

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

IN RE:

**MISSISSIPPI PHOSPHATES
CORPORATION, *et al.*¹**

Debtors

**CASE NO. 14-51667-KMS
Chapter 11**

Jointly Administered

**FIRST AND FINAL APPLICATION FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF NECESSARY
EXPENSES FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC**

COMES NOW, the Law Offices of Craig M. Geno, PLLC (“Applicant”), and files this its *First and Final Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), counsel for the Debtor, and in support thereof, would show as follows, to-wit:

1. On October 27, 2014, the Debtors filed their Voluntary Petitions for relief and thereby commenced these bankruptcy cases under Chapter 11, Title 11 of the United States Code (the “Bankruptcy Code”). Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors are operating their business and managing the properties as debtors-in-possession. No trustees or examiners have been appointed.

2. On February 18, 2015, counsel for the Debtors filed an Application to Employ Craig M. Geno and the Law Offices of Craig M. Geno, PLLC as Special Counsel in this Chapter 11

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 Direction Joint Administration of Affiliated Cases Pursuant to Bankruptcy Rule 1015(b), dated October 29, 2014 [Dkt. #62]: Mississippi Phosphates Corporation, Case No. 14-51667, Ammonia Tank Subsidiary, Inc., Case No. 14-51668 and Sulfuric Acid Tanks Subsidiary, Inc., Case No. 14-51671. These chapter 11 cases are sometimes referred to herein as the “Bankruptcy Cases.”

proceeding [DK #503]. An Order granting that Application was entered by the Court on March 26, 2015 [DK #650]. Craig M. Geno and the Law Offices of Craig M. Geno, PLLC are hereinafter referred to as "Applicant".

3. The services rendered to the Debtors by Applicant represent substantial services. The services rendered and expenses incurred benefitted the estate. An Affidavit reflecting the legal services rendered and expenses incurred by said attorneys is attached hereto as Exhibit "A". The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of the services rendered, and expenses incurred, is attached as Exhibit "B" and incorporated herein by reference.

4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by counsel to the Debtor, directly or indirectly, in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel's obligations herein, and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. Certain fees and expenses are to be paid by non-debtor parties but must be approved by the Court.

5. This is Applicant's first and final request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from February 10, 2015, to and including November 29, 2016, and is for the sum of \$29,665.85, which represents \$29,225.50 in fees and \$440.35 in expenses.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an appropriate Order awarding reasonable attorneys' fees, as administrative expenses, for the

professional services rendered herein by Applicant and authorizing and directing the responsible parties to pay said Applicant's fees and expenses, on a final basis. Applicant prays for such further and other relief, both general and special, as allowable under the circumstances.

THIS, the 6th day of December, 2016.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
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Ridgeland, MS 39157
601-427-0048 - Telephone
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cmgeno@cmgenolaw.com
jnichols@cmgenolaw.com

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission and/or U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Esq.
Christopher.J.Steiskal@usdoj.gov

Stephen W. Rosenblatt, Esq.
Steve.Rosenblatt@butlersnow.com

THIS, the 6th day of December, 2016.

/s/ Craig M. Geno

Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:

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Debtors

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EXHIBIT “A”

² 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 Direction Joint Administration of Affiliated Cases Pursuant to Bankruptcy Rule 1015(b), dated October 29, 2014 [Dkt. #62]: Mississippi Phosphates Corporation, Case No. 14-51667, Ammonia Tank Subsidiary, Inc., Case No. 14-51668 and Sulfuric Acid Tanks Subsidiary, Inc., Case No. 14-51671. These chapter 11 cases are sometimes referred to herein as the “Bankruptcy Cases.”

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AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First and Final Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.



Craig M. Geno

STATE OF MISSISSIPPI

COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 6th day of December, 2016.



NOTARY PUBLIC

MY COMMISSION EXPIRES



³ 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 Direction Joint Administration of Affiliated Cases Pursuant to Bankruptcy Rule 1015(b), dated October 29, 2014 [Dkt. #62]: Mississippi Phosphates Corporation, Case No. 14-51667, Ammonia Tank Subsidiary, Inc., Case No. 14-51668 and Sulfuric Acid Tanks Subsidiary, Inc., Case No. 14-51671. These chapter 11 cases are sometimes referred to herein as the "Bankruptcy Cases."

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IN RE:

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Debtors

**CASE NO. 14-51667-KMS
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EXHIBIT “B”

⁴ 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 Direction Joint Administration of Affiliated Cases Pursuant to Bankruptcy Rule 1015(b), dated October 29, 2014 [Dkt. #62]: Mississippi Phosphates Corporation, Case No. 14-51667, Ammonia Tank Subsidiary, Inc., Case No. 14-51668 and Sulfuric Acid Tanks Subsidiary, Inc., Case No. 14-51671. These chapter 11 cases are sometimes referred to herein as the “Bankruptcy Cases.”

