

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 MOTION FOR LEAVE TO FILE REPLY TO  
COMPLAINT COUNSEL’S OPPOSITION TO MOTION FOR PROTECTIVE ORDER**

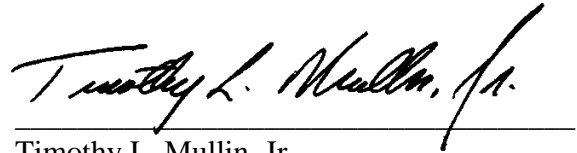
Respondent Craig Zucker (“Mr. Zucker”) files this motion for leave to file a reply to Complaint Counsel’s opposition to Mr. Zucker’s motion pursuant to 16 C.F.R. § 1025.31(d), seeking a protective order, and in support thereof states:

1. On January 31, 2014, Mr. Zucker filed his Motion for Protective Order and supporting Memorandum of Law.
2. On February 10, 2014, Complaint Counsel filed an Opposition to the Motion for Protective Order.
3. Mr. Zucker seeks leave to file a Memorandum of Law in reply to Complaint Counsel’s opposition to address issues raised for the first time in the opposition.
4. The rules governing this proceeding permit the Presiding Officer to grant leave to file a reply to an opposition to a motion. 16 C.F.R. § 1025.23(c).
5. A proposed reply accompanies this motion as Exhibit A.

WHEREFORE, Respondent Craig Zucker requests the entry of an order:

- A. Granting leave to file the Memorandum of Law in reply to Complaint Counsel’s opposition to Mr. Zucker’s Motion for Protective Order attached hereto as Exhibit A; and

B. Granting to Respondent Craig Zucker such other and further relief as justice and its cause require.

A handwritten signature in black ink, reading "Timothy L. Mullin, Jr.", written over a horizontal line.

Timothy L. Mullin, Jr.  
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Co-Counsel for Respondent, Craig Zucker

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20th day of February, 2014, copies of **Respondent Craig Zucker's Motion for Leave to File Reply to Complaint Counsel's Opposition to Motion for Protective Order and Proposed Order** 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  
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U.S. Courthouse  
601 25<sup>th</sup> 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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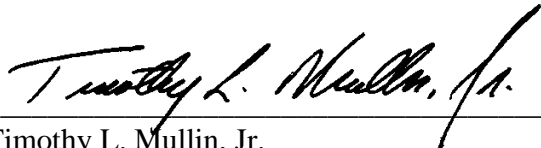
One copy by electronic mail (by agreement) to co-counsel for Craig Zucker:

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One copy by electronic mail (by agreement) to counsel for MOH Liquidating Trust:

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Timothy L. Mullin, Jr.