

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

IN RE:	§	
	§	
PILGRIM’S PRIDE CORPORATION,	§	CASE NO. 08-45664 (DML)
<i>et al.,</i>	§	
Debtor.	§	Chapter 11
	§	
	§	JOINTLY ADMINISTERED
	§	

**AMENDED VERIFIED STATEMENT OF HIERSCHE, HAYWARD, DRAKELEY &
URBACH, P.C. PURSUANT TO FED. R. BANKR. P. 2019 REGARDING
REPRESENTATION OF MULTIPLE ENTITIES**

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

COMES NOW, Hiersche, Hayward, Drakeley & Urbach, P.C. (“HHDU”), and files the following amended verified statement pursuant to Federal Rule of Bankruptcy Procedure 2019:

1. HHDU represents The Raymond Corporation (“Raymond”). HHDU has represented Raymond for a significant period of time prior to the filing of the bankruptcy case of Pilgrim’s Pride Corporation, et al. (“Debtors”). Various dealers (“Dealers”) shipped goods and provided various services to the Debtors. Pursuant to an agreement between Raymond and the Dealers, Raymond billed and collected payment on behalf of the Dealers for the goods shipped and services provided to the Debtors. On December 1, 2008 (the date of the petition), the Debtors owed Raymond approximately \$576,217.34. Raymond has an unsecured, non-priority claim in the amount of \$576,217.34. Raymond has also has administrative claims pursuant to 11 U.S.C. §503(b)(9) and reclamation claims pursuant to state law and 11 U.S.C. §546. HHDU has also represented at least one of the Dealers in certain matters before.

2. HHDU also represents the City of Mayfield, Kentucky, Graves County, Kentucky, Graves Growth Alliance and Industrial Authority of Mayfield-Graves County, Kentucky (collectively “Graves Parties”). HHDU has not represented the Graves Parties prior to the filing of Debtors’ bankruptcy case. The Graves Parties entered into various leases (and one guaranty) with the Debtors involving equipment, a feed mill, two hatcheries, a processing plant and a water/sewer system located in Graves County, Kentucky. On December 1, 2008, the Graves Parties had fee ownership interest in various properties and various unsecured, non-priority claims for amounts due and owing under various leases (and guaranty).

3. HHDU also represents ConAgra Foods, Inc. (“ConAgra”). HHDU has not represented ConAgra prior to the filing of Debtors’ bankruptcy case. ConAgra sold and shipped goods to the Debtors and also entered into a stock purchase agreement with the Debtors. On December 1, 2008, the Debtors owed ConAgra over \$3,000,000.00. ConAgra has filed various claims in this case relating to its relationship with the Debtors including without limitation unsecured, non-priority claims. ConAgra has also has administrative claims pursuant to 11 U.S.C. §503(b)(9) and reclamation claims pursuant to state law and 11 U.S.C. §546.

4. HHDU is authorized to act on behalf of Raymond, ConAgra and the Graves Parties as their legal representative, and not through any instrument.

Respectfully submitted,

HIERSCHKE, 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

15303 Dallas Parkway, Suite 700
Addison, Texas 75001
Telephone: (972) 701-7000
Facsimile: (972) 701-8765

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.

VERIFICATION

I hereby verify that the statements made in the foregoing Verified Statement are true and correct to the best of my knowledge and belief.

/s/ Russell W. Mills
Russell W. Mills

CERTIFICATE OF SERVICE

This is to certify that on October 22, 2009, a true and correct copy of the above and foregoing Amended Verified Statement of Hiersche, Hayward, Drakeley & Urbach, P.C. Pursuant to Fed. R. Bank. P. 2019 Regarding Representation of Multiple Entities was served via electronically to all parties requesting notice through the ecf system.

/s/ Russell W. Mills
Russell W. Mills