

**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)
<i>et al.,</i>	§	
	§	JOINTLY ADMINISTERED
Debtors.	§	

**Agenda of Matters Scheduled for
Hearing on November 17, 2009 at 10:30 a.m. (CT)**

I. Uncontested Matters

- A.** Debtors' Application to Employ Guantao Law Firm as Special Counsel Pursuant to 11 U.S.C. Section 327(e) Nunc Pro Tunc to September 29, 2009 [**Docket No. 3798**]

Response Deadline: November 10, 2009 at 4:00 p.m. (CT).

Response(s) Received: None as of the filing of this Agenda.

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Notice of Hearing [**Docket No. 3829**]

Status: **This matter is going forward.**

- B.** Debtors' Application Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014(a) for Authorization to Employ and Retain American Appraisal Associates, Inc. as Valuation Consultants to the Debtors Nunc Pro Tunc to September 16, 2009 [**Docket No. 3901**]

Response Deadline: November 13, 2009 at 4:00 p.m. (CT).

Response(s) Received: Informal comments received from U.S. Trustee.

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Motion for Expedited Hearing on Debtors' Application Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014(a) for Authorization to Employ and Retain American Appraisal Associates, Inc. as Valuation Consultants to the Debtors Nunc Pro Tunc to September 16, 2009 [**Docket No. 3902**]
2. Order granting Motion for Expedited Hearing [**Docket No. 3908**]
3. Notice of Hearing [**Docket No. 3909**]
4. Supplemental Declaration of Christopher L. Rexroat in Support of the Debtors' Application Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014(a) for Authorization to Employ and Retain American Appraisal Associates, Inc. as Valuation Consultants to the Debtors Nunc Pro Tunc to September 16, 2009 [**Docket No. 3958**]

Status: This matter is going forward. A revised order will be presented to the Court addressing the U.S. Trustee's informal comments.

- C.** Motion to Authorize St. Paul/Travelers to Make Advancements and Payments in Accordance with the Debtors' Fiduciary Insurance Policy [**Docket No. 3932**]

Response Deadline: November 16, 2009 at 10:00 a.m. (CT).

Response(s) Received: None as of the filing of this Agenda.

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Motion for Expedited Hearing [**Docket No. 3933**]
2. Notice of Hearing [**Docket No. 3936**]
3. Order Granting Motion for Expedited Hearing [**Docket No. 3938**]

Status: This matter is going forward.

- D.** Debtors' Motion to Approve Certain Election Procedures in Connection with Confirmation of Debtors' Joint Chapter 11 Plan [**Docket No. 3953**]

Response Deadline: November 16, 2009 at 12:00 p.m. (CT).

Response(s) Received: None as of the filing of this Agenda.

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Motion for Expedited Hearing [**Docket No. 3954**]
2. Notice of Hearing [**Docket No. 3968**]
3. Order Granting Motion for Expedited Hearing [**Docket No. 3980**]

Status: **This matter is going forward.**

II. Contested Matters

- A.** Debtors' Amended Omnibus Response to Additional Section 503(b)(9) Claims [**Docket No. 2686**]

Response Deadline: August 11, 2009 at 4:00 p.m. (CT).

Response(s) Received:

1. Response of Linde LLC to Debtors' Omnibus Response and Amended Omnibus Response to Additional Section 503(b)(9) Claims [**Docket No. 2990**]
2. Response of Motion Industries, Inc. in Support of its 503(b)(9) Claim and in Opposition to Debtors' (I) Amended Omnibus Response to Additional Section 503(b)(9) Claims and (II) Reply to Section 503(b)(9) Objections [**Docket No. 2998**]

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Debtors' Motion Pursuant to Section 503(b)(9) of The Bankruptcy Code to Establish and Implement Exclusive and Global Procedures for Submitting and Resolving Claims Relating to Goods Received Within Twenty Days Prior to The Commencement Date [**Docket No. 52**]
2. Order pursuant to section 503(b)(9) of the Bankruptcy Code to Establish and Implement Exclusive and Global Procedures for Submitting and Resolving Claims Relating to Goods Received within Twenty Days Prior to the Commencement Date [**Docket No. 412**]
3. Debtors' Omnibus Response to Additional Section 503(b)(9) Claims [**Docket No. 2680**]

4. Stipulation and Agreed Order Resolving Linde, LLC's Objection to Debtors' Omnibus Response to 503(b)(9) Claims [**Docket No. 3865**]

Status: The Court has entered an Order with respect to all claimants except Motion Industries, Inc.

The Debtors are negotiating a resolution with Motion Industries, Inc. and may present an agreed order at the November 17, 2009 hearing. If the agreed order is not finalized by the November 17, 2009 hearing, this matter with respect to such claimants will be adjourned to December 1, 2009 at 10:30 a.m. (CT).

- B. Debtors' Omnibus Response to Section 503(b)(9) Claims [**Docket No. 1693**]**

Response Deadline: May 24, 2009 at 4:00 p.m. (CT).

