

**UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION**

**IN THE MATTER OF

LEACHCO, INC.**

CPSC Docket No. 22-1

HON. MICHAEL G. YOUNG
PRESIDING OFFICER

LEACHCO, INC.’S EXHIBIT LIST

Respondent Leachco, Inc. respectfully submits the following exhibits that may be used at the August 7, 2023 Hearing:

Ex.	Description	Source
RX 1.	Peggy Shibata Investigative Report (Apr. 28, 2023)	Filed and served Apr. 28, 2023
RX 2.	CPSC Announcement, “Whether At Home or Traveling for the Holidays CPSC Reminds Parents to Keep Babies’ Sleep Space Safe” (Nov. 10, 2022)	Ex. Z to Leachco’s Mtn. for Summary Decision
RX 3.	NIH “Safe Sleep Environment for Baby”	Ex. AA to Leachco’s Mtn. for Summary Decision
RX 4.	CPSC Regulatory Documents re: Safety Standard for Bassinets and Cradles	78 Fed. Reg. 63019–36; 78 Fed. Reg. 77574
RX 5.	CPSC Regulatory Documents re: Safety Standard for Bedside Sleepers	77 Fed. Reg. 73345–54; 79 Fed. Reg. 2581–89; 88 Fed. Reg. 29820–25
RX 6.	CPSC Regulatory Documents re: Safety Standard for Carriages and Strollers	78 Fed. Reg. 29279–89; 79 Fed. Reg. 13208–16; 81 Fed. Reg. 37128–32; 84 Fed. Reg. 37763–67; 86 Fed. Reg. 64345–49
RX 7.	CPSC Regulatory Documents re: Safety Standard for Crib Mattresses	87 Fed. Reg. 8640–85; 87 Fed. Reg. 41059–60
RX 8.	CPSC Regulatory Documents re: Safety Standard for Cribs	75 Fed. Reg. 43308–27; 75 Fed. Reg. 81766–89; Fed. Reg. 81788–89

RX 9.	CPSC Regulatory Documents re: Safety Standard for Cribs-Full-Size Baby Cribs	84 Fed. Reg. 35293–97
RX 10.	CPSC Regulatory Documents re: Safety Standard for Non-Full-Size Baby Cribs	83 Fed. Reg. 29206–10; 84 Fed. Reg. 56684–89; 88 Fed. Reg. 13686–91
RX 11.	CPSC Regulatory Documents re: Safety Standard for Hand-Held Infant Carriers	77 Fed. Reg. 73354–66; 78 Fed. Reg. 73415–24; 85 Fed. Reg. 30605–08; 85 Fed. Reg. 40876; 85 Fed. Reg. 46000–02; 87 Fed. Reg. 32988
RX 12.	CPSC Regulatory Documents re: Safety Standard for High Chairs	80 Fed. Reg. 69144–61; 81 Fed. Reg. 3354; 83 Fed. Reg. 28358–70; 86 Fed. Reg. 17296–02; 87 Fed. Reg. 42633–36
RX 13.	CPSC Regulatory Documents re: Safety Standard for Infant Bouncer Seats	80 Fed. Reg. 63168–85; 82 Fed. Reg. 43470–82; 84 Fed. Reg. 46878–82; 87 Fed. Reg. 54362–66
RX 14.	CPSC Regulatory Documents re: Safety Standard for Infant Inclined Sleep Products	82 Fed. Reg. 16963–75; 84 Fed. Reg. 60949–63; 85 Fed. Reg. 4918–19; 86 Fed. Reg. 33022–72
RX 15.	CPSC Regulatory Documents re: Safety Standard for Infant Swings	77 Fed. Reg. 7011–25; 77 Fed. Reg. 66703–13; 78 Fed. Reg. 37706–10; 86 Fed. Reg. 4961–67; 86 Fed. Reg. 59609–12; 87 Fed. Reg. 57390–94
RX 16.	CPSC Regulatory Documents re: Safety Standard for Infant Walkers	59 Fed. Reg. No. 147; 74 Fed. Reg. 45704–14; 75 Fed. Reg. 35266–79; 75 Fed. Reg. 51178; 78 Fed. Reg. 37706–10; 87 Fed. Reg. 55413–14; 87 Fed. Reg. 73241–46
RX 17.	CPSC Regulatory Documents re: Safety Standard for Play Yards	76 Fed. Reg. 58167–75; 77 Fed. Reg. 52220–28; 77 Fed. Reg. 52272–77; 78 Fed. Reg. 50328–35; 84 Fed. Reg. 56684–89
RX 18.	CPSC Regulatory Documents re: Safety Standard for Sling Carriers	79 Fed. Reg. 42724–34; 82 Fed. Reg. 8671–88; 85 Fed. Reg. 21766–70; 85 Fed. Reg. 40876–77; 87 Fed. Reg. 50929–34
RX 19.	CPSC Regulatory Documents re: Safety Standard for Soft Infant and Toddler Carriers	78 Fed. Reg. 20511–22; 79 Fed. Reg. 17422–33

