UNITED STATES OF AMERICA CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)))	
TK ACCESS SOLUTIONS CORP. f/k/a THYSSENKRUPP ACCESS CORP.)))	CPSC DOCKET NO.: 21-1
Respondent.)	

COMPLAINT COUNSEL'S NOTICE OF DEPOSITION OF KEVIN L. BRINKMAN

Pursuant to 16 C.F.R. §§ 1025.35, 1025.38, and the Subpoena authorized and issued by the Commission, *See* Dkt. Nos. 47, 48, and 81, Complaint Counsel notices the deposition of Kevin L. Brinkman, c/o Peter Ney, Rendigs, Fry, Kiely & Dennis, LLP, 600 Vine Street, Suite 2650, Cincinnati, Ohio 45202, 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, on Friday, April 8, 2022, beginning at 10:00 a.m. ET, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. A link will be provided prior to the date 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 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: March 11, 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 11, 2022, I served Complaint Counsel's Notice of Deposition of Kevin L. Brinkman 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:

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:

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By email to Counsel for Patrick Bass, Jurrien Van Den Akker and Kevin Brinkman:

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Gregory M. Reyes Complaint Counsel for

U.S. Consumer Product Safety Commission