UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In re:	**)**	**In Proceedings Under Chapter 11**
	)	
FARMLAND INDUSTRIES, INC., et al.,	**)**	**Case No. 02-50557-JWV**
	)	**Joint Administration**
Debtors.	**)**	

REPLY TO RESPONSE FILED BY NICK OHL TO DEBTORS' SECOND OMNIBUS OBJECTION TO INSUFFICIENT DOCUMENTATION CLAIMS

Farmland Industries, Inc., et al., debtors and debtors in possession (collectively, the "Debtors"), by and through their undersigned counsel, hereby respectfully submit this Reply to Response Filed by Nick Ohl to Debtors' Second Omnibus Objection to Insufficient Documentation Claims. In support of this Reply, Debtors provide the following:

1. On January 10, 2003, Nick Ohl ("Ohl") filed a proof of claim alleging an unspecified claim for damages for wrongful termination and age discrimination. Furthermore, Ohl erroneously filed his claim against Farmland Industries, Inc. when he was actually an employee of Farmland Foods, Inc. ("Foods").

2. On April 14, 2003, Debtors filed their Second Omnibus Objection to Insufficient Documentation Claims (docket #3299), in which they objected to Ohl's proof of claim on the grounds that it was unsupported and unsubstantiated.

3. On May 14, 2003, Ohl filed a response in which he again asserted an age discrimination claim but offered no support of the claim nor specified the amount of the alleged claim.

4. Ohl worked at the Foods Denison, Iowa, plant as a Quality Assurance Supervisor. Ohl's salary was $63,440. Foods terminated Ohl's employment

on June 25, 2002, as part of a large-scale reduction in workforce. Ohl was released because he was the lowest performer. Ohl was 42 years old at the time.

5. The reduction in workforce was sizable and many employees were adversely affected.

6. Ohl did not file an administrative action with the Iowa Civil Rights Commission or the EEOC. No civil action has been filed.

7. Neither Ohl's Proof of Claim nor his response specifies any amount of his alleged claim. The claim contains no documentation showing any calculation of any amount claimed. Furthermore, the claim provides no evidence from which such a calculation can be determined.

8. If the objecting party rebuts the claimant's prima facie claim, the claimant must then prove his claim. The objector need not disprove it. In re Interco Incorporated, 211 B.R. 667, 677 (Bankr. E.D. Mo. 1997). Ohl was the victim of a reduction in workforce. Ohl has not provided any evidence that age was the determining factor in his termination as required in an age discrimination claim. Id. Accordingly, because his claim specifies no amount nor offers any support for an age discrimination claim, Ohl' claim should be disallowed.

WHEREFORE, the Debtors respectfully request that the Court sustain their objection to the claim filed by Nick Ohl and disallow the claim, and provide such other relief as is just and proper.

Dated: July 15, 2003

Respectfully submitted,

FARMLAND INDUSTRIES, INC., ET AL.

By: __/s/ Tammee E. McVey_____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply to Response Filed by Nick Ohl to Debtor's First Omnibus Objection to Insufficient Documentation Claims was served on the party listed below via U. S. Mail, first-class, postage prepaid on July 15, 2003:

Nick Ohl
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___/s/ Tammee E. McVey_____