

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

_____)	CPSC Docket No. 12-1
In the Matter of)	CPSC Docket No. 12-2
)	CPSC Docket No. 13-2
MAXFIELD AND OBERTON)	
HOLDINGS, LLC)	Hon. Dean C. Metry
and)	Administrative Law Judge
CRAIG ZUCKER, individually and as an)	
officer of MAXFIELD AND OBERTON)	
HOLDINGS, LLC)	
and)	
ZEN MAGNETS, LLC)	
STAR NETWORKS USA, LLC)	
)	
Respondents.)	
_____)	

STATUS REPORT

Complaint Counsel submits the following status report as required by the January 8, 2014, Order regarding the Joint Motion to Amend Discovery Schedule and for Protective Order.

1. On January 23, 2014, Complaint Counsel served a subpoena on Jacob Bronstein. Shortly thereafter, Mr. Bronstein's Counsel notified Complaint Counsel of Mr. Bronstein's intent to comply with the subpoena and begin a search of documents responsive to the subpoena.

2. On January 24, 2014, Complaint Counsel served a subpoena on Ms. Julie Beth Teicher, Trustee for the MOH Liquidating Trust (Trustee). The subpoena was necessary because: (1) Mr. Zucker represented that he no longer had documents that were responsive to Complaint Counsel's Request for Production because he had turned them over to the Trustee, and (2) the Trustee refused to produce such documents absent a subpoena.

3. On January 28, 2014, Mr. Bronstein's counsel notified Complaint Counsel that Mr. Bronstein was reviewing emails for responsive documents and that he would produce such documents pursuant to the subpoena.

4. On January 29, 2014, the Trustee filed an Unopposed Motion for Extension of Time to Move to Quash or Limit Subpoena.

5. On January 31, 2014, Respondent Craig Zucker filed a Motion for Protective Order to prohibit Complaint Counsel from seeking discovery regarding the financial records of M&O, the Trust, or any other person or entity; insurance information of M&O, the Trust, or any other person or entity; the winding up, dissolution or cancellation of M&O; and the formation and activities of the Trust (except as they may relate to unit volume sales of the subject products and the customers to which they were sold).

6. On February 10, 2014, Complaint Counsel filed an Opposition to the Motion for Protective Order.

7. On February 11, 2014, Respondent sent a letter to the Presiding Officer requesting the opportunity to file a motion for leave to file a reply to Complaint Counsel's opposition.

8. On February 11, 2014, Mr. Bronstein's counsel notified Complaint Counsel that Mr. Bronstein would produce documents pursuant to the subpoena by the end of February.

9. On February 12, 2014, Counsel for the Trustee, Paul Laurenza, agreed to produce documents to Complaint Counsel on a rolling basis pursuant to the subpoena. Mr. Laurenza has represented that the production will consist of over 700,000 pages of documents from 16 unique electronic user files as well as an unidentified number of paper documents.

10. On January 23, 2014 and February 17, 2014, Complaint Counsel produced to all Respondents a total of 1,408 documents, consisting of 6,966 pages, in response to Mr. Zucker's Request for Production.

11. As of the date of this filing, Complaint Counsel has not yet received any documents from the Trustee or Mr. Bronstein.

Dated: February 18, 2014



Mary B. Murphy
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Daniel R. Vice
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CERTIFICATE OF SERVICE

I hereby certify that I have provided on this date, February 18, 2014, Complaint Counsel's Status Report upon the Secretary, the Presiding Officer, and all parties and participants of record in these proceedings in the following manner:

Original and three copies by hand delivery to the Secretary of the U.S. Consumer Product Safety Commission: Todd A. Stevenson.

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 USA, LLC*, CPSC Docket No. 13-2:

The Honorable Dean C. Metry
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One copy by electronic mail to counsel for Craig Zucker:

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One copy by electronic mail to the Trustee for MOH Liquidating Trust:

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One copy by electronic mail to counsel for Respondents Zen Magnets, LLC and Star Networks USA, LLC:

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