

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

NOV 15 PM 3:56  
U.S. BANKRUPTCY COURT  
ALBUQUERQUE, NM

In re:

FURR'S SUPERMARKETS, INC.,

Case No. 11-01-10779-SA  
Chapter 11

Debtor.

**OBJECTION TO MOTION OF UNITED FOOD AND COMMERCIAL  
WORKERS UNION LOCAL 540 FOR ORDER ALLOWING AND REQUIRING  
IMMEDIATE PAYMENT OF ADMINISTRATIVE EXPENSES**

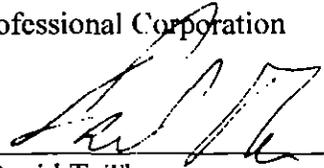
Furr's Supermarkets, Inc., debtor in possession ("Furr's"), files this objection to the Motion of United Food and Commercial Workers Union Local 540 for Order Allowing and Requiring Immediate Payment of Administrative Expenses, filed October 25, 2001 (the "Motion"), and states:

1. Furr's objects to the Motion because Furr's currently has no money with which to pay the asserted claims.
2. Furr's objects to the Motion to the extent, if any, the amounts claimed for the former employee are inaccurate. Furr's cannot determine at this time the exact amount due and owing for post-petition health insurance claims of its former employees. Furr's has no objection to the allowance of all of such claims in the proper amount, once the amount has been determined.

WHEREFORE, Furr's objects to the Motion to the extent set forth above, asks that the Motion be denied to that extent, and asks for all other just and proper relief.

1346

JACOBVITZ THUMA & WALKER  
A Professional Corporation

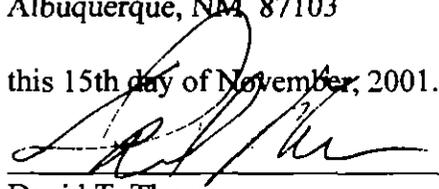
By: 

David T. Thuma  
500 Marquette N.W., Suite 650  
Albuquerque, New Mexico 87102  
(505) 766-9272  
(505) 766-9287 (fax)  
Counsel for Furr's Supermarkets, Inc.

The undersigned hereby certifies that a  
copy of the foregoing was mailed to:

U.S. Trustee  
P.O. Box 608  
Albuquerque, NM 87103

this 15th day of November, 2001.

  
David T. Thuma