UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

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U.S. BANKRUPTCY COURT
ALBUQUERQUE, N.M.

In re:

FURR'S SUPERMARKETS, INC.,

Debtor. No. 11-01-10779-SA

**LOS LUNAS SHOPPING CENTER-EAST'S FIRST AMENDED RESPONSE TO DEBTOR'S MOTION FOR ORDER APPROVING SALE OF SOME OR ALL OF DEBTOR'S OPERATING ASSETS AND GRANTING RELATED RELIEF**

Los Lunas Shopping Center-East, a New Mexico Limited Partnership ("Creditor"), through its attorneys Scott & Kienzle, P.A. (Duncan Scott), hereby responds to Debtor's Motion for Order Approving Sale of Some or All of Debtor's Operating Assets and Granting Related Relief, filed on or about June 1, 2001, as follows:

1. In the revised Exhibit 2 to Debtor's motion mailed June 13, 2001, the cure amount for Creditor's lease at the Los Lunas store (location number "862") is incorrect. The correct cure amount is:

| | | | |
|---|---|---|---|
| $4,250.00 | Pre-petition rent | | |
| | Unpaid real and personal property taxes through July 10, 2001: | | |
| | | $22,502.94 | Tract F |
| | | $1,053.70 | Tract B |
| | | $1,269.31 | Tract F (personal property tax) |
| $24,825.95 | | | |
| $7,004.42 | Attorney's fees and costs (pursuant to Section XVII of the lease) | | |
| **36,080.37** | **TOTAL** | | |

620

2. Pursuant to Section 365(b)(1)(C), prior to assuming the lease, Debtor must provide Creditor with adequate assurances of future performance of the lease.

WHEREFORE Creditor respectfully requests that this Court deny Debtor's motion unless it agrees to pay Creditor the above amounts to cure the lease default and to provide adequate assurances of future performance pursuant to Section 365(b).

SCOTT & KIENZLE, P.A.

By: _____

Duncan Scott
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I certify that this pleading was mailed or faxed to:

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on this 20th day of June, 2001.

_____
Duncan Scott

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