

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

<b>In re:</b>	§	<b>Chapter 11 Case</b>
	§	
<b>PILGRIM'S PRIDE CORPORATION, et. al</b>	§	<b>Case No. 08-45664 (DML-11)</b>
	§	
<b>Debtors.</b>	§	<b>Jointly Administered</b>
	§	

**STATEMENT OF LOCKE LORD BISSELL & LIDDELL, LLP PURSUANT TO RULE  
2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

LOCKE LORD BISSELL & LIDDELL, LLP (“LLBL”), as counsel to the parties designated herein in the above-styled bankruptcy case (the “Bankruptcy Case”), submits the following Statement (the “Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure.

**A. Identity of Entities Represented by LLBL in the Bankruptcy Case.**

2. Set forth below is a general preliminary statement of the parties represented by LLBL in these cases, subject to further investigation and without waiver of any claims, remedies and/or rights of such parties. This Statement does not constitute an exhaustive or complete statement of all claims, interests, liens, agreements, and rights. This Statement may be amended, supplemented or otherwise modified.

3. LLBL has been employed to represent the following parties and, as applicable, to appear on their behalf in the Bankruptcy Case:

4. General Electric Capital Corporation has retained LLBL to represent it and to appear for it in the Bankruptcy Case. GECC executed, or is the assignee of, various master equipment lease agreements, related schedules and other agreements related thereto. For the sole

purposes of this statement, GECC's address is C/O Thomas McCormick, Vice President, Global Restructuring Solutions, General Electric Capital Corporation, 516c Virginia Drive Ft. Washington, PA 19034.

5. GELCO Corporation has retained LLBL to represent it in the Bankruptcy Case. Upon information and belief, GELCO Corporation executed, or is the assignee of, various master lease agreements with one or more of the debtors and other agreements related thereto. One or more of the Debtors executed a guaranty of such indebtedness and obligations. For the sole purposes of this statement, GELCO Corporation's address is c/o Keith Berquist, 3 Capital Drive, Eden Prairie, Mn. 55344.

6. Gulf Coast Cold Storage LLC ("GCCS") has retained LLBL to represent it in connection with certain aspects of the Bankruptcy Case. GCCS' facilities are located at 100 Port Road, Pascagoula, Mississippi 39567. GCCS provided pre-petition blast-freezing, cold-storage warehousing, and stevedoring services to one or more of the Debtors in Pascagoula and continues to provide such services post-petition. One or more of the debtors owed outstanding amounts to GCCS as of the petition date. LLBL represents GCCS in connection with enforcement of such claims and GCCS' state law lien rights. For the sole purposes of this statement, GCCS address is C/O Mr. David G. Mannella, 1555 Poydras Street, Suite 1600, New Orleans, Louisiana 70112.

7. U.S. Cold Storage, L.P. ("U.S. Cold") has retained LLBL to represent it in the Bankruptcy Case. U.S. Cold is a national warehouseman that holds a pre-petition secured claim against the debtors in excess of \$800,000. On the petition date, U.S. Cold held approximately 13 million pounds of inventory. For the sole purposes of this statement, U.S. Cold's address is C/O

David Aaronson, Drinker, Biddle & Reath LLP, One Logan Square, 18<sup>th</sup> & Cherry Street, Philadelphia, Pa. 19103.

8. LLBL represents, on a contingent fee basis, three plaintiffs (Cody Wheeler, Davey Williams, and Don Davis)(collectively, "Plaintiffs") in two cases against Pilgrim's Pride commenced pre- petition: (i) an antitrust price-fixing and market allocation case, and (ii) a case brought under the Packers and Stockyards Act. The Plaintiffs' assert unsecured claims. This representation began prior to the commencement of the Bankruptcy Case. For the sole purpose of this statement, the address of these plaintiffs' is c/o Doug Skierski, Locke Lord Bissell & Liddell LLP, 2200 Ross Avenue, Suite 2200, Dallas, Texas 75201

**B. Employment of LLBL.**

9. The foregoing have retained LLBL as their legal counsel with respect to matters arising in the Bankruptcy Case. LLBL was retained prior to the commencement of these cases by the Plaintiffs, GECC and GELCO Corporation.

**C. Claims Owned by LLBL.**

10. To the best of the knowledge and belief of the individual verifying this Statement on behalf of LLBL, LLBL has not filed a proof of claim on its own behalf in the Bankruptcy Case and does not asset a direct claim against the debtors.

I, Greg Lowry, by executing this statement below, based upon the information provided to me after inquiry, verifies and believes that the foregoing is true and correct, to the best of my knowledge, information, and belief.

LOCKE LORD BISSELL & LIDDELL LLP

By: /s/ Greg Lowry  
Gregory A. Lowry  
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**CERTIFICATE OF SERVICE**

I hereby certify that steps were taken to cause a true and correct of this Statement to be served on those parties who receive electronic service via ECF service on December 30, 2008.

/s/ Greg Lowry