

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

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

RESPONDENT’S NOTICE OF INTENT TO RESPOND

Pursuant to 16 C.F.R. § 1025.23(c), Respondent TK Access Solutions Corp., formerly known as thyssenkrupp Access Corp. (hereinafter “Respondent” or “TKASC”), by and through undersigned counsel, hereby files this Notice of Intent to Respond to Complaint Counsel’s Motion to Compel Discovery and the accompanying memorandum filed in support. Under CPSC’s rules governing this proceeding, Respondent has 10 days after service to submit a response, 16 C.F.R. § 1025.23(c), which results in a filing deadline of April 15, 2022. In their supporting memorandum, Complaint Counsel ignore substantial evidence already produced in this proceeding regarding Respondent’s ability to finance any requested relief in this matter and TKASC’s corporate structure. While maintaining its objection to their relevance to any matter under Section 15 of the CPSA, Respondent will address these and other matters in its response.

Respondent does not oppose Complaint Counsel’s Motion for Extension of Time to Submit Additional Briefing on the Motion to Amend Complaint.

Dated: April 6, 2022



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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 April 6, 2022, a true and correct copy of the foregoing Respondent's Notice of Intent to Respond was 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
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By electronic mail to Complaint Counsel:

Mary B. Murphy
Complaint Counsel
Director
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