MAYER · BROWN

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PUBLIC DOCUMENT

Inv. No. 731-TA-1089 (Review)

February 22, 2011

The Honorable Marilyn Abbott Secretary U.S. International Trade Commission 500 E Street, SW Washington, D.C. 20436

Re:

Orange Juice from Brazil: Entry of Appearance and Application for

Business Proprietary Access

Dear Madam Secretary:

On behalf of Southern Gardens Citrus Processing Corporation ("Southern Gardens"), and pursuant to 19 C.F.R. § 201.11 and the notice of institution of five-year review, we hereby enter an appearance for Messrs. Matthew J. McConkey (lead), Jeffery C. Lowe, Dave M. Wharwood and Ms. Margaret-Rose Sales, as counsel and Fabian Rivelis as consultant in the abovereferenced review and further request that we be placed on the Commission's service list.

Southern Gardens is a producer in the United States of a domestic like product as defined in 19 U.S.C. § 1677(9)(C) and therefore is an interested party. Southern Gardens intend to participate in this review by filing briefs to address matters relevant to this review.

Also, enclosed is an application for disclosure of business proprietary information under Administrative Protective Order ("APO") for the individuals named above.

Notice of Institution of a Five-Year Review Concerning the Antidumping Duty Order on Certain Orange Juice from Brazil, 76 Fed. Reg. 5822 (Feb. 2, 2011)

The Honorable Marilyn Abbott February 22, 2011 Page 2

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely

Matthew J. McConkey Jeffery C. Lowe

Dave M. Wharwood

Margaret-Rose Sales

MAYER BROWN LLP

Counsel to Southern Gardens Citrus **Processing Corporation**

PUBLIC CERTIFICATE OF SERVICE

Orange Juice from Brazil, Inv. No. 731-TA-1089 (Sunset Review)

I, Robin L. Algood, hereby certify that copies of the attached were served on all parties by first class mail, postage prepaid, on this 22nd day of February 2011:

Robert G. Kalik, Esq. **KALIK LEWIN** 4720 Montgomery Lane Suite 400 Bethesda Maryland, 20814

Matthew T. McGrath, Esq. **BARNES, RICHARDSON & COLBURN**11 Dupont Circle NW
Suite 500

Washington, DC 20036

Jeffrey L. Snyder, Esq. **CROWELL & MORING LLP** 1001 Pennsylvania Avenue, N.W. Washington, D.C. 20004-2595

Christopher Dunn, Esq. **HELLER EHRMAN LLP** 1717 Rhode Island Avenue, N.W. Washington, D.C. 20036-3023

George W. Thompson, Esq. **NEVILLE PETERSON LLP** 1400 Sixteenth Street, N.W. Suite 350 Washington, DC 20036

Robin L. Algood



APPLICATION FOR DISCLOSURE OF BUSINESS PROPRIETARY INFORMATION UNDER ADMINISTRATIVE PROTECTIVE ORDER

Inv. No(s). 731-TA-1089 (Review)

Orange Juice from Brazil

(Name of Investigation(s))

I. Authorized applicant status

I, the undersigned, am an authorized applicant, as defined in section 207.7(a)(3) of the Commission's Rules of Practice and Procedure (19 C.F.R. §207.7(a)(3), as amended), for the disclosure of business proprietary information (BPI) under the administrative protective order (APO) issued in the above-captioned investigation. I represent the following interested party, as defined in 19 U.S.C. §1677(9), which is a party to the investigation:

Southern Gardens Citrus Processing Corporation ("Southern Gardens")
State the name of the interested party and its category, e.g., domestic producer, importer, etc.).
I am (check one): (✓) (1) An attorney, excepting in-house corporate counsel.
() (2) An in-house corporate attorney. I am not involved in competitive decisionmaking for the interested party I represent. I have attached a written statement describing my job functions, disclosing all financial holdings I may have in my employer or its affiliates, and indicating whether I am involved in the formulation of my employer's pricing policies.
() (3) A consultant or expert under the direction and control of an attorney under paragraph (1) or 2) above. That attorney has also signed this application to indicate that the attorney is held responsible for my compliance with the APO:
Name of AttorneyPlease Print) (Signature of Attorney)
() (4) A consultant or expert who appears regularly before the Commission and is not involved in competitive decisionmaking for the interested party I represent. I have attached a written statement listing my appearances before the Commission in the past three (3) years.
() (5) A representative of an interested party that is not represented by counsel. I am not involved in competitive decisionmaking for that interested party. I have attached a written statement describing my job functions, disclosing all financial holdings I may have in the interested party I represent or its affiliates, and indicating whether I am involved in the formulation of the interested party's pricing policies.

Competitive decisionmaking: As defined in section 207.7 of the Commission's rules, involvement in "competitive decisionmaking" includes past, present, or likely future activities, associations, and relationships with an interested party which is a party to the investigation that involve the prospective authorized applicant's advice or participation in any of such party's decisions made in light of similar or corresponding information about a competitor (pricing, product design, etc.).

