

Monthly Operating Report

CHAPTER 11

CASE NAME: Mississippi Phosphates Corporation

CASE NUMBER: 14-51667

For Period:

September 1 to September 30 2016

THIS REPORT IS DUE 15 DAYS AFTER THE END OF THE MONTH. The debtor must attach each of the following forms unless the United States Trustee has waived the requirement in writing. File with the court and submit a paper copy to UST with an original signature.

Form Attached (mark only one - attached or waived)	Previously Waived	REQUIRED REPORTS/DOCUMENTS
(X)	()	Comparative Balance Sheet (FORM 2-B)
(X)	()	Profit and Loss Statement (FORM 2-C)
(X)	()	Cash Receipts & Disbursements Statement (FORM 2-D)
(X)	()	Supporting Schedules (FORM 2-E)
(X)	()	Narrative (FORM 2-F)
(X)	()	Copies of Bank Statement(s) and Reconciliations of Bank Balance for all account(s)

I declare under penalty of perjury that the following Monthly Operating Report and any attachments therefor, are true and correct to the best of my knowledge and belief.

Executed on: 11-7-2016
(date)

Debtor(s)* Mississippi Phosphates Corporation

By:** 

Position: Board Member

Name of Preparer: Robert P. Kerley

Telephone No. of Preparer: _____

* both debtors must sign if a joint petition

** for corporate or partnership debtor

MPC Consolidating Balance Sheet
(Amounts in Thousands USD)

	MPC		ATS		SATS		MPC	
	9/30/2016	8/30/2016	9/30/2016	8/30/2016	9/30/2016	8/30/2016	9/30/2016	9/30/2016
							Eliminations	Balances
Petty Cash	2	2					-	2
Wells Fargo Bank Funding							-	-
MPC DIP Account	67	72					-	67
MPC DIP Tax Account	30	30					-	30
MPC Employee Health Benefit Account							-	-
Wells Fargo Disbursement							-	-
Merchange & Marine Plt Mgr							-	-
PHI Cash							-	-
Total Cash	99	104					-	99
Deferred Income Taxes - Current	5,004	5,004					-	5,004
A/R - Trade							-	-
A/R - Misc Trade							-	-
Total A/R - Trade							-	-
A/R - Other	11	11					-	11
A/R - OCP							-	-
A/R - Intercompany	2,921	2,921					-	2,921
A/R - Ammonia Tank Subsidiary							-	-
A/R - Sulfuric Acid Tank Subsidiary							-	-
Note Receivable - PHI/MPC							-	-
Interest Receivable - PHI/MPC							-	-
Total A/R - Other	2,932	2,932					-	2,932
Workers Compensation Deposit							-	-
Prepaid Insurance	7	7					-	7
Deposits and Retainers							-	-
Transammonia Inv Valuation Deposit							-	-
Prepaid Other							-	-
Raw Material Deposits-Exxon Mobil							-	-
ST Freight Deposits							-	-
Raw Material Deposits-Chevron							-	-
Raw Material Deposits-Shrieve							-	-
Raw Material Deposits-Trammo Ammonia							-	-
Prepaid Turnaround Cost							-	-
DAP Inventory Delivered not Billed							-	-
Total Prepaid & Other Current	7	7					-	7
DAP - Finished Goods Inventory							-	-
Sulfuric Acid							-	-
Phos Acid							-	-
Total Intermediary Products Inventory							-	-
Phos Rock							-	-
Sulfur							-	-
Purchased SA							-	-
Raw Material Deposits							-	-
Chemicals							-	-
Total Raw Materials Inventory							-	-
Spare Parts & Supplies							-	-
Spare Parts Out for Repair							-	-
Spare Parts - Transfer to Capital Spares							-	-
Total Spare Parts Inventory							-	-
Total Inventories							-	-
Total Current Assets	8,043	8,048					-	8,043
Investment in MPC							-	-
PHI Other Assets							-	-
Deferred Loan Costs	481	481					-	481
Morgan Keegan - Gyp Closure							-	-
LT Freight Deposits							-	-
LT Deferred Tax Asset							-	-
Investment - Ammonia Tank Subsidiary							-	-
Investment - Sulfuric Acid Tanks Sub							-	-
Total Other LT Assets	481	481					-	481
Buildings - Non Katrina							-	-
Buildings - Katrina							-	-
Land Improvements-2010							-	-
Land Improvements-2011							-	-
Land Improvements-2012							-	-
Land Improvements-2013							-	-
Site Improvements							-	-

