

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re:

FILED
FURR'S SUPERMARKETS, INC., 12:00 MIDNIGHT

Case No. 11-01-10779-SA

SEP 13 2001 Chapter 11

Debtor. **DROP BOX**
United States Bankruptcy Court
Albuquerque, New Mexico

**OBJECTION TO THE COMMITTEE'S EXPENSE REIMBURSEMENT
APPLICATION**

Furr's Supermarkets, Inc., debtor in possession ("Furr's"), objects to the First Application For Order Approving Reimbursement of Expenses of the Members of the Unsecured Creditors' Committee of Furr's Supermarkets, Inc., Submitted Through June 30, 2001 (the "Expense Reimbursement Application") and states:

1. Furr's objects to the Expense Reimbursement Application to the extent it seeks reimbursement of Ms. Sandra Schirmang's February 12, 2001 trip to Albuquerque (\$785.31), as that trip occurred before the Unsecured Creditors' Committee (the "Committee") was appointed.

2. Furr's objects to the additional expense incurred because the Committee meetings were not held in a cost-efficient, centralized location. Three of the Committee member representatives traveled from Albuquerque, New Mexico. The other members traveled from Omaha, Nebraska; Chicago, Illinois; Cincinnati, Ohio; and Winston-Salem, North Carolina. Given these locations, it made little sense to hold a Committee meeting in New York, New York. It may have made sense to hold all Committee meetings in Dallas, Texas, and to hold most of the meetings by telephone conference.

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3. Furr's objects to the Expense Reimbursement Application to the extent it seeks reimbursement of air travel purchased at maximum rates. There appears to have been little effort made by the Committee to schedule meetings far enough in advance to allow purchase of advance-purchase tickets. While some members obtained low cost tickets (e.g., Rick Johnson & Co. paid \$232 for a round trip to Dallas, Texas from Albuquerque, New Mexico), others paid top dollar (e.g., Kraft paid \$913 for a round trip to Dallas, Texas, and \$1,115 for a round trip to Denver, Colorado, both from Chicago, Illinois). The estate should not be required to pay top dollar for travel unless unavoidable.

4. Furr's objects to the Expense Reimbursement Application to the extent it seeks reimbursement for meals in excess of \$50 per day per person, or for lodging in excess of \$200 per day, as being unreasonable.

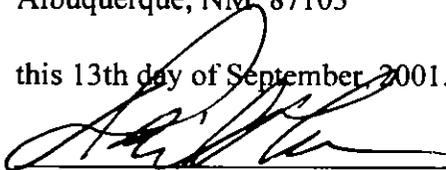
WHEREFORE, Furr's prays that the Expense Reimbursement Application be denied to the extent set forth above, and for all other just and proper relief.

JACOBVITZ THUMA & WALKER

Stuart Hertzberg
Pepper Hamilton, LLP
100 Renaissance Center, Suite 3600
Detroit, MI 48243

United States Trustee
P.O. Box 608
Albuquerque, NM 87103

this 13th day of September, 2001.

A handwritten signature in black ink, appearing to read "David T. Thuma", is written over a horizontal line.

David T. Thuma