

# SAVAGE, TURNER, PINSON & KARSMAN

## ATTORNEYS AT LAW

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BRENT J. SAVAGE  
ROBERT BARTLEY TURNER  
WILLIAM H. PINSON, JR.  
STANLEY M. KARSMAN  
R. SCOTT KRAEUTER  
KATHRYN HUGHES PINCKNEY  
C. DORIAN BRITT  
ASHLEIGH R. MADISON  
JEREMY S. MCKENZIE  
GEORGE T. MAJOR, JR.  
DANIEL J. McNAMARA

304 EAST BAY STREET  
POST OFFICE BOX 10600  
SAVANNAH, GEORGIA 31412  
WWW.SAVAGEFLAWFIRM.NET

(912) 231-1140 TELEPHONE  
(912) 232-4212 TELECOPIER  
(912) 231-9157 TELECOPIER

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

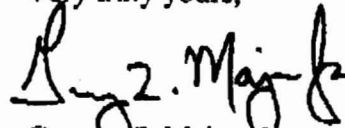
Re: Secretary of Labor v. Imperial Sugar Company and Imperial Savannah, I.P.  
Occupational Safety and Health Review Commission  
OSHRC Docket No. 08-1104      Region IV  
Inspection No. 310988712

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 and return to me 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**

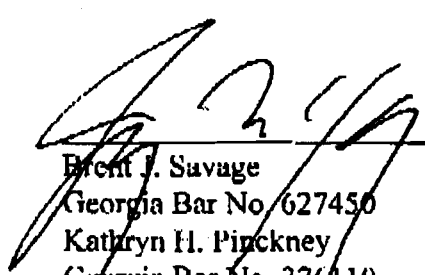
COME NOW, SHAMIER FRASIER; LATESHA HABERSHAM, Individually and as Spouse of MICKINLEY HABERSHAM, Deceased; WALTER B. MAXWELL; WILLIAM PROCTOR, Individually and as the Spouse of PATRICIA ANN PROCTOR, Deceased; PAULETTE WILLIAMS, Individually and as the Spouse of MICHAEL WILLIAMS, Deceased; DEBRA BYERS, Individually and as Executrix of the Estate of TRUITT BYERS, Deceased; HELEN QUARTERMAN, Individually and as Surviving Spouse of EARL 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 Intervenor in the above-captioned proceedings, with all rights thereto appertaining.

Respectfully submitted, this 16 day of April, 2009.



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Brent J. Savage  
Georgia Bar No. 627450  
Kathryn H. Pinckney  
Georgia Bar No. 376110  
Jeremy S. McKenzie  
Georgia Bar No. 436655  
George T. Major, Jr.  
Georgia Bar No. 619608  
*Counsel for Petitioners*

SAVAGE, TURNER, PINSON & KARSMAN  
P.O. Box 10600  
Savannah, Georgia 31412  
Telephone (912) 231-1140  
Facsimile (912) 231-9157

UNITED STATES OF AMERICA  
OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION

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

CERTIFICATE OF SERVICE

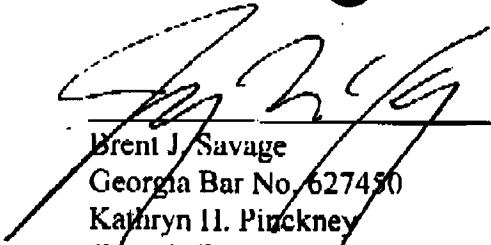
This is to certify that I have this date served a copy of the foregoing PETITION FOR LEAVE TO INTERVENE by certified United States Mail, return receipt requested with adequate postage affixed thereon, addressed as follows:

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  
61 Forsyth Street S.W.  
Room 7T10  
Atlanta, Georgia 30303

Charles H. Morgan  
Matthew J. Gilligan  
Jeremy K. Tucker  
ALSTON & BIRD LLP  
1202 West Peachtree Street  
Atlanta, Georgia 30309-3424

Mark Tate, Esq.  
TATE LAW GROUP  
2 East Bryan Street, Suite 600  
Savannah, Georgia 31401

This 16 day of April, 2009.



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Brent J. Savage  
Georgia Bar No. 627450  
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