Response(s) Received:

1. Reply of Packaging Specialties of Georgia, Inc., Packaging Specialties, Inc. and Pacmac, Inc. to Debtors' Omnibus Response to Section 503(b)(9) Claims [**Docket No. 1932**]
2. Response of Motion Industries, Inc. in Support of its 503(b)(9) Claim and in Opposition to Debtors' (I) Amended Omnibus Response to Additional Section 503(b)(9) Claims and (II) Reply to Section 503(b)(9) Objections [**Docket No. 2998**]

Replies Received:

1. Debtors' Omnibus Reply to Section 503(b)(9) claims [**Docket No. 2673**]
2. Debtors' Supplemental Reply to Section 503(b)(9) claims [**Docket No. 3054**]

Related Documents:

1. Debtors' Motion Pursuant to Section 503(b)(9) of The Bankruptcy Code to Establish and Implement Exclusive and Global Procedures for Submitting and Resolving Claims Relating to Goods Received Within Twenty Days Prior to The Commencement Date [**Docket No. 52**]
2. Order pursuant to section 503(b)(9) of the Bankruptcy Code to Establish and Implement Exclusive and Global Procedures for

Submitting and Resolving Claims Relating to Goods Received Within Twenty Days Prior to the Commencement Date [**Docket No. 412**]

Status: The Court has entered an Order with respect to all claimants except for Packaging Specialties of Georgia, Inc., Packaging Specialties, Inc., Pacmac, Inc., and Motion Industries, Inc.

The Debtors are negotiating a resolution with Packaging Specialties of Georgia, Inc., Packaging Specialties, Inc., and Pacmac, Inc., and with Motion Industries, Inc., and may present agreed orders at the November 17, 2009 hearing. If the agreed orders are not finalized by the November 17, 2009 hearing, this matter with respect to such claimants will be adjourned to December 1, 2009 at 10:30 a.m. (CT).

C. Motion to Reject Certain Broiler Grower Agreements (Fifth Rejection Motion) [Docket No. 2591**]**

Response Deadline: July 28, 2009 at 4:00 p.m. (CT).

Response(s) Received:

1. Response of Larry Harden, Larry Harden Farm, Eva Harden and Eva Harden Farm to Debtors' Fifth Motion to Reject Broiler Grower Agreements [**Docket No. 2808**]

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Notice of Hearing [**Docket No. 2600**]
2. Notice of Hearing [**Docket No. 3006**]
3. Notice of Continued Hearing [**Docket No. 3175**]
4. Notice of Continued Hearing [**Docket No. 3309**]
5. Notice of Continued Hearing [**Docket No. 3471**]
6. Notice of Continued Hearing [**Docket No. 3621**]

Status: The Debtors have reached an agreement in principle with the growers asserting their objection at Docket No. 2808 and plan on filing a motion seeking approval of such agreement and presenting the motion at the December 1, 2009 hearing.

D. Application of MAC Trailer Leasing, Inc. for Allowance and Payments of Administrative Claims [**Docket No. 2489**]

Response Deadline: August 11, 2009 at 4:00 p.m. (CT)
(extended to October 20, 2009)

Response(s) Received: None as of the filing of this Agenda.

Replies Received: None as of the filing of this Agenda.

Related Documents:

1. Notice of Hearing [**Docket No. 2653**]
2. Notice of Adjournment of Hearing [**Docket No. 2992**]
3. Notice of Adjournment of Hearing [**Docket No. 3114**]
4. Notice of Adjournment of Hearing [**Docket No. 3264**]
5. Notice of Adjournment of Hearing [**Docket No. 3443**]
6. Notice of Adjournment of Hearing [**Docket No. 3611**]
7. Notice of Adjournment of Hearing [**Docket No. 3672**]
8. Notice of Adjournment of Hearing [**Docket No. 3795**]

Status: **The Debtors are negotiating a resolution of this matter with MAC Trailer Leasing, Inc. and may present an agreed order at the November 17, 2009 hearing. If the agreed order is not finalized by the November 17, 2009 hearing, this matter will be adjourned to December 1, 2009 at 10:30 a.m. (CT).**

III. Legal Argument

- A.** Legal Argument regarding which postpetition interest rate is applicable to unsecured claims without a contract.

Brief(s) Received:

1. Official Committee of Unsecured Creditors' Memorandum Regarding Rate of Postpetition Interest Payable to Class 7 Creditors Under Debtors' Proposed Plan of Reorganization [**Docket No.**
2. Joint Brief in Support of Application of Federal Judgment Rate of Postpetition Interest to Unsecured Claims in Classes 7(A) Through 7(G) of the Debtors' Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [**Docket No. 3969**]

Status: **This matter is going forward.**

Dated: November 13, 2009
Fort Worth, Texas

/s/ Stephen A. Youngman

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