

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	
	)	
BABY MATTERS, LLC	)	CPSC DOCKET NO. 13-1
	)	
Respondent.	)	HON. WALTER J. BRUDZINSKI
	)	Administrative Law Judge
	)	
	)	

**COMPLAINT COUNSEL’S MOTION FOR LEAVE TO TAKE DEPOSITIONS**

Pursuant to 16 C.F.R. § 1025.35, Complaint Counsel seeks leave to take the depositions upon oral examination of Leslie Gudel, President, owner, and founder of Baby Matters, LLC; Krista Ross, Director of Customer Service for Baby Matters, LLC; and the person most knowledgeable concerning:

- 1) The design, development, and manufacturing of the Subject Products;
- 2) The sales, marketing and advertising of the Subject Products;
- 3) The testing and evaluation of the safety of the Subject Products, including the harness restraint system;
- 4) The evaluation of risks, including risks of foreseeable misuse, of the Subject Products;
- 5) The development of instructions and warnings concerning the Subject Products and evaluation of the effectiveness of such instructions and warnings;
- 6) The development of advertising and marketing campaigns for the Subject Products;
- 7) Claims, complaints, injuries, fatalities and litigation relating to the Subject Products, and;
- 8) Respondent’s finances, assets, and profits.

Complaint Counsel also seeks leave to take the deposition of each person that Respondent names as an expert witness.<sup>1</sup>

If the Presiding Officer grants this motion, Complaint Counsel will serve written notice of the depositions on all parties and the Presiding Officer at least ten days before the date noticed for the deposition as required by 16 C.F.R. § 1025.35(b).



---

Daniel Vice, Trial Attorney  
Kelly Moore, Trial Attorney  
Mary B. Murphy, Assistant General Counsel  
Division of Compliance  
Office of the General Counsel  
U.S. Consumer Product Safety Commission  
Bethesda, MD 20814  
Tel: (301) 504-7809

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

February 19, 2013

---

<sup>1</sup> Complaint Counsel also reserves the right to seek a subpoena for any materials to be produced at the depositions.