

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

In re:	)	Chapter 11
	)	
Fleming Companies, Inc., <u>et al.</u> ,	)	Case No. 03-10945 (MFW)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Objection Deadline: December 18, 2003</b>
	)	<b>Hearing Date: December 23, 2003 @ 2:00 p.m.</b>
	)	

**NOTICE OF MOTION**

TO: The Debtors, the United States Trustee, the Debtors' Lenders, the Official Committee of Unsecured Creditors and all parties who have requested copies pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

Bradford Plaza Investment Group, LLC, a creditor and landlord of the Debtors (the "Landlord") in the above-referenced cases, has filed the attached *Motion of Bradford Plaza Investment Group, LLC for an Order Authorizing and Directing the Production of Documents from and Oral Examinations By Deposition of Fleming Companies, Inc., C&S Wholesale Grocers, Inc. and White Rose, Pursuant to Fed. R. Bankr. P. 2004.*

You are required to file a response to the attached motion on or before **December 18, 2003.**

At the same time, you must also serve via facsimile or hand delivery a copy of the response upon the Landlord's attorneys:

Jeffrey Kurtzman, Esquire  
KLEHR, HARRISON, HARVEY,  
BRANZBURG & ELLERS LLP  
260 South Broad Street  
Philadelphia, PA 19102-5003  
Phone: (215) 568-6060  
Fax: (215) 568-6603

Jennifer L. Scoliard, Esquire  
KLEHR, HARRISON, HARVEY,  
BRANZBURG & ELLERS, LLP  
919 Market Street, Suite 1000  
Wilmington, DE 19801  
Phone: (302) 426-1189  
Fax: (302) 426-9193

A HEARING ON THE MOTION WILL BE HELD ON **DECEMBER 23, 2003 AT 2:00 P.M.** ONLY IF TIMELY OBJECTIONS ARE FILED. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Respectfully Submitted,

Dated: December 12, 2003

KLEHR, HARRISON, HARVEY,  
BRANZBURG & ELLERS LLP

By: /s/ Jennifer L. Scoliard  
Jeffrey Kurtzman, Esquire  
Jennifer L. Scoliard, Esquire (# 4147)  
919 Market Street, Suite 1000  
Wilmington, Delaware 19801  
(302) 552-5510 (telephone)  
(302) 426-9193 (fax)

Counsel for Bradford Plaza Investment  
Group, LLC