David W. Parham (15459500)
BAKER & McKENZIE LLP
2001 Ross Avenue
2300 Trammell Crow Center
Dallas, Texas 75201
Telephone No.: (214) 978-3034
Facsimile No.: (214) 978-3099

-and-

Martin A. Sosland (18855645)
Stephan A. Youngman (22226600)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone No.: (214) 746-7700
Facsimile No.: (214) 746-7777

Attorneys for Reorganized Debtors

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

In re:	§	
	§	**Case No. 08-45664 (DML)**
Pilgrim's Pride Corporation, *et al.*	§	
	§	**Chapter 11**
Debtors.	§	
	§	**Jointly Administered**
	§	
	§	

DEBTORS' SIXTIETH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY, BOOKS AND RECORDS, AND UNSUPPORTED CLAIMS)

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

Pilgrim's Pride Corporation ("PPC") and its affiliated reorganized debtors in the above-referenced chapter 11 cases (collectively, the "Debtors"),[1] file this their Sixtieth Omnibus

[1] The Reorganized Debtors in these cases are PPC; PFS Distribution Company; PPC Transportation Company; To-Ricos, Ltd.; To-Ricos Distribution, Ltd.; Pilgrim's Pride Corporation of West Virginia, Inc.; and PPC Marketing, Ltd.

Objection to Claims (No Liability, Books and Records, and Unsupported Claims) (this "Objection") and respectfully represent:

Background

1. On December 1, 2008 (the "Commencement Date"), the Debtors each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

2. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

3. PPC, together with its subsidiaries (collectively, "Pilgrim's Pride"), has one of the best brand names in the chicken industry. It is one of the largest producers of chicken in the United States and the Fifth-largest producer in Mexico. Pilgrim's Pride has operations throughout the continental United States, Puerto Rico, and Mexico. Formed in 1946 as a retail feed store partnership between Lonnie A. "Bo" Pilgrim and his brother, Aubrey E. Pilgrim, PPC has been a publicly traded company since 1986.

The Schedules, Bar Date and Claims Objections Procedures Order

4. On January 26, 2009, the Debtors each filed with this Court schedules of assets and liabilities [Docket Nos. 628 – 642] in which the Debtors scheduled approximately 6,000 claims against the Debtors in the aggregate. The Debtors amended their schedules of assets and liabilities on March 17, 2009 [Docket No. 1204], June 3, 2009 [Docket Nos. 2068, 2074, 2075, 2076], and September 8, 2009 [Docket No. 3261] (collectively, as amended, the "Schedules of Assets and Liabilities").

5. On April 1, 2009, this Court entered an Order establishing June 1, 2009 (the "Bar Date") as the deadline for submitting claims against the Debtors [Docket No. 1352] (the "Bar Date Order").

6. Pursuant to the Bar Date Order, the Debtors caused notices of the Bar Date and "proof of claim" forms to be mailed to, among others, all parties known to the Debtors as having potential claims against the Debtors' estates as of the Commencement Date. Notice of the Bar Date also was published once in *The Wall Street Journal*, the *USA Today, The Mount Pleasant Daily Tribune*, a Texas publication, and the *El Nuevo Día*, a Puerto Rican newspaper.

7. On July 21, 2009, the Court entered an Order establishing procedures for filing omnibus objections in which the Debtors may object to multiple claims within a single objection where the Debtors have at least one common ground for objecting to each such claim [Docket No. 2723] (the "Claims Objections Procedures Order").

8. Pursuant to section 1129 of the Bankruptcy Code, on December 10, 2009, the Bankruptcy Court entered an order (the "Confirmation Order") confirming Debtors' Amended Joint Plan of Reorganization under chapter 11 of the Bankruptcy Code (as modified) (the "Plan").

9. The Plan became effective on December 28, 2009 (the "Effective Date"). Pursuant to the Plan, the Debtors may object to claims on or before the later of (i) one hundred and fifty (150) days after the Effective Date and (ii) such later date as may be fixed by the Bankruptcy Court. Confirmation Order at ¶ 12(c); Plan at ¶ 7.1(b).

Jurisdiction and Venue

10. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Objections to Employee Claims

11. Various individuals, including mostly current and former employees of the Debtors, (the "Claimants") filed proofs of claim (the "Employee Claims") in the Debtors' bankruptcy cases as reflected in **Exhibits A, B, and C**. The Debtors object to the Employee Claims on the grounds that (i) the Debtors are not liable; (ii) the Employee Claims do not comport with the Debtors' books and records; and (iii) the Employee Claims do not provide sufficient supporting documents.

12. The columns on **Exhibits A, B, and C** entitled "Claim Amount" represent the amount asserted in the Employee Claims. But these amounts are incorrect according to the Debtors' books and records. In fact, the Debtors have no record of any liability to the Claimants for the Employee Claims.

13. Additionally, the Claimants did not provide sufficient information or documentation to establish the amounts asserted in the Employee Claims. Thus, outside of reviewing the Debtors' books and records for amounts owed to each Claimant, which the Debtors have done, the Employee Claims do not provide any documentation or evidence to establish their validity. Accordingly, the Debtors request that the Court disallow and expunge the Employee Claims.

Reservation of Rights

14. The Debtors reserve the right to further object to each of the Employee Claims on any other ground.

Notice

15. The Debtors submit that they have served this Objection on the following: (i) the United States Trustee; (ii) counsel to the statutory committees appointed in these chapter 11 cases; (iii) each creditor that holds an Employee Claim; and (iv) parties listed on the Master Service List filed with this Court (collectively, the "Notice Parties"). The Debtors submit that no other or further notice need be provided.

WHEREFORE, the Debtors respectfully request that the Court disallow and expunge the Employee Claims as set forth on **Exhibits A, B, and C** in their entirety and grant such other relief as it deems just and proper.

Dated: January 28, 2010
Fort Worth, Texas

/s/David W. Parham
David W. Parham (15459500)
BAKER & McKENZIE LLP
2001 Ross Avenue
2300 Trammell Crow Center
Dallas, Texas 75201
Telephone No.: (214) 978-3034
Facsimile No.: (214) 978-3099
David.w.Parham@bakernet.com

-and-

Martin A. Sosland (18855645)
Stephen A. Youngman (22226600)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone No.: (214) 746-7700
Facsimile No.: (214) 746-7777

Attorneys for Reorganized Debtors

Exhibit A[1]

(No Liability)

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
1	TATE, ANGELA	3040	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
2	TATE, JIMMY, JR	2218	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
3	TATE, UNDRA L	5762	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
4	TAYLOR, DAVID L	4901	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
5	TAYLOR, DORIS	2167	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
6	TAYLOR, PREMIAULA L	2697	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
7	TAYLOR, RHONDA R	5845	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
8	TAYLOR, WOODIE	3906	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

