

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

FILED
OFFICE OF THE
02 MAY 28 PM 1:56
CLERK OF DISTRICT COURT
ALBUQUERQUE, N.M.

In re:

FURR'S SUPERMARKETS, INC.

No. 11-01-10779-SA

Debtor.

**RESPONSE TO MOTION OF STATE OF NEW MEXICO
TAXATION & REVENUE AS TO J. D. BEHLES & ASSOCIATES**

COMES NOW Jennie Dedcn Behles and in Response to the Motion does state:

1. Jurisdiction to enforce orders of the District Court, Santa Fe County, resides in that Court exclusively.
2. The Department seeks here to gain what the state District Court would not grant it, an injunction against Behles practicing.
3. No such order was made or entered, despite attempts of the Department to have such an order entered in a manner not in conformity with the local rules of that court and the New Mexico Rules of Civil Procedure.
4. The Department seeks to gain advantage here when in fact they abandoned for purposes of hearing in the State Court the majority of their claims based on a successor theory and refused security or settlement of tax during this proceeding.
5. Behles has filed a Motion before the District Court (Judge Hall) asking to have this practice on behalf of the Department stopped.

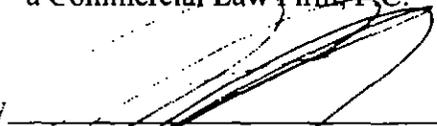
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Respectfully submitted,

J.D. Behles & Associates,
a Commercial Law Firm, P.C.

By



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I HEREBY CERTIFY that a true and correct copy of the foregoing **Response to Motion of State of New Mexico Tax & Revenue as to J.D. Behles & Associates** was mailed via U.S. mail, first class, postage prepaid, to:

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Courtesy copy to
The Honorable James A. Hall
Judge of the First Judicial District Court
P. O. Box 2268
Santa Fe, NM 87504

this 28 day of May, 2002.

By: _____
Jennie Deden Behles

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