Exhibit E

WILLIAMS & ANDERSON PLC

TWENTY-SECOND FLOOR
111 CENTER STREET
LITTLE ROCK, ARKANSAS 72201

TERESA M WINELAND
twineland@williamsanderson.com

DIRECT DIAL
(501) 396-8453

(501) 372-0800
TELECOPIER
(501) 372-6453

September 15, 2010

Brian Esters
812 Towne Oaks Lane
El Dorado, AR 71730-3710

VIA PROCESS SERVER

RE: **In re: Pilgrim's Pride Corporation**

Dear Mr. Esters:

Enclosed and served upon you is a subpoena *duces tecum* in the above-referenced matter currently pending before the United States Bankruptcy Court for the Northern District of Texas. Your deposition is set for October 6, 2010, at the Union County Courthouse, third floor conference room, 101 North Washington Avenue, El Dorado, Arkansas, at 1:00p.m. Also enclosed is a witness fee check for $40.00.

If you have any questions about the documents requested in this subpoena, please contact me and we will make every effort to work with you in that regard.

Thank you in advance for your cooperation in this matter. We look forward to hearing from you.

Sincerely,

Williams & Anderson PLC

Teresa Wineland

/jdg
Encl.
Cc: To all counsel of record

Form 256 – Subpoena in a Case under the Bankruptcy Code (12/06)

UNITED STATES BANKRUPTCY COURT

Western District of Arkansas

In re Pilgrim's Pride Corporation,
Debtor

SUBPOENA IN A CASE UNDER THE BANKRUPTCY CODE

Case No. * 08-45664 (DML) Northern District of Texas

To: Brian Esters
812 Towne Oaks Lane
El Dorado, Arkansas 71730-3710

Chapter 11

☐ YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Union County Courthouse, 3rd Floor Conference Room, 101 N. Washington Ave., El Dorado, AR 71730	10/06/2010 @ 1:00pm

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See attached Exhibit A

PLACE	DATE AND TIME
Union County Courthouse, 3rd Floor Conference Room, 101 N. Washington Ave., El Dorado, AR 71730	10/06/2010 @ 1:00pm

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this proceeding that is subpoenaed for the taking of a disposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Rule 30(b)(6), Federal Rules of Civil Procedure, made applicable in bankruptcy cases and proceedings by Rules 1018, 7030, and 9014, Federal Rules of Bankruptcy Procedure.

ISSUING OFFICER SIGNATURE AND TITLE	DATE
Teresa Wineland, attorney for claimants	9-15-10

ISSUING OFFICER'S NAME, ADDRESS, AND PHONE NUMBER

Teresa Wineland, Williams & Anderson PLC, 111 Center St., 22nd Floor, Little Rock, AR, 501-372-0800

* If the bankruptcy case is pending in a district other than the district in which the subpoena is issued, state the district under the case number.

Form 256 – Subpoena in a Case under the Bankruptcy Code (12/06)

PROOF OF SERVICE

	DATE	PLACE
SERVED		

SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

_____
SIGNATURE OF SERVER

_____
ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006, made applicable in cases under the Bankruptcy Code by Rule 9016, Federal Rules of Bankruptcy Procedure:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

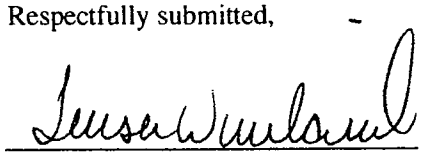
(e) CONTEMPT. Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).

Exhibit A to Subpoena Duces Tecum

1. All documents, writings, email, letters, communications, memoranda, reports, analyses, and other documentary evidence relating to the idling, closing, potential sale, profitability, condition, reputation, value, location, proximity to other poultry processing plants, income and/or expenses of the Pilgrim's Pride Corporation El Dorado plant or complex.

2. All communications, email, letters, and documents pertaining to the growers: Eddie & Angie Ferrell, Greg & Sherry Jenkins, Jeff & Shannon Jenkins, Mark & Angie Simmons, Bruce & Shanda Boykin, Jim & Linda Davis, and/or South Arkansas Farms, Inc.

