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' FOURTH OMNIBUS OBJECTION TO LATE-FILED UNSCHEDULED CLAIMS

COME NOW the above-captioned Debtors and Debtors-in-Possession (collectively, the "Debtors"), by and through their attorneys, and for their <u>Fourth Omnibus</u>

<u>Objection to Late-Filed Unscheduled Claims</u> (the "Omnibus Objection") respectfully state as follows:

- 1. Various unknown claimants who were not included in the Debtors' schedules (the "Unknown Claimants") filed proofs of claim after the expiration of the January 10, 2003 Bar Date established by this Court (the "Late-Filed Unscheduled Claims"). According to the Debtors' books and records, the proofs of claim identified on **Exhibit A** attached hereto are Late-Filed Unscheduled Claims. The Debtors object to the Late-Filed Unscheduled Claims and request that each of the Late-Filed Unscheduled 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 Unscheduled Claims. Debtors expressly reserve the right to file additional claim objections in the future with respect to the Late-Filed Unscheduled Claims or any other claims asserted by the Unknown Claimants asserting the Late-Filed Unscheduled 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 Unscheduled 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 Unscheduled Claims.

NOTICE OF DEBTORS' FOURTH OMNIBUS **OBJECTION TO LATE-FILED UNSCHEDULED CLAIMS**

TAKE NOTICE that the Debtors have objected to the claims identified on

Exhibit A attached hereto, on the basis that said claims are Late-Filed Unscheduled Claims.

Each Unknown Claimant identified on Exhibit A has 30 days from the date of this notice to

file a response to this Omnibus Objection. If an Unknown Claimant does not have

electronic filing access such Unknown 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 November 7, 2003. If no response is timely filed, an order will

be entered denying each claim identified on Exhibit A. If a Response is timely filed, the Court

will conduct an evidentiary hearing on February 9, 2004, 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 on Exhibit A will be

finally disallowed without further notice or hearing, based upon failure to respond to this

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Omnibus Objection.

Questions regarding this Omnibus Objection should be directed to Bankruptcy

Management Corporation at telephone number (888) 909-0100.

Dated: October 8, 2003.

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Respectfully submitted,

FARMLAND INDUSTRIES, INC., ET AL.

By: /s/ Tammee E. McVey

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 <u>Debtors' Fourth</u> <u>Omnibus Objection to Late-Filed Unscheduled Claims</u> was served by United States mail, first-class, postage prepaid, on the parties listed on Exhibit A attached hereto, on October 8, 2003.

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/s/ Tammee E. McVey

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In re: Farmland Industries, Inc. OMNIBUS 4: EXHIBIT A - LATE FILED - NOT SCHEDULED CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars	Claim Class*
1	COFFEY, GLEN E 1367 LAKEVIEW DR MCCOOL JUNCTION NE 68401	02-50557- JWV	8818	\$800.00	(U)
2	HELENA CHEMICAL COMPANY DAVID J HARRIS 130 N COURT AVE MEMPHIS TN 38103	02-50557- JWV	8834	\$70,361.06	(U)
3	SSA GLOBAL TECHNOLOGIES INC ATTN LYNNE KARBIN 500 W MADISON CHICAGO IL 60661	02-50557- JWV	8969	\$4,808.25	(U)
4	TRIBBLE BROS FISH FARM PO BOX 190 MONEY MS 38945	02-50557- JWV	9084	\$434.76	(U)
5	WALTERS PORK INC C/O MICHAEL WALTERS PRESIDENT RR 1 SHICKLEY NE 68436	02-50557- JWV	8772	\$0.00 \$13,637.00	(S) (U)

Total Number of Claims: 5 Total Dollars in Claims Listed on this Omnibus: \$90,041.07

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