[1] *See* Exhibits B and C for additional grounds for objection to the Employee Claims.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
9	TAYLOR, WOODIE D	2487	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
10	TAYLOR, YOLANDA D	2948	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
11	TEEL, TAHJA B	2738	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
12	TENNANT, JAMAR K	5772	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
13	THOMAS, JAMES M	1964	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
14	THOMAS, JANICE	2832	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
15	THOMAS, MARCIA A	2789	1,000.00	0.00	1,000.00	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
16	THOMAS, ORIA A	2911	7,500.00	0.00	7,500.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
17	THOMAS, WELDON E	3776	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
18	THOMPSON, CECILY	2251	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							amount owed to claimant.
19	THOMPSON, JEANETTE	3545	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
20	THOMPSON, LAKESHIA M	5740	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
21	THORN, LAKEISHA L	2558	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
22	TIDWELL, GALVIN L	2491	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
23	TIDWELL, PIPER D	2489	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
24	TILLERY, ROBERT	3312	5,400.00	0.00	5,400.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
25	TILLIS, VIOLET D	2329	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
26	TIMMS, CHARLOTTE	3726	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
27	TOBIN, SHELLEY R	2811	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
28	TOLBERT, DESMOND	5727	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
29	TOLBERT, WILLIE R	2255	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							claimant.
30	TRAYLOR, CATHERINE	4178	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
31	TRAYLOR, GRADY R	2332	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
32	TRAYLOR, JOHN L	2364	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
33	TURNER, SANDRA D	3238	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
34	TUTT, MACK	5721	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
35	TYLER, FELIX C	3596	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
36	VALDEZ, MARCOS	3537	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
37	VALKOS, CHRISTOPHER R	3702	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
38	VANMETER, SANDRA D	2953	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
39	VAZQUEZ, GLADYS M	3248	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
40	VENTURA, MICHAEL	3413	700.00	0.00	700.00	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
41	WADE, WINSTON L	3723	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
42	WAFER, CHANZETTE M	4467	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
43	WALKER, CONNIE L	4249	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
44	WALKER, NAPOLEON	2408	2,425.00	0.00	2,425.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
45	WALKER, SHAREIKA S	3614	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
46	WALLACE, LANARIAN J	5960	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
47	WARD, DALE L	5724	1,648.00	0.00	1,648.00	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
48	WASHINGTON, BETTY J	1969	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
49	WASHINGTON, BEVERLY D	4422	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
50	WASHINGTON, ELLA M	1933	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							claimant.
51	WASHINGTON, SHANIECE V	1821	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
52	WATERS, DEBRA	2555	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
53	WATKINS, LINDA A	5782	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
54	WATTS, JIMMY	2740	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
55	WATTS, TIMOTHY	2727	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
56	WEST, FELICIA R	3533	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
57	WHITAKER, KAREN S	3241	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
58	WHITAKER, TAJI	2393	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
59	WHITAKER, WILLIE T	2369	10,034.26	0.00	10,034.26	0.00	Claim not supported by claim documents; Debtor checked its records and shows no amount owed to claimant.
60	WHITE, CALVIN R	2766	12,500.00	0.00	12,500.00	0.00	Claim not supported by claim documents; Debtor checked its records and shows no amount owed to claimant.
61	WHITE, DESTINY N	2731	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
62	WHITE, DIANE C	5896	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
63	WHITE, JERMAINE	4339	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
64	WHITE, RODNEY D	5932	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
65	WHITEM CASTINA D	3499	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
66	WHITFIELD, LASHUNDRA N	3629	1,000.00	0.00	1,000.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
67	WILLIAMS, ANTHONY	2732	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
68	WILLIAMS, ARMER J	4280	400.00	0.00	400.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
69	WILLIAMS, BENNY C	1926	1,762.00	0.00	1,762.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
70	WILLIAMS, BILLIE W	3534	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
71	WILLIAMS, CHALONDA	3122	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
72	WILLIAMS, CHRISTA N	5888	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
73	WILLIAMS, DONALD L	2076	2,000.00	0.00	2,000.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
74	WILLIAMS, GEORGE	2467	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							amount owed to claimant.
75	WILLIAMS, IVORY J, SR	3373	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
76	WILLIAMS, JAY A	2982	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
77	WILLIAMS, JOHN C	3765	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
78	WILLIAMS, LARRY D, SR	3451	450.00	0.00	450.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
79	WILLIAMS, MICHELLE L	4900	320.00	0.00	320.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
80	WILLIAMS, ODESSA	2829	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
81	WILLIAMS, PEARLENE	2881	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
82	WILLIAMS, TAVORRIS	4583	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
83	WILLIAMS, WANDA L	5844	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
84	WILLIAMS, WINSTON, JR	2242	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claim does not provide enough information to determine the validity of

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							the claim; Debtor checked its records and shows no amount owed to claimant.
85	WILLIS, LADELL	2540	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
86	WILSON, LEMMIE	3962	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
87	WILSON, THOMASINA S	2718	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
88	WINZER, JOHNTRAVIS	5787	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
89	WINZER, TAMMY L	5806	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
90	WOODALL, CIDNEY	2890	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
91	WOODGETT, JOANN	3003	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
92	YANCEY, PATRICIA A	3101	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
93	YBARRA, JUAN	2849	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
94	YOUNG, CHARLES F, JR	3236	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
95	YOUNG, MARJORY	3543	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
96	YOUNG, SARAH	2902	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

Exhibit B[1]

(Books and Records)

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
1	TATE, ANGELA	3040	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
2	TATE, JIMMY, JR	2218	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
3	TATE, UNDRA L	5762	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
4	TAYLOR, DAVID L	4901	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
5	TAYLOR, DORIS	2167	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
6	TAYLOR, PREMIAULA L	2697	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
7	TAYLOR, RHONDA R	5845	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
8	TAYLOR, WOODIE	3906	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

