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

IN RE \$ \$ \$ PILGRIMS PRIDE CORPORATION \$ Case No. 08-45664-DML-11 \$ DEBTOR \$

## APPLICATION AND REQUEST FOR ALLOWANCE OF 11 U.S.C.§503(b)(9) CLAIM BY S. EASLEY TRUCKING, INC. D/B/A DET COMPANY

COMES NOW, S. Easley Trucking, Inc. dba DET Company ("SET"), and by and through its attorney, files this Application and Request for Allowance of a §503(b)(9) claim in this case.

- 1. Between November 10, 2008 and November 30, 2008, SET, 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, SET provides the following information in support of its claim:
- a.) Exhibit "A" is a summary of claims that reflects the freight, invoice number, date received by Debtor and charges for each invoice.
- b.) Exhibit "B" SET 0001 through 0097 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. SET requests the allowance and payment of \$48,771.38, as supported by the attached documents.

WHEREFORE PREMISES CONSIDERED, SET prays for allowance of a \$503(b)(9) claim in the total amount of \$48,771.38.

SET prays for general relief.

Respectfully submitted,

/s/ Ernest A. Laun

Ernest A. Laun Attorney for S. Easley Trucking, Inc. dba DET Company

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of March, 2009, I did mail by federal express, electronic mail or by fax a true and exact copy of the foregoing to the following:

Via Federal Express and
Facsimile (972)290-8908
Gary Tucker
Pilgrims Pride Corporation
4845 US Hwy 271 N

4845 US Hwy. 271 N. Pittsburg, Texas 75686

Via Federal Express and Electronic Mail

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

Via Federal Express and Electronic Mail Kurtzman Carson Consultants, LLC Claims and Noticing Agent Attn: Pilgrim's Pride Claims 2335 Alaska Avenue El Segundo, CA 90245

Via Electronic Mail
Elisa R. Behar Lemmer
Victoria Vron
767 Fifth Avenue
New York, NY 10153

Via Electronic Mail
Stephen A. Youngman
Weil, Gotshal & Manges
200 Crescent Court, Suite 300
Dallas, Texas 75201

Via Electronic Mail
Office of the United States Trustee
U.S. Courthouse
1100 Commerce Street, Room 9-C-60
Dallas, Texas 75242

Via Electronic Mail
Jason S. Brookner
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Paul N. Silverstein
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New York, NY 10022

/s/ Ernest A. Laun

Ernest A. Laun