MPC Consolidating Balance Sheet (Amounts in Thousands USD)	MPC		ATS		SATS		MPC	
	9/30/2016	8/30/2016	9/30/2016	8/30/2016	9/30/2016	8/30/2016	9/30/2016	9/30/2016
							Eliminations	Balances
Apparatus & Machinery							-	-
Katrina Equipment							-	-
Other Equipment - Non Katrina							-	-
Other Equipment - Katrina							-	-
Plant Rolling Stock - Non Katrina							-	-
Plant Rolling Stock - Katrina							-	-
Office Furn & Fix - Non Katrina							-	-
Office Furn & Fix - Katrina							-	-
Capital Spare Parts							-	-
Total Machinery & Equipment			-	-	-	-	-	-
A/D - Land-2010							-	-
A/D - Land-2011							-	-
A/D - Land-2012							-	-
A/D - Land-2013							-	-
A/D - Buildings - Non Katrina							-	-
A/D - Buildings - Katrina							-	-
A/D - Site Improvements							-	-
A/D - Apparatus & Machinery							-	-
A/D - Apparatus & Machinery							-	-
A/D - Other Equipment - Non Katrina							-	-
A/D - Other Equipment - Katrina							-	-
A/D - Plant Rolling Stock - Non Katrina							-	-
A/D - Plant Rolling Stock - Katrina							-	-
A/D - Office Furn & Fix - Non Katrina							-	-
A/D - Office Furn & Fix - Katrina							-	-
A/D - Capital Spare Parts							-	-
Total Accumulated Depreciation			-	-	-	-	-	-
Construction in Progress							-	-
Total Net PP&E			-	-	-	-	-	-
Total Assets	8,524	8,528	-	-	-	-	-	8,524
A/P - Trade (Post Petition)	(1)	(1)					-	(1)
A/P - Trade (Pre-Petition)	27,657	27,657					-	27,657
Payroll Liabilities							-	-
A/P-Accr							-	-
A/P-ATS	(8)	(8)	8	8			-	(0)
A/P-SATS	(14)	(14)			14	14	-	(0)
A/P - PHI	62	62					-	62
A/P - MPC			-	-			-	-
Total Accounts Payable	27,696	27,696	8	8	14	14	-	27,718
Accrued Other	399	399					-	399
Accrued Other - Rock	-	-					-	-
Accrued Environmental Remediation	-	-					-	-
Accrued Rock Price Adj	-	-					-	-
Accrued Competitive Discounts	-	-					-	-
Accrued Medical Claims - IBNR	-	-					-	-
Spare Parts Received Not Billed	81	81					-	81
Accrued Workers Comp - IBNP	383	383					-	383
Accrued Hospital Insurance	-	-					-	-
United Way Contribution	-	-					-	-
HBP Revolver	9,067	9,067					-	9,067
Butler Snow Escrow	(1,859)	(1,859)					-	(1,859)
UCC Escrow	(425)	(425)					-	(425)
Notes Payable - HBP	-	-					-	-
Accrued Interest - PHI	-	-					-	-
Accrued Payroll	93	93					-	93
Accrued Vacations	-	-					-	-
Accrued Vacation Employee Bank	-	-					-	-
Accrued Compensation - SARS	-	-					-	-
Accrued Bonus	-	-					-	-
Accrued Audit Fees	-	-					-	-
Accrued Interest - Hudson	9,130	9,130					-	9,130
Accrued Property Tax	2,062	2,062					-	2,062
Accrued Franchise Tax	226	226					-	226
Accrued Use Tax	25	25					-	25
Accrued Interest - Ins Financing	-	-					-	-
Total Accrued Liabilities	19,182	19,182	-	-	-	-	-	19,182
Total A/P & Accrued Expenses	46,878	46,878	8	8	14	14	-	46,900
Hudson Bay LTD	31,000	31,000					-	31,000
Notes Payable - PHI/MPC	5,968	5,968					-	5,968
Notes Payable - Equipment Financing	-	-					-	-
Notes Payable - Ins Financing	-	-					-	-
Trammo Term Loan - Long Term	-	-					-	-

