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U.S. BANKRUPTCY COURT  
ALBUQUERQUE N.M.

Attorney for Manufacturers' Leasing Services Corp..

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

In re:

FURR'S SUPERMARKETS, INC.,

Case No. 11-01-10779 SA  
Chapter 11

Debtor.

**NOTICE OF MOTION TO COMPEL  
ASSUMPTION OR REJECTION OF  
LEASES AND TO PROHIBIT OR  
CONDITION USE OF LEASED  
EQUIPMENT; TO PROVIDE  
ADEQUATE PROTECTION; AND TO  
COMPEL PAYMENT OF LEASE  
PAYMENTS**

NOTICE IS HEREBY GIVEN THAT on December 26, 2001, Creditor  
Manufacturers' Leasing Services Corp. ("MLSC") filed the following:

**MOTION TO COMPEL ASSUMPTION OR REJECTION OF LEASES AND TO  
PROHIBIT OR CONDITION USE OF LEASED EQUIPMENT; TO PROVIDE  
ADEQUATE PROTECTION; AND TO COMPEL PAYMENT OF LEASE  
PAYMENTS**

MLSC urges approval of the above-described Motion for the reason that: MLSC is a Lessor under thirty-two (32) unexpired executory equipment leases (the "Leases") the terms of which obligate the Debtor to make payments to MLSC; the Debtor was in possession of personal property which is the subject of the Leases during the administration of this Chapter 11 case; and MLSC has not been paid its administrative claim. MLSC is therefore entitled to an order compelling the Debtor to immediately

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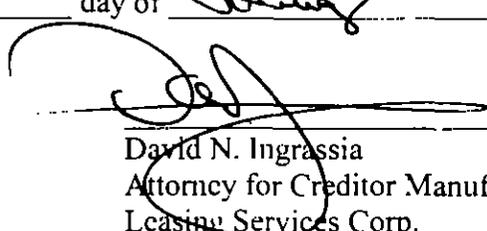
assume its unexpired Leases with MLSC, alternatively prohibiting the Debtor from using MLSC's equipment until the Debtor pays all post-petition payments due MLSC; alternatively if the Debtor fails to make the required payments and assume the Lease, the Debtor be directed to surrender the equipment to MLSC; and for payment of all sums due under the Leases as an administrative claim pursuant to 11 U.S.C. Section 365(d)(10).

For further information, consult the Motion on file with the Court of the United States Bankruptcy Court. Any person opposing the Motion shall file an objection within twenty (20) days from the date of this Notice with the Clerk of the United States Bankruptcy Court and serve a copy upon the attorney for MLSC at the address shown:

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If no objections to the Motion are received within that time, the Court may enter an appropriate Order approving Manufacturers' Leasing Services Corp.'s Motion without further notice.

DATED this 8<sup>th</sup> day of January, 2002.

  
\_\_\_\_\_  
David N. Ingrassia  
Attorney for Creditor Manufacturers'  
Leasing Services Corp.

Copy of the foregoing mailed  
this 8<sup>th</sup> day of January, 2002 to:

Robert H. Jacobvitz  
David T. Thuma  
500 Marquette NW, #650  
Albuquerque, NM 87102  
Debtor's attorneys

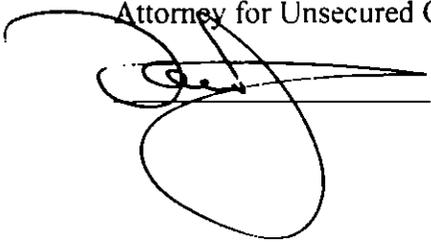
Amy S. Park  
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Laura M. Franze  
1700 Pacific Avenue, Suite 4100  
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Debtor's attorney

Furr's Supermarkets, Inc.  
c/o Chief Financial Officer  
4411 The 25 Way NE, Suite 100  
Albuquerque, NM 87109  
Debtor

United States Trustee  
c/o Ron E. Andazola  
Assistant US Trustee  
P.O. Box 608  
Albuquerque, New Mexico 87103-0608  
U.S. Trustee

William J. Davis  
Davis & Pierce  
201 Broadway, SE  
Albuquerque, New Mexico 87102  
Attorney for Unsecured Creditor's Committee

A handwritten signature in black ink, appearing to be 'W. J. Davis', written over a horizontal line. The signature is stylized with a large loop at the end.