UNITED STATES OF AMERICA CONSUMER PRODUCT SAFETY COMMISSION

)

)

))

In the Matter of

THYSSENKRUPP ACCESS CORP.

CPSC DOCKET NO.: 21-1

Respondent.

COMPLAINT COUNSEL'S AMENDED 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 virtually, accessible as follows:

Join from the meeting link

Join by meeting number

Tap to join from a mobile device (attendees only)

Join by phone

on February 23, 2022, beginning at 8:00 a.m. ET, as agreed to by 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: February 1, 2022

Michael J. Rogal

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 February 1, 2022, I served Complaint Counsel's Amended 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

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

Email: mcausey@qgtlaw.com

Michael J. Royal

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