

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

Received CPSC

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Office of the Secretary
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In the Matter of)
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 MAXFIELD AND OBERTON HOLDINGS, LLC)
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 Respondent.)
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CPSC DOCKET NO. 12-1

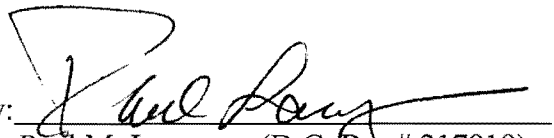
**RESPONSE OF MAXFIELD AND OBERTON HOLDINGS, LLC TO COMPLAINT
COUNSEL’S MOTION TO CONSOLIDATE PROCEEDINGS**

In its motion to consolidate this proceeding with CPSC Docket No. 12-2, Complaint Counsel requests “*at this juncture* that the court order both matters be consolidated before this court, *and requests that further matters be consolidated as the parties may request and as the court deems appropriate.*” Memorandum of Points and Authorities in Support of Complaint Counsel’s Motion to Consolidate Proceedings, at 4 (emphasis added). In light of this stated request by Complaint Counsel, Respondent is unclear as to what Complaint Counsel is seeking to have the court consolidate “at this juncture.”

Maxfield and Oberton does not oppose consolidation of the two proceedings. Respondent reserves its right, however, to move for severance of specific matters, including but not limited to the final hearing, as this proceeding progresses, should consolidation of such specific matters present concerns of undue burden, delay, prejudice, or confusion of the issues before this court.

Respectfully submitted

Dated: September 28, 2012

By: 

Paul M. Laurenza (D.C. Bar # 217919)

Eric C. Tew (D.C. Bar # 477023)

DYKEMA GOSSETT PLLC

Franklin Square Building

1300 I Street, N.W., Suite 300 West

Washington, D.C. 20005

Telephone: (202) 906-8600

Facsimile: (202) 906-8669

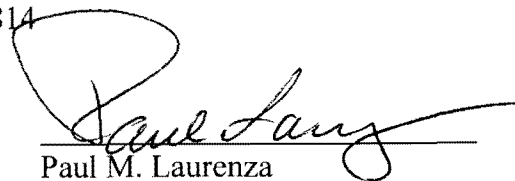
CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2012, a true and correct copy of the foregoing Response of Maxfield and Oberton Holdings, LLC to Complaint Counsel's Motion to Consolidate proceedings was served via first class, postage prepaid, U.S. Mail, and by electronic mail on:

Judge Bruce T. Smith
U.S. Coast Guard
Hale Boggs Federal Building
500 Poydras Street, Room 1211
New Orleans, LA 70130-3396

Mary B. Murphy, Assistant General Counsel
Division of Compliance, Office of General Counsel
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814

Jennifer Argabright, Trial Attorney
Complaint Counsel
Division of Compliance, Office of General Counsel
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814


Paul M. Laurenza