

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

IN RE:

**PILGRIM'S PRIDE CORPORATION,
et al.,
Debtor.**

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**CASE NO. 08-45664 (DML)

Chapter 11

JOINTLY ADMINISTERED**

**AMENDED NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Hiersche, Hayward, Drakeley & Urbach, P.C. files this Amended Notice of Appearance and Request for Notices and Service of Papers and enters this appearance as counsel for City of Mayfield, Kentucky, Graves County, Kentucky, Graves Growth Alliance, Inc. and Industrial Authority of Mayfield- Graves County, Kentucky (collectively "Graves Parties"), The Raymond Corporation ("Raymond") and ConAgra Foods, Inc. ("ConAgra"), creditors and parties-in-interest in the above-entitled and -numbered bankruptcy proceeding, pursuant to 11 U.S.C § 1109(b), and respectfully request that all notices given or required to be given in this proceeding and all papers served or required to be served in this proceeding, be served upon:

**Russell W. Mills
Jason M. Katz
HIERSCHE, HAYWARD,
DRAKELEY & URBACH, P.C.
15303 Dallas Parkway, Suite 700
Addison, TX 75001
Ph: 972/701-7000
Fax: 972/701-8765
rmills@hhdulaw.com
jkatz@hhdulaw.com**

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes all of the notices and papers filed in this proceeding including, without limitation: Notices of any Application, Motion, Petition, Pleading, Request, Complaint or Demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise: (1) which affect or seek to affect in any way the rights or interests with respect to: (a) the Graves Parties/Raymond/ConAgra or the Debtors; (b) property in which the Graves Parties/Raymond/ConAgra or the Debtors may claim an interest; and (c) property in the possession, custody or control of the Graves Parties/ Raymond/ ConAgra or the Debtors; or (2) which seek to require any act, payment or other conduct by the Graves Parties/Raymond/ConAgra, or which provide or are required to provide the Graves Parties/Raymond/ConAgra an opportunity to act.

PLEASE TAKE FURTHER NOTICE that the Graves Parties/Raymond/ConAgra intend that this Notice and Request or any later appearance, pleading, claim or suit shall not constitute a waiver of (i) the Graves Parties/Raymond/ConAgra's right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) Graves Parties/Raymond/ConAgra's right to trial by a jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases; (iii) the Graves Parties/Raymond/ConAgra's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) the Graves Parties/Raymond/ConAgra's entitlement to exercise its rights under 28 U.S.C. § 157(b)(5), § 1452 or any other section of the United States Code; or (v) any other rights, claims, actions, defenses, setoffs or recoupments to which the Graves Parties/Raymond/ConAgra are or may be

entitled under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Graves Parties/Raymond/ConAgra expressly reserve.

The undersigned additionally requests that the Debtors and the Clerk of the Court place the name and address below on any mailing matrix or list of creditors to be prepared or existing in the above-numbered case.

Respectfully submitted,

HIERSCHE, HAYWARD, DRAKELEY
& URBACH, P.C

By: /s/ Russell W. Mills
Russell W. Mills
TX State Bar No. 00784609
Jason M. Katz
TX State Bar No. 24038990

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ATTORNEYS FOR CITY OF MAYFIELD,
KENTUCKY, GRAVES COUNTY, KENTUCKY,
GRAVES GROWTH ALLIANCE, INC.,
INDUSTRIAL AUTHORITY OF MAYFIELD-
GRAVES COUNTY, KENTUCKY, THE
RAYMOND CORPORATION AND CONAGRA
FOODS, INC.

CERTIFICATE OF SERVICE

This is to certify that on October 21, 2009, a true and correct copy of the above and foregoing Amended Notice of Appearance was served via electronically to all parties requesting notice through the ecf system.

/s/ Russell W. Mills
Russell W. Mills