Howard Marc Spector
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Howard Marc Spector, P.C.
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ATTORNEY FOR TLISA R. CHAMPION, Individually
And as Administrator of the ESTATE OF DIANNE MARTIN
AND RECCUS BRANCH

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	)	
	)	**Chapter 11**
Debtor.	)	

TLISA R. CHAMPION, INDIVUDALLY AND AS ADMINISTRATOR OF THE ESTATE OF DIANNE MARTIN AND RECUUS BRANCH'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS

To: Pilgrim's Pride Corporation, by and through its attorney of record, Stephen Youngman, Weil, Gotshal & Manges, LLP, 200 Crescent Court, Suite 300, Dallas, Texas 75201.

NOTICE OF EXPEDITED DISCOVERY
REQUIREMENTS PURSUANT TO LOCAL RULE 4001.1(c)

> A written response shall be served within 12 days after service hereof, and all documents requested shall be produced at the office of the attorney for Tlisa R. Champion, Individually and as Administrator of the Estate of Dianne Martin, within 12 days after service hereof.

Pursuant to the Local Rule 4001.1(c) these Requests for Production are served on Pilgrim's Pride Corporation ("Debtor") by Tlisa R. Champion, Individually and as Administrator of the Estate of Dianne Martin and Reccus Branch ("Champion"). All documents shall be produced at the office of the attorney for Champion, Howard Marc Spector, P.C., 12770 Coit Road, Suite 1100, Dallas, Texas 75251, on or before 12 days

from the service of this request. These Requests for Production are deemed to be continuing in nature, and the Debtor shall supplement all new information when it becomes available as required by Federal Rule of Civil Procedure 26(e) and Federal Rule of Bankruptcy Procedure 7026.

Dated: February 19, 2009.

Respectfully submitted,

By: /s/Howard Marc Spector
Howard Marc Spector, P.C.
Texas State Bar No. 00785023
12770 Coit Road, Suite 1100
Dallas, Texas 75251
(214) 365-5377
FAX: (214) 237-3380

ATTORNEY FOR TLISA R. CHAMPION, Individually And as Administrator of the ESTATE OF DIANNE MARTIN AND RECCUS BRANCH

CERTIFICATE OF SERVICE

This certifies that a copy of the foregoing has been served via facsimile on February 19, 2009 as follows:

/s/ Howard Marc Spector
Howard Marc Spector

Via Facsimile (214) 746-777
Mr. Steve Youngman
Weil Gotshal & Manges
200 Crescent Court
Suite 300
Dallas, TX 75201

DEFINITIONS AND INSTRUCTIONS

As used herein:

1. Unless otherwise defined, the capitalized terms have the meaning ascribed to such terms in 11 U.S.C. § 101.

2. **Document** means the original of any book, record, report, memorandum, paper, communication, chart, disc, card, wire or other electronic or mechanical recording or transcription of any other instrument or device from which information can be perceived, regardless of the method of transcription, in the possession, custody or control of the party responding to these requests. The term document includes all drafts, work sheets and copies that bear any notation, marking or information not on the original. The term also includes information contained in any computer storage medium or automated data processing system.

3. **You, Your, or Debtor** shall mean Pilgrim's Pride Corporation, unless otherwise specified in a particular request.

4. To the extent that You claim any document requested herein is privileged, please state the nature of the privilege, identify the document, and prepare a privilege log identifying when the document was prepared, and any entity who was responsible for producing the document or to whom the document has been transmitted.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1:

Produce any true and accurate copies of any and all commercial general liability insurance policies in effect on August 13, 2003 providing liability coverage at the Athens, Georgia facility operated by Pilgrim's Pride Corporation of Delaware, Inc and/or its predecessor ConAgra Poultry Company, including but not limited to any declarations pages evidencing such coverage.

RESPONSE:

REQUEST NO. 2:

Produce true and accurate copies of any motor vehicle liability insurance policies providing coverage for any and all motor vehicles owned or operated at the Athens, Georgia facility operated by Pilgrim's Pride Corporation of Delaware, Inc. and/or its predecessor ConAgra Poultry Company and in effect on August 13, 2003 including but not limited to any declarations page evidencing such coverage.

RESPONSE:

REQUEST NO. 3:

Produce any and all schedules of motor vehicles of any kind covered under any motor vehicle liability coverage for any and all motor vehicles owned and operated by Pilgrim's Pride Corporation of Delaware, Inc. and/or its predecessor ConAgra Poultry Company at its Athens, Georgia facility and in effect on August 13, 2003.

RESPONSE:

REQUEST NO. 4:

Produce any and all liability insurance policies which may provide coverage for the 1994 Ottowa tractor/truck (vehicle number 612, serial number 70254) being operated by Rafael Figuero at the Pilgrim's Pride Corporation of Delaware, Inc. and/or its predecessor ConAgra Poultry Company facility in Athens, Georgia at the time Diane Martin was injured on August 13, 2003.

RESPONSE: