

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

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

**COMPLAINT COUNSEL’S
NOTICE OF DEPOSITION OF PATRICK M. BASS**

Pursuant to 16 C.F.R. §§ 1025.35, 1025.38, and the Subpoena authorized and issued by the Commission, *See* Dkt. Nos. 47, 49, and 72, Complaint Counsel notices the deposition of Patrick M. Bass, c/o Peter Ney, Rendigs, Fry, Kiely & Dennis, LLP, 600 Vine Street, Suite 2650, Cincinnati, Ohio 45202, concerning all matters related to CPSC Docket No. 21-1, as well as all matters related to the Complaint, the Answer, and any responses by Respondent to any of Complaint Counsel’s discovery requests.

The deposition shall take place virtually, on Tuesday, March 29, 2022, beginning at 11:00 a.m. ET, before a person authorized by law to administer oaths, for the purpose of discovery and/or as evidence. A link will be provided prior to the date of the deposition. The taking of this deposition may be adjourned from day to day until completed, and may occur over several days if necessary to provide the information requested.

This deposition may be videotaped, and the transcript and/or video of the deposition may be used at the hearing of this matter or for such other purposes as are permitted under the Commission’s Rules of Practice for Adjudicative Proceedings.

Dated: March 11, 2022

A handwritten signature in blue ink, appearing to be 'G. M. Reyes', with a long horizontal line extending to the right.

Gregory M. Reyes, Supervisory Attorney
Michael J. Rogal, Trial Attorney
Frederick C. Millett, Trial Attorney
Joseph E. Kessler, Trial Attorney
Nicholas J. Linn, Trial Attorney

Division of Enforcement and Litigation
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
Bethesda, MD 20814
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Complaint Counsel for
U.S. Consumer Product Safety Commission

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2022, I served Complaint Counsel's Notice of Deposition of Patrick M. Bass upon all parties and participants of record in these proceedings by electronic mail ("Email"), as described below:

By email to the Secretary:

Alberta E. Mills
Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
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By email to the Presiding Officer:

Hon. Mary F. Withum, Administrative Law Judge
c/o Alberta E. Mills
Secretary
U.S. Consumer Product Safety Commission
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By email to Counsel for Respondent:

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By email to Counsel for Patrick Bass, Jurrien Van Den Akker and Kevin Brinkman:

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Gregory M. Reyes
Complaint Counsel for
U.S. Consumer Product Safety Commission