

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI**

<b>In Re:</b>	)	<b>In Proceedings Under Chapter 11</b>
	)	
<b>FARMLAND INDUSTRIES, INC., et al.,</b>	)	<b>Case No. 02-50557</b>
	)	<b>Joint Administration</b>
<b>Debtors.</b>	)	

**DEBTORS' EXPEDITED MOTION FOR LEAVE TO FILE DOCUMENT  
RELATING TO THE DEBTORS' ASSUMPTION OF FACILITY LEASE AGREEMENT  
AND NOTICE OF INTENT TO EXERCISE OPTION UNDER SEAL**

Farmland Industries, Inc., et al., Debtors and Debtors in Possession, pursuant to 11 U.S.C. § 107(b) and for their Expedited Motion for Leave to File Document Relating to the Debtors' Assumption of Facility Lease Agreement and Notice of Intent to Exercise Option Under Seal (the "Motion"), respectfully state as follows:

1. Debtors' previously submitted their Motion To (A) Assume Facility Lease Agreement And (B) Authorizing Debtors To Provide Notice of Intent to Exercise Option Under The Lease To Purchase The Facility and Request for Expedited Hearing (the "Motion to Assume").

2. On October 29, 2002, the Court granted the Motion to Assume subsequent to an evidentiary hearing on the matter.

3. During the October 29 hearing, a copy of correspondence dated August 6, 2002 was offered and received into evidence as Exhibit 9.

4. Pursuant to 11 U.S.C. § 107(b), Debtors seek leave to file Exhibit 9 under seal with this Court to prevent disclosure of the information contained in this letter to third parties, as the information is of a confidential nature and constitutes commercial information. In re Orion Pictures Corp., 21 F.3d 24, 27 (2d Cir. 1994).

5. The confidential nature of Exhibit 9 is not prejudicial to any party in these proceedings as this document has already been provided to this Court, the Official Committee of Unsecured Creditors, the Official Committee of Bondholders, the United States Trustee, the Debtors' prepetition and postpetition lenders, and all other interested parties present at the October 29 hearing.

WHEREFORE, for the foregoing reasons, the Debtors respectfully request that this Court enter its Order approving the Debtors' request to file Exhibit 9 under seal, and for such other and further relief as this Court deems just and proper.

Dated: October 30, 2002

Respectfully submitted,

**FARMLAND INDUSTRIES, INC. ET AL.**

By: /s/ Robert M. Thompson  
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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above referenced Expedited Motion for Leave to File Document Relating to the Debtors' Assumption of Facility Lease Agreement and Notice of Intent to Exercise Option Under Seal was served on those parties which do not receive electronic notice in these proceedings, via U.S. Mail, postage prepaid, on October 30, 2002.

/s/ Robert M. Thompson