[1] *See* Exhibits A and C for additional grounds for objection to the Employee Claims.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
9	TAYLOR, WOODIE D	2487	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
10	TAYLOR, YOLANDA D	2948	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
11	TEEL, TAHJA B	2738	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
12	TENNANT, JAMAR K	5772	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
13	THOMAS, JAMES M	1964	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
14	THOMAS, JANICE	2832	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
15	THOMAS, MARCIA A	2789	1,000.00	0.00	1,000.00	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
16	THOMAS, ORIA A	2911	7,500.00	0.00	7,500.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
17	THOMAS, WELDON E	3776	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
18	THOMPSON, CECILY	2251	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							amount owed to claimant.
19	THOMPSON, JEANETTE	3545	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
20	THOMPSON, LAKESHIA M	5740	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
21	THORN, LAKEISHA L	2558	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
22	TIDWELL, GALVIN L	2491	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
23	TIDWELL, PIPER D	2489	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
24	TILLERY, ROBERT	3312	5,400.00	0.00	5,400.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
25	TILLIS, VIOLET D	2329	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
26	TIMMS, CHARLOTTE	3726	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
27	TOBIN, SHELLEY R	2811	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
28	TOLBERT, DESMOND	5727	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
29	TOLBERT, WILLIE R	2255	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							claimant.
30	TRAYLOR, CATHERINE	4178	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
31	TRAYLOR, GRADY R	2332	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
32	TRAYLOR, JOHN L	2364	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
33	TURNER, SANDRA D	3238	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
34	TUTT, MACK	5721	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
35	TYLER, FELIX C	3596	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
36	VALDEZ, MARCOS	3537	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
37	VALKOS, CHRISTOPHER R	3702	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
38	VANMETER, SANDRA D	2953	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
39	VAZQUEZ, GLADYS M	3248	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
40	VENTURA, MICHAEL	3413	700.00	0.00	700.00	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
41	WADE, WINSTON L	3723	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
42	WAFER, CHANZETTE M	4467	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
43	WALKER, CONNIE L	4249	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
44	WALKER, NAPOLEON	2408	2,425.00	0.00	2,425.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
45	WALKER, SHAREIKA S	3614	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
46	WALLACE, LANARIAN J	5960	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
47	WARD, DALE L	5724	1,648.00	0.00	1,648.00	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
48	WASHINGTON, BETTY J	1969	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
49	WASHINGTON, BEVERLY D	4422	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
50	WASHINGTON, ELLA M	1933	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							claimant.
51	WASHINGTON, SHANIECE V	1821	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
52	WATERS, DEBRA	2555	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
53	WATKINS, LINDA A	5782	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
54	WATTS, JIMMY	2740	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
55	WATTS, TIMOTHY	2727	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
56	WEST, FELICIA R	3533	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
57	WHITAKER, KAREN S	3241	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
58	WHITAKER, TAJI	2393	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
59	WHITAKER, WILLIE T	2369	10,034.26	0.00	10,034.26	0.00	Claim not supported by claim documents; Debtor checked its records and shows no amount owed to claimant.
60	WHITE, CALVIN R	2766	12,500.00	0.00	12,500.00	0.00	Claim not supported by claim documents; Debtor checked its records and shows no amount owed to claimant.
61	WHITE, DESTINY N	2731	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
62	WHITE, DIANE C	5896	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
63	WHITE, JERMAINE	4339	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
64	WHITE, RODNEY D	5932	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
65	WHITEM CASTINA D	3499	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
66	WHITFIELD, LASHUNDRA N	3629	1,000.00	0.00	1,000.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
67	WILLIAMS, ANTHONY	2732	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
68	WILLIAMS, ARMER J	4280	400.00	0.00	400.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
69	WILLIAMS, BENNY C	1926	1,762.00	0.00	1,762.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
70	WILLIAMS, BILLIE W	3534	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
71	WILLIAMS, CHALONDA	3122	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
72	WILLIAMS, CHRISTA N	5888	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
73	WILLIAMS, DONALD L	2076	2,000.00	0.00	2,000.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
74	WILLIAMS, GEORGE	2467	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							amount owed to claimant.
75	WILLIAMS, IVORY J, SR	3373	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
76	WILLIAMS, JAY A	2982	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
77	WILLIAMS, JOHN C	3765	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
78	WILLIAMS, LARRY D, SR	3451	450.00	0.00	450.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
79	WILLIAMS, MICHELLE L	4900	320.00	0.00	320.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
80	WILLIAMS, ODESSA	2829	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
81	WILLIAMS, PEARLENE	2881	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
82	WILLIAMS, TAVORRIS	4583	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
83	WILLIAMS, WANDA L	5844	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
84	WILLIAMS, WINSTON, JR	2242	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claim does not provide enough information to determine the validity of

