

Lyndel Anne Mason
State Bar No. 24058913
CAVAZOS, HENDRICKS,
POIROT & SMITHAM, P.C.
Suite 570, Founders Square
900 Jackson Street
Dallas, TX 75202
Phone: (214) 573-7344
Fax: (214) 573-7399
Email: Lmason@chfirm.com

Attorneys for Ferguson Enterprises, Inc., Creditor

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

IN RE	§	Chapter 11
	§	
PILGRIM'S PRIDE CORPORATION, <i>et</i>	§	Case No. 08-45664 (DML)
<i>al.</i> ,	§	
	§	
Debtors.	§	
	§	JOINTLY ADMINISTERED

**FERGUSON'S NOTICE OF SUBMISSION OF WRITTEN REQUESTS
FOR PAYMENT OF SECTION 503(b)(9) CLAIM PURSUANT TO
PROCEDURES SET FORTH IN THE DEC. 31 ORDER OF THIS COURT**

[Doc. No. 412]

COMES NOW Ferguson Enterprises, Inc. (hereinafter "Ferguson"), by its counsel, and herein files Notice of Submission of its Written Requests For Payment of Section 503(b)(9) Claim Pursuant to Procedures Set Forth in This Court's December 17, 2008 Order.

1. Although a written demand as to Ferguson's entire Reclamation Claim for all outstanding invoices for goods sold and delivered in the ordinary course of business within 45 days of the Petition Date in these proceedings was delivered to Debtor, Pilgrim's Pride Corporation, and its counsel, on December 19, 2008 (with all supporting documentation therefore) and the same was also filed with this Court and served on Debtor's counsel and parties in interest on February 29, 2009 (with copies of all invoices and a summary of the goods received at each of the locations of the Debtors which had not been paid), both of which

contained demand and documentation relative to 20 days prior to the Petition Date, resubmission has been made in compliance with this Court's Order of December 31, 2008.

2. On March 2, 2009, three (3) identical packets with copies of this Notice were sent, by FedEx overnight delivery: one to Debtor's Texas counsel, one to their New York Counsel and one to their Claims and Noticing Agent. Due to the expense of duplication, and the fact that each and every invoice referenced in this Demand is in the Court's records in these proceedings [Doc. Nos. 833, 841 and 843-845] and hard copies were also furnished to Debtors and their counsel on December 19, 2008, a new set of the same was not prepared again for this service. The Written Demands are reflected in Exhibits A, B and C hereto. Each such Written Demand was sent with another Excel Spreadsheet showing all pre-petition sums due to Ferguson by identified by the branch of the Debtor which received the goods and a list of all invoices for the 20-day period.

Ferguson's Demand for Payment of Administrative Claim under 503(b)(9) is entirely for goods sold pursuant to the shipping terms reflected on the invoices provided, the same were all promptly delivered and accepted by the Debtor, Pilgrim's Pride Corporation, and are still in its possession. These goods are parts used in the Debtor's distribution centers. The goods sold were all of the value stated on the invoices and in the same quantities as specified on the invoices.

REPECTFULLY SUBMITTED,

/s/ Lyndel Anne Mason
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900 Jackson Street
Dallas, TX 75202
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ATTORNEYS FOR FERGUSON ENTERPRISES, INC., CREDITOR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the **FERGUSON'S NOTICE OF SUBMISSION OF WRITTEN REQUESTS FOR PAYMENT OF SECTION 503(b)(9) CLAIM PURSUANT TO PROCEDURES SET FORTH IN THE DEC. 31 ORDER OF THIS COURT [Doc. No. 412]** was served this 2nd day of March, 2009, upon all Debtors' counsel and all counsel or parties of record in accordance with the requirements of the CM/ECF filing system.

/s/Lyndel Anne Mason _____
Lyndel Anne Mason