UNITED STATES OF AMERICA CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)))
TK ACCESS SOLUTIONS CORP. f/k/a 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
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By email to Counsel for Respondent:

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