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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**

REORGANIZED DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING ON OCTOBER 28, 2010 REGARDING PILGRIM'S
PRIDE CORPORATION'S MOTION FOR CONTINUANCE AND BRIEF IN SUPPORT
[Relates to Docket No. 5912]

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, as reorganized, the "Debtors")[1] hereby file the following Witness and Exhibit List for the hearing (the "Hearing") on October 28, 2010 regarding Pilgrim's Pride Corporation's Motion for Continuance of All Remaining Deadlines by 90 Days and Brief in Support [Docket No. 5912] (the "Motion").

[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.

Witness List

The Debtors may call the following witnesses to testify at the Hearing:

1. Brynn Long;

2. Any witness designated by any other party; and

3. Any witness necessary to rebut the testimony of a witness called or designated by any other party.

Exhibit List

1. Declaration of Clayton E. Bailey dated October 1, 2010

2. True and correct copy of email message from Teresa Wineland, counsel for Douglas Georgia Growers, dated August 19, 2010 enclosing list of 43 individuals counsel intends to depose in these proceedings

3. A true and correct copy of email and related letter attachment from counsel for Pilgrim's Pride to Ms. Wineland dated August 27, 2001 in response to her August 19, 2010 email

4. True and correct copies of El Dorado Claimant Jeff Jenkins' answers and objections to Pilgrim's Pride's first set of written interrogatories and responses and objections to Pilgrim's Pride's first set of requests for production

5. Summary chart setting forth names of individuals that Claimants intend to depose in these proceedings, the dates of those depositions, the employment status of those individuals and comments concerning those depositions

6. True and correct copies of Claimants' subpoena and amended subpoena to Brian Esters

7. True and correct copies of email exchanges between counsel for Claimants, Julia Crenshaw, and Clayton E. Bailey, counsel for Pilgrim's Pride, dated September 28, 2010 in which counsel for Claimants attempted to schedule four depositions in Georgia on the same days they scheduled two other depositions in two different Texas cities

8. True and correct copy of email from counsel for Claimants, Clay Fulcher, dated September 29, 2010 in which counsel for Claimants expresses concern that they will not be able to complete all of their intended depositions during the current discovery period

9. True and correct copies of email exchanges between counsel for Claimants, Clay Fulcher, and Adam Dougherty, counsel for Pilgrim's Pride, dated September 30 and October 1, 2010 in which counsel for both parties conferred about the relief sought in the Motion for Continuance

10. True and correct copy of demand letter from Pilgrim's Pride to Claimants on October 1, 2010 concerning their deficient answers and responses to Pilgrim's Pride's written interrogatories and requests for production

11. True and correct copy of email from David Parham, counsel for Pilgrim's Pride, to counsel for Claimants dated January 20, 2010 forwarding a proposed scheduling order

12. True and correct copy of email exchanges between counsel for Claimants, Clay Fulcher, and Clayton Bailey, counsel for Pilgrim's Pride, dated September 30, 2010 and October 1, 2010 relating to the identities of the Douglas Growers who will proceed with their claims

13. True and correct copy of email from Adam Dougherty, counsel for Pilgrim's Pride, to Clay Fulcher, counsel for Claimants, dated September 30, 2010 suggesting an extension of certain deadlines

14. Declaration of Brynn Long dated October 1, 2010

15. True and correct copy of photographs taken of documents made available by Pilgrim's Pride for Claimants' inspection and copying on August 23-24, 2010

16. Summary chart setting forth deposition testimony of certain Claimant growers designated for trial concerning whether they have current relationships growing for other poultry companies

17. Excerpts from the transcript of the deposition of Jim Davis dated September 20, 2010

18. Excerpts from the transcript of the deposition of Eddie Ferrell dated September 23, 2010

19. Excerpts from the transcript of the deposition of Danny Rainey dated September 23, 2010

20. Excerpts from the transcript of the deposition of Mark Allen Simmons dated September 22, 2010

21. Excerpts from the transcript of the deposition of William Craig Buchanan dated September 16, 2010

22. Excerpts from the transcript of the deposition of Michael Rufus Newton dated September 15, 2010

23. Excerpts from the transcript of the deposition of Timothy Patterson dated September 13, 2010

24. Any exhibits designated by any other party; and

25. Any exhibits needed to rebut the testimony or evidence presented by any other party.

Reservation of Rights

The Debtors reserve the right to supplement this Witness and Exhibit List as necessary and to introduce additional exhibits or call additional witnesses as may be necessary and appropriate at the Hearing.

The Debtors submit that they have served this Witness and Exhibit List on the following: (i) the United States Trustee; (ii) counsel for the Growers; and (iii) parties listed on the Master Service List filed with this Court. The Debtors submit that no other or further notice need be provided.

Dated: October 22, 2010
Dallas, Texas

/s/ Clayton E. Bailey

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