

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)	
)	
)	
LEACHCO, INC.)	CPSC DOCKET NO. 22-1
)	
)	Hon. Michael G. Young
)	Presiding Officer
Respondent.)	
)	

**STIPULATION AND JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO
PENDING DISCOVERY MOTIONS**

Whereas, on November 17, 2022, Complaint Counsel filed a Motion to Compel Production of Electronic Communications Pursuant to Complaint Counsel’s Second Set of Requests for Production to Respondent (“Motion to Compel”) and, on November 21, 2022, Respondent Leachco, Inc. (“Leachco”) filed a Motion for a Protective Order;

Whereas, under 16 C.F.R. § 1025.23(c), Leachco’s opposition to Complaint Counsel’s Motion to Compel would be due on November 28, 2022 and Complaint Counsel’s opposition to Leachco’s Motion for a Protective Order would be due on December 1, 2022; and

Whereas the Thanksgiving federal holiday falls between when the motions were filed and the oppositions are due, and counsel for both parties wish to ensure that they have adequate time to work with their clients and prepare appropriate oppositions.

It is hereby stipulated between Leachco and Complaint Counsel that the oppositions to the pending discovery motions shall be due no later than December 2, 2022. This represents a four-day extension for Leachco and a one-day extension for Complaint Counsel.

Further, the parties jointly move and request, pursuant to 16 C.F.R. §§ 1025.15(c) and 1025.23(c), that the Presiding Officer order that (a) Leachco's opposition, if any, to Complaint Counsel's Motion to Compel and (b) Complaint Counsel's opposition, if any, to Leachco's Motion for a Protective Order shall be due no later than December 2, 2022. The parties have attached a proposed order for the Presiding Officer's review.

Dated this 22nd day of November, 2022

Respectfully submitted,

/s/ Brett Ruff
Gregory M. Reyes, Supervisory Attorney
Brett Ruff, Trial Attorney
Michael J. Rogal, Trial Attorney
Division of Enforcement and Litigation
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
Bethesda, MD 20814

Complaint Counsel for
U.S. Consumer Product Safety Commission

/s/ Oliver J. Dunford
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Counsel for Respondent Leachco, Inc.

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**[PROPOSED] ORDER ON STIPULATION AND JOINT MOTION FOR EXTENSION
OF TIME TO RESPOND TO PENDING DISCOVERY MOTIONS**

This matter, having come before the Presiding Officer on the parties’ Stipulation and Joint Motion for Extension of Time to Respond to Pending Discovery Motions, it is hereby ORDERED that the Joint Motion is GRANTED. Specifically, it is ORDERED, under 16 C.F.R. §§ 1025.15(c) and 1025.23(c), that (1) Respondent Leachco, Inc.’s opposition, if any, to Complaint Counsel’s Motion to Compel Production of Electronic Communications Pursuant to Complaint Counsel’s Second Set of Requests for Production to Respondent and (2) Complaint Counsel’s opposition, if any, to Respondent Leachco, Inc.’s Motion for a Protective Order shall be due no later than December 2, 2022.

Done and dated _____ 2022

Michael G. Young
Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I served Stipulation and Joint Motion for Extension of Time to Respond to Pending Discovery Motions on all parties and participants of record in these proceedings as follows:

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:

Judge Michael G. Young
Presiding Officer and Administrative Law Judge
Federal Mine Safety and Health Review Commission
1331 Pennsylvania Ave., N.W., Ste. 520N
Washington, DC 20004-1710
Email: myoung@fmshrc.gov
cjannace@fmshrc.gov

By email to Counsel for Respondent:

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/s/ Brett Ruff
Brett Ruff
Complaint Counsel for
U.S. Consumer Product Safety Commission