App. Ex. I

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

In re:	§	**Chapter 11**
	§	
PILGRIM'S PRIDE CORPORATION,	§	**Case No. 08-45664 (DML)**
	§	
Debtor.	§	**Jointly Administered**

PILGRIM'S PRIDE CORPORATION'S OBJECTIONS AND RESPONSES TO CLAIMANTS' INTERROGATORIES

TO: Claimants, by and through their attorney of record, Nolan E. Aubrey, HARE, WYNN, NEWELL & NEWTON, L.L.P, 2025 Third Avenue North, Suite 800, Birmingham, AL 35203.

Pilgrim's Pride Corporation ("Pilgrim's") serves its Objections and Responses to Claimants' Interrogatories (the "Answers") and responds as follows:

I. GENERAL OBJECTIONS

1. Pilgrim's objects to the Interrogatories in their entirety because Claimants failed to include any instructions or definitions to the words they used therein. Accordingly, they are inherently vague and ambiguous.

2. Pilgrim's reserves its right to supplement and amend its Responses to these Interrogatories with any and all relevant information which may come to its attention as the discovery process continues, as allowed or required by the Federal Rules of Civil Procedure.

3. Pilgrim's objects to the Interrogatories to the extent that they seek to impose duties and/or obligations beyond those required by the Federal Rules of Civil Procedure.

4. Pilgrim's objects to the Interrogatories in their entirety to the extent that they (i) seek information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence, or are (ii) vague or ambiguous including, but not limited to,

the terms "identify," "you" and "your," (iii) overly broad, (iv) unduly burdensome and/or (v) harassing.

5. Pilgrim's objects to any Interrogatory that calls for information protected by the attorney-client privilege, the attorney work product doctrine, the trade secrets privilege, the party communication privilege, or any other applicable evidentiary privilege provided by federal law.

6. Subject to and without waiver of the foregoing General Objections, which are incorporated by reference in each of the following, Pilgrim's specifically objects and answers as follows:

II. SPECIFIC OBJECTIONS AND ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1: Please identify the name and present place of employment of every Pilgrim's Pride representative known to you, to have had any conversation or authored any correspondence with any of the Claimants relating to Pilgrim's Pride's intention to continue doing business with the Claimants following the ConAgra purchase by Pilgrim's Pride.

ANSWER: Pilgrim's objects to this interrogatory to the extent that it assumes facts not in evidence and is argumentative. Pilgrim's further objects to this interrogatory on the grounds that the word "representative" and the words "Pilgrim's Pride's intention to continue doing business with the Claimants following the ConAgra purchase by Pilgrim's Pride" are vague and ambiguous. Pilgrim's further objects to this interrogatory on the grounds that it calls for Pilgrim's speculate

Subject to and without waiving the foregoing objections, Pilgrim's states as follows: Claimant's business relationship with Pilgrim's and the term of that relationship are expressly set forth in the written poultry grower agreement(s) that each claimant signed with Pilgrim's. All of those agreements contain valid and binding merger clauses. Answers to this Interrogatory may be found in the documents Claimants attached to their Claimant Statements and documents Pilgrim's produced to Claimants bates labeled Clinton Growers 491 - 1759.

Pilgrim's further responds to this interrogatory by directing counsel to the attached documents affixed hereto as Exhibits "A" and "B."

Pilgrim's further states that Mike Pruitt is employed with Foster Farms. Danny Boone is self-employed. Jamie Statler is employed with Schering-Plough.

Pilgrim's reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure.

INTERROGATORY NO. 2: Do you acknowledge that any Pilgrim's Pride representative made representations to any or all of the Claimants regarding a promise of a long term future business relationship between Pilgrim's Pride and any or all of the Claimants?

ANSWER: Pilgrim's objects to this interrogatory to the extent that it assumes facts not in evidence and is argumentative. Pilgrim's further objects to this interrogatory on the grounds that the word "representative" and the words "promise of a long term future business relationship" are vague and ambiguous.

