

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  
REQUESTS FOR ADMISSION TO RESPONDENT**

Pursuant to 16 C.F.R. § 1025.34, Complaint Counsel hereby requests that Respondent thyssenkrupp Access Corp., now known as TK Access Solutions Corp. (“Respondent”), admit the truth of each of the following matters under oath and in writing within 30 days of service hereof.

**DEFINITIONS AND INSTRUCTIONS**

Complaint Counsel hereby incorporates by reference all of its Definitions and Instructions set forth in Complaint Counsel’s First Set of Requests for Admission to Respondent, filed on February 9, 2022.

**REQUESTS FOR ADMISSION**

82. Admit that Respondent produced the below engineering drawings:

Elevator Model	Engineering Drawings
Destiny	1996, 2002, 2003, 2004, 2005, 2007, 2008, 2010

<b>LEV</b>	2001, 2006, 2007, 2009, 2010, 2012
<b>Chaparral</b>	[date unknown]
<b>Rise</b>	[date unknown], 2011
<b>Windsor</b>	1999

83. Admit that Respondent produced the below brochures, design guides, installation manuals, and owner's manuals ("Installation Materials"):

<b>Elevator Model</b>	<b>Brochure</b>	<b>Design Guide</b>	<b>Installation Manual</b>	<b>Owner's Manual</b>
<b>Destiny</b>	2003, 2004, 2006, 2008, 2009, 2010	2002, 2005, 2006, 2007, 2008, 2009, 2010, 2011	1997, 2003, 2004, 2005, 2006, 2007, 2008, 2009	2004, 2006, 2007, 2008, 2009, 2011
<b>LEV</b>	[date unknown]	2001, 2007, 2008, 2009, 2010	2002, 2009	[date unknown]
<b>LEV II</b>	[date unknown]	2011	2011	[date unknown]
<b>Chaparral</b>	[date unknown], 2010	2000		
<b>Rise</b>	[date unknown]	2007, 2011	2007, 2011	[date unknown]
<b>Volant</b>	2010, [date unknown]	2008	2011	[date unknown]
<b>Windsor</b>	[date unknown]	2010	1999	[date unknown]
<b>Flexi-Lift</b>	[date unknown]			

84. Admit that Respondent has not produced to Complaint Counsel engineering drawings for each model Elevator that Respondent manufactured.

85. Admit that Respondent has not produced to Complaint Counsel engineering drawings for every year of manufacture for each model Elevator.

86. Admit that Respondent has not produced to Complaint Counsel Installation Materials for each model Elevator that Respondent manufactured.

87. Admit that Respondent has not produced to Complaint Counsel Installation Materials for every year of manufacture for each model Elevator.

88. Admit that, for purposes of the Hazardous Space, engineering drawings for the Destiny Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all other dates of manufacture for Destiny Elevators not produced by Respondent.

89. Admit that, for purposes of the Hazardous Space, engineering drawings for the LEV Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for LEV Elevators not produced by Respondent.

90. Admit that, for purposes of the Hazardous Space, engineering drawings for the Chaparral Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for Chaparral Elevators not produced by Respondent.

91. Admit that, for purposes of the Hazardous Space, engineering drawings for the Rise Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for Rise Elevators not produced by Respondent.

92. Admit that, for purposes of the Hazardous Space, engineering drawings for the Windsor Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for Windsor Elevators not produced by Respondent.

93. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the LEV Elevator are representative of the engineering drawings that were not produced by Respondent for the Volant Elevator.

94. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the Volant Elevator.

95. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the LEV Elevator are representative of the engineering drawings that were not produced by Respondent for the LEV II Elevator.

96. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the LEV II Elevator.

97. Admit that, for purposes of the Hazardous Space, Installation Materials for the Destiny Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Destiny Elevators not produced by Respondent.

98. Admit that, for purposes of the Hazardous Space, Installation Materials for the LEV Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for LEV Elevators not produced by Respondent.

99. Admit that, for purposes of the Hazardous Space, Installation Materials for the LEV II Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for LEV II Elevators not produced by Respondent.

100. Admit that, for purposes of the Hazardous Space, Installation Materials for the Chaparral Elevator for years of manufacture produced by Respondent, are representative of

Installation Materials for all dates of manufacture for Chaparral Elevators not produced by Respondent.

101. Admit that, for purposes of the Hazardous Space, Installation Materials for the Rise Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Rise Elevators not produced by Respondent.

102. Admit that, for purposes of the Hazardous Space, Installation Materials for the Volant Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Volant Elevators not produced by Respondent.

103. Admit that, for purposes of the Hazardous Space, Installation Materials for the Windsor Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Windsor Elevators not produced by Respondent.

104. Admit that, for purposes of the Hazardous Space, Installation Materials for the Flexi-Lift Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Flexi-Lift Elevators not produced by Respondent.

105. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent are representative of the Installation Materials that were not produced by Respondent for the Flexi-Lift Elevator.

106. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the Flexi-Lift Elevator.

107. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the LEV Elevator are representative of the engineering drawings that were not produced by Respondent for the LEV II Builder Elevator.

108. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the LEV II Builder Elevator.

109. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent for the LEV II Elevator are representative of the Installation Materials that were not produced by Respondent for the LEV II Builder Elevator.

110. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent are representative of the Installation Materials that were not produced by Respondent for the LEV II Builder Elevator.

111. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the Destiny Elevator are representative of the engineering drawings that were not produced by Respondent for the Independence Elevator.

112. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the Independence Elevator.

113. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent for the Destiny Elevator are representative of the Installation Materials that were not produced by Respondent for the Independence Elevator.

114. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent are representative of the Installation Materials that were not produced by Respondent for the Independence Elevator.

Dated this 4th day of March, 2022



---

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  
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 March 4, 2022, I served Complaint Counsel's Second Set of Requests for Admission 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  
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](mailto:mjgarnier@garnierlaw.com)

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

Email: [mcausey@qgtlaw.com](mailto:mcausey@qgtlaw.com)



---

Frederick C. Millett  
Complaint Counsel for  
U.S. Consumer Product Safety Commission