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Attorney for GRAY INDUSTRIAL ELECTRIC, INC.

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

IN RE	§	CASE NO 08-45664-DML-11
	§	JOINTLY ADMINISTERED
PILGRIMS PRIDE CORPORATION, ET.AL.	§	
	§	
DEBTORS	§	CHAPTER 11

OBJECTION OF GRAY INDUSTRIAL ELECTRIC, INC. TO  
PROPOSED ASSUMPTION OF EXECUTORY CONTRACT PURSUANT  
TO DEBTORS' JOINT AMENDED PLAN OF REORGANIZATION  
UNDER CHAPTER 11 OF THE BANKRUPTCY CODE (AS MODIFIED)

Comes Now Gray Industrial Electric, Inc., ("Gray") and files this Objection to the Proposed Assumption of Executory Contract Pursuant to Debtors' Joint Amended Plan of Reorganization Under Chapter 11 of the Bankruptcy Code (as Modified) and would show the Court:

1. On November 17, 2009, a Notice of Proposed Assumption of Executory Contract was served on Gray. The Notice proposes to assume a contract with Gray that is described as a "Construction Agreement and General Conditions." The Notice states that the cure amount is \$0.00.

2. The description of the contract is not sufficient for Gray to determine what contract the Debtors are proposing to assume. As a result it is impossible to know the amount required to cure the contract.

3. Gray filed an Amended Proof of Claim on April 3, 2009, in the amount of \$114,990.63 for goods and services performed pre-petition. Gray objects to the assumption of any contract upon which money is owed by the Debtors to the extent that no provision is made to cure the amount due under the contract.

4. Gray opposes the proposed assumption in that it is a conditional assumption. The Bankruptcy Code does not authorize the conditional assumption of an executory contract.

Wherefore, Gray Industrial Electric, Inc. prays that the Court enter an Order denying the relief requested in the Notice of the Proposed Assumption of Executory Contract and for such other relief as is just.

Respectfully Submitted,

MCNALLY & PATRICK L.L.P

By: /s/ Glen Patrick

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the Objection was served either by electronic means or by regular first class mail on all parties listed below and on the attached list, this 30<sup>th</sup> day of November, 2009.

/s/ Glen Patrick

DEBTORS

Pilgrim's Pride Corporation  
4845 US Hwy. 271 N.  
Pittsburg TX 75686  
Atten: Rachel Hatch

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450 Lexington Avenue

New York, New York 10017

Atten: Paul N Silverstein, Esq. And Jonathan I.  
Levine, Esq.

ATTORNEY FOR THE DEBTORS

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767 Fifth Avenue,  
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Atten: Victoria Vron, Esq.

ATTORNEYS FOR THE COMMITTEE OF  
EQUITY SECURITY HOLDERS OF PPC:

Brown Rudnick LLP  
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Atten Jeremy B. Coffey, Esq.

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