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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 20th Street NW, 9th Floor
Washington, DC 20036

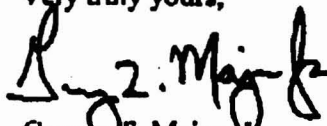
Re: Secretary of Labor v. Imperial Sugar Company and Imperial Savannah, I.P.
Occupational Safety and Health Review Commission
OSHRC Docket No. 08-1104 Region IV
Inspection No. 310988712

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
Complaint,)	REGION IV
)	
V.)	INSPECTION NO.
)	310988712
)	
IMPERIAL SUGAR COMPANY;)	
IMPERIAL-SAVANNAH, L.P.,)	
)	
Respondents.)	

PETITION FOR LEAVE TO INTERVENE


COME NOW, LASHUNDA HARVEY, as Administratrix of the Estate of SHELATHIA HARVEY, as his surviving spouse; THE ESTATE OF BYRON R. SINGLETON, by its co-administrators, JOSEPH ANDERSON, the Decedent's Minor Son, and BYRON SINGLETON, JR., the Decedent's other surviving minor son, through their natural mother; TROY BACON; JAMIE J. BUTLER and JAMELLAH BUTLER; CALVIN BRYANT, JR.; TAWANNA BUTLER, as Administratrix of the Estate of JOHN C. BUTLER, JR., and as his surviving spouse; JOANN FIELDS, as Administratrix of the Estate of ALPHONSO FIELDS, and as his surviving spouse; LATACIA JOHNSON-BYNES and EARL GREGORY JOHNSON, JR., as co-administrators of the Estate of EARL GREGORY JOHNSON, SR., and as his surviving children; PATRICIA GRANT-SINGLETON; MATTHEW FREEMAN; SHIRLEY BARNES, as Administratrix of the Estate of ERIC STANLEY BARNES, SR., and his surviving spouse, 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.

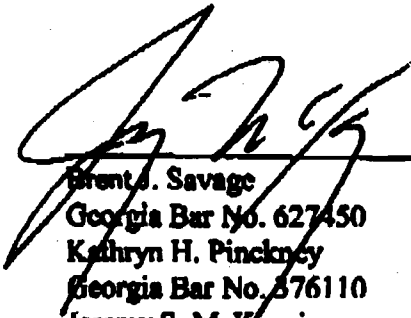
WHEREFORE, Petitioners respectfully request that their Petition for Leave to Intervene be **GRANTED** and that Petitioners be named as Intervenor in the above-captioned proceedings, with all rights thereto appertaining.

Respectfully submitted, this 16 day of April, 2009.



Mark Tate
Georgia Bar No. 698820
Counsel for Petitioners

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*Co-Counsel for Petitioners Joseph Anderson
and Byron Singleton, Jr.*

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**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, I.P.,)	310988712
)	
Respondents.)	

CERTIFICATE OF SERVICE

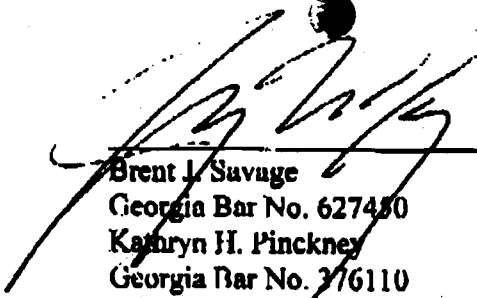
This is to certify that I have this date served a copy of the foregoing PETITION FOR LEAVE TO INTERVENE by certified United States Mail, return receipt requested with adequate postage affixed thereon, addressed as follows:

Stanley E. Keen, Esq.
Sharon D. Calhoun, Esq.
Karen E. Muck, Esq.
Christopher D. Helms, Esq.
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U.S. Department of Labor
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This 16th day of April, 2009.



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