

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	
	)	
BABY MATTERS LLC,	)	
	)	CPSC DOCKET No. 13-1
	)	
Respondent.	)	
	)	
	)	

**BABY MATTERS' SECOND SET OF INTERROGATORIES TO THE  
CONSUMER PRODUCT SAFETY COMMISSION**

Pursuant to 16 C.F.R. 1025.32, Baby Matters, LLC (“Respondent,” or “Baby Matters”) hereby propounds the following Second Set of Interrogatories to the Consumer Product Safety Commission (the “Commission”). These Interrogatories are to be answered separately and fully in writing under oath, within thirty (30) days.

**INSTRUCTIONS AND DEFINITIONS**

1. The term “you” or the possessive “your” shall refer to the United States of America Consumer Product Safety Commission and its Commissioners, employees, officers, directors and other agents.
2. The term “Baby Matters” shall refer to Respondent Baby Matters LLC.
3. The term “document” means all written, printed, typed, and electronic media, and any other media from which information can be derived. It includes, without limitation, original documents, drafts, non-identical copies, diaries, correspondence, proposals, valuations, financial statements, contracts, letters, memoranda, appointment calendars, schedules, books, indices, printed forms, publications, press releases, notices, brochures, pamphlets, guidelines, manuals,

minutes, summaries, abstracts, reports, files, file jackets, transcripts, data processing cards, computer tapes, discs, and hard drives, print-outs, information contained in, on, or retrievable from computer programs, bulletins, surveys, charts, exhibits, diagrams, graphs, tables, photographs, recordings, telegrams, cables, telex messages, facsimiles, microfilms, videotapes, studies, work papers, analyses, valuations, and notes.

4. The term “identify,” when used in reference to an individual, means to state his/her full name, present or last known residence, present or last known business address, and present or last known employer.

5. The term “identify,” when used in reference to a document, means to describe the type of the document, its author(s), all recipients, the date it was drafted, edited, finalized and/or executed, where all drafts are physically located or stored, to state its title, subject line, re: line, or other heading or distinguishing marker, as appropriate to differentiate the document from all others, and to describe the contents of the document.

6. The term “state” means provide in reasonable detail all facts and information responsive to the interrogatory including, without limitation, the identification of all persons, communications and documents that relate to your response, and to provide, in a reasonable degree of detail, the essential facts concerning the matter to be described, including the identification of persons involved, the relevant dates and places, and the form, nature and/or content of communications occurring in connection with such matter. Also, include the time period during which the events described in your response occurred and identify all persons having knowledge of the facts and information contained in your response.

7. The use of the singular form of any word includes the plural and vice versa.

8. The use of the present tense includes the past and future tenses and vice versa.

9. These interrogatories are ongoing and require supplementation in accordance with 16 C.F.R. Part 1025.31(f).

### INTERROGATORIES

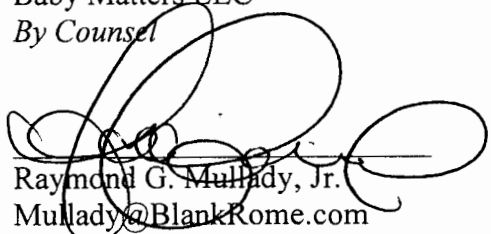
**Interrogatory No. 11.** If your response to any of Baby Matters' Requests for Admission was anything other than an unqualified admission, state the facts upon which you base your response, identify all persons with knowledge of such facts, and identify all documents that pertain to your response.

### RESPONSE:

February 19, 2013

Respectfully submitted,

Baby Matters LLC  
*By Counsel*



Raymond G. Mullady, Jr.  
Mullady@BlankRome.com

Adrien C. Pickard  
APickard@BlankRome.com  
BLANK ROME, LLP

Watergate  
600 New Hampshire Ave, N.W.  
Washington, D.C. 20037

Tel: (202) 772-5828

Fax: (202) 572-8414

*Counsel for Respondent Baby Matters LLC*

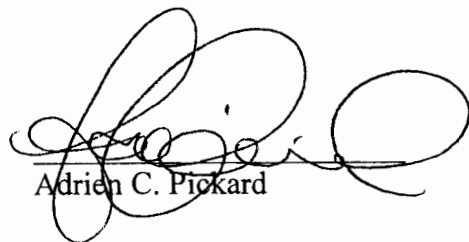
## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Baby Matters' Second Set of Interrogatories to the Consumer Product Safety Commission upon the following parties in these proceedings by mailing, postage prepaid, and by emailing a copy to each on this 19th day of February, 2013.

Mary B. Murphy, Esquire  
(MMurphy@cpsc.gov)  
Assistant General Counsel  
Division of Compliance  
Office of the General Counsel  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

Kelly Moore, Trial Attorney  
(KMoore@cpsc.gov)  
Complaint Counsel for  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

The Honorable Walter J. Brudzinski  
c/o Timothy O'Connell  
(Timothy.A.O'Connell@uscg.mil)  
c/o Regina V. Maye  
(Regina.V.Maye@uscg.mil)  
1 South Street, Battery Park Building  
Room 216  
New York, NY 10004-1466



Adrien C. Pickard