Law Offices of Craig M. Geno, PLLC

587 Highland Colony Parkway
Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048

Fax:601-427-0050

Mississippi Phosphates Corporation
c/o Stephen W. Rosenblatt
P.O. Box 6010
Ridgeland, MS-Mississippi
39158-6010 USA

December 6, 2016

File #: 315002

Inv #: 346488

Attention:

RE: Chapter 11
Special Counsel - BP Claims

DATE	TASK CODE	ACTIVITY CODE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-10-15	B160	A103	Work on Application to Employ; review memo from Steve Rosenblatt regarding application revisions	0.75	288.75	CMG
Feb-11-15	B100	A103	Update/preparation of document management control (subfiles and pleadings)	0.20	30.00	BRP
	B160	A103	Review Court docket; assist Craig Geno with drafting of proposed Application to Employ the Law Offices of Craig M. Geno, PLLC as special counsel in connection with BP Claims	1.00	150.00	BRP
Feb-14-15	B100	A103	Review memo from Steve Rosenblatt; review 8/13 Board minutes	0.20	77.00	CMG
Feb-16-15	B100	A104	Review letter from K. Long; Steve Rosenblatt regarding turnover of the BP claim	0.60	231.00	CMG
	B100	A104	Review memo from Steve Rosenblatt regarding MDER/DOJ inquiry and positions	0.05	19.25	CMG
	B100	A104	Review analysis of MR	0.55	211.75	CMG

	B100	A104	Very brief review of BP claim	0.35	134.75	CMG
Feb-27-15	B100	A106	Receipt and review of Amended Notice of Motion for Order Approving Settlement Among Debtors, Committee, Lender Parties and PHI; calendar hearing date and objection deadline to trigger preparation of hearing folder and retrieval/organizaiton of additional documents needed for hearing	0.15	22.50	BRP
Mar-07-15	B160	A104	Review memos to/from Steve Rosenblatt, review draft order of engagement	0.35	134.75	CMG
Mar-09-15	B160	A104	Review memos to/from Steve Rosenblatt; review fee procedures order	0.35	134.75	CMG
Mar-10-15	B100	A104	Review memo from Paul Murphy regarding scheduled hearings being cancelled and orders being uploaded/agreed to	0.10	38.50	CMG
Apr-13-15	B160	A104	Review email regarding Stipulation to Christopher Steiskal as requested by CMG	0.10	15.00	JAS
May-05-15	B100	A104	Brief review of emergency financing motion	0.25	96.25	CMG
May-06-15	B100	A104	Telephone conference with Steve Rosenblatt regarding status of negotiations on environmental issues/claims	0.20	77.00	CMG
May-14-15	B160	A104	Review memos to/from Steve Rosenblatt regarding case status, fees and expenses	0.20	77.00	CMG
Jun-20-15	B100	A104	Review memos to/from Steve Rosenblatt regarding additional engagement, employment of John Lammert and Assessment Technologies to contest tax issues	0.20	77.00	CMG
Jun-29-15	B100	A104	Review memos to/from John Lammert regarding including and incorporating 2013 and 2014 tax years into appeal	0.20	77.00	CMG
Jul-05-15	B100	A104	Review memos to/from Steve Rosenblatt regarding tax objections and related matters	0.20	77.00	CMG

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Jul-07-15	B160	A104	Review memos to/from Steve Rosenblatt regarding special counsel retention; review declaration	0.30	115.50	CMG
	B160	A104	Review memos to/from Steve Rosenblatt regarding amended application for engagement	0.20	77.00	CMG
Jul-10-15	B160	A104	Review memos to/from Steve Rosenblatt, John Lammert, review application to retain Assessment Technologies	0.65	250.25	CMG
Jul-13-15	B160	A104	Review memos to/from Steve Rosenblatt; review supplemental declaration	0.20	77.00	CMG
Jul-14-15	B160	A104	Dictation of email memos to Steve Rosenblatt and Velvet Johnson re: Craig Geno Declaration	0.10	15.00	BRP
Jul-21-15	BW	A104	Review memos to/from Steve Rosenblatt regarding engagement of Assessment Technologies, letter of authorization	0.20	77.00	CMG
Jul-22-15	B100	A104	Review memos to/from Steve Rosenblatt regarding compilation of taxes for 2012-2014	0.35	134.75	CMG
	B100	A104	Review memos to/from John Lammert regarding engagement, initial considerations regarding tax matters and introduction	0.25	96.25	CMG
	B100	A104	Review memos to/from Steve Rosenblatt, review charts showing redemption amounts for parcels form 2014 tax sales, statutory fees and redemption costs	0.75	288.75	CMG
	B160	A104	Dictation of letter to J. Lammert regarding additional thoughts on 2015 appeal	0.20	77.00	CMG
Jul-23-15	B100	A104	Review 11USC S 505; case law and recent developments on tax claim objections	1.20	462.00	CMG
	B100	A104	Finalize 505 motion, dictate memo to Mr. Lammert regarding terms and conditions of 505 motion and broad based approach	1.00	385.00	CMG
	B100	A104	Review memos to/from Mr. Lammert, review MS precedent regarding taxes and	0.65	250.25	CMG

