

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
Fleming Companies, Inc., et al.,)	Case No. 03-10945 (MFW)
)	(Jointly Administered)
Debtors.)	
)	

**MOTION OF GLOBAL INTERFACE SOLUTIONS, INC. TO LIMIT NOTICE OF ITS
MOTION TO COMPEL ALLOWANCE AND PAYMENT OF ADMINISTRATIVE
EXPENSE CLAIM AND CURE CLAIM UNDER 11 U.S.C. §§ 503(b)(1)(A) AND 365(b)**

Global Interface Solutions, Inc. (“Movant”) files this motion to limit notice (the “Motion”) of the above-referenced motion to compel allowance and payment of administrative expense claim and cure claim under 11 U.S.C. §§ 503(b)(1)(A) and 365(b) (the “Motion to Compel”).

1. Movant is a post-petition creditor in the above-referenced bankruptcy cases of Fleming Companies, Inc., et al. (the “Debtors”).
2. Contemporaneously with the filing of this Motion, Movant is filing its Motion to Compel.
3. In the Motion to Compel, Movant seeks allowance and payment of its administrative expense claim, and cure claim.
4. Local Bankruptcy Rule 9013-1(f) requires that any motion must be served in accordance with Local Bankruptcy Rule 2002-1(b), which requires services on all parties requesting notices under Fed. R. Bankr. P. 2002(i).
5. Movant’s administrative claim against the Debtors is of a routine nature.

Accordingly, Movant submits that service of the Motion upon counsel to the Debtors, the Official Committee of Unsecured Creditors (the “Committee”), the Debtors’ postpetition lenders (the “DIP Lenders”) and the Office of the United States Trustee is sufficient under the circumstances.

6. Moreover, the cost of serving the entire 2002(i) list in this case would be needlessly expensive. There are over 300 parties on the Debtors' 2002(i) list. The Motion to Compel, with exhibits, is over 20 pages long. Hence, the cost of serving the entire 2002(i) list with the Motion, at the rate of \$.15 per page, would be approximately \$1,000 in copy charges alone.

7. Furthermore, the administrative claim, while substantial for Movant, is insignificant in relation to the size of the Debtors' cases. Hence third parties have little if any interest in the Motion to Compel.

8. Finally, most if not all of the parties on the 2002(i) list have entered electronic appearances in this case. Accordingly, they have been notified electronically of the filing of the Motion.

WHEREFORE, for all these reasons, Movant requests that the Court enter an order substantially in the form attached as Exhibit "A" to limit notice of the Motion to Compel to counsel for (i) the Debtors, (ii) the Committee, (iii) the DIP Lenders and (iv) the Office of the United States Trustee.

Dated: September 12, 2003

/s/ Christopher D. Loizides
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