

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: FLEMING COMPANIES, INC.,]
et al.,] No. 03-10945 (MFW)
] Ch. 11
Debtors.] (Jointly Administered)
]]
] **Hearing Date: 9/4/03 at 2:00 p.m.**
] **Objection Deadline: 8/28/03 at 4:00 p.m.**

**NOTICE OF MOTION OF P & J, INC. AND JUMBO II, L.L.C.
FOR RELIEF FROM AUTOMATIC STAY**

To: All parties identified on attached service list.

P & J, INC. AND JUMBO II, L.L.C. (“Movants”) have filed a Motion for Relief from Automatic Stay which seeks the following relief: An Order modifying the automatic stay pursuant to 11 U.S.C. § 362(d) to permit Movants to terminate a certain facility standby agreement (FSA) based upon certain incurable defaults by debtor Fleming Companies, Inc., et al., (“Fleming” or “Debtor”). Alternatively, Movants seek the entry of an Order compelling the Debtor to immediately reject the FSA pursuant to 11 U.S.C. § 365(d)(2).

HEARING ON THE MOTION WILL BE HELD ON THE SCHEDULED OMNIBUS DATE, **September 4, 2003 at 2:00 p.m.**

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(d)) to the attached motion by **August 28, 2003 at 4:00 p.m.**

At the same time, you must also serve a copy of the response upon movant's attorney:

Kevin A. Guerke, Esq. (DE #4096)
SEITZ, VAN OGTROP & GREEN, P.A.
222 Delaware Avenue, Suite 1500
P. O. Box 68
Wilmington, DE 19899
(302) 888-0600

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

Date: August 11, 2003
Wilmington, DE

SEITZ, VAN OGTROP & GREEN, P.A.

By: /s/ Kevin A. Guerke
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Attorney for Movants