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

LEACHCO, INC.'S AMENDED NOTICE OF FACT DEPOSITION OF CELESTINE KISH

Respondent Leachco, Inc., pursuant to 16 C.F.R. § 1025.35, notices the fact deposition of Celestine Kish, c/o Brett Ruff, Consumer Product Safety Commission, 4330 East West Highway, Bethesda, MD 20814, concerning all matters related to CPSC Docket No. 22-1.

The deposition shall take place at 3100 Clarendon Blvd., Arlington, VA 22201, on March 17, 2023, beginning at 10:00 a.m. Eastern, or on a date and location mutually agreeable to the parties, before a person authorized to administer oaths, for the purposes of discovery and/or as evidence at the hearing of this matter, or for such other purposes as are permitted under the Commission's Rules of Practice for Adjudicative Proceedings. As stipulated by the parties, Federal Rule of Civil Procedure 30(d)(1) will govern the duration of the deposition. 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 will be transcribed, and the transcript 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. The deposition will concern all matters related to CPSC Docket No. 22-1, as well as all matters related to the Complaint, the Answer, and any responses by Complaint Counsel to any of Leachco's discovery requests. These matters include, but are not limited to, Ms. Kish's educational and professional background; Ms. Kish's role at the CPSC; Ms. Kish's involvement concerning the Podster and/or Leachco; any communications or discussions Ms. Kish has had regarding the Podster and/or Leachco; any documents in Ms. Kish's custody or control related to the Podster and/or Leachco; Ms. Kish's knowledge and experience concerning infant consumer products.

Dated: March 6, 2023.

Respectfully submitted,

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Counsel for Respondent Leachco, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2023, I served, by electronic mail, the

foregoing upon all parties of record in these proceedings:

Leah Ippolito, Supervisory Attorney Brett Ruff, Trial Attorney **Rosalee Thomas**, Trial Attorney Caitlin O'Donnell, Trial Attorney Michael Rogal, Trial Attorney Frederick C. Millett, Trial Attorney Gregory M. Reyes, Supervisory Attorney Complaint Counsel Office of Compliance and Field Operations U.S. Consumer Product Safety Comm'n Bethesda, MD 20814 lippolito@cpsc.gov bruff@cpsc.gov rbthomas@cpsc.gov codonnell@cpsc.gov mrogal@cpsc.gov fmillett@cpsc.gov greyes@cpsc.gov

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