**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.** | ) | |

**DEBTORS' SECOND OMNIBUS OBJECTION**
**TO LATE-FILED DUPLICATE CLAIMS**

COME NOW the above-captioned Debtors and Debtors-in-Possession (collectively, the "Debtors"), by and through their attorneys, and for their Second Omnibus Objection to Late-Filed Duplicate Claims (the "Omnibus Objection") respectfully state as follows:

1. Various claimants ("Claimants") filed duplicate proofs of claim after the expiration of the January 10, 2003 Bar Date established by this Court (the "Late-Filed Duplicate Claims"). The Late-Filed Duplicate Claims are improperly repetitive of other filed proofs of claim and would result in inflated recovery to Claimants. According to the Debtors' books and records, the proofs of claim identified as *Claim To Be Expunged* on Exhibit A attached hereto are Late-Filed Duplicate Claims. The Debtors object to the Late-Filed Duplicate Claims and request that the claims be stricken and finally disallowed.

2. Nothing contained in this Omnibus Objection is intended to or shall be construed to constitute a waiver of any additional defenses, claims or other issues Debtors may have with the allowance or propriety of the Late-Filed Duplicate Claims. Debtors expressly reserve the right to file additional claim objections in the future with respect to the Late-Filed Duplicate Claims or any other claims asserted by the Claimants asserting the Late-Filed Duplicate Claims. Furthermore, nothing contained in this Omnibus Objection is intended to or

shall be construed as a representation that Exhibit A is a complete and final list of all Late-Filed Duplicate Claims filed in these Chapter 11 proceedings. Debtors expressly reserve the right to file additional objections on the basis that certain proofs of claim are late filed, duplicative and improperly repetitive.

**NOTICE OF DEBTORS' SECOND OMNIBUS**
**OBJECTION TO LATE-FILED DUPLICATE CLAIMS**

**TAKE NOTICE** that the Debtors have objected to the claims identified as *Claim to be Expunged* on Exhibit A attached hereto, on the basis that said claims are late filed and improperly duplicative of other filed claims. **Each Claimant identified on Exhibit A has 30 days from the date of this notice to file a response to this Omnibus Objection. If a Claimant does not have electronic filing access such Claimant should file its written response with the Clerk of the U.S. Bankruptcy Court, 400 East 9th Street, Kansas City, Missouri 64106, with a copy to the undersigned Debtors' counsel. To be timely, any response must be received by the Clerk by no later than September 7, 2003.** If no response is timely filed, an order will be entered denying each claim identified on Exhibit A as *Late-Filed Claim to be Expunged*. If a Response is timely filed, the Court will conduct a hearing on **November 24, 2003, at 10:00 a.m.** at the United States Courthouse, Courtroom 6A, 400 East 9th Street, Kansas City, Missouri, to address only those claims to which a Response was timely filed. All other claims identified as *Claim to be Expunged* will be finally disallowed without further notice or hearing, based upon failure to respond to this Omnibus Objection.

Questions regarding this Omnibus Objection should be directed to Bankruptcy Management Corporation at telephone number (888) 909-0100.

Dated: August 8, 2003.

Respectfully submitted,

FARMLAND INDUSTRIES, INC., ET AL.

By: /s/ Tammee E. McV ey

Laurence M. Frazen MO #31309
Cynthia Dillard Parres MO #37826
Tammee E. McVey MO #42947
BRYAN CAVE LLP
1200 Main Street, Suite 3500
Kansas City, Missouri 64105

Attorneys for Debtors and Debtors in Possession

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Debtors' Second Omnibus Objection to Late-Filed Duplicate Claims was served by United States mail, Second-class, postage prepaid, on the parties listed on Exhibit A attached hereto, on August 8, 2003.

/s/ Tammee E. McVey

# In re: Farmland Transportation, Inc.

## OMNIBUS 2: EXHIBIT A - LATE FILED-DUPLICATE CLAIMS

| | Claim To Be Expunged | | | | | Surviving Claim | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Creditor Name and Address | Case No | Claim Number | Total Claims Dollars* | Surviving Creditor Name and Address | Case No | Claim Number | Total Claims Dollars* | Reason For Proposed Disallowance |
| **1** | RODRIQUEZ, MANUEL V<br>1205 BROADWAY ST<br>PT LAVACA TX 77979-2717 | 02-50564-JW | 8981 | $6,732.00 | RODRIQUEZ, MANUEL V<br>1205 BROADWAY ST<br>PORT LAVACA TX 77979-2717 | 02-50564-JWV | 5663 | $6,732.00 | |

**Total Claims Expunged:** 1 **Total Dollars Expunged** $6,732.00 **Total Claims Remaining:** 1 **Total Dollars Remaining:** $6,732.00

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.