reconsideration of assessments, review
draft motion

	B100	A104	Assist Craig Geno with drafting of Motion Requesting Determination of Tax Liability, etc.	1.00	150.00	BRP
Jul-24-15	B100	A104	Telephone conference with John Lammert regarding timing of 505 motion; tactics and strategy in 505 motion, application of facts to law and related matters	0.45	173.25	CMG
Jul-26-15	B100	A104	Review memos to/from Mr. Lammert regarding markup to 505 motion	0.40	154.00	CMG
	B160	A104	Review amended notice regarding application to employ assessment tech.	0.20	77.00	CMG
Jul-27-15	B100	A104	Review memo from Steve Rosenblatt; notice regarding failure to obtain lien	0.25	96.25	CMG
	B100	A104	Review memos to/from John Lammert, Steve Rosenblatt regarding tax objections	0.35	134.75	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding inventory, returns and rendition filings	0.20	77.00	CMG
	B100	A104	Review appeal notice of 2015; letter from J. Lammert regarding same	0.35	134.75	CMG
	B100	A104	Review memos to/from John Lammert, review preservation of rights with the 2015 appeal; review and comment on draft of appeal from 2015 assessment	0.40	154.00	CMG
	B100	A104	Review memos to/from John Lammert, review comments to 505 motion	0.40	154.00	CMG
	B130	A104	Review memos to/from Steve Rosenblatt, "no bid" information and pleadings	0.45	173.25	CMG
Jul-28-15	B100	A104	Review assessment of technical order; memo from Steve Rosenblatt regarding same	0.15	57.75	CMG
	B100	A104	Review MS statutes regarding reduction in	0.65	250.25	CMG

taxes; conference with Jarret Nichols
regarding same

	B100	A104	Review memo from Steve Rosenblatt regarding meeting agenda	0.15	57.75	CMG
	B100	A104	Telephone conference with Mr. Lammert regarding tax issues thus far; protests; prepare for conference call and related matters	0.25	96.25	CMG
	B100	A104	Review memos to/from Mr. Chung, Mr. Lammert regarding valuation savings and specifics of "offers"	0.35	134.75	CMG
	B130	A107	Conference call with debtor's professionals regarding sale results, tax objections and numerous related issues	0.45	173.25	CMG
	B100	A104	performed legal research on objections to ad valorem taxes and procedure on same; phone conference with Tax Assessor	3.70	832.50	JPN
Jul-29-15	B100	A104	Review memo from Mr. Lammert regarding filing three pleadings and timing	0.10	38.50	CMG
	B100	A104	Dictation of revisions to 505 and 143 motion	0.25	96.25	CMG
	B100	A104	Telephone conference with John Lammert regarding recent rendition submissions, withdrawal and treatment in objections	0.20	77.00	CMG
	B100	A104	Review counsel's comments to draft 505 motion	0.10	38.50	CMG
	B100	A104	Revise 505 motion	0.20	77.00	CMG
Jul-30-15	B100	A104	Review 2015 revisions; review memos to/from Mr. Lammert; Steve Rosenblatt regarding same	0.60	231.00	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding changes to "protest" with Board of Supervisors and tax years being challenged	0.25	96.25	CMG

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B100	A104	Review draft changes to 505 motion from Steve Rosenblatt	0.25	96.25	CMG
B100	A104	Review numerous memos to/from client, John Lammert, Steve Rosenblatt regarding 2015 property tax renditions, revision/withdrawal of same and numerous related matters	0.75	288.75	CMG
B100	A104	Review statute on reconsideration, terms and conditions in support of application to reconsider	0.45	173.25	CMG
B100	A104	Review and revision of applications to reconsider with Board of Supervisors and tax assessor	0.45	173.25	CMG
B100	A104	Telephone conference with Mr. Lammert regarding issues on 2015 renditions	0.25	96.25	CMG
B100	A104	Review memos to/from Joni Shaw regarding filing of applications for reconsideration and timing of filing of 505 motion	0.10	38.50	CMG
B100	A104	Review memo from Robert Kerley regarding asset list and personal property values	0.25	96.25	CMG
B100	A104	Review changes to draft motion/applications and memo from Joni Shaw re same	0.20	77.00	CMG
B100	A104	Assist CMG drafting and revising letter to Jackson County Assessor regarding Application for Reduction in Real & Personal Property Taxes & named Owners for Tax Years 2013, 2014, 2015; prepare letter to be sent via FedEx to Jackson County Assessor and to Jackson County Board of Supervisors	1.00	150.00	JAS
B100	A104	Assist CMG drafting and revising Motion of MS Phosphates, et al Requesting Determination of Value for Calculating Tax Liability & Relief from Excess Taxation for Tax Years 2013, 2014, 2015; ECF file Motion; Draft email to Derek	0.55	82.50	JAS

Meek, Chris Steiskal attaching copy of
Motion to each

Aug-03-15	B100	A104	Review State of MS notice	0.15	57.75	CMG
Aug-05-15	B100	A104	Conference with Beverly Pritchard regarding noticing procedure for 505 motion	0.20	77.00	CMG
Aug-06-15	B100	A104	Review memos to/from J. Lammert; telephone conference with Mr. Lammert regarding next steps procedurally	0.30	115.50	CMG
	B100	A104	Dictation of notice/Certificate of Service regarding 505 motion; review and revision of same	0.20	77.00	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding status conference and related issues	0.20	77.00	CMG
	B100	A104	Telephone conference with Wanda Watson re: noticing out Motion Requesting Determination of Value; conference with Craig Geno re: same.	0.15	22.50	BRP
	B100	A104	Dictation of email memo to J.Lammert re: 21-day notice to be filed in connection with Motion Requesting Determination of Value	0.10	15.00	BRP
	B100	A104	Organize and supervise service/mailout of Notice of Motion of Debtors Requesting Determination of Value for the Purpose of Calculating Tax Liability, etc.	1.00	150.00	BRP
	B100	A104	Assist Craig Geno with drafting of Certificate of Service re: service/mailout of Notice of Motion of Debtors Requesting Determination of Value for the Purpose of Calculating Tax Liability, etc.; prepare exhibits	0.30	45.00	BRP
	B100	A104	Calendar deadline for objections to Debtors' Motion Requesting Determination of Value for the Purpose of Calculating Tax Liability, etc.	0.10	15.00	BRP