MPC Consolidating Balance Sheet (Amounts in Thousands USD)	MPC		ATS		SATS		MPC	
	9/30/2016	8/30/2016	9/30/2016	8/30/2016	9/30/2016	8/30/2016	9/30/2016	9/30/2016
							Eliminations	Balances
LT Notes Payable - Equipment Financing							-	-
Accrued Gypsum Disposal							-	-
Deferred Income Taxes - LT	1,262.79	1,262.79					-	1,263
								-
Common Stock	1.00	1.00					-	1
Add'l Paid-In-Capital	29,877.00	29,877.00	2,861	2,861	3,111	3,111	-	35,849
Retained Earnings	-105,542.36	-105,542.36	(2,869)	(2,869)	(3,125)	(3,125)	-	(111,536)
Net Income	-921.00	-916.60	-	-	-	-	-	(921)
Total Shareholder's Equity	(76,585)	(76,581)	(8)	(8)	(14)	(14)	-	(76,607)
								-
Total Liabilities & Shareholder's Equity	8,524	8,528	0	0	(0)	(0)	-	8,524

MCD Consolidating Profit and Loss Statement

(Amounts in Thousands USD)

Year to Date 09/30/2016

	MPC	ATS	SATS	MPC	MPC
	Adjusted Balances	Adjusted Balances	Adjusted Balances	Consolidated Eliminations	Consolidated Balances
DAP Sales	-	-	-	-	-
MAP Sales	-	-	-	-	-
Profit Share Income - Trammo	-	-	-	-	-
Customer Volume Discounts	-	-	-	-	-
Misc sales adj	-	-	-	-	-
Stg & Handling - Trammo Sales	-	-	-	-	-
Net Sales - DAP	-	-	-	-	-
Net Sales - Other	-	-	-	-	-
PHI Management Services Income	-	-	-	-	-
PHI Sales Commissions	-	-	-	-	-
Total Net Sales	-	-	-	-	-
Total Cost of Sales	-	-	-	-	-
Gross Profit (Loss)	(100)	-	-	-	(100)
Total Selling, General & Admin Exp	-	-	-	-	-
Insurance Recoveries	-	-	-	-	-
Environmental Remediation	-	-	-	-	-
Operating Income (Loss)	(100)	-	-	-	(100)
Total Interest, Net	-	-	-	-	-
Total Other, Net	(821)	-	-	-	(821)
Income (Loss) Before Taxes	(921)	-	-	-	(921)
Income Tax Expense	-	-	-	-	-
Net Income (Loss)	(921)	-	-	-	(921)

Mississippi Phosphates Corporation
For the Period of september 1 thru september 31, 2016

Cash Reconciliation

Beginning Cash Balance	\$	190,218
Cash Receipts (ties to Form 2-D)	\$	-
Cash Disbursements (ties to Form 2D)	\$	(4,826)
Net Cash Flow	\$	(4,826)
Ending Cash Balance (ties to Form 2B)	\$	185,448

Cash Summary - Ending Balance

	Amount	Financial Institution
Real Estate Account		
Trust Account	\$ -	
Operating and / or Personal Account	\$ -	
DIP Funding Account	\$ 153,476	WF DIP Funding Account
Payroll Account		
Tax Account	\$ 30,472	Wells Fargo
Control Disbursements	\$ -	
Other Accounts (Specify savings or checking)	Checking \$ -	
Other Accounts (Specify savings or checking)	Checking \$ -	
Cash Collateral Account		
Petty Cash	\$ 1,500	Cash on hand
Total Cash (must agree with above ending Cash)	\$ 185,448	