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							the claim; Debtor checked its records and shows no amount owed to claimant.
85	WILLIS, LADELL	2540	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
86	WILSON, LEMMIE	3962	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
87	WILSON, THOMASINA S	2718	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
88	WINZER, JOHNTRAVIS	5787	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
89	WINZER, TAMMY L	5806	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
90	WOODALL, CIDNEY	2890	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
91	WOODGETT, JOANN	3003	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
92	YANCEY, PATRICIA A	3101	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
93	YBARRA, JUAN	2849	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
94	YOUNG, CHARLES F, JR	3236	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
95	YOUNG, MARJORY	3543	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
96	YOUNG, SARAH	2902	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

Exhibit C[1]

(Unsupported Claims)

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
1	TATE, ANGELA	3040	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
2	TATE, JIMMY, JR	2218	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
3	TATE, UNDRA L	5762	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
4	TAYLOR, DAVID L	4901	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
5	TAYLOR, DORIS	2167	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
6	TAYLOR, PREMIAULA L	2697	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
7	TAYLOR, RHONDA R	5845	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
8	TAYLOR, WOODIE	3906	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

[1] *See* Exhibits A and B for additional grounds for objection to the Employee Claims.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
9	TAYLOR, WOODIE D	2487	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
10	TAYLOR, YOLANDA D	2948	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
11	TEEL, TAHJA B	2738	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
12	TENNANT, JAMAR K	5772	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
13	THOMAS, JAMES M	1964	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
14	THOMAS, JANICE	2832	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
15	THOMAS, MARCIA A	2789	1,000.00	0.00	1,000.00	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
16	THOMAS, ORIA A	2911	7,500.00	0.00	7,500.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
17	THOMAS, WELDON E	3776	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
18	THOMPSON, CECILY	2251	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							amount owed to claimant.
19	THOMPSON, JEANETTE	3545	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
20	THOMPSON, LAKESHIA M	5740	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
21	THORN, LAKEISHA L	2558	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
22	TIDWELL, GALVIN L	2491	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
23	TIDWELL, PIPER D	2489	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
24	TILLERY, ROBERT	3312	5,400.00	0.00	5,400.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
25	TILLIS, VIOLET D	2329	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
26	TIMMS, CHARLOTTE	3726	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
27	TOBIN, SHELLEY R	2811	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
28	TOLBERT, DESMOND	5727	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
29	TOLBERT, WILLIE R	2255	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							claimant.
30	TRAYLOR, CATHERINE	4178	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
31	TRAYLOR, GRADY R	2332	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
32	TRAYLOR, JOHN L	2364	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
33	TURNER, SANDRA D	3238	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
34	TUTT, MACK	5721	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
35	TYLER, FELIX C	3596	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
36	VALDEZ, MARCOS	3537	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
37	VALKOS, CHRISTOPHER R	3702	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
38	VANMETER, SANDRA D	2953	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
39	VAZQUEZ, GLADYS M	3248	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
40	VENTURA, MICHAEL	3413	700.00	0.00	700.00	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
41	WADE, WINSTON L	3723	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
42	WAFER, CHANZETTE M	4467	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
43	WALKER, CONNIE L	4249	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
44	WALKER, NAPOLEON	2408	2,425.00	0.00	2,425.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
45	WALKER, SHAREIKA S	3614	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
46	WALLACE, LANARIAN J	5960	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
47	WARD, DALE L	5724	1,648.00	0.00	1,648.00	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
48	WASHINGTON, BETTY J	1969	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
49	WASHINGTON, BEVERLY D	4422	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
50	WASHINGTON, ELLA M	1933	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							claimant.
51	WASHINGTON, SHANIECE V	1821	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
52	WATERS, DEBRA	2555	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
53	WATKINS, LINDA A	5782	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
54	WATTS, JIMMY	2740	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
55	WATTS, TIMOTHY	2727	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
56	WEST, FELICIA R	3533	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
57	WHITAKER, KAREN S	3241	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
58	WHITAKER, TAJI	2393	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
59	WHITAKER, WILLIE T	2369	10,034.26	0.00	10,034.26	0.00	Claim not supported by claim documents; Debtor checked its records and shows no amount owed to claimant.
60	WHITE, CALVIN R	2766	12,500.00	0.00	12,500.00	0.00	Claim not supported by claim documents; Debtor checked its records and shows no amount owed to claimant.
61	WHITE, DESTINY N	2731	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
62	WHITE, DIANE C	5896	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
63	WHITE, JERMAINE	4339	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
64	WHITE, RODNEY D	5932	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
65	WHITEM CASTINA D	3499	BLANK	0.00	BLANK	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.
66	WHITFIELD, LASHUNDRA N	3629	1,000.00	0.00	1,000.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
67	WILLIAMS, ANTHONY	2732	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
68	WILLIAMS, ARMER J	4280	400.00	0.00	400.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
69	WILLIAMS, BENNY C	1926	1,762.00	0.00	1,762.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
70	WILLIAMS, BILLIE W	3534	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
71	WILLIAMS, CHALONDA	3122	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
72	WILLIAMS, CHRISTA N	5888	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
73	WILLIAMS, DONALD L	2076	2,000.00	0.00	2,000.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
74	WILLIAMS, GEORGE	2467	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							amount owed to claimant.
75	WILLIAMS, IVORY J, SR	3373	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
76	WILLIAMS, JAY A	2982	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
77	WILLIAMS, JOHN C	3765	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
78	WILLIAMS, LARRY D, SR	3451	450.00	0.00	450.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
79	WILLIAMS, MICHELLE L	4900	320.00	0.00	320.00	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
80	WILLIAMS, ODESSA	2829	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
81	WILLIAMS, PEARLENE	2881	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
82	WILLIAMS, TAVORRIS	4583	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
83	WILLIAMS, WANDA L	5844	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
84	WILLIAMS, WINSTON, JR	2242	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claim does not provide enough information to determine the validity of