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Aug-07-15	B100	A104	Review memos to/from John Lammert regarding agenda/2015 value, 2014 value, 2013 value, and Trammo tax	0.20	77.00	CMG
Aug-11-15	B100	A104	Review memo from Rita Eustrom regarding notices received	0.20	77.00	CMG
	B100	A104	Review memo from John Lammert regarding approach and response to county	0.20	77.00	CMG
Aug-12-15	B100	A104	reviewed First Amended Disclosure Statement filed by Debtor	0.60	135.00	JPN
	B100	A104	participated in phone conference with John Hammert; researched valuation of property for real property taxing authorities	0.80	180.00	JPN
	B100	A103	update/preparation of document management control (subfiles and pleadings)	1.25	187.50	BRP
Aug-13-15	B100	A104	Review hearing notice regarding tax protest	0.20	77.00	CMG
Aug-14-15	B100	A104	Telephone conference with clerk's office regarding tax protest and hearing continuance	0.10	38.50	CMG
	B100	A104	Review memos to/from Mr. Lambert regarding moving hearing date	0.20	77.00	CMG
Aug-17-15	B100	A107	Telephone conference with Susan Fesser; review Frederick's office regarding continuance	0.25	96.25	CMG
	B100	A104	Review memos to/from Beverly Pritchard regarding inquiries from Jackson County Chancery Clerk (Susan Fesser) and Benny Goff regarding hearings set on August 27th and continuance	0.20	77.00	CMG
	B100	A104	performed legal research regarding taxing authorities and procedures regarding valuation and objections of values	1.50	337.50	JPN
Aug-18-15	B100	A107	Telephone conference with Ryan Frederick's office	0.10	38.50	CMG

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	B100	A104	Dictation of letter to Ryan Frederick regarding deadlines, possible continuance and settlement of current hearing	0.25	96.25	CMG
Aug-19-15	B100	A104	Review memos to/from Mr. Lammert regarding status of 8/27 hearing	0.20	77.00	CMG
	B100	A104	Dictation of Emergency Motion regarding 8/27 hearing	0.85	327.25	CMG
	B100	A104	Telephone conference with J. Lammert regarding Emergency Motion and 8/27 hearing	0.20	77.00	CMG
	B100	A104	Telephone conference with C. Evans regarding Emergency Motion	0.20	77.00	CMG
	B100	A104	Telephone conference with Steve Rosenblatt, J. Lammert regarding Emergency Motion	0.25	96.25	CMG
	B100	A104	Review and revision of Emergency Motion	0.40	154.00	CMG
	B100	A104	Brief review of sale motion and notice	0.20	77.00	CMG
	B100	A104	Review memos to/from J. Lammert regarding appraiser contact and report	0.20	77.00	CMG
	B100	A104	Review memo from Mr. Lammert regarding afternoon regroup	0.10	38.50	CMG
	B100	A104	Review memo of Beverly Pritchard regarding notice and draft motion	0.20	77.00	CMG
	B100	A104	Review memos to/from Mr. Lammert, review notice from outside appraiser	0.35	134.75	CMG
	B100	A104	Review memo from Mr. Lammert regarding 3rd party appraiser and status	0.20	77.00	CMG
	B140	A104	Review memo from Beverly Pritchard to clerk regarding emergency motion	0.10	38.50	CMG
	B100	A104	Assist Craig Geno with drafting of Emergency Motion for Enforcement of Automatic Stay and for Other Relief	0.50	75.00	BRP

	B130	A104	Receipt and review of Notice re: hearing on Debtor's Motion to Sell; calendar objection deadline	0.10	15.00	BRP
Aug-20-15	B100	A104	Review memos to/from J. Lammert, Steve Rosenblatt regarding 8/20 hearing; contact from county appraiser	0.20	77.00	CMG
	B100	A104	Review hearing notice	0.25	96.25	CMG
	B100	A104	Review memos to/from Beverly Pritchard, Susan at the Chancery Clerk's office regarding new hearing dates	0.20	77.00	CMG
	B100	A104	Review memo from Mr. Lammert regarding topics for discussion in conference call and related matters	0.20	77.00	CMG
	B100	A104	Review memos to/from Steve Rosenblatt, Mr. Lammert regarding accounts for the MPC criminal plea as relates to taxes	0.65	250.25	CMG
	B100	A104	Review memos to/from Steve Rosenblatt, Robert regarding memo to the appraisers	0.25	96.25	CMG
	B100	A104	Receipt and review of notice of hearing on Emergency Motion for Enforcement of Automatic Stay and For Other Relief; calendar hearing date and objection deadline	0.15	22.50	BRP
	B100	A104	Receipt and review of email correspondence between Craig Geno and Steve Rosenblatt, etc.; calendar conference call date/time.	0.05	7.50	BRP
Aug-21-15	B100	A106	Conference with Jarret Nichols regarding tax issue under Section 505 jurisdiction/automatic stay	0.20	77.00	CMG
	B100	A107	Conference call with Mr. Lammert, debtor's counsel and representatives of debtor regarding emergency motion, strategy and tactics regarding tax hearing	0.45	173.25	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding preparing for State Court hearing in the event we have one	0.20	77.00	CMG

	B100	A104	Review memo from Steve Rosenblatt, review points of draft settlement	0.45	173.25	CMG
	B100	A104	Review memo from Steve Rosenblatt, brief review of EPA proof of claim	0.35	134.75	CMG
	B100	A104	Review memos to/from Steve Rosenblatt regarding order on cure amounts; cure amount for the assignment of the applicable MDEQ permit	0.25	96.25	CMG
	B100	A104	Review memo from Steve Rosenblatt, review debtors schedules regarding indebtedness to MDEQ and EPA	0.45	173.25	CMG
	B100	A104	performed legal research on final adjudication of tax reassessment of ad valorem taxes; §505 of bankruptcy code and time constraints to appeal; ability of BR Court to hear matter	4.00	900.00	JPN
Aug-23-15	B100	A104	Review memo from Steve Rosenblatt regarding conduct of 8/27 hearing	0.05	19.25	CMG
Aug-24-15	B100	A104	Review Jackson County response	0.85	327.25	CMG
	B100	A106	Telephone conference with B. Mullen (vm); dictation of memo to B. Mullen regarding resolving Wednesday hearing	0.20	77.00	CMG
	B100	A104	Review memos to/from Steve Rosenblatt regarding response; hearing	0.15	57.75	CMG
	B100	A104	Review motion to county to extend time	0.30	115.50	CMG
	B100	A104	Review response to emergency motion	0.35	134.75	CMG
	B100	A104	Review memos to/from John Lammert regarding Trammo portion/account, temporary resolution and effect of same	0.25	96.25	CMG
Aug-25-15	B100	A104	Review memos to/from Ben Mullen regarding approval of agreed order	0.25	96.25	CMG
	B100	A104	Review draft order for additional time for county to respond	0.25	96.25	CMG

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	B100	A104	Review memos to/from Ben Mullen regarding order for additional time	0.20	77.00	CMG
	B100	A104	Review minute entry	0.20	77.00	CMG
	B100	A104	Review county motion for time to answer	0.30	115.50	CMG
	B100	A107	Telephone conference with Christy Cannette (vm) regarding settlement announcement	0.15	57.75	CMG
	B100	A104	Review minute entry	0.20	77.00	CMG
Aug-26-15	B100	A104	Review memo from Steve Rosenblatt regarding materials submitted	0.10	38.50	CMG
	B100	A107	Assist CMG drafting and revising letter to Harry Benjamin Mullen, attaching draft Agreed Order for his review; draft email to Mr. Mullen sending letter from CMG and draft Agreed Order to be approved by CMG and Mr. Mullen	0.35	52.50	JAS
	B100	A103	Assist CMG revising Agreed Order regarding Emergency Motion for Enforcement of the Automatic Stay & Other Relief; Upload Agreed Order approved by CMG and Harry Benjamin Mullen	0.50	75.00	JAS
Aug-27-15	B100	A104	Review memos from Ben Mullen concerning entry and execution of orders; conference with Joni Shaw regarding county settlement order	0.10	38.50	CMG
	B100	A103	Dictation of order regarding stay motion	0.60	231.00	CMG
	B100	A104	Review and revision of order regarding stay motion	0.15	57.75	CMG
	B100	A103	Dictation of letter to counsel regarding order regarding stay motion	0.20	77.00	CMG
	B100	A104	Receipt and review of Order granting Jackson County time to respond to Debtor's Motion Requesting Determination of Value for Purpose of	0.10	15.00	BRP

Calculating Tax Liability etc.; calendar
deadline for response

Aug-28-15	B100	A104	reviewed Motion of Debtor for an Order Approving Liquidation the Trust Asset Purchase Agreement free and clear of liens	0.50	112.50	JPN
Aug-29-15	B100	A104	Dictation of status report	0.20	77.00	CMG
Aug-31-15	B310	A103	Review MDR proof of claim, dictation of memo to John Lammert re same	0.20	77.00	CMG
Sep-03-15	B310	A104	Receipt and review of notice of deadline for objections to MDEQ's Application for Administration Expenses; calendar deadline	0.10	15.00	BRP
Sep-04-15	B100	A104	reviewed Jackson County's Response to Emergency Motion to Impose Automatic Stay with supporting documents attached	0.50	112.50	JPN
	B100	A104	reviewed Unopposed Motion regarding extending time to calculate tax liability; reviewed file on tax liability issue	0.40	90.00	JPN
Sep-05-15	B100	A104	Review motion and notice of hearing regarding sale confirmation	0.15	57.75	CMG
	B100	A104	Review Mississippi Department of Environmental Quality request for administrative expense claim, notice and certificate of service	0.35	134.75	CMG
Sep-08-15	B100	A104	Receipt and review of notice of hearing on Debtor's Motion to Sell/Liquidate (#979); calendar hearing date to trigger preparation of hearing folder and retrieval/organization of additional documents needed for hearing	0.10	15.00	BRP
Sep-10-15	B100	A104	Telephone conference with Carl Burrer regarding appraisals and 505 issues	0.20	77.00	CMG
Sep-14-15	B100	A104	reviewed Notice of Schedules for the Asset Purchase Agreement and attached Exhibits regarding sale of Debtor's assets free and clear of liens	0.50	112.50	JPN