\$ -

Adjusted Cash Disbursements: _____

Cash disbursements above less inter-account transfers and UST fees paid (to be used to determining quarterly UST fee)

Mississippi Phosphates Corporation

MPC Quarterly Fee Summary

August 31, 2016

<u>Payment Date</u>	<u>Cash Disbursements</u>	<u>Quarterly Fee Due</u>	<u>Check No.</u>	<u>Date</u>
January	\$ 940,535.82			
February	\$ 33,772.82			
June	\$ 15,495.48			
Total 1st Quarter	\$ 989,804.12	\$ 13,000.00	58277	4/22/2015
April	\$ 14,067.40			
May	\$ 8,175.81			
June	\$ 5,742.47			
Total 2nd Quarter	\$ 27,985.68	\$ 13,000.00	60187	7/15/2015
July	\$ 42,603.36			
September	\$ 2,323.58			
Total 3rd Quarter	\$ 44,926.94	\$ 13,000.00	60392	10/16/2015
October	_____			
November	_____			
December	_____			
Total 4th Quarter	\$ -	\$ -		

Mississippi Phosphates Corporation

Cash Disbursements september 2016				
Date	Check No.-TO	Vendor	DESCRIPTION	AMOUNT
09/07/2016	60478	Jeffrey Bowman		\$ (900.00)
09/07/2016	60477	UPS		\$ (33.33)
09/12/2016		wells fargo		\$ (1,738.62)
9/26/2016		crawford		\$ (2,130.62)

Grand Total	(4,826.15)
Tax Account	
petty cash	-
Employee benefit account	-
Plant Managers Account	-
Total disbursements	(4,826.15)

Mississippi Phosphates Corporation

Cash Receipts september 2016

Date	Request	Description	Receipts
7/13/2016	Wells fargo over the counter deposit		

Grand total	\$0.00
Tax accounts	0.00
petty cash	-
Employee benefit account	-
Plant Managers Account	
MPC DIP Account	
	<u><u>\$0.00</u></u>

Phosphate Holdings Inc.
Phosphate Holdings Inc. : Mississippi Phosphates Corporation
Custom A/P Aging Summary
As of september, 2016

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BROCK SERVICES, LTD	0.00	0.00	0.00	0.00	3,490.56	3,490.56
JACKSON COUNTY PORT AUTHORITY	0.00	0.00	-691.94	-691.94	0.00	-1,383.88
JOE TUCKER, TAX COLLECTOR	0.00	0.00	0.00	0.00	149,682.69	149,682.69
PASCAGOULA UTILITIES	0.00	0.00	0.00	0.00	2,017.78	2,017.78
U.S. Trustee	0.00	0.00	0.00	0.00	0.00	0.00
USA BLUE BOOK	0.00	0.00	534.17	534.17	0.00	1,068.34
Vanguard	0.00	0.00	19,181.67	0.00	0.00	19,181.67
	0.00	0.00	19,023.90	-157.77	155,191.03	174,057.16

**Mississippi Phosphates Corporation
Customer A/R Aging Summary 2
As of september 31, 2016**

Filters: Amount Due (not equal to From: 0.0), Name (equal to A/R - Trade)

Customer:Work Order	Current	12/17/2014 - 1/15/2015 (30)	11/17/2014 - 12/16/2014 (60)	10/18/2014 - 11/16/2014 (90)	Before 10/18/2014 (>90)	Total
	Open Balance	Open Balance	Open Balance	Open Balance	Open Balance	Open Balance
Debruce Fertilizer, INC	\$0.00	\$0.00	\$0.00	\$0.00	(\$5,357.17)	(\$5,357.17)
Growmark, Inc	\$0.00	\$0.00	\$0.00	\$0.00	(\$33,709.19)	(\$33,709.19)
Stuart Farm Center	\$0.00	\$0.00	\$0.00	\$0.00	\$559.20	\$559.20
Ammonia Tanks Subsidiary	\$0.00	\$0.00	\$0.00	\$0.00	\$1,137,392.00	\$1,137,392.00
Total	\$0.00	\$0.00	\$0.00	\$0.00	\$1,098,884.84	\$1,098,884.84
Inter-Oceanic Corp.					\$0.00	\$0.00
Less Reserve for Doubtful Accounts					(\$1,098,884.84)	(\$1,098,884.84)
Net AR Outstanding	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Mississippi Phosphates Corporation
As of september 30,2016
Insurance Schedule

