

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

**FILED**

at \_\_\_\_\_ o'clock \_\_\_\_ M

APR 10 2001

In re:

FURR'S SUPERMARKETS, INC.,

United States Bankruptcy Court  
Albuquerque, New Mexico

Case No. 11-01-10779-SA

Chapter 11

Debtor.

**RESPONSE TO KENNETH CROW'S MOTION FOR RELIEF FROM STAY**

Furr's Supermarkets, Inc., debtor and debtor in possession ("Furr's") files this response to Kenneth Crow's ("Movant's") Motion for Relief From Stay (the "Motion"), filed on or about March 21, 2001.

1. Furr's admits the allegations in paragraph 1 of the Motion.
2. Furr's denies the allegations in paragraph 2 of the Motion.
3. Furr's admits the allegations in paragraph 3 of the Motion.
4. Furr's admits the allegations in paragraph 4 of the Motion.
5. Furr's denies the allegations in paragraph 5 of the Motion.
6. Furr's denies the allegations in paragraph 6 of the Motion.
7. Furr's denies the allegations in paragraph 7 of the Motion.
8. Furr's denies the allegations in paragraph 8 of the Motion.
9. Furr's admits the allegations in paragraph 9 of the Motion.
10. Furr's admits the allegations in paragraph 10 of the Motion.
11. In further answer, Furr's states that it would be much more efficient, and

would conserve estate assets, if pre-petition personal injury claims were adjudicated before

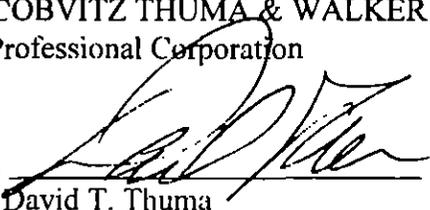
*3/20*

this Court, either through a claims estimation process, an alternative dispute resolution process, or some similar means.

12. In any event, it is in the best interests of the creditors, including the Movant, to delay liquidation of Movant's claim until it appears that such claim liquidation is necessary.

WHEREFORE, Furr's prays that the Motion be denied, and for all other just and proper relief.

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)

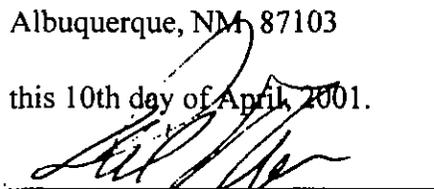
Counsel for Furr's Supermarkets, Inc.

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

Daniel J. Behles  
P.O. Box 415  
Albuquerque, New Mexico 87103

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

this 10th day of April, 2001.

  
David T. Thuma