

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

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

RESPONDENT’S NOTICE OF DEPOSITION OF CAROLINA ABRAHAM

Pursuant to 16 C.F.R. § 1025.35, Respondent TK Access Solutions Corp., formerly known as thyssenkrupp Access Corp. (“Respondent”), through the undersigned counsel, notices the deposition of Carolina Abraham, c/o U.S. Consumer Product Safety Commission, 4330 East West Highway, Bethesda, MD 20814, 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 Complaint Counsel to any of Respondent’s discovery requests.

The deposition shall take place at the offices of Keller and Heckman LLP at 1001 G Street NW, Washington, DC 20001, on January 25, 2022, beginning at 10:00am, 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.

The 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: January 3, 2022



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ATTORNEYS FOR RESPONDENT,

TK Access Solutions Corp.

CERTIFICATE OF SERVICE

Pursuant to 16 C.F.R. § 1025.16, as adopted by the Presiding Officer in CPSC Docket No. 21-1, I hereby certify that on January 3, 2022, true and correct copies of the foregoing Respondent's Notice of Deposition of Carolina Abraham were filed with the Secretary of the U.S. Consumer Product Safety Commission and served on all parties and participants of record in these proceedings in the following manner:

By electronic mail to the Secretary of the U.S. Consumer Product Safety Commission:

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

By electronic mail to the Presiding Officer:

The Honorable Mary Withum, Administrative Law Judge
c/o Alberta E. Mills
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
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By electronic mail to Complaint Counsel:

Mary B. Murphy
Complaint Counsel
Director
Division of Enforcement and Litigation
Office of Compliance and Field Operations
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