Respectfully submitted,



Teresa Wineland (AR Bar No. 1168)
Peter G. Kumpe (AR. Bar No. 72073)
Williams & Anderson PLC
111 Center St., Suite 2200
Little Rock, AR 72201
Tel.: 501-372-0800
Fax: 501-372-6453

Clay Fulcher (Ark. Bar No. 88005)
James G. Lingle (Ark. Bar No. 76070)
Lingle Law Firm
110 S. Dixieland Road Rogers, AR 72758
Tel.: 479-636-7899 Fax: 479-636-0095

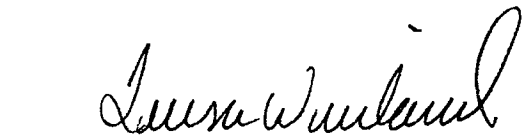
Josephine Garrett (State Bar No. 07695400)
Josephine Garrett, P.C. 3119 West 5th Street
Fort Worth, TX 76107
Tel.: 817-335-5432 Fax:
817-338-1122

Attorneys for Certain Arkansas, Georgia, Alabama, North Carolina and Florida Growers

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this instrument was emailed and sent by U.S. First Class Mail to the following on September 15, 2010:

David W. Parham, Esq.
Clayton E. Bailey, Esq.
Adam T. Dougherty, Esq.
Baker & McKenzie LLP
2300 Trammell, Crow Center
2001 Ross Avenue
Dallas, TX 75201



Teresa Wineland

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**

NOTICE OF DEPOSITION DUCES TECUM

TO: Counsel of Record

Pursuant to the Federal Rules of Civil Procedure, please take notice that on October 6, 2010, commencing at 1:00 p.m., the attorneys for Certain Arkansas, Georgia, Alabama, North Carolina, and Florida Growers will take the deposition upon oral examination of BRIAN ESTERS at the Union County Courthouse third floor conference room, 101 North Washington Avenue, El Dorado, Arkansas 71730. The deposition shall be taken before a duly qualified court reporter or some other officer authorized by law to administer oaths. The deposition will continue from day to day thereafter in accordance with the Federal Rules of Civil Procedure and until the examination is completed. Deponent is directed to bring to the deposition the documents listed on Exhibit A to the attached Subpoena. You are invited to attend and cross examine.

WILLIAMS & ANDERSON PLC 09/15/2010 69286

Brian Esters CHECK NO:

VENDOR:

OUR REF. NO.	YOUR INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
103879	6565-12391 Witness fees for depositions of AR employees	9/15/2010	40.00	40.00	

CHECK AMOUNT $40.00

69286

WILLIAMS & ANDERSON PLC
TWENTY-SECOND FLOOR
111 CENTER STREET
LITTLE ROCK, AR 72201
PHONE (501) 372-0800
EMPLOYER ID. #71-0670047

Metropolitan National Bank
P.O. Box 8010, Little Rock, AR 72203
81-124-820

CHECK NO.	CHECK DATE	VENDOR NO.
69286	9/15/2010	TEMP

PAY CHECK AMOUNT

Forty and NO/100********** $40.00

TO THE ORDER OF
Brian Esters
812 Towne Oaks Lane
El Dorado, AR 71730-3710

Teresa Wineland
AUTHORIZED SIGNATURE

⑈069286⑈ ⑆082001247⑆ 0147257⑈

Case 08-45664-dml11 Doc 5913-6 Filed 10/04/10 Entered 10/04/10 15:28:09 Desc Exhibit 1E Page 8 of 16

From: Janet D. Guess [jguess@williamsanderson.com]

Sent: Thursday, September 30, 2010 10:50 AM

To: Dougherty, Adam; Bailey, Clayton E.; Parham, David

Cc: Judy K. Helm; Julia Crenshaw; Josephine Garrett; Jim Lingle; Peter G. Kumpe; Teresa M. Wineland; clayfulcher@wyoming.com

Subject: Pilgrim's Pride

Follow Up Flag: Follow up

Flag Status: Red

Attachments: Esters, Brian 0930.10 amended cv ltr and subpoena for deposition.PDF

<<Esters, Brian 0930.10 amended cv ltr and subpoena for deposition.PDF>>
Counsel: The attached is for your review.

