

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

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

**COMPLAINT COUNSEL'S  
SECOND SET OF INTERROGATORIES TO RESPONDENT**

Pursuant to 16 C.F.R. § 1025.32, Complaint Counsel hereby requests that Respondent thyssenkrupp Access Corp. ("Respondent"), serve upon Complaint Counsel, within thirty (30) days, written answers, under oath, to each of the interrogatories set forth below.

**DEFINITIONS AND INSTRUCTIONS**

Complaint Counsel hereby incorporates by reference all of its Definitions and Instructions set forth in Complaint Counsel's First Set of Interrogatories to Respondent, filed on July 30, 2021, with the following additional definitions:

■ [REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

[REDACTED]

27. “homeSAFE” shall mean the homeSAFE (Safety Awareness For Elevators) Campaign launched in June 2014 supported by Respondent, as well as the Association of Members of the Accessibility Equipment Industry (AEMA), National Association of Elevator Contractors (NAEC), and National Association of Elevator Safety Authorities International (NAESA International).

28. “Home Elevator Safety Program” shall mean the “thyssenkrupp Access Corp. Home Elevator Safety Program” launched in February 2021 by Respondent.

29. “TK Elevator” shall mean TK Elevator Corporation, also known as “TKE,” a Delaware corporation with its principal place of business in Georgia.

30. “July 27 Carneiro Declaration” shall mean the July 27, 2021 Declaration of Mauro Carneiro, produced as bates number TK\_000001 through TK\_000006.

31. “November 11 Carneiro Declaration” shall mean the November 11, 2021 Declaration of Mauro Carneiro, produced as bates number TKAS\_CPSC21-1\_64757 through TKAS\_CPSC21-1\_64760.

## **INTERROGATORIES**

### **INTERROGATORY NO. 41**

[REDACTED]

[REDACTED]

### **INTERROGATORY NO. 42**

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 43**

Identify the total number of consumers that participated in Respondent's homeSAFE program.

**INTERROGATORY NO. 44**

Identify the total number of consumers, and provide a list of all of these consumers along with their contact information, that inquired about Respondent's homeSAFE program but did not ultimately purchase a space guard under this program.

**INTERROGATORY NO. 45**

Identify all Persons who assisted in the preparation of, or who provided information or Documents used in the preparation of, the November 11 Carneiro Declaration.

**INTERROGATORY NO. 46**

Identify all Persons who assisted in the preparation of, or who provided information or Documents used in the preparation of, the July 27 Carneiro Declaration.

**INTERROGATORY NO. 47**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 48**

[REDACTED]

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 49**

[REDACTED]

**INTERROGATORY NO. 50**

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 51**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 52**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 53**

[REDACTED]

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 54**

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 55**

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 56**

Identify all sources of funding provided to Respondent to cover litigation expenses, including attorneys' fees and costs, regarding CPSC Docket No. 21-1.

**INTERROGATORY NO. 57**

Identify all sources of funding for Mauro Carneiro's salary, including but not limited to any part of his salary he receives from TK Elevator.

Dated this 9th day of February, 2022

A handwritten signature in blue ink, appearing to read "Gregory M. Reyes", is written over a horizontal line.

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

Division of Enforcement and Litigation  
Office of Compliance and Field Operations  
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Complaint Counsel for  
U.S. Consumer Product Safety Commission

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2022, I served Complaint Counsel's Second Set of Interrogatories to Respondent pursuant to the Court's October 12, 2021 Order on Joint Motion to Amend Discovery Schedule and for Protective Order 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:*

Hon. Mary F. Withum, Administrative Law Judge  
c/o Alberta E. Mills  
Secretary  
U.S. Consumer Product Safety Commission  
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*By email to Counsel for Respondent:*

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