

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Bryan F. Moore
Administrative Law Judge

In the Matter of

CERTAIN PLAYARDS AND STROLLERS

Investigation No. 337-TA-1288

**JOINT MOTION TO EXTEND DEADLINE TO
FILE PUBLIC VERSIONS OF RESPONSES TO MOTIONS *IN LIMINE***

Respondents Baby Trend, Inc, Sichuan Hobbies Baby Products co., Ltd., and Anhui Chile Baby Products Co., Ltd. (collectively, “Respondents”) and Complainants Graco Children’s Products Inc. and Wonderland Nurserygoods Co., Ltd. (together, “Complainants”) certify they have made good-faith efforts to resolve this matter. After conferring, and for the reasons set forth below, counsel for Respondents and Complainants agreed to jointly request to extend the deadline for each party to file public versions of their motion *in limine* responses and supporting exhibits from December 12, 2022 to December 20, 2022.

Respondents and Complainants respectfully move for a six-business day extension of time to file public versions of their respective responses to motions *in limine*. On December 5, 2022 the parties filed responses to motions *in limine* with supporting documents that contain Confidential Business Information and will require redaction in order to be filed publicly. Pursuant to ALJ Moore’s Ground Rule 1.3.1, a public version of a document filed with Confidential Business Information is to be filed within five business days from the date of filing, which makes the parties’ public versions due December 12, 2022, the date of the pre-hearing

conference and the first day of the evidentiary hearing in this matter. The ALJ issued decisions as to the parties' motions *in limine* on December 7, 2022.

Respondents and Complainants submit good cause exists for the requested extension as it will provide the parties sufficient time to prepare their public filings following the conclusion of the evidentiary hearing in this matter. The parties believe the requested extension will promote efficiency in this investigation.

Dated: December 8, 2022

Respectfully submitted,

By: /s/ Bethany N. Mihalik

R. Trevor Carter
Andrew M. McCoy
Reid E. Dodge
Joshua DeAmicis
Faegre Drinker Biddle & Reath LLP
300 N. Meridian St., Suite 2500
Indianapolis, IN 46204
Telephone: (317) 237-0300
Email: BabyTrendITC@faegredrinker.com

Lauren M.W. Steinhäuser
Doowon R. Chung
Andrea I. Savageau
Faegre Drinker Biddle & Reath LLP
2200 Wells Fargo Center,
Minneapolis, MN 55402
Telephone: (612) 766-7000
Email: BabyTrendITC@faegredrinker.com

Jeff Eichen
Faegre Drinker Biddle & Reath LLP
222 Delaware Ave., Suite 1410
Wilmington, DE 19801
Telephone: (302) 467-4200
Email: BabyTrendITC@faegredrinker.com

Bethany N. Mihalik
Faegre Drinker Biddle & Reath LLP
1500 K Street NW, Suite 1100
Washington, DC 20005

Telephone: (202) 842-8800
Email: BabyTrendITC@faegredrinker.com

*Counsel for Respondents Baby Trend, Inc.;
Sichuan Hobbies Baby Products Co., Ltd.; and
Anhui Chile Baby Products Co., Ltd.*

By: /s/ Joshua B. Pond

Joshua B. Pond
Mark M. Supko
Lyle Vander Schaaf
Matthew David
Kyle Pham
Risa Rahman
Crowell & Moring LLP
1001 Pennsylvania Avenue NW
Washington, D.C. 20004-2595
Telephone: (202) 624-2500
Facsimile: (202) 628-5166
Email: GracoWonderlandITC@crowell.com

Scott L. Bittman
Robert B. Kornweiss
Michelle Chipetine
Crowell & Moring LLP
590 Madison Avenue, 20th Floor
New York, NY 10022-2544
Telephone: (212) 223-4000
Facsimile: (212) 223-4134
Email: GracoWonderlandITC@crowell.com

Wei-Chih Hsu
Jun Cheng
Crowell & Moring LLP
455 N. Cityfront Plaza Dr. Suite 3600
Chicago, IL 60611
Telephone: (312) 321-4200
Fax: (312) 321-4299
Email: GracoWonderlandITC@crowell.com

*Counsel for Respondents Graco Children's
Products Inc. and Wonderland Nurserygoods
Co., Ltd.*

CERTIFICATE OF SERVICE

I, Debbie Cairns, hereby certify that on December 8, 2022, a copy of the foregoing Joint Motion to Extend Deadline to File Public Versions of Responses to Motions *In Limine* was filed and served to the following parties as indicated:

The Honorable Lisa Barton, Secretary U.S. International Trade Commission 500 E Street, S.W., Room 112 Washington, D.C. 20436	<input type="checkbox"/> Via First Class mail <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Overnight Delivery <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via Electronic Filing (EDIS)
The Honorable Bryan F. Moore Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, D.C. 20436 Moore337@usitc.gov	<input type="checkbox"/> Via First Class mail <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Overnight Delivery <input checked="" type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via Electronic Filing (EDIS)
Irina Kushner Attorney Advisor U.S. International Trade Commission 500 E Street, S.W. Washington, D.C. 20436 Irina.Kushner@usitc.gov	<input type="checkbox"/> Via First Class mail <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Overnight Delivery <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via Electronic Filing (EDIS)
<i>For Complainants:</i>	
Joshua B. Pond Mark M. Supko Lyle Vander Schaaf Matthew David Kyle Pham Risa Rahman CROWELL & MORING LLP 1001 Pennsylvania Avenue NW Washington, DC 20004-2595 GracoWonderlandITC@crowell.com	<input type="checkbox"/> Via First Class mail <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Overnight Delivery <input checked="" type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via Electronic Filing (EDIS)

Scott L. Bittman
Robert B. Kornweiss
Michelle Chipetine
CROWELL & MORING LLP
590 Madison Avenue, 20th Floor
New York, NY 10022-2544
GracoWonderlandITC@crowell.com

Wei-Chih Hsu
Jun Cheng
CROWELL & MORING LLP
455 N. Cityfront Plaza Dr., Suite 3600
Chicago, IL 60611
GracoWonderlandITC@crowell.com

/s/ Debbie Cairns _____

Debbie Cairns, Paralegal
Faegre Drinker Biddle & Reath LLP
300 N. Meridian St., Suite 2500
Indianapolis, IN 46204