

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	
	)	
	)	
THYSSENKRUPP ACCESS CORP.	)	CPSC DOCKET NO.: 21-1
	)	
	)	
Respondent.	)	
	)	

**COMPLAINT COUNSEL’S  
NOTICE OF DEPOSITION OF MAURO CARNEIRO**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel notices the deposition of Mauro Carneiro, c/o thyssenkrupp Access Corp., now known as TK Access Solutions Corp. (“Respondent”), P.O. Box 545, Clinton, MO 64735, concerning all matters related to CPSC Docket No. 21-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent to any of Complaint Counsel’s discovery requests.

The deposition shall take place at the Commission’s headquarters at 4330 East West Highway, Bethesda, MD 20814, on January 19, 2022, beginning at 10:00 a.m., or on a date and at a location mutually agreeable to the parties, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. The taking of this deposition may be adjourned from day to day until completed, and may occur over several days if necessary to provide the information requested.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: December 21, 2021



---

Gregory M. Reyes, Supervisory Attorney  
Michael J. Rogal, Trial Attorney  
Frederick C. Millett, Trial Attorney  
Joseph E. Kessler, Trial Attorney

Division of Enforcement and Litigation  
Office of Compliance and Field Operations  
U.S. Consumer Product Safety Commission  
Bethesda, MD 20814  
Tel: (301) 504-7809

Complaint Counsel for  
U.S. Consumer Product Safety Commission

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2021, I served Complaint Counsel's Notice of Deposition of Mauro Carneiro upon all parties and participants of record in these proceedings by electronic mail ("Email"), as described below:

*By email to the Secretary:*

Alberta E. Mills  
Secretary  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814  
Email: AMills@cpsc.gov

*By email to the Presiding Officer:*

The Honorable Mary Withum  
c/o Alberta E. Mills  
Secretary  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814  
Email: AMills@cpsc.gov

*By email to Counsel for Respondent:*

Sheila A. Millar  
Steven Michael Gentine  
Eric P. Gotting  
Taylor D. Johnson  
Anushka N. Rahman  
Keller and Heckman LLP  
1001 G Street, NW, Suite 500 West  
Washington, DC 20001

Email: millar@khlaw.com  
gentine@khlaw.com  
gotting@khlaw.com  
johnsont@khlaw.com  
rahman@khlaw.com

Michael J. Garnier  
Garnier & Garnier, P.C.  
2579 John Milton Drive  
Suite 200  
Herndon, VA 20171

Email: [mjgarnier@garnierlaw.com](mailto:mjgarnier@garnierlaw.com)

Meredith M. Causey  
Quattlebaum, Grooms & Tull PLLC  
111 Center Street  
Suite 1900  
Little Rock, AR 72201

Email: [mcausey@qgtlaw.com](mailto:mcausey@qgtlaw.com)



---

Michael J. Rogal  
Complaint Counsel for  
U.S. Consumer Product Safety Commission