KANE RUSSELL COLEMAN & LOGAN PC

George H. Barber, Esq.(TSBN 01705650) Gregory M. Zarin, Esq. (TSBN 24060871) 3700 Thanksgiving Tower 1601 Elm Street Dallas, TX 75201 (214) 777-4200 Telephone (214) 777-4299 Facsimile

COUNSEL FOR CHEM-AQUA, INC., A SUBSIDIARY OF NCH CORPORATION, AND CERTIFIED LABORATORIES, CHEMSEARCH, AND MANTEK, DIVISIONS OF NCH CORPORATION

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

In re:

\$ Case No.: 08-45664-dml
PILGRIM'S PRIDE CORPORATION,
ET AL.,

\$ JOINTLY ADMINISTERED

Debtors.

NOTICE OF APPLICATION REGARDING ADMINISTRATIVE EXPENSE CLAIM IN ACCORDANCE WITH 11 U.S.C. § 503(B)(9)

PLEASE TAKE NOTICE that Chem-Aqua, Inc., a subsidiary of NCH Corporation, and Certified Laboratories, Chemsearch, and Mantek, divisions of NCH Corporation (collectively, "NCH"), acting by and through its counsel, files and serves this written notice of its administrative expense claim in accordance with 11 U.S.C. § 503(b)(9), on the above-captioned debtors (the "Debtors").

NCH seeks an administrative expense claim for the value of goods (the "Goods") that were sold to Debtor Pilgrims Pride Corporation ("PPC") in the ordinary course of the its business and actually received by PPC within 20 days before the date of commencement of the above-styled bankruptcy case. Attached hereto as **Exhibit "A,"** and incorporated by reference, is a true and correct copy of the Section 503(b)(9) administrative claim letter, dated March 2, 2009,

which was sent to the addressees indicated therein as required by the *Order Pursuant to Section* 503(b)(9) of the Bankruptcy Code to Establish and Implement Exclusive and Global Procedures for Submitting and Resolving Claims Relating to Goods Received Within Twenty Days Prior to the Commencement Date [Doc. No. 412]. The value of the Goods does not include any services.

By filing this Notice, NCH does not intend to, and shall not be deemed to, waive any rights with respect to any of its claims against PPC or any other Debtors in the above-referenced bankruptcy case, including without limitation, NCH's reclamation demand filed pursuant to 11 U.S.C. § 546(c).

Dated: March 2, 2009. Respectfully submitted,

KANE RUSSELL COLEMAN & LOGAN PC

/s/ Gregory M. Zarin
George H. Barber, Esq.(TSBN 01705650)
Gregory M. Zarin, Esq. (TSBN 24060871)
3700 Thanksgiving Tower
1601 Elm Street
Dallas, TX 75201
(214) 777-4200 Telephone
(214) 777-4299 Facsimile

COUNSEL FOR (1) CHEM-AQUA, INC., A SUBSIDIARY OF NCH CORPORATION, AND (2) CERTIFIED LABORATORIES, CHEMSEARCH, AND MANTEK, DIVISIONS OF NCH CORPORATION

Main Document Page 3 of 3

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing pleading were served via the Court's electronic (ECF) notification system on the 2nd day of March, 2009, and upon the parties whose names and addresses appear below by first class United States Mail, postage prepaid, on the 2nd day of March, 2009.

Debtor

Pilgrim's Pride Corporation Attn: Gary Tucker 4845 US Highway 271 North Pittsburg, TX 75686

Counsel for the Debtor

Weil, Gotshal & Manges, LLP Attn: Gary T. Holtzer, Esq. Attn: Russell Brooks 767 Fifth Avenue New York, NY 10153

Weil, Gotshal & Manges, LLP Attn: Stephen A. Youngman, Esq. 200 Crescent Court, Suite 300 Dallas, TX 75201

United States Trustee

Lisa L. Lambert, Esq. Office of the United States Trustee 1100 Commerce St., Room 976 Dallas, TX 75242

Debtors' Claims and Noticing Agent

Pilgrim's Pride Claims Processing c/o Kurtzman Carson Consulting, LLC 2335 Alaska Avenue El Segundo, CA 90245

Counsel for the Official Committee of **Unsecured Creditors**

Andrews Kurth LLP Attn: Paul N. Silverstein, Esq. 450 Lexington Avenue New York, NY 10017

Andrews Kurth LLP Attn: Jason S. Brookner, Esq. 1717 Main Street, Suite 3700 Dallas, TX 75201

/s/ Gregory M. Zarin Gregory M. Zarin