

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:	)	Chapter 11
	)	
PIKE NURSERY HOLDING, LLC,	)	Case No. 07-79129
	)	
Debtor.	)	Judge Diehl
_____	)	

NOTICE OF RECLAMATION DEMAND

Conrad Fafard, Inc. hereby provides notice that it served its written demand for reclamation of goods upon counsel of record for Pike Nursery Holding, LLC ("Debtor") on December 4, 2007, pursuant to *inter alia*, 11 U.S.C. §546. A copy of the written demand for reclamation is attached hereto.

Conrad Fafard, Inc. made its demand for reclamation without prejudice to other rights and remedies available to it at law or in equity, including without limitation the right of Conrad Fafard, Inc. to an administrative expense claim pursuant to 11 U.S.C. §503.

This the 19th day of December, 2007.

s/Bonnie Keith Green
David H. Conaway
Bonnie Keith Green
(Georgia Bar No. 411315)
Shumaker, Loop & Kendrick, LLP
128 S. Tryon Street, Suite 1800
Charlotte, NC 28202
Telephone: 704.375.0057
Fax: 704.332.1197

Attorneys for Conrad Fafard, Inc.

SHUMAKER

Shumaker, Loop & Kendrick, LLP

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December 4, 2007

VIA FACSIMILE AND
FEDEXPike Nursery Holding LLC
c/o J. Robert Williamson, Esquire
Scroggins and Williamson
1500 Candler Building
127 Peachtree Street, N.E.
Atlanta, Georgia 30303

RE: Reclamation Demand of Conrad Fafard, Inc.

Dear Mr. Williamson:

This law firm represents Conrad Fafard, Inc. ("Fafard"), with regard to its reclamation claim against Pike Nursery Holding LLC and related debtors (the "Debtors"). Pursuant to Uniform Commercial Code § 2-702 and applicable state law adoptions of same, and pursuant to 11 U.S.C. § 546, Fafard hereby makes a reclamation claim against the Debtors regarding merchandise (the "Reclamation Merchandise") shipped by Fafard to the Debtors under the invoices in the total amount of \$32,779.76 that are set out on the following list:

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount</u>
382557	10.11.07	2,841.70
382558	10.11.07	3,445.80
383027	10.18.07	2,887.60
383474	10.25.07	3,439.44
383475	10.25.07	3,419.12
383957	11.01.07	3,577.20
383958	11.01.07	3,622.78
384495	11.09.07	3,162.80
384496	11.09.07	2,673.50
384498	11.09.07	3,709.82

Fafard demands that the Debtors immediately:

1 Cease from opening any of the shipping cartons or other packaging containing the Reclamation Merchandise.

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2. Repack in the original shipping cartons (or, if the original shipping cartons are not available, repack in appropriate substitute cartons) all Reclamation Merchandise in the possession of the Debtors, whether now located in any facility owned by the Debtors or otherwise within the control of the Debtors.

3. Return all Reclamation Merchandise, appropriately packaged as described in the preceding paragraph, to the facility where it was originally received by the Debtors from Fafard.

4. Segregate all Reclamation Merchandise in the facility from other merchandise so that it can be readily picked up by Fafard.

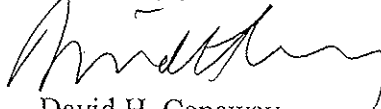
5. Adequately protect all Reclamation Merchandise from loss through theft, damage from the elements, or otherwise.

6. Provide Fafard with an accounting of all Reclamation Merchandise in its possession, including an accounting of and explanation for the Reclamation Merchandise that the Debtors assert is no longer in the Debtors' possession or is otherwise not subject to reclamation.

7. Contact Michelle Doiron at 413.786.4343, ext. 317 to arrange for Fafard to pick up the Reclamation Merchandise.

If you have any questions concerning this letter, please do not hesitate to contact me. Failure to comply with this letter may expose the Debtors to appropriate sanctions under state law and under the Bankruptcy Code.

Very truly yours,



David H. Conaway

DHC:cpe

cc: Mr. Christopher Howard
Ms. Michelle Doiron

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Debtor.	)	Judge Diehl
_____	)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Reclamation Demand was served upon the parties listed below via United States first class mail, postage prepaid, on the 19th day of December, 2007.

