UNITED STATES OF AMERICA CONSUMER PRODUCT SAFETY COMMISSION

	_	
)	CPSC DOCKET 12-1
In the Matter of)	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 FIRST APPLICATION FOR LEAVE TO TAKE <u>DEPOSITIONS</u>

Pursuant to 16 C.F.R. § 1025.35, Respondent Craig Zucker seeks leave to take depositions upon oral examination of the following individuals in the above matter:

- 1. Sarah Garland, Ph.D., U.S. Consumer Product Safety Commission
- 2. Stephen Hanway, M.S., U.S. Consumer Product Safety Commission
- 3. Kenneth Hinson, formerly employed by U.S. Consumer Product Safety Commission
 - 4. Sandra E. Inkster, Ph.D., U.S. Consumer Product Safety Commission
 - 5. Celestine Kiss, U.S. Consumer Product Safety Commission
 - 6. Mark E. Kumagai, U.S. Consumer Product Safety Commission
 - 7. T. Michael Lee, U.S. Consumer Product Safety Commission
 - 8. Jonathan Midgett, Ph.D., U.S. Consumer Product Safety Commission
 - 9. Catherine A. Sedney, U.S. Consumer Product Safety Commission
 - 10. Charles L. Smith, U.S. Consumer Product Safety Commission
 - 11. Timothy P. Smith, U.S. Consumer Product Safety Commission
 - 12. Kathleen Stralka, M.S., U.S. Consumer Product Safety Commission

13. Howard Tarnoff, U.S. Consumer Product Safety Commission

14. Sharon Whiten, U.S. Consumer Product Safety Commission

15. Joseph Williams, U.S. Consumer Product Safety Commission

16. Scott Wolfson, U.S. Consumer Product Safety Commission

17. Mary Toro, U.S. Consumer Product Safety Commission

18. Expert witnesses identified by Complaint Counsel

19. Respondent reserves the right to seek leave to take additional depositions when Complaint Counsel has provided complete responses to Respondent's written discovery requests,

or as depositions lead to the discovery of additional persons with discoverable knowledge.

Upon leave of the Presiding Officer to take these depositions, Respondent will serve notices of deposition, and for non-parties will make application for the issuance of a subpoena, in accordance with the provisions of 16 C.F.R. § 1025.35.

Timothy L. Mullin, Jr.

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Co-Counsel for Respondent, Craig Zucker

Twothy L. Meulla, 11.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of September, 2013, copies of **Respondent** Craig Zucker's First Application for Leave to Take Depositions was sent by the service method indicated:

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 U.S. Coast Guard 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:

Mary B. Murphy
Complaint Counsel and Assistant General Counsel
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U.S. Consumer Product Safety Commission
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Jennifer C. Argabright, Trial Attorney jargabright@cpsc.gov Mary Claire G. Claud, Trial Attorney mcclaud@cpsc.gov Daniel Vice, Trial Attorney dvice@cpsc.gov Complaint Counsel Division of Compliance U.S. Consumer Product Safety Commission 4330 East West Highway Bethesda, MD 20814

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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