REDACTED

App. Ex. E.14

REDACTED

DALDMS/672821.1

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**

CLAIMANT'S STATEMENT

PLEASE STATE:

1. Full name, address and telephone number:

Julie Trigg Ward (formerly Julie A. Trigg)
[redacted]

2. Date of birth and the last four digits of your social security number:

DOB: [redacted]
Last 4 of SSN: [redacted]

3. The names of all poultry companies you have ever contracted with to raise poultry and the dates in which you raised poultry for each poultry company. Also, please attach a copy of each contract to raise poultry that you have ever signed, including all amendments and attachments thereto:

Pilgrim's Pride 2003 through 2008

4. The type of poultry (e.g., broiler, breeder, pullet) that you raised on your poultry farm. If you raised more than one type of poultry on your poultry farm at any time in which you operated your poultry farm, please state the dates you raised each type of poultry on your poultry farm.

Broilers

REDACTED

5. The number and type of poultry houses on your poultry farm (e.g., conventional, wood truss, steel truss, tunnel ventilated with curtain solid sidewalls, tunnel ventilated with solid sidewalls, etc.), and the year each poultry house was built:

House #1: 40' x 400', steel truss with tunnel ventilation, curtain side walls on south side. Built in 1999 I believe.

House #2: 40' x 400', drop ceiling with tunnel ventilation, solid side walls on north side. Built in 1995 I believe.

House #3: 40' x 400', drop ceiling with tunnel ventilation, solid side walls on north side. Built in 1995 I believe.

House #4: 40' x 400', drop ceiling with tunnel ventilation, solid side walls on north side. Built in 1995 I believe.

6. Please identify

(a) all upgrades, modifications or repairs made to your poultry houses:

New computer controllers and computer rooms, new fans- 2 per house, new curtains, new solid north walls, new lights.

(b) the dates that such upgrades, modifications or repairs were made:

November 2003 and November 2005

(c) reason(s) for such upgrades, modifications or repairs:

These additions and upgrades were required by Pilgrim's Pride, first to secure a contract to grow for them, and then to keep my contract with them.

(d) costs of the upgrades, modifications or repairs:

Approximately $52,000

7. Please identify all statements upon which you base your claims of fraud, deceit and promissory estoppel as reflected in your proof of claim filed in the Bankruptcy Court. In responding to this question, please provide:

(a) the name of the person who made the statement:

Danny Boone and Alex Darter

(b) the company for whom the person making the statement worked at the time the statement was made and his position in that company:

REDACTED

Both worked for Pilgrim's Pride. Growout supervisors, service techs, and location manager.

(c) the date the statement was made:

October 2003 and October 2005

(d) whether the statement was written or verbal. If the statement was written, please attach a copy of each written statement that you base your claims of fraud, deceit, and promissory estoppel as reflected in your proof of claim (this includes, but is not necessarily limited to, all copies of any "Commitment Letters" cited to and relied on in the complaint filed in the case styled, *Arnold, et al. v. Pilgrim's Pride Corp., et al.*, Circuit Court of Van Buren County, Arkansas, that was affixed to your proof of claim):

All were verbal.

(e) if verbal, the location where the statement was made (e.g., at your poultry farm, at a company office, over the telephone, etc.)

Either at the Pilgrim's Pride office or on my farm.

(f) detail the content of the statement:

Danny Boone told me that I would need to put in solid north walls in order to compete and to secure a contract with Pilgrim's Pride. He said not to worry about how much you are borrowing because you are "in it for the long haul" and that we'd make the money back.

Alex Darter told us we would be growing chickens "for generations to come."

(g) identify to whom the statement was made:

To myself, Julie Ward Trigg and my ex-husband.

(h) identify each person (name, address, telephone number) present when the statement was made:

Jamie Statler, Alex Darter, Danny Boone, myself, and my ex-husband, Bryan Trigg.

(i) explain how you relied, if at all, on each statement:

I borrowed $675,000 to purchase the poultry farm and to update it and an

REDACTED

additional nearly $12,000, later on to make the north walls solid. I based my decision to purchase and to borrow that very large sum of money on what Danny Boone and Alex Darter had told us; that we would be growing chickens for generations to come.

(j) how many flocks of poultry did you raise on your poultry farm *after* each statement was made?

Approximately 18 flocks.

8. The date your most recent contract to raise poultry ended, whether the poultry contract was terminated by you or the poultry company, and the reason provided for such termination (if you received a termination letter from the poultry company, please attach a copy hereto).

Pilgrim's Pride terminated the contract on August 28, 2008.

I declare under penalty of perjury under the laws of the United States and the State of Arkansas that the foregoing is true and correct based on my personal knowledge and that this declaration was executed in Morrilton, Arkansas on the 5 day of May, 2010.

Julie A (Trigg) Ward
[Name]

Julie A. (Trigg) Ward appeared before me. a Notary public. on May 5. 2010.

OFFICIAL SEAL
MELODY LYN DIXON
NOTARY PUBLIC - ARKANSAS
CONWAY COUNTY
My Commission Exp. 7-18-2012

Melody Lyn Dixon