

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In Re:

FURR'S SUPERMARKETS, INC.,

Debtor.

Chapter 11

Case No. 01-10779-SA

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

**DECLARATION OF ANTHONY FORCUM IN SUPPORT OF OFFICIAL UNSECURED
CREDITOR'S COMMITTEE OBJECTION TO DEBTOR'S APPLICATION FOR ORDER
AUTHORIZING THE RETENTION
OF PETER J. SOLOMON COMPANY AS INVESTMENT BANKER**

I, Anthony D. Forcum, declare that:

1. I am a Principal with the firm of Deloitte Consulting L.P. ("Deloitte"), financial advisors and reorganization consultants to the Official Unsecured Creditor's Committee in the above-referenced case (the "Committee"), with offices at Las Colinas Corporate Center II, 6363 N. State Highway 161, Suite 800, Irving, Texas 75038. I submit this Declaration in support of the Objection and Trial Brief filed by the Committee to the Debtor's Application for Order Authorizing the Retention of Peter J. Solomon Company, Limited ("PJS") as its Investment Banker (the "Solomon Application"). Except as otherwise indicated, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

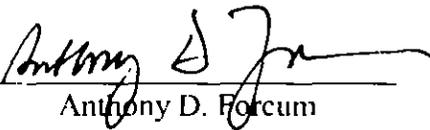
2. At the request of the Committee, I have examined and analyzed the Solomon Application and all of the terms therein. I have further examined and analyzed the exhibits submitted by the Debtor in support of the Solomon Application, including the documents purporting to demonstrate comparable retention applications and engagement terms. I have also analyzed, based on data obtained by my firm, comparable engagement terms for investment bankers both in the supermarket industry as well as in other industries.

3. As set forth on Exhibit "A" attached to this Declaration, the fee schedule for PJS has been broken down based on comparable transactions, beginning at \$100,000,000. For example, a

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 14th day of May, 2001, in Irving, Texas.



Anthony D. Forcum