

# SAVAGE, TURNER, PINSON & KARSMAN

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April 16, 2009

**Via facsimile only to (202) 606-5409**  
Honorable Covette Rooney, ALJ  
Occupational Safety and Health Review Commission  
1120 20<sup>th</sup> Street NW, 9<sup>th</sup> Floor  
Washington, DC 20036

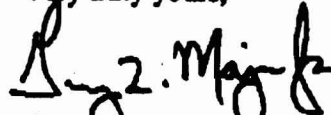
Re: Secretary of Labor v. Imperial Sugar Company and Imperial Savannah, I.P.  
Occupational Safety and Health Review Commission  
OSHRC Docket No. 08-1104      Region IV  
Inspection No. 310988712

Dear Judge Rooney:

Attached for filing in the above-referenced action are our clients' Petitions for Leave to Intervene. To verify filing, please file-stamp a copy of each document are return to my either via facsimile or US mail. Please note that there are two separate petitions attached.

Thank you for your consideration in this matter. If I can be of any assistance, please don't hesitate to call.

Very truly yours,



George T. Major, Jr.

SAVAGE, TURNER, PINSON & KARSMAN

GIM

Attachments (9pg)

Cc: Stanley E. Keen, Esq.  
Charles H. Morgan, Esq.  
Mark Tate, Esq.

**UNITED STATES OF AMERICA  
OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION**

SECRETARY OF LABOR,	)	OSHRC DOCKET NO.
	)	08-1104
Complainant,	)	
	)	Region IV
v.	)	
	)	
IMPERIAL SUGAR COMPANY;	)	Inspection No.:
IMPERIAL-SAVANNAH, L.P.,	)	310988712
	)	
Respondents.	)	

**PETITION FOR LEAVE TO INTERVENE**

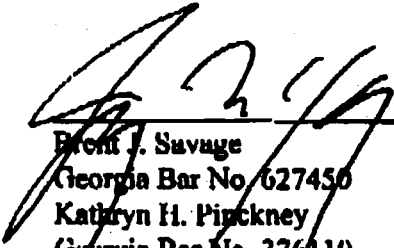
COME NOW, SHAMIE FRASIER; LATESHA HABERSHAM, Individually and as Spouse of MICKINLEY HABERSHAM, Deceased; WALTER B. MAXWELL; WILLIAM PROCTOR, Individually and as the Spouse of PATRICIA ANN PROCTOR, Deceased; PAULETTE WILLIAMS, Individually and as the Spouse of MICHAEL WILLIAMS, Deceased; DEBRA BYERS, Individually and as Executrix of the Estate of TRUITT BYERS, Deceased; HELEN QUARTERMAN, Individually and as Surviving Spouse of LARI QUARTERMAN, Deceased; JUSTIN PURNELL; and PAUL SECKINGER, by and through the undersigned counsel, and pursuant to the provisions of 29 CFR § 2200.21, hereby file their Petition for Leave to Intervene in the above-captioned action.

Petitioners show that each of the above-named Petitioners are interested in the above-captioned proceedings as persons who were either injured as a result of the Port Wentworth, Georgia sugar refinery explosion that has led to this proceeding or the Surviving Representatives of persons killed as a result of the Port Wentworth, Georgia sugar refinery explosion. Petitioners show that as witnesses, victims, and surviving representatives of the victims of the explosion and the events

surrounding the explosion, Petitioners will assist in the determination of the issues in question in this proceeding and can provide insight into topics necessary for a factual determination of the issues involved. Petitioners further show that their intervention will not unduly delay this proceeding.

**WHEREFORE**, Petitioners respectfully request that their Petition for Leave to Intervene be **GRANTED** and that Petitioners be named as Intervenors in the above-captioned proceedings, with all rights thereto appertaining.

Respectfully submitted, this 4 day of April, 2009.



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Brent J. Savage  
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**UNITED STATES OF AMERICA  
OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION**

SECRETARY OF LABOR,	)	OSHRC DOCKET NO.
	)	08-1104
Complainant,	)	
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v.	)	
	)	
IMPERIAL SUGAR COMPANY;	)	Inspection No.:
IMPERIAL SAVANNAH, L.P.,	)	310988712
	)	
Respondents.	)	

**CERTIFICATE OF SERVICE**

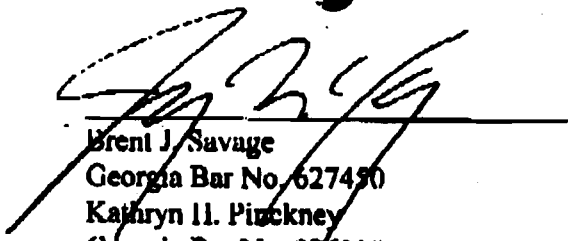
This is to certify that I have this date served a copy of the foregoing PETITION FOR LEAVE TO INTERVENE by certified United States Mail, return receipt requested with adequate postage affixed thereon, addressed as follows:

Stanley F. Keen, Esq.  
Sharon D. Calhoun, Esq.  
Karen E. Mock, Esq.  
Christopher D. Helms, Esq.  
Office of the Solicitor  
U.S. Department of Labor  
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This 16 day of April, 2009.



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