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
							the claim; Debtor checked its records and shows no amount owed to claimant.
85	WILLIS, LADELL	2540	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
86	WILSON, LEMMIE	3962	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
87	WILSON, THOMASINA S	2718	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
88	WINZER, JOHNTRAVIS	5787	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
89	WINZER, TAMMY L	5806	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
90	WOODALL, CIDNEY	2890	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
91	WOODGETT, JOANN	3003	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.
92	YANCEY, PATRICIA A	3101	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
93	YBARRA, JUAN	2849	UNLIQUIDATED	0.00	UNLIQUIDATED	0.00	Claimant provides no backup to support claim; Debtor checked its records and shows no amount owed to claimant.

Count	Name of Claimant	Proof of Claim Number / Schedule Name	Claim Amount ($)	Schedule Amount ($)	Objection Amount ($)	Modified Claim Amount ($)	Reason for Modification
94	YOUNG, CHARLES F, JR	3236	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
95	YOUNG, MARJORY	3543	BLANK	0.00	BLANK	0.00	No basis for claim stated; Debtor checked its records and shows no amount owed to claimant.
96	YOUNG, SARAH	2902	BLANK	0.00	BLANK	0.00	Claim does not provide enough information to determine the validity of the claim; Debtor checked its records and shows no amount owed to claimant.

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**
	§	**Hearing Date and Time: March 16, 2010 at 10:30 a.m.**
	§	**Response Deadline: March 1, 2010 at 4:00 p.m.**

NOTICE OF DEBTORS' OBJECTION TO YOUR CLAIM

TO THE CLAIMANTS IDENTIFIED ON *EXHIBITS* ANNEXED TO DEBTORS' SIXTIETH *OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY, BOOKS AND RECORDS, AND UNSUPPORTED CLAIMS)*:

PLEASE TAKE NOTICE that although you filed a proof of claim (the "Claim"), Pilgrim's Pride Corporation ("PPC") and its reorganized debtor affiliates (collectively, the "Debtors") have filed an objection seeking to disallow your Claim (the "Objection"). The Objection is appended to this Notice and is entitled "Sixtieth Omnibus Objection to Claims (No Liability, Books and Records, and Unsupported Claims)." The Objection seeks to disallow your Claim in its entirety. **Therefore, you should read this Notice and the attached Objection carefully.**

IF YOU AGREE WITH THE OBJECTION TO YOUR CLAIM, YOU DO NOT NEED TO TAKE ANY ACTION IN RESPONSE TO THIS NOTICE OR THE OBJECTION.