WILLIAMS & ANDERSON PLC

TWENTY-SECOND FLOOR
111 CENTER STREET
LITTLE ROCK, ARKANSAS 72201

TERESA M WINELAND
twineland@williamsanderson.com

DIRECT DIAL
(501) 396-8453

(501) 372-0800
TELECOPIER
(501) 372-6453

September 30, 2010

Brian Esters
1021 Hamilton Circle
Greenwood, AR 72936-3032

VIA CERTIFIED MAIL

RE: **In re: Pilgrim's Pride Corporation**

Dear Mr. Esters:

Enclosed and served upon you is an amended subpoena *duces tecum* in the above-referenced matter currently pending before the United States Bankruptcy Court for the Northern District of Texas. Your deposition is set for October 22, 2010, at the offices of Smith, Cohen, & Horan, PLC, 1206 Garrison Avenue, Fort Smith, Arkansas 72917, at 9:00 a.m. Also enclosed is a witness fee check for $40.00.

If you have any questions about the documents requested in this subpoena, please contact me and we will make every effort to work with you in that regard.

Thank you in advance for your cooperation in this matter. We look forward to hearing from you.

Sincerely,

Williams & Anderson PLC

Teresa Wineland

Teresa Wineland

/jdg
Encl.
Cc: To all counsel of record

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

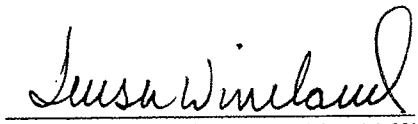
In re:	
	Case No. 08-45664 (DML)
Pilgrim's Pride Corporation, et al.,	**Chapter 11**
Debtors.	**Jointly Administered**

AMENDED NOTICE OF DEPOSITION DUCES TECUM

TO: Counsel of Record

Pursuant to the Federal Rules of Civil Procedure, please take notice that on October 22, 2010, commencing at 9:00 A.m., the attorneys for Certain Arkansas, Georgia, Alabama, North Carolina, and Florida Growers will take the deposition upon oral examination of BRIAN ESTERS at the offices of Smith, Cohen, & Horan, PLC, 1206 Garrison Avenue, Fort Smith, Arkansas 72917-0205. The deposition shall be taken before a duly qualified court reporter or some other officer authorized by law to administer oaths. The deposition will continue from day to day thereafter in accordance with the Federal Rules of Civil Procedure and until the examination is completed. Deponent is directed to bring to the deposition the documents listed on Exhibit A to the attached Subpoena. You are invited to attend and cross examine.

Respectfully submitted,



Teresa Wineland (AR Bar No. 1168)
Peter G. Kumpe (AR. Bar No. 72073)
Williams & Anderson PLC
111 Center St., Suite 2200
Little Rock, AR 72201
Tel.: 501-372-0800
Fax: 501-372-6453

Clay Fulcher (Ark. Bar No. 88005)
James G. Lingle (Ark. Bar No. 76070)
Lingle Law Firm
110 S. Dixieland Road Rogers, AR 72758
Tel.: 479-636-7899 Fax: 479-636-0095

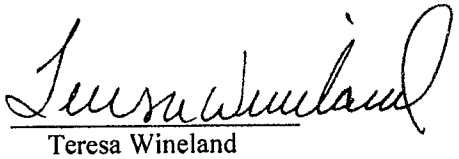
Josephine Garrett (State Bar No. 07695400)
Josephine Garrett, P.C. 3119 West 5th Street
Fort Worth, TX 76107
Tel.: 817-335-5432 Fax:
817-338-1122

Attorneys for Certain Arkansas, Georgia, Alabama, North Carolina and Florida Growers

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this instrument was emailed and sent by U.S. First Class Mail to the following on September 30, 2010:

