

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

GARRISON SOUTHFIELD PARK LLC,

Plaintiff,

vs.

CLOSED LOOP REFINING AND
RECOVERY, INC., et al.,

Defendants.

Case No. 2:17-cv-783-EAS EPD

CHIEF JUDGE EDMUND A.
SARGUS, JR.

Magistrate Judge Elizabeth Preston
Deavers

OLYMBEC USA LLC,

Plaintiff,

vs.

CLOSED LOOP REFINING AND
RECOVERY, INC., et al.,

Defendants.

Case No. 2:19-cv-1041-EAS EPD

CHIEF JUDGE EDMUND A.
SARGUS, JR.

Magistrate Judge Elizabeth Preston
Deavers

**KUUSAKOSKI DEFENDANTS' AMENDED RESPONSE TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Defendants Kuusakoski Inc., Kuusakoski Glass Recycling LLC, Kuusakoski US LLC and Vintage Tech, LLC (jointly referred to herein as "Kuusakoski") hereby amend their response to Plaintiff Garrison Southfield Park LLC and Plaintiff Olymbec USA LLC's First Set of Interrogatories, specifically Interrogatory Number 5. All objections and other responses to the First Set of Interrogatories remain unchanged.

INTERROGATORY NO. 5: *Identify all OEMs who claimed extended producer responsibility credit for materials delivered to the Facility.*

ANSWER: To the best of Kuusakoski's knowledge and understanding, MRM, MPC, LG, Sony, Waste Management WMRA, E-World Recyclers, Microsoft, Haeir, Micro-Center, Premio, Amazon, and Universal Recycling Technologies each may have claimed extended producer responsibility credit for materials handled by Kuusakoski. However, Kuusakoski did deliver some materials to locations other than Closed Loop in the years 2012 through 2016. In particular, pursuant to Vintage Tech's contract with MRM, Kuusakoski (Vintage Tech) sent all materials attributable to MRM to locations other than Closed Loop and therefore Kuusakoski is specifically unaware of MRM having claimed extended producer responsibility credit for materials delivered by Kuusakoski to Closed Loop, and any previous attribution by Kuusakoski of Closed Loop material to MRM was inaccurate.

Date 03/04/2021

Mandi Rehder

Mandi Rehder, President and CEO Kuusakoski US LLC

Date: March 4, 2021

Respectfully submitted,

McMAHON DeGULIS LLP

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*COUNSEL FOR THE KUUSAKOSKI
DEFENDANTS*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on March 4, 2021, a copy of the foregoing discovery responses was served by electronic mail on counsel of record.

/s/ William Ford