

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)	
)	
)	
BRITAX CHILD SAFETY, INC.)	CPSC DOCKET NO.: 18-1
)	
)	
Respondent.)	
)	

JOINT MOTION FOR EXTENSION OF TIME FOR MOTIONS TO COMPEL

Pursuant to 16 C.F.R. §§ 1025.23, 1025.31(i), and 1025.36, Complaint Counsel (“Complaint Counsel”) and Respondent Britax Child Safety, Inc. (“Respondent”) (collectively, the “Parties”), hereby jointly move the Court for an extension of time within which to file motions to compel discovery, and in support thereof state:

1. Pursuant to the Court’s April 23, 2018, Order Amending Discovery Schedule and Procedure, the Parties exchanged written responses to certain Requests for Admission, Requests for Production of Documents and Things, and Interrogatories on May 23, 2018 (the “Discovery”).
2. Due to the nature of the searches required to locate and review documents potentially responsive to the Discovery, the Parties previously agreed to initially produce all documents excluding emails on May 23, 2018, and subsequently produced emails and related documents on June 22, 2018.
3. The Parties are in the process of reviewing the materials produced thus far.

4. The Parties have also identified potential deficiencies regarding the Parties' respective responses to the Discovery and are in the process of meeting and conferring in an effort to avoid the need for Court intervention to address these issues.
5. In addition, the Parties are considering and discussing their respective responses to this Court's June 27, 2018 Order Regarding Appointment, and the effect those responses may have on the proceedings in this case.
6. On June 5, 2018, this Court granted the Parties' joint motion for an extension of time to file motions to compel discovery, and extended the time to file motions to compel until July 12, 2018.
7. The Parties have agreed that, in light of these issues, it is appropriate to extend the time to file motions to compel pursuant to 16 C.F.R. § 1025.36 to August 13, 2018. This extension will enable the Parties to respond to the Court's June 27 order and try to resolve outstanding discovery issues.
8. It is in the interest of justice and judicial economy to permit the Parties to have additional time to consider filing motions to compel discovery while they consider their responses to this Court's June 27, 2018 Order Regarding Appointment.

Thus, the Parties respectfully request that the Court grant the relief requested in this motion.

Dated: July 5, 2018

Mary B. Murphy, Assistant General Counsel
Philip Z. Brown, Trial Attorney
Gregory M. Reyes, Trial Attorney
Daniel R. Vice, Trial Attorney
Division of Compliance
Office of the General Counsel
U.S. Consumer Product Safety Commission
Bethesda, MD 20814
Tel: (301) 504-7809

Complaint Counsel
U.S. Consumer Product Safety Commission
Bethesda, MD 20814

Timothy L. Mullin, Jr.
410-385-3641 (direct dial)
tmullin@MilesStockbridge.com
Dwight W. Stone II
410-385-3649 (direct dial)
dstone@MilesStockbridge.com
Susan DuMont
410-385-3768 (direct dial)
sdumont@MilesStockbridge.com
MILES & STOCKBRIDGE P.C.
100 Light Street
Baltimore, MD 21202
410-385-3700 (fax)

Erika Z. Jones
202-263-3232 (direct dial)
ejones@mayerbrown.com
Adam C. Sloane
202-263-3269 (direct dial)
asloane@mayerbrown.com
MAYER BROWN LLP
1999 K Street, N.W.
Washington, DC 20006-1101
(202)263-5232 (fax)

Attorneys for Respondent,
Britax Child Safety, Inc.

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)
)
)
BRITAX CHILD SAFETY, INC.) CPSC DOCKET NO.: 18-1
)
)
)
Respondent.)
_____)

**ORDER ON JOINT MOTION FOR
EXTENSION OF TIME FOR MOTIONS TO COMPEL**

This matter, having come before the Presiding Officer on the Joint Motion for Extension of Time for Motions to Compel (“Joint Motion”) dated July 5, 2018, and finding that it is just and appropriate for the timing of motions to compel pursuant to 16 C.F.R. § 1025.36 to be modified as requested by the parties in the Joint Motion, it is on this _____ day of _____, 2018,

ORDERED that the Joint Motion is GRANTED.

IT IS HEREBY ORDERED THAT Motions to Compel filed pursuant to 16 C.F.R. § 1025.36 shall be filed on or before August 13, 2018.

Cameron Elliot
Administrative Law Judge