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Counsel for Fay-J Packaging, Upshur County Rural Electric Co-Op, Corp., & Deep East Texas Electric Co-Op, Inc., El Dorado Water Utilities, and Complete Business Systems

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS FT. WORTH DIVISION

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§	
§	CASE NO. 08-45664 (DML)
§	
§	(Jointly Administered)
§	,
§	CHAPTER 11
	\$ \$ \$ \$ \$ \$ \$ \$

SECOND AMENDED STATEMENT OF ATTORNEYS FOR CREDITORS PURSUANT TO RULE 2019

COMES NOW Searcy & Searcy, P.C. (the "Firm"), and makes its Second Amended Statement of Attorneys for Creditors Pursuant to Rule 2019 (the "Statement") in the above styled and numbered cause, and would respectfully state and show as follows:

- 1. The Firm represents multiple creditors in the above styled and numbered cause, and has filed a Notice of Appearance and Request for Notices for each creditor to whom it is providing representation. These creditors are as follows.
- 2. Upshur County Rural Electric Co-Op, Corp. ("UREC"). UREC is a pre-petition and post-petition creditor of Debtor. UREC provides electricity to Debtor in approximately 200 separate accounts. The average monthly charges for UREC electricity sold to Pilgrims Pride is approximately \$220,000. The amount of the pre-petition claim of UREC is at least \$332,586.47. UREC's mailing address is 1200 W. Tyler, Gilmer, TX 75644. The claim/s of UREC is/are believed to have been acquired less than 1 year prior to the date of filing of the above styled and

numbered cause.

- 3. Deep East Texas Electric Co-Op, Inc. ("DETEC"). DETEC is a pre-petition and post-petition creditor of Debtor. DETEC provides electricity to Debtor in approximately 14 separate accounts. The average monthly charges for electricity to Pilgrims Pride is approximately \$120,000. The amount of the pre-petition claim of DETEC is at least \$182,977.67. DETEC's mailing address is P.O. Box 736, St. Augustine, TX 75972. The claim/s of DETEC is/are believed to have been acquired less than 1 year prior to the date of filing of the above styled and numbered cause.
- 4. Fay-J Packaging ("Fay-J"). Fay-J is a pre-petition and post-petition creditor of Debtor. Fay-J sells and/or has sold goods to the Debtor. The amount of the pre-petition claim of Fay-J is at least \$78,218.40. Fay-J's mailing address is 616 S. Wake Village Rd., Texarkana, TX 75501. The claim/s of Fay-J is/are believed to have been acquired less than 1 year prior to the date of filing of the above styled and numbered cause.
- 5. El Dorado Water Utilities ("El Dorado). El Dorado is a pre-petition and post-petition creditor of Debtor. El Dorado provides water to Debtor. The average monthly charges for water sold to Pilgrims Pride is approximately \$100,000.00. The amount of the pre-petition claim of El Dorado is at least \$116,262.79. El Dorado mailing address is 500 N. Washington St, El Dorado, AR 71730. The claim/s of El Dorado is/are believed to have been acquired less than 1 year prior to the date of filing of the above styled and numbered cause.
- 6. Complete Business Systems ("CBS"). CBS is a pre-petition and post-petition creditor of Debtor. CBS sells and/or has sold goods and services to the Debtor. The amount of the pre-petition claim of Fay-J is at least \$226,630.87. CBS's mailing address is 102 N. Spur 63, Longview, TX 75601. The claim/s of CBS is/are believed to have been acquired less than 1 year prior to the date of filing of the above styled and numbered cause.

7. Each of the creditors identified herein above hold claims against the Debtor.

Nothing contained herein is intended to waive or limit any rights and/or remedies of any of the above creditors which they may assert against Debtor under any applicable law, and the above creditors hereby reserve their ability to assert any and all such rights to which they may be entitled.

WHEREFORE, PREMISES CONSIDERED, Searcy & Searcy, P.C., counsel for Fay-J Packaging, Upshur County Rural Electric Co-Op, Corp., Deep East Texas Electric Co-Op, Inc., El Dorado Water Utilities, and Complete Business Systems, respectfully submits this its Second Amended Statement of Attorneys for Creditors Pursuant to Rule 2019.

Dated February 26, 2009.

Respectfully submitted,

SEARCY & SEARCY, P.C.

By: /s/ Joshua P. Searcy
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Business Systems

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the above and foregoing document was mailed, first class mail, to Stephen A. Youngman, Weil, Gotshal & Manges LLP, 200 Crescent Court, Suite 300, Dallas, Texas 75201 and that a true and correct copy of the above and foregoing document has been served upon all counsel or parties of record in accordance with the requirements of the CM/ECF filing system, all on or before February 27, 2009.

/s/ Joshua P. Searcy
Joshua P. Searcy