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	B100	A104	reviewed Motion of Debtor's for Entry of Order Approving Non-Material Modifications to Settlement Agreement and Order entered on same	0.40	90.00	JPN
Sep-16-15	B100	A104	Review memo from Mr. Lammert regarding Trammmo/property in the estate issue and how it fits with existing claims	0.20	77.00	CMG
	B100	A104	Review memo from Steve Rosenblatt regarding objection to the sale motion	0.20	77.00	CMG
Sep-18-15	B100	A104	reviewed Objection to Motion of Debtors requesting approval of Liquidation Trust Asset Purchase Agreement -objection filed by Official Committee of Unsecured Creditors	0.60	135.00	JPN
Sep-20-15	B100	A104	Review notice of status conference	0.15	57.75	CMG
Sep-21-15	B100	A104	Brief review of motion regarding letter to APA; UCC response relative to CMG assignments	0.35	134.75	CMG
Sep-25-15	B100	A104	Review notice of hearing on motion to determine tax liability	0.20	77.00	CMG
Sep-28-15	B100	A104	Review notice of hearing	0.20	77.00	CMG
Sep-29-15	B100	A104	reviewed Response to Motion to Determine Tax Liability filed by Jackson County, Mississippi	0.50	112.50	JPN
Oct-05-15	B100	A104	Review hearing notices (2)	0.20	77.00	CMG
Oct-10-15	B100	A103	Dictation of letter to B. Mullen regarding discovery	0.20	77.00	CMG
Oct-12-15	B100	A104	Review memos to/from Brad Mullen regarding discovery; hearing continuance	0.20	77.00	CMG
	B100	A103	Assist CMG drafting and revising letter to Harry Benjamin Mullen regarding his Response and hearing date; draft email to Mr. Mullen sending letter from CMG requesting setting hearing for later date	0.55	82.50	JAS

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Oct-14-15	B100	A103	Telephone conference with Steve Rosenblatt regarding sale; pusing case/motion off for discovery	0.20	77.00	CMG
Oct-15-15	B100	A104	Brief review of sale order	0.25	96.25	CMG
Oct-19-15	B100	A105	Conference with Beverly Pritchard regarding trial date	0.20	77.00	CMG
	B100	A104	Review minute entry regarding trial date	0.20	77.00	CMG
	B100	A103	Dictation of scheduling order	0.45	173.25	CMG
	B100	A103	Dictation of letter to Brad Mullen regarding scheduling order	0.25	96.25	CMG
Oct-20-15	B100	A104	Dictation of scheduling order; memo to Brad Mullen regarding scheduling order	0.15	57.75	CMG
Oct-21-15	B100	A106	Telephone conference with J. Lammert regarding asset allocation; discovery; status conference call; engagement issues; reduction of taxes	0.35	134.75	CMG
	B100	A104	Review memos to/from Steve Rosenblatt regarding status conference	0.20	77.00	CMG
	B100	A104	Review scheduling order; dictation of letter to J. Lammert regarding scheduling order	0.20	77.00	CMG
	B100	A104	Review memo from Ben Mullen regarding scheduling order and related matters	0.20	77.00	CMG
Oct-22-15	B100	A103	reviewed file regarding tax liability and Scheduling Order on hearing on same	0.40	90.00	JPN
	B100	A104	Receipt and review of Scheduling Order in connection with Debtor's Motion Requesting Determination of Value for the Purpose of Calculating Tax Liability etc.; calendar discovery deadline	0.10	15.00	BRP
	B100	A104	Assist CMG drafting and revising letter to John Lammert sending Scheduling Order entered by the Court; Draft email to Mr.	0.40	60.00	JAS

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Lammert attaching letter from CMG and
copy of Scheduling Order entered by Court

Oct-26-15	B100	A104	Review memos to/from Mr. Lammert regarding ability/inability of county to enforce tax claims and prohibition of same	0.25	96.25	CMG
Oct-27-15	B100	A104	Review memos to/from John Lammert regarding approaching county to confirm/disavow current amounts due and ballots	0.20	77.00	CMG
Oct-29-15	B100	A104	Dictation of discovery to Jackson County	2.75	1,058.75	CMG
Oct-30-15	B100	A104	Assist Craig Geno with drafting of discovery requests to Jackson County re: tax claim.	1.00	150.00	BRP
	B100	A104	Assist Craig Geno with drafting of notice of service of discovery requests to Jack	0.25	37.50	BRP
Nov-03-15	B100	A104	Review notice regarding sale closing	0.05	19.25	CMG
Nov-05-15	B100	A104	reviewed Notice of Closing of Sale of Assets to Environmental Trustee and Liquidation Trustee	0.40	90.00	JPN
Nov-21-15	B100	A104	Review and revision of discovery to Jackson County	0.20	77.00	CMG
Dec-09-15	B100	A104	Review memo from Mr. Lammert regarding results of TC county	0.20	77.00	CMG
Dec-14-15	B100	A105	Telephone conference with Mr. Lammert regarding tax issues	0.20	77.00	CMG
	B100	A104	Conference call with Bob Ogle, et. al regarding status	0.20	77.00	CMG
Jan-20-16	B100	A104	Receipt and review of emails from Wanda Watson and Craig Geno re: discovery deadline.	0.10	15.00	BRP
	B100	A104	Assist Craig Geno with drafting of Motion to Extend Discovery Deadline	0.35	52.50	BRP
	B100	A104	Assist Craig Geno with drafting of	0.30	45.00	BRP