David W. Parham, Esq.
Clayton E. Bailey, Esq.
Adam T. Dougherty, Esq.
Baker & McKenzie LLP
2300 Trammell, Crow Center
2001 Ross Avenue
Dallas, TX 75201



Teresa Wineland

Form 256 – Subpoena in a Case under the Bankruptcy Code (12/06)

UNITED STATES BANKRUPTCY COURT

WESTERN District of ARKANSAS

In re Pilgrim's Pride Corporation,
Debtor

SUBPOENA IN A CASE UNDER THE BANKRUPTCY CODE

Case No. * 08-45664 (DML) Northern District of Texas

To: Brian Esters
1021 Hamilton Circle
Greenwood, AR 72936-3032
POE: OK Foods
479-926-0488

Chapter 11

☐ YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Smith, Cohen & Horan PLC 1206 Garrison Avenue, Ft. Smith, AR 72917	10/22/10 @ 9:00am

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

Exhibit A attached to subpoena

PLACE	DATE AND TIME
Smith, Cohen & Horan PLC 1206 Garrison Avenue, Ft. Smith, AR 72917	10/22/10 @ 9:00am

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this proceeding that is subpoenaed for the taking of a disposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Rule 30(b)(6), Federal Rules of Civil Procedure, made applicable in bankruptcy cases and proceedings by Rules 1018, 7030, and 9014, Federal Rules of Bankruptcy Procedure.

ISSUING OFFICER SIGNATURE AND TITLE	DATE
Teresa Wineland, attorney for growers	9-30-10

ISSUING OFFICER'S NAME, ADDRESS, AND PHONE NUMBER

Teresa Wineland, Williams & Anderson PLC, 111 Center Street, 22nd Floor, Little Rock, Arkansas 72201; 501-372-0800

* If the bankruptcy case is pending in a district other than the district in which the subpoena is issued, state the district under the case number.

Form 256 – Subpoena in a Case under the Bankruptcy Code (12/06)

PROOF OF SERVICE

	DATE	PLACE
SERVED		

SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

_____
SIGNATURE OF SERVER

_____
ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006, made applicable in cases under the Bankruptcy Code by Rule 9016, Federal Rules of Bankruptcy Procedure:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) CONTEMPT. Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).

Exhibit A to Subpoena Duces Tecum

1. All documents, writings, email, letters, communications, memoranda, reports, analyses, and other documentary evidence relating to the idling, closing, potential sale, profitability, condition, reputation, value, location, proximity to other poultry processing plants, income and/or expenses of the Pilgrim's Pride Corporation El Dorado plant or complex.

2. All communications, email, letters, and documents pertaining to the growers: Eddie & Angie Ferrell, Greg & Sherry Jenkins, Jeff & Shannon Jenkins, Mark & Angie Simmons, Bruce & Shanda Boykin, Jim & Linda Davis, and/or South Arkansas Farms, Inc.

Case 08-45664-dml11 Doc 5913-6 Filed 10/04/10 Entered 10/04/10 15:28:09 Desc
Exhibit 1E Page 16 of 16

WILLIAMS & ANDERSON PLC

09/15/2010 69286

Brian Esters

VENDOR: CHECK NO:

OUR REF. NO.	YOUR INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
103879	6565-12391 Witness fees for depositions of AR employees	9/15/2010	40.00	40.00	

CHECK AMOUNT $40.00

69286

WILLIAMS & ANDERSON PLC
TWENTY-SECOND FLOOR
111 CENTER STREET
LITTLE ROCK, AR 72201
PHONE (501) 372-0800
EMPLOYER ID. #71-0670047

Metropolitan National Bank
P.O. Box 8010, Little Rock, AR 72203
81-124-820

CHECK NO.	CHECK DATE	VENDOR NO.
69286	9/15/2010	TEMP

PAY CHECK AMOUNT

Forty and NO/100********** $40.00

TO THE ORDER OF
Brian Esters
812 Towne Oaks Lane
El Dorado, AR 71730-3710

Louisa Wineland
AUTHORIZED SIGNATURE

⑈069286⑈ ⑆082001247⑆ 0147257⑈