I hereby apply for disclosure to me, subject to the APO issued in the above-captioned investigation, all BPI properly disclosed pursuant to section 207.7 of the Commission's rules, for the purpose of representing an interested party in the investigation and filing comments on the BPI so disclosed. I agree to be bound by the provisions of the APO and section 207.7.

III. Sanctions and other actions for breach of the APO

I acknowledge that, pursuant to section 207.7(d) of the Commission's rules, breach of the APO may subject me to:

- (1) Disbarment from practice in any capacity before the Commission along with my partners, associates, employer, and employees, for up to seven years following publication of a determination that the other has been breached;
 - (2) Referral to the United States Attorney;
- (3) In the case of an attorney, accountant, or other professional, referral to the ethics panel of the appropriate professional association;
- (4) Such other administrative sanctions as the Commission determines to be appropriate, including public release of or striking from the record any information or briefs submitted by, or on behalf of, me or the party I represent, denial of further access to business proprietary information in the current or any future investigations before the Commission, and issuance of a public or private letter of reprimand; and
- (5) Such other actions, including but not limited to, a warning letter, as the Commission determines to be appropriate.

IV. Oath

I declare under penalty of perjury that the foregoing is true and correct. Executed on this

184h	day of February	, <u>2011</u>	_, in Washington,	D.C. 20006	
•	(month)	(year)	100000000000000000000000000000000000000	(city, state)	
				///	#~//
			-	1/1/	(Signature)
				Matthew J. M	IcConkey
				<i></i>	(NamePlease Print)
			V	Attorney	
					(TitlePlease Print)
				Mayer Brown	LLP
					(FirmPlease Print)



APPLICATION FOR DISCLOSURE OF BUSINESS PROPRIETARY INFORMATION UNDER ADMINISTRATIVE PROTECTIVE ORDER

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interested party I represent. I have attached a writ	ttorney. I am not involved in competitive decisionmaking for the ten statement describing my job functions, disclosing all financial res, and indicating whether I am involved in the formulation of my			
	nder the direction and control of an attorney under paragraph (1) or cation to indicate that the attorney is held responsible for my			
(Name of AttorneyPlease Print)	(Signature of Attorney)			
	tho appears regularly before the Commission and is not involved in ty I represent. I have attached a written statement listing my ree (3) years.			
	terested party that is not represented by counsel. I am not involved party. I have attached a written statement describing my job			

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- (4) Such other administrative sanctions as the Commission determines to be appropriate, including public release of or striking from the record any information or briefs submitted by, or on behalf of, me or the party I represent, denial of further access to business proprietary information in the current or any future investigations before the Commission, and issuance of a public or private letter of reprimand; and
- (5) Such other actions, including but not limited to, a warning letter, as the Commission determines to be appropriate.

IV. Oath

I declare under penalty of perjury that the foregoing is true and correct. Executed on this

	in Washington, DC 20006	, 2011	day of February
	(city_state)	(year)	(month)
(Signature)			
	Jeffery C. Lowe		
(NamePlease Print)			
	Attorney		
(TitlePlease Print)			
	Mayer Brown LLP		
(FirmPlease Print)			



APPLICATION FOR DISCLOSURE OF BUSINESS PROPRIETARY INFORMATION UNDER ADMINISTRATIVE PROTECTIVE ORDER

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Orange Juice from Brazil

(Name of Investigation(s))

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Southern Gardens Citrus Processing Corporation ("Southern Gardens")

(State the name of the interested party and its category, e.g., domestic producer, importer, etc.).

I am (check one):

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(**) (2) An in-house corporate attorney. I am not involved in competitive decisionmaking for the interested party I represent. I have attached a written statement describing my job functions, disclosing all financial holdings I may have in my employer or its affiliates, and indicating whether I am involved in the formulation of my employer's pricing policies.

(**) (3) A consultant or expert under the direction and control of an attorney under paragraph (1) or (2) above. That attorney has also signed this application to indicate that the attorney is held responsible for my compliance with the APO:

(Name of Attorney--Please Print)

(Signature of Attorney)

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100	day of February	2011	:- Washington DC 20006	

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(city, state)	(year)	(month)	
MOU			
(Signature)			
Dave M. Wharwood			
(NamePlease Print)			
Attorney			
(TitlePlease Print)			
Mayer Brown LLP			
(FirmPlease Print)			



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22	day of February	, 2011	, in Washington, DC 20006	
	(month)	(year)	(city, state)	A
			Mozaetta	Sales (Signature)
			Margaret-Rose Sales	
				(NamePlease Print)
			Attorney	
			Grand Control	(TitlePlease Print)
			Mayer Brown LLP	
				(FirmPlease Print)



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Matthew J. McConkey
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IV. Oath

18	_day of February	, 2011 , ir	1 Washington, DC 20006
	(month)	(year)	Falm Murcla
			(Signature)
			Fabian Rivelis
			(NamePlease Print)
			Consultant
			(TitlePlease Print)
			Mayer Brown LLP
			(FirmPlease Print)