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December 9, 2008

**VIA FACSIMILE – (202) 606-5409  
and U.S. First Class Mail**

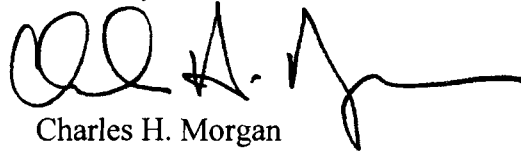
The Honorable Dennis L. Phillips  
Occupational Safety and Health Review Commission  
One Lafayette Center  
1120 20th Street, NW - 9th Floor  
Washington, DC 20036-3419

Re: *Secretary of Labor v. Imperial-Savannah, L.P. et al*, OSHRC Docket No.  
08-1104

Dear Judge Phillips:

Enclosed are an original and one copy of Respondent's Objection to Complainant's Motion for Extension of Time to Serve Answers and Objections to Respondent's First Interrogatories and First Request for Production of Documents. I would appreciate it if you would have your office stamp the copy as received and return it to me in the enclosed, self-addressed stamped envelope. We have served a copy of this Objection on counsel for Complainant. Thank you.

Sincerely,



Charles H. Morgan

CHM:chm

cc: Sharon D. Calhoun, Esq. (w/encl. via facsimile)  
Karen E. Mock, Esq. (w/encl. via facsimile)  
Christopher D. Helms, Esq. (w/encl. via facsimile)  
Matthew J. Gilligan, Esq.

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UNITED STATES OF AMERICA  
OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION

SECRETARY OF LABOR,	)	
	)	
Complainant,	)	Docket No. 08-1104
	)	
v.	)	
	)	
IMPERIAL SUGAR COMPANY;	)	
IMPERIAL-SAVANNAH, L.P.	)	
	)	
	)	
Respondents.	)	
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**RESPONDENT'S OBJECTION TO COMPLAINANT'S MOTION FOR EXTENSION OF TIME TO SERVE ANSWERS AND OBJECTIONS TO RESPONDENT'S FIRST INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Respondent Imperial-Savannah, L.P. respectfully objects to Complainant's request for thirty (30) additional days in which to respond to Respondent's discovery requests. By Order dated September 3, 2008, Complainant has already been afforded an additional thirty (30) days in which to file her Complaint, to which Respondent did not object based on Complainant's request that Complainant's counsel needed additional time in which to receive and review the file in this matter. Respondent objects to Complainant's request for an additional thirty (30) days based on Respondent's concern that the such additional time will prejudice Respondent's ability to complete discovery in a timely fashion.

Respectfully submitted, this 9th day of December, 2008.



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Attorneys for Respondents

UNITED STATES OF AMERICA  
OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION

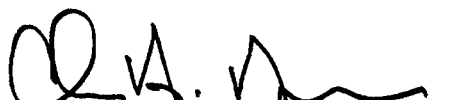
SECRETARY OF LABOR, )  
 )  
 Complainant, ) Docket No. 08-1104  
 )  
 v. )  
 )  
 IMPERIAL SUGAR COMPANY; )  
 IMPERIAL-SAVANNAH, L.P. )  
 )  
 Respondents. )  
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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served a copy of the within and foregoing  
RESPONDENT'S OBJECTION TO COMPLAINANT'S MOTION FOR EXTENSION OF  
TIME TO SERVE ANSWERS AND OBJECTIONS TO RESPONDENT'S FIRST  
INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS by  
facsimile and certified U.S. Mail, return receipt requested with adequate postage affixed thereon,  
addressed as follows:

Sharon D. Calhoun, Esq.  
Karen E. Mock, Esq.  
Christopher D. Helms, Esq.  
Office of the Solicitor  
U.S. Department of Labor  
61 Forsyth Street S.W.  
Room 7T10  
Atlanta, Georgia 30303

This 9th day of December, 2008.

  
\_\_\_\_\_  
Charles H. Morgan