

# **EXHIBIT A**

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	
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	)	
LEACHCO, INC.	)	CPSC DOCKET NO. 22-1
	)	
	)	
Respondent.	)	
	)	

**COMPLAINT COUNSEL’S  
NOTICE OF DEPOSITION OF ALEX LEACH**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel notices the deposition of Alex Leach, c/o Counsel for Respondent, Bryan Cave Leighton Paisner LLP, 211 N. Broadway, Suite 3600, Saint Louis, MO 63102, concerning all matters related to CPSC Docket No. 22-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent Leachco, Inc. to any of Complaint Counsel’s discovery requests.

The deposition shall take place virtually, on September 20, 2022, beginning at 10:00 a.m. ET, or on a date and at a location mutually agreeable to the parties, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. A link will be provided prior to the date of the deposition. As stipulated by the parties, Federal Rule of Civil Procedure 30(d)(1) will govern the duration of the deposition.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: August 4, 2022

/s/ Brett Ruff

Mary B. Murphy, Director  
Leah Ippolito, Supervisory Attorney  
Brett Ruff, Trial Attorney  
Rosalee Thomas, Trial Attorney  
Caitlin O'Donnell, 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 August 4, 2022, I served the foregoing Notice of Deposition on the following:

*By email to the Presiding Officer:*

Judge Michael G. Young  
Presiding Officer and Administrative Law Judge  
Federal Mine Safety and Health Review Commission  
1331 Pennsylvania Ave., N.W., Ste. 520N  
Washington, DC 20004-1710  
Email: myoung@fmshrc.gov  
cjannace@fmshrc.gov

*By email to Counsel for Respondent:*

Cheryl Falvey  
Crowell & Moring LLP  
1001 Pennsylvania Avenue, NW  
Washington, D.C. 20004-2595  
Email: cfalvey@crowell.com

Bettina Strauss  
Bryan Cave Leighton Paisner LLP  
One Metropolitan Square  
211 North Broadway, Suite 3600  
St. Louis, MO 63102  
Email: bjstrauss@bclplaw.com

*/s/ Brett Ruff*

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Brett Ruff  
Complaint Counsel for  
U.S. Consumer Product Safety Commission

UNITED STATES OF AMERICA  
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Respondent.	)	

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**COMPLAINT COUNSEL’S  
NOTICE OF DEPOSITION OF CLYDE LEACH**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel notices the deposition of Clyde Leach, c/o Counsel for Respondent, Bryan Cave Leighton Paisner LLP, 211 N. Broadway, Suite 3600, Saint Louis, MO 63102, concerning all matters related to CPSC Docket No. 22-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent Leachco, Inc. to any of Complaint Counsel’s discovery requests.

The deposition shall take place virtually, on September 21, 2022, beginning at 10:00 a.m. ET, or on a date and at a location mutually agreeable to the parties, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. A link will be provided prior to the date of the deposition. As stipulated by the parties, Federal Rule of Civil Procedure 30(d)(1) will govern the duration of the deposition.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: August 4, 2022

/s/ Brett Ruff

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Leah Ippolito, Supervisory Attorney  
Brett Ruff, Trial Attorney  
Rosalee Thomas, Trial Attorney  
Caitlin O'Donnell, Trial Attorney  
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*/s/ Brett Ruff*

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**COMPLAINT COUNSEL’S  
NOTICE OF DEPOSITION OF JAMIE LEACH**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel notices the deposition of Jamie Leach, c/o Counsel for Respondent, Bryan Cave Leighton Paisner LLP, 211 N. Broadway, Suite 3600, Saint Louis, MO 63102, concerning all matters related to CPSC Docket No. 22-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent Leachco, Inc. to any of Complaint Counsel’s discovery requests.

The deposition shall take place virtually, on September 22, 2022, beginning at 10:00 a.m. ET, or on a date and at a location mutually agreeable to the parties, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. As stipulated by the parties, Federal Rule of Civil Procedure 30(d)(1) will govern the duration of the deposition.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: August 4, 2022

/s/ Brett Ruff

Mary B. Murphy, Director  
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Brett Ruff, Trial Attorney  
Rosalee Thomas, Trial Attorney  
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*By email to Counsel for Respondent:*

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Washington, D.C. 20004-2595  
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*/s/ Brett Ruff*

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**COMPLAINT COUNSEL’S  
NOTICE OF DEPOSITION OF MABRY BALLARD**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel notices the deposition of Mabry Ballard, c/o Counsel for Respondent, Bryan Cave Leighton Paisner LLP, 211 N. Broadway, Suite 3600, Saint Louis, MO 63102, concerning all matters related to CPSC Docket No. 22-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent Leachco, Inc. to any of Complaint Counsel’s discovery requests.

The deposition shall take place virtually, on September 15, 2022, beginning at 10:00 a.m. ET, or on a date and at a location mutually agreeable to the parties, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. A link will be provided prior to the date of the deposition. As stipulated by the parties, Federal Rule of Civil Procedure 30(d)(1) will govern the duration of the deposition.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: August 4, 2022

/s/ Brett Ruff

Mary B. Murphy, Director  
Leah Ippolito, Supervisory Attorney  
Brett Ruff, Trial Attorney  
Rosalee Thomas, Trial Attorney  
Caitlin O'Donnell, Trial Attorney  
Division of Enforcement and Litigation  
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*By email to Counsel for Respondent:*

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*/s/ Brett Ruff*

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**COMPLAINT COUNSEL’S  
NOTICE OF DEPOSITION OF TONYA BARRETT**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel notices the deposition of Tonya Barrett, c/o Counsel for Respondent, Bryan Cave Leighton Paisner LLP, 211 N. Broadway, Suite 3600, Saint Louis, MO 63102, concerning all matters related to CPSC Docket No. 22-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent Leachco, Inc. to any of Complaint Counsel’s discovery requests.

The deposition shall take place virtually, on September 14, 2022, beginning at 10:00 a.m. ET, or on a date and at a location mutually agreeable to the parties, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. As stipulated by the parties, Federal Rule of Civil Procedure 30(d)(1) will govern the duration of the deposition.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: August 4, 2022

/s/ Brett Ruff

Mary B. Murphy, Director  
Leah Ippolito, Supervisory Attorney  
Brett Ruff, Trial Attorney  
Rosalee Thomas, Trial Attorney  
Caitlin O'Donnell, Trial Attorney  
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I hereby certify that on August 4, 2022, I served the foregoing Notice of Deposition on all parties and participants of record in these proceedings as follows:

*By email to the Presiding Officer:*

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