Subject to and without waiving the foregoing objections, Pilgrim's states as follows: Pilgrim's admits that Claimant's business relationship with Pilgrim's and the term of that relationship are expressly set forth in the written poultry grower agreement(s) that each claimant signed with Pilgrim's, which are already in Claimants' possession

INTERROGATORY NO. 3: What was your intention following the purchase of ConAgra in terms of how long you would continue providing chickens to farmers who were farming with ConAgra?

ANSWER: With respect to the growers raising poultry for Pilgrim's Clinton, Arkansas complex, it was Pilgrim's intent at the time it acquired that facility from ConAgra Poultry Company to continue the operations into the foreseeable future subject, of course, like any business to any unforeseen economic variable and business realities. Pilgrim's did not contemplate "idling" that facility until the summer of 2008 when numerous unexpected and unprecedented economic variables rapidly impacted the entire poultry industry (as well as the US economy) including, but not limited to, record corn and other input prices impacting feed costs, record energy prices, decreasing consumer demand for chicken, collapsing chicken prices, the onset of a catastrophic economic collapse, the seriousness of which had not been seen since the Great Depression, and tightening credit markets. These factors, and others, coupled with the economic losses stemming from the Clinton, Arkansas facility led Pilgrim's to the decision, which was announced in August 2008, to "idle" the facility.

Respectfully submitted,

David W. Parham (15459500)
Clayton E. Bailey (00796151)
BAKER & McKENZIE LLP
2300 Trammell Crow Center
2001 Ross Avenue
Dallas, Texas 75201
Telephone: (214) 978-3000
Facsimile: (214) 978-3099

Attorneys for Reorganized Debtors

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2010, a true and correct copy of the foregoing document was served via first class mail and certified mail, return receipt requested:

George Barber
Michael Scanlon
KANE RUSSELL COLEMAN & LOGAN PC
3700 Thanksgiving Tower
1601 Elm Street
Dallas, TX 75201

Nolan Awbrey
James J. Thompson, Jr.
HARE, WYNN, NEWELL & NEWTON LLP
2025 Third Avenue North
Birmingham, AL 35203

Clayton E. Bailey

EXHIBIT
A

November 20, 2003

Dear Valued Grower:

Pilgrim's Pride Corporation is pleased to welcome you as a grower to our company and convey certain important information in connection with our upcoming acquisition of Conagra Foods' chicken division. This acquisition includes the legal entities of ConAgra Poultry Company, Hester Industries, Inc., To-Ricos, Inc. and Lovett Company, Inc., including all Professional Food Systems "PFS" distribution locations, collectively referred to herein as the "ConAgra chicken division."

Acquisition set to be Effective November 24, 2003

The acquisition is scheduled to be completed on November 23, 2003, with Pilgrim's Pride Corporation taking full control of ConAgra's chicken division effective November 24th. If for any reason the acquisition does not close on this scheduled date, you will be notified prior thereto. This letter provides you with the information necessary for both of us to move forward in an expedient manner, without service or payment interruptions. Also enclosed is contact information should you have any questions with this transition process.

First and foremost, it is important that your company continue to conduct business with the ConAgra's chicken division in the same manner in which you conduct business today.

What You Need to Do and Provide

Before we can begin the process of adding your company into our information systems, we require one form to be completed. This is a critical step in establishing our business relationship and required before invoice payments can be made so we strongly encourage you to provide this information as soon as possible to avoid any delays. The information and documents we require to be provided are attached to this letter and include the following:

A. Completed W-9 (attached).

Please ensure that the form W-9 is executed by a duly authorized person and returned to Pilgrim's Pride Corporation for receipt prior to November 24, 2003. Please mail this form to the following address:

more →

Pilgrim's Pride Corporation
P.O. Box 93
Pittsburg, Texas 75686-0093
903 855 1000

Pilgrim's Pride Corporation
Attn: New Vendor Request Coordinator
P.O. Box 5000
Pittsburg, Texas 75686-5000

