

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)	
)	CPSC Docket No. 12-2
ZEN MAGNETS, LLC,)	
)	Hon. Dean C. Metry
Respondent.)	Administrative Law Judge
)	

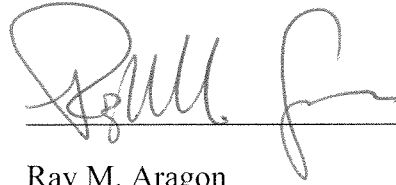
DECLARATION OF RAY M. ARAGON IN SUPPORT OF
MOTION TO STRIKE PROPOSED EXPERTS
DAVID A. RICHTER AND BOYD EDWARDS

My name is Ray M. Aragon. I am an attorney and Complaint Counsel in the above matter. I have personal knowledge of the facts stated in this Declaration, and if called as a witness I could and would testify competently to them.

1. Attached as Exhibit 1 are true and correct excerpt pages from the deposition of David A. Richter in this action.
2. Attached as Exhibit 2 are true and correct excerpt pages from the deposition of Boyd Edwards in this action.
3. Attached as Exhibit 3 is a true and correct copy of David A. Richter's proposed expert report in this action.
4. Attached as Exhibit 4 is a true and correct copy of Boyd Edwards's proposed expert report in this action, with voluminous exhibits omitted.
5. Attached as Exhibit 5 is a true and correct copy of David A. Richter's curriculum vitae.
6. Attached as Exhibit 6 is a true and correct copy of David A. Richter's August 9, 2012 letter to the Consumer Product Safety Commission.
7. Attached as Exhibit 7 is a true and correct copy of Boyd Edwards' curriculum vitae.
8. Attached as Exhibit 8 are true and correct excerpt pages of exhibit E of the proposed expert report of Boyd Edwards.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 20, 2014.



Ray M. Aragon