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proposed order re: Motion to Extend
Discovery Deadline

Feb-16-16	B100	A104	Telephone conference with Mr. Lammert (vm)	0.20	77.00	CMG
Feb-17-16	B100	A104	Telephone conference with John Lammert regarding case/claim status	0.20	77.00	CMG
Mar-07-16	B100	A104	Receipt and review of Order setting hearing out of time on the UST's Motion to Convert/Dismiss; confirming hearing date on bankruptcy calendar	0.10	15.00	BRP
Mar-14-16	B100	A104	Update discovery	0.20	77.00	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding U.S. Trustee motion	0.20	77.00	CMG
Mar-15-16	B100	A104	Dictation of notice of service of discovery	0.25	96.25	CMG
Mar-18-16	B100	A104	Assist Craig Geno with additional revisions to discovery requests	0.25	37.50	BRP
Mar-21-16	B100	A104	Telephone conference with Mr. Lammert regarding discovery; Trammo material; trial vs. reduction of asset value; assessment of inventory value of third party inventory	0.25	96.25	CMG
	B100	A104	Review memos to/from Steve Rosenblatt, draft treatment of Jackson County and plan	0.35	134.75	CMG
Mar-30-16	B100	A104	Review memos to/from Ms. Lammert; Beverly Pritchard regarding Jackson County's response	0.20	77.00	CMG
	B100	A104	reviewed Unsecured Creditor Committee's Response to Motion to Convert Case to Chapter 7	0.30	67.50	JPN
Apr-14-16	B100	A104	Review updated treatment of Jackson County under plan (draft), review memos to/from Mr. Lammert regarding same	0.75	288.75	CMG
	B100	A104	Review memos to/from Steve Rosenblatt regarding treatment of Jackson County claims in the plan	0.75	288.75	CMG

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Apr-20-16	B100	A104	Review memos to/from John Lammert, conference with Beverly Pritchard regarding discovery submitted to county	0.20	77.00	CMG
Apr-26-16	B100	A104	Review memos to/from John Lammert regarding the discovery process, application for compensation	0.20	77.00	CMG
May-01-16	B100	A104	Review order on disclosure statement hearing	0.25	96.25	CMG
May-02-16	B100	A104	Receipt and review of order and notice of hearing on Disclosure Statement; calendar hearing date and objection deadline to trigger preparation of hearing folder and retrieval/organization of additional documents needed for hearing	0.15	22.50	BRP
May-03-16	B100	A104	Dictation of demand letter to county attorney for responses to discovery	0.20	77.00	CMG
	B100	A104	Assist CMG drafting and revising letter to Harry Benjamin Mullen regarding outstanding discovery responses; draft email to Mr. Mullen sending letter from CMG and copy of Notice of Service of Discovery Requests; draft email to Mr. Mullen sending copy of Debtor's First Set of Interrogatories and Requests for Production of Documents to Jackson County	0.40	60.00	JAS
May-04-16	B100	A104	Review memos to/from Ben Mullen, Mr. Lammert regarding extension of discovery and preparation of scheduling order	0.40	154.00	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding plan confirmation and discovery	0.10	38.50	CMG
May-25-16	B100	A104	Review memos to/from B. Mullen, J. Lammert regarding county discovery	0.20	77.00	CMG
	B100	A104	Review memos to/from County Counsel; Mr. Lammert regarding discovery; plan effect on discovery and trial	0.25	96.25	CMG
Jun-13-16	B100	A104	Review memos to/from J. Lammert; SWR regarding responses from Jackson County/Trammo	0.25	96.25	CMG

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Jul-03-16	B100	A104	Review "lienor" proof of claim	0.15	57.75	CMG
	B100	A103	Dictation of letter to client regarding "lienor" proof of claim	0.20	77.00	CMG
Jul-05-16	B100	A103	Review lienor's notice, dictation of memo to John Lambert and Steve Rosenblatt re same	0.20	77.00	CMG
	B100	A104	Assist CMG drafting and revising letter to John Lammert and Steve Rosenblatt regarding Lienor Notice of Delinquent Property Taxes; draft email to Mr. Lammert and Mr. Rosenblatt sending letter from CMG and copy of Lienor Notice	0.30	45.00	JAS
Jul-08-16	B100	A104	Receipt and review of order approving disclosure statement; calendar confirmation hearing, deadlines for filing ballots, objections, and determining parties entitled to vote on the plan	0.10	15.00	BRP
Jul-12-16	B300	A104	Receipt and review of amended order approving disclosure statement; calendar amended ballot deadline	0.10	15.00	BRP
Jul-19-16	B100	A105	Telephone conference with John Lammert regarding claim/case status on tax issues	0.25	96.25	CMG
Jul-22-16	B100	A104	Dictation of 505 motion	1.45	558.25	CMG
Aug-03-16	B100	A103	Telephone conference with John Lammert regarding case status	0.20	77.00	CMG
Aug-15-16	B100	A104	Review memos to/from Mr. Lammert regarding open issues and pending matters	0.20	77.00	CMG
Aug-18-16	B100	A104	Review memos to/from John Lammert regarding status conference	0.20	77.00	CMG
Aug-19-16	B100	A104	Review memos to/from John Lammert, Bob Ogle regarding priority claims and related matters	0.20	77.00	CMG
Aug-22-16	B100	A104	Review memos to/from Mr. Lammert regarding status conference	0.20	77.00	CMG

