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January 16, 2015

Case Numbers: A-201-845

C-201-846

Total Pages: 6

Investigation

Suspension Agreement
AD/CVD Operations, Office VII

PUBLIC DOCUMENT

VIA ELECTRONIC FILING

The Honorable Penny S. Pritzker
Secretary of Commerce
U.S. Department of Commerce
Attention: Enforcement and Compliance
APO/Dockets Unit, Room 1870
14th Street and Constitution Avenue, NW
Washington, DC 20230

Re: *Sugar from Mexico*, Inv. Nos. A-201-845 and C-201-846 – Request for Continuation of Investigations

Dear Secretary Pritzker:

On behalf of Imperial Sugar Company (“Imperial Sugar”), we hereby request the continuation of the above-referenced antidumping and countervailing duty investigations. These investigations were initiated on April 17, 2014 and suspended by the Department on December 19, 2014.¹

The statute provides that continuation can be requested by an “interested party” who is a “party to the investigation.”² Imperial Sugar is a manufacturer and producer in the United States of refined cane sugar, a domestic product that is like the subject merchandise. Therefore, Imperial Sugar qualifies as an

¹ *Sugar From Mexico: Initiation of Antidumping Duty Investigation*, 79 Fed. Reg. 22795 (Apr. 24, 2014); *Sugar From Mexico: Initiation of Countervailing Duty Investigation*, 79 Fed. Reg. 22790 (Apr. 24, 2014); *Sugar From Mexico: Suspension of Antidumping Investigation*, 79 Fed. Reg. 78039 (Dec. 29, 2014); *Sugar From Mexico: Suspension of Countervailing Duty Investigation*, 79 Fed. Reg. 78044 (Dec. 29, 2014).

² 19 U.S.C. §§ 1671c(g)(2), 1673c(g)(2).

The Honorable Penny S. Pritzker

WHITE & CASE

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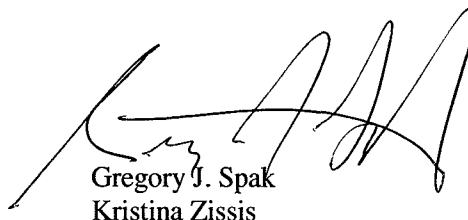
“interested party.”³ Imperial Sugar also qualifies as a “party to the investigation” because it entered an appearance in the investigation and filed comments on the proposed suspension agreements.

This request is timely because it is filed within 20 days of “the date of publication of the notice of suspension of the investigation.”⁴ The suspension notices were published in the *Federal Register* on December 29, 2014, and they stated that “the Department will continue the investigation if it receives such a request within 20 days after the date of publication of this notice.”⁵ This request is filed within 20 days of that publication date, and, therefore, is timely filed.

In accordance with 19 C.F.R. § 351.208(h), notice of this request for continuation has been filed simultaneously with the U.S. International Trade Commission.

Please contact the undersigned if you have any questions regarding this submission.

Respectfully submitted,



Gregory J. Spak
Kristina Zisis

Counsel to Imperial Sugar Company

³ 19 U.S.C. § 1677(9)(C).

⁴ 19 U.S.C. §§ 1671c(g), 1673c(g).

⁵ *Sugar From Mexico: Suspension of Antidumping Investigation*, 79 Fed. Reg. 78039, 78040 (Dec. 29, 2014); *Sugar From Mexico: Suspension of Countervailing Duty Investigation*, 79 Fed. Reg. 78044, 78045 (Dec. 29, 2014).

Louis Dreyfus Commodities



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I, Michael A. Gorrell, President and Chief Executive Officer of Imperial Sugar Company, certify that I prepared or otherwise supervised the preparation of the attached Request for Continuation of Investigations, filed on January 16, 2015, pursuant to the Suspended Antidumping Duty Investigation of Sugar from Mexico (Case Number A-201-845) and the Suspended Countervailing Duty Investigation of Sugar from Mexico (Case Number C-201-846). I certify that the public information and any business proprietary information of Imperial Sugar Company contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the antidumping proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

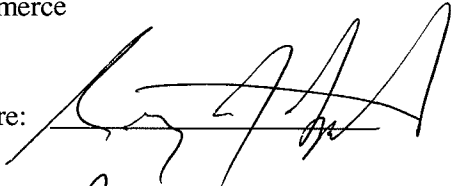
Signature: 
Michael A. Gorrell

Date: January 16, 2015

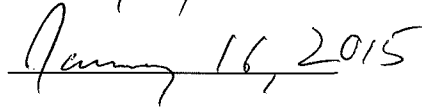
CERTIFICATION OF LEGAL COUNSEL

I, Gregory J. Spak, with the law firm of White & Case LLP, counsel to Imperial Sugar Company, certify that I have read the attached Request for Continuation of Investigations, filed on January 16, 2015, on behalf of Imperial Sugar Company pursuant to the Suspended Antidumping Duty Investigation of Sugar from Mexico (Case Number A-201-845) and the Suspended Countervailing Duty Investigation of Sugar from Mexico (Case Number C-201-846). In my capacity as counsel for this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the antidumping proceeding, the Department may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce

Signature:



Date:



PUBLIC CERTIFICATE OF SERVICE

I, Gregory J. Spak, hereby certify that copies of the attached submission have been served by first-class mail, postage prepaid, this 16th day of January 2015 on the following parties:

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