

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

_____)	CPSC DOCKET 12-1
In the Matter of)	CPSC DOCKET 12-2
)	CPSC DOCKET 13-2
MAXFIELD AND OBERTON HOLDINGS, LLC)	
and CRAIG ZUCKER)	(Consolidated)
ZEN MAGNETS, LLC)	
STAR NETWORKS USA, LLC)	Hon. Dean C. Metry
)	Administrative Law Judge
Respondents.)	
_____)	

**JOINT MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE MOTIONS TO COMPEL DISCOVERY**

Pursuant to 16 C.F.R. § 1025.31(i), the parties file this joint motion seeking an extension of time within which to file motions to compel discovery, and in support thereof state:

1. Respondent Craig Zucker (“Mr. Zucker”) and Complaint Counsel have made discovery requests, and have responded or are in the process of responding. Complaint Counsel has provided to Mr. Zucker its first set of documents responsive to Mr. Zucker’s document requests, consisting of approximately 6,300 pages of documents, and is in the process of preparing a supplemental response.

2. The Rules of Practice for Adjudicative Proceedings, 16 C.F.R. § 1025.36 provides that a motion to compel discovery be filed within 20 days of the response.

3. The parties are reviewing the various responses, including documents, and expect to receive for review additional documents from the MOH Liquidating Trust (the “Trust”) over the next month.

4. It is in the interest of justice and judicial economy to permit all parties to have additional time to review the discovery responses filed, along with the documents being

produced, as well as documents from the Trust, before filing motions to compel discovery. This will prevent unnecessary motions to compel filed merely to protect the deadline.

WHEREFORE, the parties jointly request the entry of an Order:

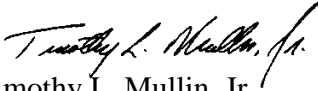
A. Granting this Joint Motion for Extension of Time within which to File Motions to Compel Discovery; and


B. Extending the time within which parties can file motions to compel discovery to and including March 31, 2014; and

C. Granting to the parties such other and further relief as justice and its cause require.

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Complaint Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of February, 2014, copies of **Joint Motion for Extension of Time within which to File Motions to Compel Discovery** were sent by the service method indicated:

Original and three copies by U.S. mail, and one copy by electronic mail, to the Secretary of the U.S. Consumer Product Safety Commission:

Todd A. Stevenson
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
tstevenson@cpsc.gov

One copy by U.S. mail and one copy by electronic mail to the Presiding Officer for *In the Matter of Maxfield and Oberton Holdings, LLC*, CPSC Docket No. 12-1; *In the Matter of Zen Magnets, LLC*, CPSC Docket No. 12-2, and *In the Matter Of Star Networks UA, LLC*, CPSC Docket No. 13-2:

The Honorable Dean C. Metry
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601 25th Street, Suite 508A
Galveston, TX 77550
Janice.M.Emig@uscg.mil

One copy by electronic mail (by agreement) to Complaint Counsel:

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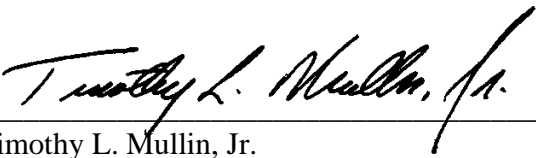
One copy by electronic mail (by agreement) to co-counsel for Craig Zucker:

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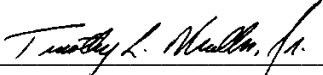
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