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App. Ex. F.24

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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:

Timothy Honeycutt, Jr.
[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

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

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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: 43' x 500', tunnel ventilated with solid side walls and ceiling vent doors, built in 2006.

House #2: 43' x 500', tunnel ventilated with solid side walls and ceiling vent doors, built in 2006.

House #3: 43' x 500', tunnel ventilated with solid side walls and ceiling vent doors, built in 2006.

6. Please identify

No upgrades were necessary as the houses were built in 2006 and met specifications. Each house included:

Tunnel ventilation
ceiling vent doors
cool cells
fogger system with nine 50" fans and three 36" fans
24 brooders
5 wall space heaters
Agri Alert System

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

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

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

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

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:

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Danny Boone

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

Pilgrim's Pride

(c) the date the statement was made:

Numerous times between April 2006 and August 2008.

(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):

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.)

At my residence.

(f) detail the content of the statement:

I was told numerous times by Danny Boone that Pilgrim's Pride is the world's largest chicken producer and that it wasn't going anywhere. I would be growing chickens for a very long time. Mr. Boone told me that this was a long term commitment. I told Mr. Boone that I would have to finance the houses for 15 years and he told me that I'd be able to pay them off without a problem.

(g) identify to whom the statement was made:

Myself, Timothy E. Honeycutt, Jr.

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

Danny Boone and myself.

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

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Based on Danny Boone's representations, I went ahead and borrowed the money to build the three chicken houses. I even inquired about building a fourth. They didn't let me to begin with, but by the beginning of 2007, Danny Boone was encouraging me to build a fourth, which I did not.

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

9 flocks between September 2006 and August 2008.

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).

August 11, 2008. We received a termination letter in August 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 Van Buren County, Arkansas on the 10 day of May, 2010.

Timothy E. Honeycutt Jr.
[Name]

Marsha Evans, Notary

Notary Expires - 9-27-10

OFFICIAL SEAL
MARSHA EVANS
NOTARY PUBLIC-ARKANSAS
VAN BUREN COUNTY
COMM. EXP. 9-27-2010