

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

<b>In re:</b>	)	
	)	<b>Case No. 02-50557-jwv</b>
<b>Farmland Industries, Inc.,</b>	)	
<b>a Kansas Corporation,</b>	)	<b>Chapter 11</b>
	)	
<b>Debtor.</b>	)	
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**MOTION TO LIFT STAY**  
**FILED BY CINDY K. ANDERSON D/B/A CINDY'S FOOD SERVICE**

Cindy K. Anderson d/b/a Cindy's Food Service ("Movant"), by her undersigned attorney, moves the Court for the relief requested below:

1. This motion is filed pursuant to Bankruptcy Rule 4001 and Local Rules 9013-2 and 4001-1 and Movant requests relief from the automatic stay of 11 U.S.C. § 362(a) to permit Movant to liquidate her claim against the Debtor and pursue any applicable insurance proceeds.
2. This case was filed as a voluntary case under Chapter 11 of the United States Bankruptcy Code, and the case is now pending in this Court. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 1334 and 157(a), Local Rule 1070-1, 11 U.S.C. § 362(d) and applicable rules. This is a core proceeding.
3. Movant is the plaintiff in an action in Freeborn County Minnesota. A true and correct copy of the Complaint is attached as Exhibit A.
4. Movant seeks to pursue her third party complaint against Debtor to liquidate the amount owing by Debtor, provided however, Movant will limit her recovery to any applicable insurance coverage owned by Debtor.

WHEREFORE, Movant, respectfully moves the Court for an order modifying the automatic stay of section 362(a) of the Bankruptcy Code to allow Movant to liquidate her claim against the Debtor and pursue any applicable insurance policies and for such other relief as may be just and equitable.

Date: October 17, 2002.

GRIMES & REBEIN, LC

By /s/ Cynthia F. Grimes  
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**ATTORNEYS FOR MOVANT  
CINDY K. ANDERSON**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI

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In re:

Chapter 11

Case No. 02-50557-jwv

Farmland Industries, Inc., a  
Kansas Corporation,,

Debtor.

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VERIFICATION

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I, Cindy K. Anderson, declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on: October 4, 2002

Signed: Cindy K. Anderson  
Cindy K. Anderson

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

IN RE: )  
 )  
FARMLAND INDUSTRIES, INC., ) Case No. 02-50557-jwv  
 ) Chapter 11  
Debtor. )

**SUMMARY OF EXHIBITS AND CERTIFICATE OF SERVICE**

The following exhibits in reference to the Motion to Lift Stay Filed by Cindy K. Anderson d/b/a Cindy's Food Service are available upon request.

1. Complaint

*Respectfully submitted,*

**GRIMES & REBEIN, L.C.**

By: /s/ Cynthia F. Grimes  
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**ATTORNEYS FOR MOVANT  
CINDY K. ANDERSON d/b/a  
CINDY'S FOOD SERVICE**

Copy of the above served this  
17<sup>th</sup> day of October, 2002 on:

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