

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)	
)	
)	
THYSSENKRUPP ACCESS CORP.)	CPSC DOCKET NO.: 21-1
)	
)	
Respondent.)	
)	

**COMPLAINT COUNSEL’S SECOND SET OF
REQUESTS FOR ADMISSION TO RESPONDENT**

Pursuant to 16 C.F.R. § 1025.34, Complaint Counsel hereby requests that Respondent thyssenkrupp Access Corp., now known as TK Access Solutions Corp. (“Respondent”), admit the truth of each of the following matters under oath and in writing within 30 days of service hereof.

DEFINITIONS AND INSTRUCTIONS

Complaint Counsel hereby incorporates by reference all of its Definitions and Instructions set forth in Complaint Counsel’s First Set of Requests for Admission to Respondent, filed on February 9, 2022.

REQUESTS FOR ADMISSION

82. Admit that Respondent produced the below engineering drawings:

Elevator Model	Engineering Drawings
Destiny	1996, 2002, 2003, 2004, 2005, 2007, 2008, 2010

LEV	2001, 2006, 2007, 2009, 2010, 2012
Chaparral	[date unknown]
Rise	[date unknown], 2011
Windsor	1999

83. Admit that Respondent produced the below brochures, design guides, installation manuals, and owner’s manuals (“Installation Materials”):

Elevator Model	Brochure	Design Guide	Installation Manual	Owner's Manual
Destiny	2003, 2004, 2006, 2008, 2009, 2010	2002, 2005, 2006, 2007, 2008, 2009, 2010, 2011	1997, 2003, 2004, 2005, 2006, 2007, 2008, 2009	2004, 2006, 2007, 2008, 2009, 2011
LEV	[date unknown]	2001, 2007, 2008, 2009, 2010	2002, 2009	[date unknown]
LEV II	[date unknown]	2011	2011	[date unknown]
Chaparral	[date unknown], 2010	2000		
Rise	[date unknown]	2007, 2011	2007, 2011	[date unknown]
Volant	2010, [date unknown]	2008	2011	[date unknown]
Windsor	[date unknown]	2010	1999	[date unknown]
Flexi-Lift	[date unknown]			

84. Admit that Respondent has not produced to Complaint Counsel engineering drawings for each model Elevator that Respondent manufactured.

85. Admit that Respondent has not produced to Complaint Counsel engineering drawings for every year of manufacture for each model Elevator.

86. Admit that Respondent has not produced to Complaint Counsel Installation Materials for each model Elevator that Respondent manufactured.

87. Admit that Respondent has not produced to Complaint Counsel Installation Materials for every year of manufacture for each model Elevator.

88. Admit that, for purposes of the Hazardous Space, engineering drawings for the Destiny Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all other dates of manufacture for Destiny Elevators not produced by Respondent.

89. Admit that, for purposes of the Hazardous Space, engineering drawings for the LEV Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for LEV Elevators not produced by Respondent.

90. Admit that, for purposes of the Hazardous Space, engineering drawings for the Chaparral Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for Chaparral Elevators not produced by Respondent.

91. Admit that, for purposes of the Hazardous Space, engineering drawings for the Rise Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for Rise Elevators not produced by Respondent.

92. Admit that, for purposes of the Hazardous Space, engineering drawings for the Windsor Elevator for years of manufacture produced by Respondent, are representative of engineering drawings for all dates of manufacture for Windsor Elevators not produced by Respondent.

93. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the LEV Elevator are representative of the engineering drawings that were not produced by Respondent for the Volant Elevator.

94. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the Volant Elevator.

95. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the LEV Elevator are representative of the engineering drawings that were not produced by Respondent for the LEV II Elevator.

96. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the LEV II Elevator.

97. Admit that, for purposes of the Hazardous Space, Installation Materials for the Destiny Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Destiny Elevators not produced by Respondent.

98. Admit that, for purposes of the Hazardous Space, Installation Materials for the LEV Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for LEV Elevators not produced by Respondent.

99. Admit that, for purposes of the Hazardous Space, Installation Materials for the LEV II Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for LEV II Elevators not produced by Respondent.

100. Admit that, for purposes of the Hazardous Space, Installation Materials for the Chaparral Elevator for years of manufacture produced by Respondent, are representative of

Installation Materials for all dates of manufacture for Chaparral Elevators not produced by Respondent.

101. Admit that, for purposes of the Hazardous Space, Installation Materials for the Rise Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Rise Elevators not produced by Respondent.

102. Admit that, for purposes of the Hazardous Space, Installation Materials for the Volant Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Volant Elevators not produced by Respondent.

103. Admit that, for purposes of the Hazardous Space, Installation Materials for the Windsor Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Windsor Elevators not produced by Respondent.

104. Admit that, for purposes of the Hazardous Space, Installation Materials for the Flexi-Lift Elevator for years of manufacture produced by Respondent, are representative of Installation Materials for all dates of manufacture for Flexi-Lift Elevators not produced by Respondent.

105. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent are representative of the Installation Materials that were not produced by Respondent for the Flexi-Lift Elevator.

106. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the Flexi-Lift Elevator.

107. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the LEV Elevator are representative of the engineering drawings that were not produced by Respondent for the LEV II Builder Elevator.

108. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the LEV II Builder Elevator.

109. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent for the LEV II Elevator are representative of the Installation Materials that were not produced by Respondent for the LEV II Builder Elevator.

110. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent are representative of the Installation Materials that were not produced by Respondent for the LEV II Builder Elevator.

111. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent for the Destiny Elevator are representative of the engineering drawings that were not produced by Respondent for the Independence Elevator.

112. Admit that, for purposes of the Hazardous Space, the engineering drawings produced by Respondent are representative of the engineering drawings that were not produced by Respondent for the Independence Elevator.

113. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent for the Destiny Elevator are representative of the Installation Materials that were not produced by Respondent for the Independence Elevator.

114. Admit that, for purposes of the Hazardous Space, Installation Materials produced by Respondent are representative of the Installation Materials that were not produced by Respondent for the Independence Elevator.

Dated this 4th day of March, 2022



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

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2022, I served Complaint Counsel's Second Set of Requests for Admission to Respondent pursuant to the Court's October 12, 2021 Order on Joint Motion to Amend Discovery Schedule and for Protective Order as follows:

By email to the Secretary:

Alberta E. Mills
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By email to the Presiding Officer:

Hon. Mary F. Withum, Administrative Law Judge
c/o Alberta E. Mills
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By email to Counsel for Respondent:

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