

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW MEXICO

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U.S. BANKRUPTCY COURT
ALBUQUERQUE, NM

In re:

FURR'S SUPERMARKETS, INC.,

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

Debtor.

**DEBTOR'S RESPONSE TO THE OFFICIAL UNSECURED CREDITORS'
COMMITTEE'S APPLICATION FOR ENTRY OF ADMINISTRATIVE ORDER
REGARDING PAYMENT OF INTERIM PROFESSIONAL FEES AND EXPENSES**

The debtor in possession, Furr's Supermarkets, Inc. (the "Debtor") responds and objects to the Official Unsecured Creditors' Committee's (the "UCC's") Application for Entry of Administrative Order Regarding Payment of Interim Professional Fees and Expenses (the "Application"), filed on or about May 30, 2001 (document # 527), as follows:

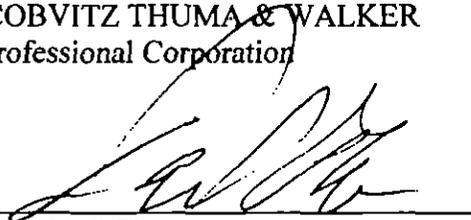
1. The Debtor objects to the Application to the extent it seeks an order that would require Furr's to pay any professional fees regardless of Furr's liquidity or other needs for its cash.
2. The Debtor objects to the Application because granting it without modification is not in the best interests of the Debtor, the estate, or other parties in interest.
3. The Debtor is a debtor-in-possession and is authorized to operate its business and make decisions about use of its resources. The Application seeks to usurp the authority of the Debtor, and should be denied to that extent.
4. The Debtor disputes the assertion in paragraph 4 of the Application that the relief sought is in the Debtor's best interests. To the contrary, the order sought would benefit only the UCC's professionals. The Debtor is charged with proceeding in the best interests of all parties,

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not just the members of the UCC or its professionals.

WHEREFORE, the Debtor objects to the Application, requests that it be denied, and requests all other just and proper relief.

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This certifies that a copy of
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this 22nd day of June, 2001.