<u>Type</u>	<u>Carrier / Agent</u>	<u>Coverage</u>	<u>Date of Expiration</u>	<u>Premium Paid</u>
Workers Compensation	New Hampshire Ins. (AIG)	Statutory + 1M employer	22-Dec-15	237,686
General Liability	National Union (AIG)	1,000,000	22-Dec-15	26,528
Property (Fire, Theft)	AIG & Lloyds of London	100,000,000	22-Dec-15	1,783,031
Vehicle	Granite State Insurance Co. (AIG)	2,000,000	22-Dec-15	32,074
Other				
Other:				
Foreign Liability	ACE	1,000,000	22-Dec-15	2,500
Marine Liability	Travelers Group	5,000,000	22-Dec-15	12,500
Hull / P&I	Travelers Group	1,037,500	22-Dec-15	5,720
Umbrella Liability	National Union (AIG)	25,000,000	22-Dec-15	188,346
Environmental	AIG	10,000,000	22-Dec-15	357,158
Fiduciary	XL Specialty Insurance Company	5,000,000	23-Dec-15	25,000
Emp. Practices Liab.	XL Specialty Insurance Company	5,000,000	23-Dec-15	75,000
Crime	U.S. Specialty Ins. Co.	1,000,000	22-Mar-16	4,342
Director and Officer	Endurance American Insurance Compar	10,000,000	31-Oct-15	14,900 (A)
Kidnap & Ransom	Federal Insurance Company (Chubb)	5,000,000	22-Dec-16	5,250

Note: Insurance is purchased by MPC for the consolidated group without segregation between the individual operations. The amounts above reflect the insurance in place for the entire group till expiration of the particular policy. Additionally, we increased the collateral on the workers compensation insurance from \$1,500 thousand to \$1,850 thousand at the time of the renewal in December 2014.

(A) In September 2015, the company obtained a one month coverage for D&O as noted above to cover the period from Oct. 1 to October 31, 2015.

WellsOne® Account

Account number: 8733 ■ September 1, 2016 - September 30, 2016 ■ Page 1 of 1



MISSISSIPPI PHOSPHATES CORPORATION
DEBTOR IN POSSESSION
CH 11 CASE 14-51667 (SMI)
601 INDUSTRIAL RD
PASCAGOULA MS 39581-3233

Questions?

Call your Customer Service Officer or Client Services
1-800-AT WELLS (1-800-289-3557)
5:00 AM TO 6:00 PM Pacific Time Monday - Friday

Online: wellsfargo.com

Write: Wells Fargo Bank, N.A. (182)
PO Box 63020
San Francisco, CA 94163

Account summary**WellsOne® Account**

Account number	Beginning balance	Total credits	Total debits	Ending balance
8733	\$158,246.19	\$0.00	-\$4,769.24	\$153,476.95

Debits**Electronic debits/bank debits**

Effective date	Posted date	Amount	Transaction detail
	09/12	1,738.62	Client Analysis Srvc Chrg 160909 Svc Chge 0816 000004202608733
	09/26	2,130.62	C & C Sisdal-Aeg DTC 16065 Crawford & Company
		\$3,869.24	Total electronic debits/bank debits

Checks paid

WellsOne® Account

Account number: 4128195625 ■ September 1, 2016 - September 30, 2016 ■ Page 1 of 1



MISSISSIPPI PHOSPHATES CORPORATION
TAX ACCOUNT
DEBTOR IN POSSESSION
CH 11 CASE 14-51667 (SMI)
601 INDUSTRIAL RD
PASCAGOULA MS 39581-3233

Questions?

