

**United States Bankruptcy Court
For the Southern District of Ohio
Eastern Division**

In Re

United Producers, Inc.

Debtor and Debtor-in-Possession

Case No. 05-55272

Jointly Administered

Chapter 11

Judge Charles M. Caldwell

Re: Dkt No. 16

Judgment Creditors Objections to Motion to Sell, and Lease, Office Space

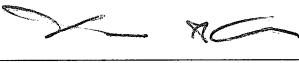
G.E. Cattle Co., Inc., Producers Livestock Marketing Association, and Harry Hayes, "Judgment Creditors", respectfully object to Filing No. 148, the Motion of Debtor United Producers Inc. for authority to sell its Columbus, Ohio office locations and lease back those locations for three (3) years. Objections are respectfully made to the Motion on these grounds:

1. The Motion presumes United Producers Inc. will exist for three years and be able to perform the lease when no plan of reorganization has been approved.
2. The Motion and supporting data do not indicate that there is a viable economic justification for the sale or that the lease arrangement is more economically suitable, feasible, prudent or appropriate for the Debtor than its continued ownership of the real estate.
3. The Motion does not explore or explain why the Debtor cannot make cash available for its operations through borrowing on terms substantially identical, for repayment purposes to the lease proposed. Furthermore, the lease will constitute a liability of the company similar to indebtedness that might be incurred.

4. The Motion is not supported by sufficient evidence to justify either the sale price for the building or the lease price for the facility.
5. The Motion is premature. It should be a part of, or occur after approval of, a plan of reorganization.

Dated: July 25, 2005.

G.E. Cattle Co., Inc., Producers
Livestock Marketing Association,
and Harry Hayes, Judgment Creditors,

By 

David A. Domina,
Domina Law pc
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(402) 493-4100

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Certificate of Service

I certify that on July 25, 2005, I filed a true and correct copy of **Judgment Creditors Objections to Motion to Sell, and Lease, Office Space** with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Assistant U.S. Trustee (Col)
Ustpreion09.cv.ecf@usdoj.gov

Randall D. LaTour, Esq.
rdaltour@vssp.com,
cdfricke@vssp.com

Notification was also served upon the parties listed on the attached Service List, on the 25th day of July 2005 by United States Mail, postage prepaid.

/s/ David A. Domina
David A. Domina, #11043

UPI.BK Core Service List
 Revised 6/8/05

US Bankruptcy Court
 Southern District of Ohio
 Southern Division

UPI.BK
 Case No. 05-55272

<p>Do not send – will receive E-filing Randall D. LaTour Vorys, Sater, Seymour and Pease P. O Box 1008 Columbus, OH 43215</p>	<p>Do not send Reginald W. Jackson Vorys, Sater, Seymour and Pease P. O Box 1008 Columbus, OH 43215</p>
<p>Do not send GE Cattle Domina Law pc 2425 S. 144th Street Omaha, NE 68144</p>	<p>Do not send – will receive E-filing United States Trustee 170 North High, Suite 200 Columbus, OH 43215</p>
<p>Do not send Curreys of Nebraska LLC Domina Law pc 2425 S. 144th Street Omaha, NE 68144</p>	<p>Do not send Harry Hayes Domina Law pc 2425 S. 144th St. Omaha, NE 68144</p>
<p>Do not send Producers Livestock Corp. Domina Law pc 2425 S. 144th Street Omaha, NE 68144</p>	
<p>Joseph Werstak, DFO United Producers, Inc. 5909 Cleveland Avenue Columbus, OH 43229</p>	<p>Hoffman Heating and Air 1791 East Johnson Lane Vincennes, IN 47591</p>
<p>OfficeMax Contract Inc. P. O. Box 360755 Pittsburgh, PA 15250-6755</p>	<p>Lancaster Utilities Collection 104 East Main St. P. O. Box 1099 Lancaster, OH 43130</p>
<p>Rogers, Everett & Deborah c/o Richard D. Rhyne – Lathrop 2345 Grand Blvd., Suite 2800 Kansas City, MO 64108</p>	<p>Stockton Animal Clinic MFA Cattlemen Auction Co. 14975 S. Highway 39 Stockton, MO 65785</p>

OfficeMax Credit Plan Dept 58-3400616958 P.O. Box 9020 Des Moines, IA 50368-9020	Sanders, Ed 4820 Mason Road Fort Laramie, OH 45845
Scholfield Veterinary Supply P. O. Box 8232 Des Moines, IA 50301	Rumbold Valley Farms, Inc. Feed Division 411 N. Chestnut St. Kenwancee, IL 61443
Dell Commercial Credit Dept. 50-0059090269 P. O. Box 9020 Des Moines, IA 50368	Aquila P.O. Box 219703 Kansas City, MO 64121
United States Postal Service USPA – Hasler Box 0527 Carol Stream, IL 60132	MFA Oil Company 1515 East First St. Maryville, MO 64468
Owen Electric Cooperative, Inc. P. O. Box 308 510 S. Main St. Florence, KY 41022	Geiler’s Sunoco 101 West 1 st St. Kinmundy, IL 62854
Moore Wallace P. O. Box 905046 Charlotte, NC 28290	American Electric Power P. O. Box 24418 Canton, OH 44701
CoBank ACB 5500 South Quebec Street Greenwood Village, CO 80111	James Markus Block, Markus, Williams, LLC 1700 Lincoln St., Ste 4000 Denver, CO 80203
Office of the U.S. Attorney – Columbus 303 Marconi Blvd., Suite 200 Columbus, OH 43215	Jeannette Eisan Hinshaw Bose, McKinney & Evans LLP 135 N. Pennsylvania St., Suite 2700 Indianapolis, IN 46204
Joseph Robbins Robbins Appraisal, Inc. 5200 Schott Rd. Maryville, MI 48744	Daniel A. DeMarco Hahn, Loeser & Parks, LLP 3300 BP Tower 200 Public Square Cleveland, OH 44114
BASCOM Mutual Telephone Co. P. O. Box 316 Bascom, OH 44809-0316	Verizon Wireless P.O. Box 790406 St. Louis, MO 63179-0406

<p>James R. Morris Special Asst. Atty. General Missouri Dept. of Revenue 301 High St., Rm 670 Jefferson City, MO 65105</p>	<p>Kyle R. Grubbs, Esq. Frost, Brown, Todd LLC 2200 PNC Center 201 East Fifth Street Cincinnati, OH 45202</p>