RX 20.	CPSC Injuries and Deaths Associated with Nursery Products Among Children Younger than Five (Reports 2009–2022)	CPSC Website
RX 21.	NEISS Data Highlights (Top 20 Product Groups by Age Group) (2003–2022)	https://www.cpsc.gov/cgibin/neiss-query/home.aspx
RX 22.	NEISS Data Highlights (2003–2022)	https://www.cpsc.gov/cgibin/neiss-query/home.aspx
RX 23.	CPSC Field Manual for Investigation Procedures and Reporting Techniques (Nov. 2016)	Dep. Ex. 8
RX 24.	CPSC Product Safety Planning, Reporting, and Recall Handbook (Sept. 2021)	Dep. Ex. 9 https://www.cpsc.gov/s3fs-public/CPSCRecallHandbookSeptember2021.pdf
RX 25.	CPSC Infant Cushion Briefing Package	Dep. Ex. 12
RX 26.	CPSC Criteria and Rationales for Field-Initiated In-Depth Investigations (FY 2020)	Dep. Ex. 14
RX 27.	Leachco, Inc.'s First Supplemental Responses to CSPC's First Set of Requests for Admission Nos. 3, 4, and 5	Served Jan. 17, 2023

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Leachco also reserves the right to use the following:

- Exhibits identified on the Parties' Joint Exhibit List;
- Exhibits identified on the Commission's Exhibit List;
- Sources cited in the proffered testimony of Umakanth Katwa, Celestine Kish, and Erin Mannen; and
- Exhibits for impeachment.

Dated: July 14, 2023.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2023, I served, by electronic mail, the foregoing upon all parties of record in these proceedings:

<p>Honorable Michael G. Young Federal Mine Safety & Health Review Commission Office of the Chief Administrative Law Judge 1331 Pennsylvania Ave., N.W., Suite 520N Washington, D.C. 20004-1710 myoung@fmshrc.gov cjannace@fmshrc.gov whodnett@fmshrc.gov</p>	<p>Mary B. Murphy Director, Div. of Enforcement & Litigation U.S. Consumer Product Safety Comm'n 4330 East West Highway Bethesda, MD 20814 mmurphy@cpsc.gov</p> <p>Robert Kaye Assistant Executive Director Office of Compliance and Field Operations U.S. Consumer Product Safety Comm'n 4330 East West Highway Bethesda, MD 20814 rkaye@cpsc.gov</p> <p>Leah Ippolito, Supervisory Attorney Brett Ruff, Trial Attorney Rosalee Thomas, Trial Attorney Caitlin O'Donnell, Trial Attorney Michael Rogal, Trial Attorney Frederick C. Millett, Trial Attorney Gregory M. Reyes, Supervisory Attorney Complaint Counsel Office of Compliance and Field Operations U.S. Consumer Product Safety Comm'n Bethesda, MD 20814 lippolito@cpsc.gov bruff@cpsc.gov rbthomas@cpsc.gov codonnell@cpsc.gov mrogal@cpsc.gov fmillett@cpsc.gov greyes@cpsc.gov</p>
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