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ATTORNEYS FOR CREDITOR,
STANLEY FREIGHT, LLC
6446.01/sh

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:)	IN PROCEEDINGS UNDER
)	
PILGRIM'S PRIDE CORPORATION,)	CHAPTER 11
<i>et al.</i> ,)	
)	CASE NO. 08-45664-DML-11
DEBTORS.)	
)	JOINTLY ADMINISTERED

APPLICATION AND REQUEST FOR ALLOWANCE OF
11 U.S.C. § 503(b)(9) CLAIM BY STANLEY FREIGHT, LLC

COMES NOW, Stanley Freight LLC ("Stanley"), and, through its attorneys, files this Application And Request For Allowance of a § 503(b)(9) claim in this case.

1. Between November 19, 2008, and December 1, 2008, Stanley, at the behest of the Debtor provided freight and services to the Debtor, without which freight and services the Debtor would have had to cease or curtail operations.

2. Pursuant to and in compliance with the Order entered December 31, 2008, Stanley provides the following information in support of its claim:

a. Exhibit "A" is a summary of claims and Exhibit "B" reflects the freight, invoice number, date received by Debtor, and charges for each invoice.

- b. Exhibit "C" 000001 through 000028, are the supporting invoices documenting each transport service and which provides the other information required in the December 31, 2008 Order.
 - c. No duplicate claims have been filed and this request is for freight charges only.
3. Stanley requests the allowance and payment of \$79,921.51, as supported by the attached documents.

WHEREFORE, PREMISES CONSIDERED, Stanley prays for allowance of a § 503(b)(9) claim in the total amount of \$79,921.51.

Stanley prays for general relief.

Respectfully submitted:

LAW OFFICES OF
ST. CLAIR NEWBERN, III
A Professional Corporation

By: /s/ Clayton L. Everett
CLAYTON L. EVERETT
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ATTORNEYS FOR CREDITOR,
STANLEY FREIGHT, LLC

CERTIFICATE OF SERVICE

_____ I hereby certify that I have this date served a true and correct copy of the foregoing via first class mail, proper postage affixed or via ECF, upon the following:

Office of the U.S. Trustee
U.S. Courthouse
1100 Commerce Street, Room 9-C-60
Dallas, TX 75242
Attention: Erin Schmidt and Lisa Lambert

Mr. Greg Hunt
Stanley Freight, LLC
1738 Empire Central
Dallas, TX 75235

Gary Tucker and via facsimile 972-290-8908
Pilgrim's Pride Corporation and via Federal Express
4845 US Highway 271 North
Pittsburg, TX 75686

Gary T. Holtzer and via facsimile 212-310-8007
Russell Brooks and via Federal Express
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Kurtzman Carson Consultants, LLC and via facsimile 310-823-9133
Claims and Noticing Agent and via Federal Express
Attn: Pilgrim's Pride Claims
2335 Alaska Avenue
El Segundo, CA 90245

Elisa R. Behar Lemmer
Victoria Vron
767 Fifth Ave.
New York, NY 10153

Jason Brookner
Andrews Kurth, LLP
1717 Main Street, Suite 3700
Dallas, TX 75201
(Official Committee of Unsecured Creditors)

and those parties filing receiving ECF noticing.

Dated: March 2, 2009.

/s/ Clayton L. Everett
CLAYTON L. EVERETT