IF YOU DISAGREE WITH THE OBJECTION, PLEASE FOLLOW THE INSTRUCTIONS BELOW FOR FILING A RESPONSE TO THE OBJECTION.

PLEASE TAKE NOTICE that you may contact the Debtors at **(877) 512-0008**, or by email at Claiminfo@pilgrimspride.com, to ask questions or to attempt to resolve the Objection to the Claim outside of court and without the need to hire an attorney. You must clearly provide the following information to the Debtors: (1) the name of the claimant(s) that you are calling or emailing about, (2) the title of the Objection (here, the "*Sixtieth Omnibus Objection to Claims (No Liability, Books and Records, and Unsupported Claims)*"), and (3)

either a phone number or email address that the Debtors may use to contact you to attempt to resolve the Objection to the Claim.

PLEASE TAKE FURTHER NOTICE that if you disagree with the Objection and are unable or unwilling to resolve the Objection with the Debtors, you or your attorney **must** both (1) attend the hearing on the objection (the "Hearing") in person or, consistent with court procedures, by telephone and (2) file a written response (the "Response") to the Objection with the Clerk of the United States Bankruptcy Court, Eldon B. Mahon U.S. Courthouse, 501 West Tenth Street, Fort Worth, Texas 76102 **no later than March 1, 2010 at 4:00 p.m. (Prevailing Central Time)**. You must also file and serve copies of the Response on (1) the Debtors' attorneys: Attn: R. Adam Swick, Baker & McKenzie LLP, 2300 Trammell Crow Center, 2001 Ross Avenue, Dallas, Texas 75201; (fax) 214-965-7045; and (2) the Official Committee of Unsecured Creditors: Attn: Monica S. Blacker, Andrews Kurth LLP, 1717 Main Street, Suite 3700, Dallas, TX 75201; (fax) 214-659-4844; so as to be **received** no later than **March 1, 2010 at 4:00 p.m. (prevailing Central Time)** (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that your Response must contain, at a minimum, the following:

(i) A caption setting forth the name of the Court, the name of the debtors, the case number and the title of the Omnibus Objection to which the Response is directed;

(ii) The name of the Claimant and description of the basis for the amount of the Claim;

(iii) A concise statement setting forth the reasons why the Claim should not be disallowed for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection;

(iv) The name, address(es), telephone number and facsimile number of the person(s) (who may be the Claimant and/or the Claimant's legal representative) to whom counsel for the Debtors should serve any reply to the Response, and who possess the authority to reconcile, settle, or otherwise resolve the Objection on the Claimant's behalf.

PLEASE TAKE FURTHER NOTICE that, if you or your designated attorney or representative do not timely file and serve the Response in accordance with the above-referenced procedures and attend the Hearing (in the absence of a written agreement between you and the Debtors providing otherwise), the Court may enter an order granting the relief requested in the Objection. **If you fail to respond in accordance with this Notice, the Court may grant the relief requested in the Objection without further notice or hearing.**

PLEASE TAKE FURTHER NOTICE that if you or your designated representative or attorney do file a Response, the Hearing on the Objection will automatically be

adjourned to another hearing that is at least 30 days thereafter to allow the Debtors to file a reply to your Response. Only those Reponses made in accordance with the above-referenced requirements and timely filed and received by the Court and the Debtors' attorneys will be considered by the Court at a hearing on the Objection.

PLEASE TAKE FURTHER NOTICE that nothing in this Notice or the accompanying Objection constitutes a waiver of the Debtors' right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions, or any other bankruptcy or nonbankruptcy claims against you. The Debtors also reserve the right to assert additional objections to your Claim.

Dated: January 28, 2010
Fort Worth, Texas