Leroy Culton, Esquire Office of the U.S. Trustee 75 Spring Street, SW 362 Richard B. Russell Bldg. Atlanta, GA 30303	Paul M. Alexander, Esquire Miller & Martin PLLC Suite 800 1170 Peachtree Street NE Atlanta, GA 30309
Ron C. Bingham, II, Esquire Thompson, O'Brien, Kemp & Nasuti Suite 300, 40 Technology Pkwy S. Norcross, GA 30092	Michael W. Bishop, Esquire Looper, Reed & McGraw 1601 Elm Street, Ste. 4100 Dallas, TX 75201
Sarah Robinson Borders, Esquire King & Spalding LLP 1180 Peachtree Street Atlanta, GA 30309	Jody Charles Campbell, Esquire Webb, Tanner, Powell, Mertz & Wilson LLP P. O. Box 1390 Lawrenceville, GA 30046
Kelly E. Culpin, Esquire Troutman Sanders, LLP Ste. 5200, 600 Peachtree St., NE Atlanta, GA 30308	Priscilla H. Douglas, Esquire Office of the General Counsel 18201 Von Karman Avenue Suite 800 Irvine, CA 92612

Jeffrey W. Dulberg, Esquire Pachulski Stang Ziehl & Jones 10100 Santa Monica Blvd. 11 th Floor Los Angeles, CA 90067	Gwendolyn J. Godfrey, Esquire Powell Goldstein, LLP One Atlantic Center, 14 th Fl. 1201 W. Peachtree St., NW Atlanta, GA 30309
Michael F. Hastings, Esquire LeClairRyan 1800 Wachovia Tower Drawer 1200 Roanoke, VA 24006	Samuel D. Hicks, Esquire Hicks, Casey & Foster, PC Suite 100 136 North Fairground St. Marietta, GA 30060
James R. Langdon, Esquire Moore & Van Allen PLLC Suite 4700 100 North Tryon Street Charlotte, NC 28202-4003	Robert M.D. Mercer, Esquire Powell Goldstein, LLP One Atlantic Center, 14 th Fl. 1201 W. Peachtree St., NW Atlanta, GA 30309-3488
John C. Pennington, Esquire John C. Pennington, P.C. P. O. Box 275 Helen, GA 30545	Jeffrey N. Pomerantz, Esquire 10100 Santa Monica Blvd. 11 th Floor Los Angeles, CA 90067
Eric T. Ray, Esquire Balch & Bingham, LLP P. O. Box 306 Birmingham, AL 35201-0306	Scott B. Riddle, Esquire Suite 2800 Tower Place 3340 Peachtree Road, NE Atlanta, GA 30326
William A. Rountree, Esquire Macey Wilensky & Kessler, LLP Suite 600 Marquis Two Tower 285 Peachtree Center Ave., NE Atlanta, GA 30303-1229	W. Clark Watson, Esquire Balch & Bingham LLP Suite 2600, 1901 Sixth Avenue N. Birmingham, AL 35203
Karen Fagin White, Esquire Cohen Pollock Merlin & Small Suite 1600, 3350 Riverwood Pkwy. Atlanta, GA 30339-6401	J. Robert Williamson, Esquire Scroggins and Williamson 1500 Candler Building 127 Peachtree Street, N.E. Atlanta, GA 30303
Samuel R. Arden, Esquire Hartman, Simons, Spielman & Wood Suite 400, 6400 Powers Ferry Rd., NW Atlanta, GA 30339	James C. Joedecke, Jr., Esquire Andersen, Tate & Carr, PC P. O. Box 2000 Lawrenceville, GA 30046

J. Hayden Kepner, Jr., Esquire Arnall Golden Gregory LLP Suite 2100, 171 17 th St., NW Atlanta, GA 30363	Paul M. Rosenblatt, Esquire Kilpatrick & Stockton LLP Suite 2800 1100 Peachtree Street Atlanta, GA 30309-4530
William H. Short, Jr., Esquire Sinkler & Boyd, P.A. P. O. Box 11889 Columbia, SC 29211-1889	Lisa Ritchey Craig, Esquire McCullough & Payne Suite 975, 171 17 th St., NW Atlanta, GA 30363-1032
Gilbert B. Weisman, Esquire Becket & Lee LLP P. O. Box 3001 Malvern, PA 19355-0701	

s/Bonnie Keith Green

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