Contact Information for Questions

If you have any questions regarding this vendor transition process you should direct all of your questions to the persons listed below and *not* to your previous contact at the ConAgra chicken division. The appropriate persons to contact, along with their area of responsibility, are as follows:

Pilgrim's Pride Vendor Hotline
(W-9 questions)
903-855-4179 / office
972-290-8303 / fax
vendorhotline@pilgrimspride.com

We look forward to working with you to make this transition a smooth process. While subsequent changes will be necessary and will be communicated as we fully integrated the ConAgra chicken division into our information systems platform, communicating these initial process changes and completing the required document requests are paramount at this time. In closing, we are excited about the possibilities this acquisition creates for all of our business partners as we grow and become the second largest chicken company in the U.S. and we sincerely hope that you will promptly address and provide the information requested in this letter so that you may join us in this exciting transition.

Sincerely,

Mike Pruitt
Sr. Vice President
Technical Services

EXHIBIT
B

Dear Grower:

Since our last letter you have become partners with Pilgrim's Pride Corp. Most of you have asked about the Grow-Out programs and our future in the business.

Our Grow-Out programs are basically the same. We will continue to maintain high standards as before.

- Litter 4' or more (top dress to maintain this, if needed). Tilling is not accepted.
- Preheat 24 to 48 hours prior to chick delivery.
- 1 feed lid per 1000 chicks (clean and fed properly).
- Feed lids placed around brooders.
- Brooder temperature 95 degrees to 110 degrees (all must be operational).
- Proper amount of vent doors operating at proper static pressure.
- Use litter treatment to eliminate ammonia.
- Site tubes clean so water pressure can be checked.
- Trigger water nipples prior to chick arrival.
- House checks will be made 24 hours prior to delivery day. Houses not ready may be cancelled. Your serviceman will make this determination.

With 21 days of out-time there is no excuse not to be prepared for chicks.

Out-time has reached its peak we believe. The company is bringing new laying flocks into production now and as egg supply increases out-time should slowly shorten.

The feed ration has changed. Your feed being delivered now has a higher-energy level than before and may require us to make adjustment in our light programs in the future. Your serviceman will keep you informed if any changes will be made.

Pilgrim's Pride Corporation
P.O. Box 218
Atkins, Arkansas 72823

One of the most important issues facing us is disease and bio-security procedures. You recently received a letter concerning the matter. We are experiencing more disease than in the past years. Some diseases are the viral form and can be spread from house to house. We have freezers on approximately 50% of the farms. We will continue to order freezers for a short time longer allowing you to pay for them in 6 flocks of birds. After that freezers will have to be paid for upon delivery to your farm. **Dead birds may be removed only by authorized personnel trained in bio-security methods or they will be incinerated or composed on your farm.** Please help us control disease and disposal of dead birds properly.

The River Valley Poultry Symposium has been delayed to a later date to control the spread of disease from company to company. You will be informed as soon as a new date has been established.

Pilgrim's Pride encourages you to register with your County Extension Agent for the Litter Management Program as soon as possible.

Service Technician

Grow-Out Supervisor

Location Manager

Pilgrim's Pride Corporation
P.O. Box 218
Atkins, Arkansas 72823
479 641 2958

VERIFICATION

STATE OF Texas)
)
COUNTY OF Camp)

On this day, Randy Stroud, representative of Pilgrim's Pride Corporation, appeared before me, the undersigned notary public, and after I administered an oath to him, upon his oath, he said that he read Defendant's Objections and Responses to Plaintiffs' First Set of Interrogatories and that every statement set forth therein is within his personal knowledge and is true and correct.

Randy Stroud
, Representative

SWORN TO AND SUBSCRIBED before me by Randy Stroud on July 12, 2010.

Deborah W Nelson
Notary Public in and for
the State of Texas

DALDMS/681455.1

DEBORAH W. NELSON
NOTARY PUBLIC STATE OF TEXAS
COMMISSION EXPIRES:
AUGUST 7, 2010

VERIFICATION – Solo Page