Levy, Stopol & Camelo, LLP Counselors at Law 1425 RexCorp Plaza Uniondale, NY 11556

Attorney for Camerican International Inc.

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

	X	
	\mathbf{X}	•
IN RE:	X	CASE NO. 08-45664
	X	
PILGRIM'S PRIDE CORPORATION, et al.,	X	CHAPTER 11
	X	
DEBTORS	X	JOINTLY ADMINISTERED

WRITTEN REQUEST OF CAMERICAN INTERNATIONAL INC. FOR PAYMENT OF SECTION 503(b)(9) CLAIM PURSUANT TO ORDER ENTERED DECEMBER 31, 2008

TO THE HONORABLE D. MICHAEL LYNN, UNITED STATES BANKRUPTCY JUDGE

COMES NOW, Camerican International Inc., ("Camerican"), by and through its counsel, and files this Written Request of Camerican for Payment of Section 503(b)(9) Claim Pursuant to Order Entered December 31, 2008, ("Request") relating to goods, as more fully described in the attachments hereto ("Goods"), received by Pilgrim's Pride Corporation ("Debtor") within twenty (20) days before the date of the commencement of the Debtor's bankruptcy case ("Case") and, in support thereof, would respectfully show the Court as follows:

1. Pilgrim's Pride Corporation and some of it's affiliates filed voluntary chapter 11 petitions on December 1, 2008.

- 2. Camerican sold the goods to Debtor in the ordinary course of the Debtor's business and such Goods were received by the Debtor within twenty (20) days before the date of the commencement of the Case.
 - 3. The value of the Goods is \$83,319.75
 - 4. Camerican has not been paid for the Goods.
- 5. Attached to this Request as Exhibit A is Camerican's Invoice Number 042693 which sets forth the payment and shipping terms and the value of the Goods. Also annexed as Exhibit A is the Bill of Lading which sets forth the date of delivery (November 26, 2008) to and/or acceptance by Debtor. The value of such Goods do not represent a combination of goods and services. Camerican filed a Notice of Reclamation, or alternatively, for Priority Claim or Lien on December 29, 2008, pursuant to 11 U.S.C. § 546 (C)(1)(A) and (B), 11 U.S.C. § 503 (b)(9) and § 507 (a)(1), for \$83,319.75 worth of goods. These statements were 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 (20) Days prior to the Commencement Date ("Order") entered on December 31, 2008.
 - 6. Camerican has complied in all respects with the Order.
- 7. Pursuant to 11 U.S.C. § 503(b)(9), Camerican has an allowed administrative claim in the amount of \$83,319.75.
- 8. Nothing in this Request waives any rights Camerican may have against the Debtor with respect to the Goods nor with respect to any other rights and/or remedies Camerican may have.

WHEREFORE, Camerican International, Inc. respectfully requests its administrative priority claim be allowed in the amount of \$83,319.75 pursuant to 11 U.S.C. § 503(b)(9) and for such other and further relief to which it is justly entitled.

Respectfully submitted,

Levy, Stopol & Camelo, LLP Counselors at Law 1425 RexCorp Plaza Uniondale, NY 11556 Telephone: (516) 802-7007 Fax: (516) 802-7008

By: /s/ Larry N. Stopol
Levy, Stopol & Camelo, LLP

ATTORNEYS FOR CAMERICAN INTERNATIONAL INC.

CERTIFICATE OF SERVICE

This is to certify that on this 3rd day of March, 2009, a true and correct copy of the foregoing Written Request of Camerican International Inc. for Payment of Section 503(b)(9) Claim Pursuant to Order Entered December 31, 2008 was served electronically or via United States mail, postage prepaid, upon:

Debtors c/o Pilgrims Pride Corporation Attn: Gary Tucker 4845 U.S. Hwy 271 N Pittsburg, TX 75686

Weil, Gotshal & Manges, LLP Attorneys for Pilgrims Pride Corporation Attn: Gary T. Holtzer & Russell Brooks 767 Fifth Avenue New York, NY 10153

Pilgrims Pride Claims Processing c/o Kurtzman Carson Consultants, LLC 2335 Alaska Avenue El Segundo, CA 90245 Weil, Gotshal & Manges, LLP Attorneys for Pilgrims Pride Corporation Attn: Stephen A. Youngman 200 Crescent Court, Ste 300 Dallas, TX 75201

/s/ Larry N. Stopol
Levy, Stopol & Camelo, LLP