IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF NEW MEXICO

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U.S. BANKRUPTCY COURT
ALBUQUERQUE, NM

In re:

FURR'S SUPERMARKETS, INC., 01-11-10779 SA
Chapter 11

Debtor.

EMERGENCY MOTION OF PINNACLE LOGISTICS, INC. AND COUNTRYWIDE LOGISTICS, INC. FOR EMERGENCY AND EXPEDITED FINAL HEARING ON MAY 18, 2001 MOTION FOR RELIEF FROM AUTOMATIC STAY

COME NOW Creditors Pinnacle Logistics, Inc. and Countrywide Logistics, Inc. by and through their counsel of record, Rodey, Dickason, Sloan, Akin & Robb, P.A. by James A. Askew and by Pryor, Cashman, Sherman & Flynn LLP by Peter D. Wolfson and Richard G. Downing II, and for their Emergency Motion for Emergency and Expedited Final Hearing on May 18, 2001 Motion for Relief from Automatic Stay, state as follows:

1. Creditors filed their Stay Motion on May 18, 2001. Notice of the deadline to object and the preliminary hearing was provided on May 18, 2001.

2. A preliminary hearing is set for June 11, 2001 at 9:00 a.m.

3. Since the filing of the Stay Motion the situation has changed drastically. The Unsecured Creditors Committee has filed an Emergency Motion for Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104. Debtor has sought to establish sale procedures for its business. Inventory upon which Creditors claim a lien continues to be depleted and to diminish. Debtor has refused to offer adequate protection. Creditors lack adequate protection for their interest.

4. Immediate and irreparable harm will result to Creditors without an

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emergency final hearing on the Stay Motion or without an immediate grant of additional adequate protection.

5. Debtor does not consent to an emergency final hearing.

WHEREFORE, Pinnacle Logistics, Inc. and Countrywide Logistics, Inc pray that the Court grant its Emergency Motion for Emergency and Expedited Final Hearing on May 18, 2001 Motion for Relief from Automatic Stay and for such other and further relief as the Court deems just and proper.

RODEY, DICKASON, SLOAN, AKIN & ROBB
Attorneys for Pinnacle Logistics, Inc. and
Countrywide Logistics, Inc.

By:_____
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-and-

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CERTIFICATE OF SERVICE:

I certify that I mailed a true and correct copy of the foregoing pleading, by U.S. Mail, first class, postage prepaid, on this 4th day of June, 2001 to the following:

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RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By: _____
James A. Askew