Call your Customer Service Officer or Client Services
1-800-AT WELLS (1-800-289-3557)
5:00 AM TO 6:00 PM Pacific Time Monday - Friday

Online: wellsfargo.com

Write: Wells Fargo Bank, N.A. (182)
PO Box 63020
San Francisco, CA 94163

Account summary**WellsOne® Account**

Account number	Beginning balance	Total credits	Total debits	Ending balance
625	\$30,471.62	\$0.00	\$0.00	\$30,471.62

Daily ledger balance summary

Date	Balance
09/31	30,471.62
Average daily ledger balance	\$30,471.62

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

<p>In re:)</p> <p style="padding-left: 100px;">)</p> <p>MISSISSIPPI PHOSPHATES)</p> <p style="padding-left: 40px;">CORPORATION, <i>et al.</i>¹)</p> <p style="padding-left: 80px;">Debtors)</p> <hr style="width: 50%; margin-left: 0;"/>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>CASE NO. 14-51667-KMS</p> <p>Chapter 11</p> <p>Jointly Administered</p>
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NARRATIVE STATEMENT

For Period September 1, 2016 to September 30, 2016

Please provide a brief description of the significant business and legal action by the debtor, its creditors, or the court during the reporting period. Comments should include any change in bank accounts, explanation of extraordinary expenses, and purpose of any new post-petition financing. Comments should also include debtor’s efforts during the month to rehabilitate the business and to develop a plan.²

Mississippi Phosphates Corporation, *et al.*, the Debtors and debtors-in-possession herein (the “**Debtors**”), filed their Bankruptcy Cases on October 27, 2014 (the “**Petition Date**”). The Debtors have continued to operate and manage their businesses pursuant to Bankruptcy Code §§ 1107(a) and 1108.

As noted in the November 2015 Monthly Operating Report, on October 16, 2015 (the “**Closing Date**”), the Debtors closed the Alternative Transactions by transferring to the MPC Environmental Trust and to the MPC Liquidation Trust substantially all of its real and personal property. As of that date, the MPC Environmental Trustee assumed the responsibility for the wastewater treatment and the gyp stacks maintenance, while the MPC Liquidation Trustee assumed the responsibility for the ammonia terminalling operations of the Debtors. On November 3, 2015, the Debtors filed their *Notice of Closing of Sale of Assets to Environmental Trustee and Liquidation Trustee under Alternative Transaction* [Dkt. # 1070].

After the Closing Date, the Debtors’ professionals have continued to work with professionals for the MPC Environmental Trustee, the MPC Liquidation Trustee, and the Environmental Agencies with respect to numerous operational, transitional, and legal issues

¹ The chapter 11 cases of the following affiliated Debtors have been administratively consolidated for joint administration pursuant to that certain *Order Granting Motion of the Debtor for Order Directing Joint Administration of Affiliated Cases Pursuant to Bankruptcy Rule 1015(b)*, dated October 29, 2014 [Dkt. # 62]: Mississippi Phosphates Corporation (“**MPC**”), Case No. 14-51667, Ammonia Tank Subsidiary, Inc. (“**ATS**”), Case No. 14-51668 and Sulfuric Acid Tanks Subsidiary, Inc. (“**SATS**”), Case No. 14-51671. These chapter 11 cases are sometimes referred to herein as the “**Bankruptcy Cases.**” Consequently, this Narrative describes developments in all three Bankruptcy Cases.

² All references to Docket Numbers are to the Docket in the MPC case, which is the Lead Case.

related to the transfer of the Debtors' real and personal property to the appropriate trust, including matters related to a survey of the subject property.

During September 2016, the Debtors and the Committee focused their attention on the confirmation hearing for *First Amended Joint Chapter 11 Plan of the Debtors and the Official Committee of Unsecured Creditors* [Dkt. # 1168], which was held on September 1, 2016, and then the necessary follow-up items related to that confirmation hearing. The Debtors presented their testimony and evidence in support of the confirmation of the First Amended Joint Plan [Dkt. # 1168] through the testimony of Jonathan J. Nash, the Court-approved Chief Restructuring Officer of the Debtors, as well as through the exhibits that were introduced into evidence at that hearing [Dkt. # 1681].

