-2, and *In the Matter Of Star Networks UA, LLC*, CPSC Docket No. 13-2:

The Honorable Dean C. Metry
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U.S. Courthouse
601 25th Street, Suite 508A
Galveston, TX 77550
Janice.M.Emig@uscg.mil

One copy by electronic mail (by agreement) to Complaint Counsel:

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One copy by electronic mail (by agreement) to counsel for Respondents Zen Magnets, LLC and Star Networks USA, LLC:

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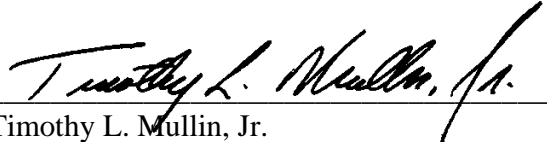
One copy by electronic mail (by agreement) to co-counsel for Craig Zucker:

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