

UNITED STATES OF AMERICA  
 CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of  MAXFIELD AND OBERTON HOLDINGS, LLC   Respondent.	) ) ) ) ) ) ) ) ) ) )	CPSC DOCKET NO. 12-1
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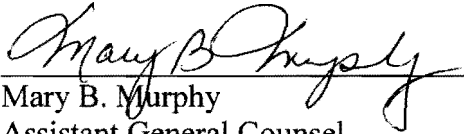
**COMPLAINT COUNSEL’S MOTION TO CONSOLIDATE PROCEEDINGS**

Complaint Counsel for the U.S. Consumer Product Safety Commission (“CPSC”) has initiated adjudicative proceedings against Maxfield and Oberton Holdings, LLC (“M&O”) (CPSC Docket No. 12-1) and Zen Magnets, LLC (“Zen”) (CPSC Docket No. 12-2) requesting that the CPSC determine that high-powered, small rare earth magnets (the “Subject Products”) imported and distributed by M&O and Zen present a substantial product hazard as defined in section 15(a)(2) of the Consumer Product Safety Act, 15 U.S.C. § 2064(a)(2).

Complaint Counsel moves to consolidate Docket 12-1 and Docket 12-2 and have the matters heard before this Court pursuant to Commission Regulations at 16 C.F.R. Part 1025.19 because the proceedings “involve similar issues” that can be resolved more consistently and efficiently in consolidated proceedings than in separate proceedings. The facts and rationale supporting consolidation are set forth in the attached Memorandum of Points and Authorities in Support of Complaint Counsel’s Motion to Consolidate Proceedings.

Wherefore, Complaint Counsel requests that the Presiding Officer grant this motion and consolidate these two administrative matters.

Respectfully submitted,



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