

## EXHIBIT B

### Document Request.

1. Any and all documents or information relating to any claims by Furr's Supermarkets, Inc. ("FSI") against Don Newsom, Newsom's Food Center, Inc., MKN, Inc., Mardon Investments, and/or NFC, Inc. (the "Newsom Parties") arising anytime in 1993, including but not limited to claims arising from the sale of assets by Furr's Supermarkets, Inc. to Newsom's Food Center, Inc. in or around August 1993. Without limiting the forgoing, documents to be produced should include correspondence, papers filed in litigation, handwritten notes, and internal memoranda, whenever any such documents were created.

2. Any and all documents or information related to any transactions between Furr's Supermarkets, Inc. and any one or more of the Newsom Parties that occurred in 1993. Without limiting the forgoing, documents to be produced should include contracts, letters or memoranda of understanding, correspondence, handwritten notes, and internal memoranda, whenever any such documents were created.

3. To the extent not requested above, the Asset Purchase Agreement (the "APA"), dated August 26, 1993, between Furr's Supermarkets, Inc. and Newsom's Food Center Inc.; all documents relating to negotiation of the APA; all documents executed in connection with the APA or the consummation of the transactions contemplated by the APA; all documents constituting or relating to any collateral pledged to FSI at anytime to secure obligations arising in connection with the consummation of the transactions contemplated by the APA (the "Obligations"); all documents relating to any work out or restructuring of the Obligations; and all papers filed in any litigation concerning claims arising out of the APA or any notes or other agreements executed in connection therewith.

4. To the extent not requested above, any and all documents referring or otherwise relating in anyway to the purchase of any life insurance in or around October 1993 by any one or more of the Newsome Parties an/or the collateral assignment or other pledge of any such policies to FSI in or around October 25, 1993.

5. Any information regarding the current location, address or office or home telephone numbers of Allison Kelso Chandler, or the otherwise relates to how she may be contacted.