

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)
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)
LEACHCO, INC.) CPSC DOCKET NO. 22-1
)
)
) Hon. Michael G. Young
) Presiding Officer
Respondent.)
_____)

**DECLARATION OF FREDERICK C. MILLETT IN SUPPORT OF COMPLAINT
COUNSEL'S MOTION IN LIMINE TO ADMIT IN-DEPTH INVESTIGATION REPORTS**

I, Frederick C. Millett, hereby declare:

1. I am one of the attorneys for Complaint Counsel in the above-captioned matter.
2. I am over the age of 18 and I am competent to make this Declaration.
3. This Declaration is based on my personal knowledge.
4. Attached to this Declaration as Exhibit 1 is a true and correct redacted copy of the CPSC in-depth investigation report bearing Task Number 160519CCC2600 (Alabama Incident IDI, JX-6, CPSC0000039-138).
5. Attached to this Declaration as Exhibit 2 is a true and correct unredacted copy of the CPSC in-depth investigation report bearing Task Number 160519CCC2600 (Alabama Incident IDI, JX-7, CPSC0010224-327).
6. Attached to this Declaration as Exhibit 3 is a true and correct redacted copy of the CPSC in-depth investigation report bearing Task Number 200917CCC3888 (Texas Incident IDI, JX-8, CPSC0000139-95).

7. Attached to this Declaration as Exhibit 4 is a true and correct unredacted copy of the CPSC in-depth investigation report bearing Task Number 200917CCC3888 (Texas Incident IDI, JX-9, CPSC0010328-84).

8. Attached to this Declaration as Exhibit 5 is a true and correct redacted copy of the CPSC in-depth investigation report bearing Task Number 220916HCC1454 (Virginia Incident IDI, JX-10, CPSC0012949-13009).

9. Attached to this Declaration as Exhibit 6 is a true and correct unredacted copy of the CPSC in-depth investigation report bearing Task Number 220916HCC1454 (Virginia Incident IDI, JX-11, CPSC0012949-13009).

10. Attached to this Declaration as Exhibit 7 is a true and correct redacted copy of the MECAPS Report for the Virginia incident (JX-12A, CPSC0010550-65).

11. Attached to this Declaration as Exhibit 8 is a true and correct unredacted copy of the MECAPS Report for the Virginia incident (JX-12B, CPSC0010550-65).

I declare that the foregoing is true and correct.

Dated this 14th day of July, 2023

/s/ Frederick C. Millett

Frederick C. Millett, Trial Attorney

EXHIBITS 1-8

[Redacted in their entirety]