

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

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

COMPLAINT COUNSEL'S NOTICE OF FILING

Pursuant to Your Honor's October 26, 2022 Scheduling Order, Complaint Counsel is hereby submitting the following expert reports and accompanying exhibits, to be filed *in camera* in this proceeding:

1. Expert Report of Dennis B. Brickman, P.E., dated March 17, 2022;
2. Expert Report of Dr. Mitchell A. Garber, M.D., M.P.H., M.S.M.E., dated March 18, 2022;
3. Expert Report of Mark E. Kumagai, P.E., dated March 18, 2022.

Dated this 18th day of March, 2022

Respectfully submitted,



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 18, 2022, I served Complaint Counsel's Notice of Filing and the (1) Expert Report of Dennis B. Brickman, P.E., dated March 17, 2022; (2) Expert Report of Dr. Mitchell A. Garber, M.D., M.P.H., M.S.M.E., dated March 18, 2022; and (3) Expert Report of Mark E. Kumagai, P.E., dated March 18, 2022 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

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

Email: mcausey@qgtlaw.com



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