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Attorneys for Debtors and
Debtors in Possession

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

In re	§	
	§	Chapter 11
	§	
PILGRIM'S PRIDE CORPORATION, et al.,	§	Case No. 08-45664 (DML)
	§	
Debtors.	§	
	§	JOINTLY ADMINISTERED
	§	

**MOTION FOR EXPEDITED HEARING ON
DEBTORS' MOTION TO AUTHORIZE ST. PAUL/TRAVELERS
TO MAKE ADVANCEMENTS AND PAYMENTS IN ACCORDANCE
WITH THE DEBTORS' FIDUCIARY INSURANCE POLICY**

1. Pilgrim's Pride Corporation and its affiliated debtors hereby request that a hearing be set on the DEBTORS' MOTION TO AUTHORIZE ST. PAUL/TRAVELERS TO MAKE ADVANCEMENTS AND PAYMENTS IN ACCORDANCE WITH THE DEBTORS' FIDUCIARY INSURANCE POLICY (the "Motion") not later than November 17, 2009. A

hearing by such date is necessary because St. Paul/Travelers (as defined in the Motion) will not make advancements or pay defense fees and costs with respect to certain of the Debtors' fiduciary liability policy until an order authorizing such payments is entered by the Court.

2. Notice of the proposed expedited hearing will be provided to (i) the Office of the United States Trustee; (ii) counsel to the statutory committees appointed in these chapter 11 cases (the "Committees"); (iii) counsel to the Debtors' prepetition secured lenders; (iv) counsel to the Agent to the Debtors' postpetition lenders; (v) the Defendants; (vi) counsel for the Plaintiffs; and (vii) all parties on the Master Service List filed with this Court (collectively, the "Notice Parties"). This notice will be sufficient because the Notice Parties will have seven (7) days to object to the Motion.

3. A hearing was not requested earlier because St. Paul/Travelers only recently requested entry of order authorizing advancements and payments of defense fees and costs under the fiduciary insurance policy.

Dated: November 9 2009
Fort Worth, Texas

/s/ Stephen A. Youngman
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CERTIFICATE OF CONFERENCE

The Debtors have conferred with the Committees regarding the Motion and have been informed that the Committees do not object to this request for expedited relief.

/s/ Stephen A. Youngman
Stephen A. Youngman