

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

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

**RESPONDENT’S NOTICE OF FILING – RESPONDENT’S MEMORANDUM IN  
OPPOSITION TO COMPLAINT COUNSEL’S MOTION TO COMPEL DISCOVERY**

Pursuant to 16 C.F.R. § 1025.23(c), Respondent has filed its Respondent’s Memorandum in Opposition to Complaint Counsel’s Motion to Compel Discovery, filed April 5, 2022. Due to the highly confidential nature of the additional voluntary production of information and documents made in the Memorandum and its exhibits, Respondent filed this Memorandum *in camera*.

Dated: April 15, 2022



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**CERTIFICATE OF SERVICE**

Pursuant to 16 C.F.R. § 1025.16, as adopted by the Presiding Officer in CPSC Docket No. 21-1, and 16 C.F.R. § 1025.38(f), I hereby certify that on April 15, 2022, true and correct copies of the foregoing Respondent’s Notice of Filing – Respondent’s Memorandum in Opposition to Complaint Counsel’s Motion to Compel Discovery 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  
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A handwritten signature in blue ink, appearing to read "Sheila A. Millar", is enclosed within a thin black rectangular border.

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Sheila A. Millar