The objections to the confirmation of the First Amended Joint Plan filed by The Chemours Company, LLC [Dkt. # 1640] were resolved, and the resolution was announced into the record at the Confirmation Hearing. Similarly, all but one of the objections by the United States Trustee [Dkt. # 1641] were also resolved, and the resolutions were announced into the record.

Subsequently, the Debtors filed an *Amended Response to the United State Trustee's Objection to Confirmation of the First Amended Joint Chapter 11 Plan of Debtors and the Official Committee of Unsecured Creditors* [Dkt. # 1686] on September 6, 2016. The United States Trustee filed the United States Trustee's Reply to the *Amended Response to the United State Trustee's Objection to Confirmation of the First Amended Joint Chapter 11 Plan of Debtors and the Official Committee of Unsecured Creditors* [Dkt. # 1698] on September 12, 2016.

Counsel for the Debtors drafted proposed orders confirming the First Amended Joint Chapter 11 Plan, and circulated the proposed order to counsel for the Committee (and subsequently to other interested parties) for their review and input.

In the three-day period from July 12-14, 2016, MPC had filed more than 125 objections to claims of various claimants seeking severance pay from MPC. In early August, only five parties against whom the Debtors had filed objections to claims for severance pay had filed a Response to any of those objections [See Dkt. ## 1607, 1608, 1613, 1615, and 1616]. For those claims in which the claimant did not file a response, the Court entered its *Order Granting Debtors Objections to Claims as to Severance Pay* on August 23, 2016 [Dkt. # 1648]. On August 31, 2016, the Court conducted a hearing on these claims objections and to the five responses. At that hearing, the Court sustained all of the Debtors' claims objections as to these claims [Dkt. ## 1669, 1670, and 1671]. The Court entered Orders sustaining the five objections where the parties appeared [Dkt. ## 1687, 1688, 1689, and 1692].

Several motions seeking to modify the automatic stay to permit workers' compensation claims and Longshore and Harbor Workers Act compensation claims were filed during August 2016. One claimant filed a motion for relief from stay [Dkt. ## 1618, 1626] to which the Debtors responded [Dkt. # 1650], while the Debtors filed their *Motion of the Debtors to Modify the Automatic Stay as to Workers' Compensation Claims* [Dkt. # 1632]. These motions were set

for hearing on August 31, 2016 and the Court entered its Minute Entries concerning these matters on that date [Dkt. ## 1672, 1673]. On September 7, the Court entered an Agreed Order Granting Motion of the Debtors to Modify the Automatic Stay as to Workers Compensation Claims [Dkt. # 1690], and on September 8, the Court entered an Agreed Order with respect to two specific motions for relief from the automatic stay with respect to two workers compensation claims [Dkt. # 1692].

Another claimant had filed a *Motion for Relief from Stay as to the Longshore & Harbor Workers Compensation Act Claim* [Dkt. # 1659], to which the Debtors filed a *Response to Motion for Relief from Stay* [Dkt. # 1691], and an *Agreed Order Granting Motion for Relief from Stay* [Dkt. # 1705] was entered on October 3, 2016.

The Debtors also filed an *Application to Employ Horne LLP as Certified Public Accountant and Tax Consultants nunc pro tunc to July 1, 2016* to prepare and file federal and state income taxes for the Debtors [Dkt. ## 1701, 1702].

During September 2016, the Debtors' professionals continued to communicate with other interested parties, including:

- (a) Addressing means of resolving motions to lift stay with respect to pending workers compensation claims and longshoremen's claims;
- (b) Counsel for the Committee regarding confirmation hearing issues;
- (c) John Lammert and counsel with respect to the treatment for Jackson County, Mississippi for its ad valorem tax claim for real and personal property;
- (d) Horne LLP with respect to its being retained to prepare and file the 2015 federal and state income tax returns; and
- (e) Counsel for the MPC Liquidation Trust and the surveyor regarding the final survey and legal descriptions of the property transferred by the Debtors to the MPC Liquidation Trust and the MPC Environmental Trust.

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