"EXHIBIT B"

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CAUSE NO. 38757-05-07

FILED
AT O'CLOCK
JUL 29 2005
REBA D. SOUYRES, CLERK, DISTRICT COURT
BY ANGELINA COUNTY, TEXAS
DEPUTY

BILLY JOE BURNETT BURNETT AND SHERI LISA BURNETT,	§	**IN THE DISTRICT COURT**
Plaintiffs,	§	
	§	
v.	§	**OF ANGELINA COUNTY, TEXAS**
	§	
JACK ALTON SHERMAN AND PILGRIM'S PRIDE CORPORATION,	§	
Defendants.	§	**_____ JUDICIAL DISTRICT**

PLAINTIFFS' ORIGINAL PETITION & REQUEST FOR DISCLOSURE

TO THE HONORABLE PRESIDING JUDGE OF SAID COURT:

COME NOW PLAINTIFFS, BILLY JOE BURNETT AND SHERI LISA BURNETT, and complain of Defendants, Jack Alton Sherman and Pilgrim's Pride Corporation, and for cause of action would show the Court the following:

DISCOVERY CONTROL PLAN

1. Plaintiffs intend to conduct discovery under Level 2 of Texas Rule of Civil Procedure 190.3 because this suit involves monetary relief aggregating more than $50,000.00, excluding court costs and prejudgment interest.

PARTIES

2. Plaintiffs, Billy Joe Burnett and Sheri Lisa Burnett, are, and at all times mentioned were, individuals residing at 9668 East State Highway 103, Lufkin, Angelina County, Texas 75901-1006.

3. Defendant, Jack Alton Sherman, is, and at all times mentioned was, an individual, who may be served with process at his usual abode, at 704 Logansport Street, Center, Shelby County, Texas 75935.

4. Defendant, Pilgrim's Pride Corporation, a foreign corporation organized and existing under the laws of the State of Delaware, whose principal office is located at 110 South Texas Street, Pittsburg, Camp County, Texas 75686, is authorized to do business in Texas and may be served with process by serving its registered agent for service of process, CT Corporation System, at 350 North St. Paul Street, Dallas, Dallas County, Texas 75201.

VENUE

5. Venue is proper in Angelina County, Texas. Specifically, venue is proper in this county under the general venue rule because all or a substantial part of the events or omissions occurred in this county.

FACTS

6. On or about October 13, 2004, at approximately 6:30 a.m., Plaintiff Billy Joe Burnett was operating a 1986 blue Ford pickup truck in the southbound lane of FM 326, near the intersection of FM 326 and Old Ewing Road, which is approximately 4.4 miles southeast of the city limits of Lufkin, Angelina County, Texas, when it was violently and unexpectedly struck by a 1998 white Mack truck, Texas License Number R4C-L98, VIN 1M1AA14Y2WW079684. The aforementioned Mack truck was towing a grey 1996 Viking flatbed trailer, Texas License Number 468-59Y, VIN 1V9FC4521TN062128 (the "Tractor-Trailer"), and had made a left-hand turn from the eastbound lane of Old Ewing Road into northbound lane of FM 326. Defendant Sherman was driving the truck. At the time of the collision, the Tractor-Trailer was owned by Defendant Pilgrim's Pride.