

UNITED STATES OF AMERICA
OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION

SECRETARY OF LABOR,)
)
Complainant,)
)
v.)
)
IMPERIAL SUGAR COMPANY;)
IMPERIAL-SAVANNAH, L.P.)
)
Respondents.)
_____)

Docket No. 08-1104

JOINT PERIODIC DISCOVERY STATUS REPORT

Pursuant to the Review Commission's February 10, 2009 Scheduling Order, the parties respectfully submit this periodic report on the progress of discovery. The parties have exchanged documents during the initial weeks of discovery and are continuing to request, review, and produce documents. The parties have exchanged numerous written discovery requests and are in the process of responding to those requests. The parties also are working to schedule several depositions in the next few weeks.

Respectfully submitted this 10th day of April 2009.

/s/ Charles H. Morgan
Charles H. Morgan
charlie.morgan@alston.com
Matthew J. Gilligan
matt.gilligan@alston.com
Ashley D. Brightwell
ashley.brightwell@alston.com
Jeremy D. Tucker
jeremy.tucker@alston.com
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
(404) 881-7000
(404) 253-8757

Attorneys for Respondents

CAROL A. DE DEO
Deputy Solicitor for National Operations

STANLEY E. KEEN
Regional Solicitor

SHARON D. CALHOUN
Counsel for Occupational Safety and Health

By: /s/ Karen E. Mock
KAREN E. MOCK

Senior Trial Attorney
ANGELA DONALDSON
Trial Attorney

U. S. Department of Labor
Office of the Solicitor
61 Forsyth Street, SW, Room 7T10
Atlanta GA 30303
Telephone: (404) 302-5435
Facsimile: (404) 302-5438

Attorneys for Complainant

UNITED STATES OF AMERICA

OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION

SECRETARY OF LABOR,)
)
 Complainant)
)
 v.)
)
 IMPERIAL SUGAR COMPANY;)
 IMPERIAL-SAVANNAH, L.P.)
)
 Respondents.)
 _____)

Docket No. 08-1104

CERTIFICATE OF SERVICE

I certify that all parties have consented that all papers required to be served in this action may be served and filed electronically. I further certify that a copy of JOINT PERIODIC DISCOVERY STATUS REPORT was electronically served on April 10, 2009 on the following counsel for Complainant:

Karen E. Mock
 Mock.Karen@dol.gov
 Angela F. Donaldson
 Donaldson.Angela@dol.gov
 Office of the Solicitor
 U.S. Department of Labor
 61 Forsyth Street S.W.
 Room 7T10
 Atlanta, Georgia 30303

/s/ Charles H. Morgan
 Charles H. Morgan
 Alston & Bird LLP
 1201 West Peachtree Street
 Atlanta, Georgia 30309-3424
 charlie.morgan@alston.com