

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.)	
_____)	

RESPONDENT'S NOTICE OF FILING – EXPERT REPORTS

Pursuant to Your Honor's October 26, 2021, Scheduling Order, Respondent is hereby submitting the following expert reports and accompanying exhibits, to be filed *in camera* in this proceeding:

1. Expert Report of Joseph B. Sala, Ph.D., dated March 18, 2022 and
2. Expert Report of Jon B. Halpern, P.E., dated March 28, 2022.

Dated: March 18, 2022



Sheila A. Millar (DC Bar 339341)
202-434-4143 (direct dial)
millar@khlaw.com

Eric P. Gotting (MD Bar 9612170350/DC Bar
456406)
202-434-4269 (direct dial)
gotting@khlaw.com

S. Michael Gentine (MD Bar 1212110311/DC Bar
1644540)
202-434-4164 (direct dial)
gentine@khlaw.com

Taylor D. Johnson (DC Bar 1616613)
202-434-4255 (direct dial)
johnsont@khlaw.com

Anushka N. Rahman (DC Bar 1048328/NY Bar 5421433)

202-434-4116 (direct dial)

rahman@khlaw.com

KELLER AND HECKMAN LLP

1001 G Street, N.W.

Suite 500 West

Washington, D.C. 20001

(202) 434-4100

Michael J. Garnier (DC Bar 432819/VA Bar 23994)

mjgarnier@garnierlaw.com

GARNIER & GARNIER, P.C.

2579 John Milton Drive

Suite 200

Herndon, VA 20171

(703) 237-2010

Meredith M. Causey (AR Bar 2012265)

501-379-1743 (direct dial)

mcausey@qgtlaw.com

QUATTLEBAUM, GROOMS & TULL PLLC

111 Center Street

Suite 1900

Little Rock, AR 72201

(501) 379-1700

ATTORNEYS FOR RESPONDENT,

TK Access Solutions Corp.

CERTIFICATE OF SERVICE

Pursuant to 16 C.F.R. § 1025.16, as adopted by the Presiding Officer in CPSC Docket No. 21-1, I hereby certify that on March 18, 2022, true and correct copies of the foregoing Respondent's Notice of Filing – Expert Reports were filed with the Secretary of the U.S. Consumer Product Safety Commission and served on all parties and participants of record in these proceedings in the following manner:

By electronic mail to the Secretary of the U.S. Consumer Product Safety Commission:

Alberta Mills
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
amills@cpsc.gov

By electronic mail to the Presiding Officer:

The Honorable Mary Withum, Administrative Law Judge
c/o Alberta E. Mills
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
amills@cpsc.gov

By electronic mail to Complaint Counsel:

Mary B. Murphy
Complaint Counsel
Director
Division of Enforcement and Litigation
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
mmurphy@cpsc.gov

Gregory M. Reyes, Trial Attorney
Michael J. Rogal, Trial Attorney
Frederick C. Millett, Trial Attorney
Joseph E. Kessler, Trial Attorney

Nicholas J. Linn, Trial Attorney
Complaint Counsel
Division of Enforcement and Litigation
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
greyes@cpsc.gov
mroga@cpsc.gov
fmillett@cpsc.gov
jkessler@cpsc.gov
nlinn@cpsc.gov



Sheila A. Millar