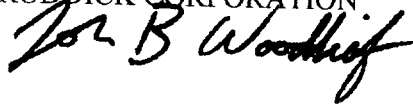


4. The Employer hereby states that it maintains the other plans listed below primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and the number of employees in each plan as follows:
- (a) Ruddick Supplemental Executive Retirement Plan: 47 participants
 - (b) Ruddick Corporation Flexible Deferral Plan: 80 participants
 - (c) Ruddick Deferred Compensation Plan: 27 participants
 - (d) Ruddick Corporation Director Deferral Plan: 11 participants
 - (e) Ruddick Corporation Senior Officers Insurance Plan: 6 participants
 - (f) Ruddick Corporation Supplemental Executive Retirement Plan For the Benefit of Alan T. Dickson: 1 participant
5. The Plan was implemented on March 31, 2006.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

RUDDICK CORPORATION



By: John B. Woodlief

Title: Vice President – Finance and Chief Financial Officer

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 - (e) Ruddick Corporation Senior Officers Insurance Plan: 6 participants
 - (f) Ruddick Corporation Supplemental Executive Retirement Plan For the Benefit of R. Stuart Dickson: 1 participant
5. The Plan was implemented on March 31, 2006.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

RUDDICK CORPORATION



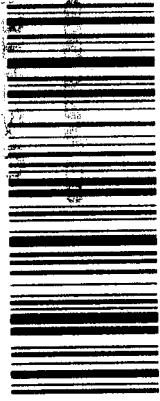
By: John B. Woodlief

Title: Vice President – Finance and Chief Financial Officer



OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
The Ogletree Building
300 North Main Street
Post Office Box 2757
Greenville, South Carolina 29602

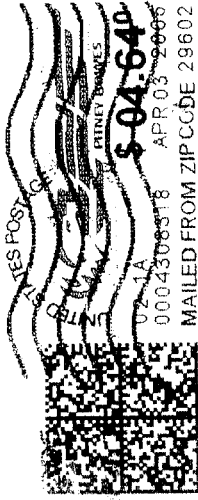
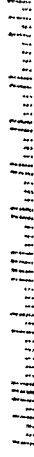
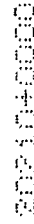
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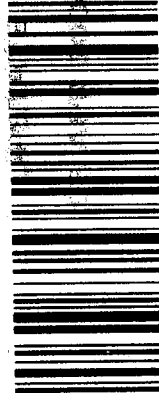
RETURN RECEIPT REQUESTED

Secretary of Labor
Top-Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U. S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210



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