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Aug-23-16	B100	A103	Telephone conference with Mr. Lammert regarding case status; issues presented	0.20	77.00	CMG
Sep-29-16	B100	A104	Review memos to/from clerk regarding request for status report	0.20	77.00	CMG
Sep-30-16	B100	A104	Review memos to/from Mr. Lammert regarding closing transaction	0.20	77.00	CMG
	B100	A104	Review memos to/from John Lammert regarding decision to go forward or abandon efforts	0.20	77.00	CMG
Oct-03-16	B100	A105	Telephone conference with John Lammert regarding case status/strategy and tactics	0.25	96.25	CMG
Oct-04-16	B100	A105	Telephone conference with Ben Miller (vm) regarding discovery	0.10	38.50	CMG
Oct-05-16	B100	A103	Dictation of status report	0.20	77.00	CMG
Oct-06-16	B100	A103	Dictation of status report; review and revision of same	0.30	115.50	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding Trammo payment and related issues	0.05	19.25	CMG
	B100	A104	Review memos to/from John Lammert regarding portion of tax being paid	0.20	77.00	CMG
	B100	A103	Draft letter to Danny Miller, Wanda Watson re scheduling order; copy John Lammert, Stephen Rosenblatt, Harry Ben Mullen	0.20	25.00	KLC
Oct-17-16	B100	A104	Review memos to/from Mr. Lammert regarding Trammo escrowing their share of personal property taxes	0.20	77.00	CMG
Oct-19-16	B100	A104	Review memos to/from Ben Mullen regarding answers to discovery	0.20	77.00	CMG
Oct-21-16	B100	A104	Review memos to/from Ben Mullen regarding timing of discovery	0.20	77.00	CMG
Oct-23-16	B130	A104	Review discovery responses	1.40	539.00	CMG

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Oct-24-16	B100	A105	Telephone conference with John Lammert regarding current developments and discovery; status conference with county	0.20	77.00	CMG
Oct-25-16	B100	A104	Review memos to/from John Lammert regarding pending sale of assets	0.20	77.00	CMG
Oct-28-16	B100	A106	Telephone conference with B. Mullen regarding status conference and discovery answer	0.35	134.75	CMG
	B100	A106	Review memos to/from Mr. Lammert regarding sale; response from county	0.20	77.00	CMG
	B100	A104	Review memos to/from Mr. Lammert regarding discussion of counsel for the county	0.20	77.00	CMG
Oct-29-16	B100	A104	Review memos to/from Steve Rosenblatt regarding entry of order of confirmation and meaning of it	0.20	77.00	CMG
Oct-31-16	B100	A104	Review memos to/from John Lammert regarding contact with Ben Mullen for settlement conference	0.05	19.25	CMG
Nov-07-16	B100	A104	Review notice of occurrence effective date	0.20	77.00	CMG
Nov-09-16	B100	A104	Review memos to/from Mr. Lammert regarding following up with Joe Tucker	0.20	77.00	CMG
Nov-15-16	B100	A104	Review memo from Mr. Lambert regarding settlement outline	0.25	96.25	CMG
Nov-29-16	B130	A103	Dictation of motion to approve payment	1.45	558.25	CMG
	B130	A104	Review edits from Mr. Lammert on motion requesting determination of value	0.15	57.75	CMG
	B185	A104	Dictation of memo to Mr. Morgan regarding agreed order on lease with Medicomp	0.20	77.00	CMG
Totals				90.50	\$29,225.50	

DISBURSEMENTS**EXPENSE
CODE**

Apr-06-15		Online Research Jan 2015 - Mar 2015	6.60
Jul-17-15	E105	Long Distance	4.00
Jul-28-15	E101	Photocopies	2.00
Jul-30-15	E101	Photocopies 7 pages @ .25/page	1.75
	E105	Long Distance	3.00
Aug-04-15	E101	Photocopies 41 pages @ .25/page	10.25
Aug-05-15	E108	07/31 FedEx to Jackson Co Board of Supervisors	20.70
	E108	07/31 FedEx to Jackson Co Tax Assesor	20.70
Aug-06-15	E101	Photocopies 413 pages @ .25/page	103.25
	E108	Postage Mailout	63.05
Aug-11-15	E101	Photocopies 57 pages @ .25/page	14.25
Aug-14-15	E105	Long Distance	2.00
Aug-17-15	E105	Long Distance	2.00
Aug-18-15	E105	Long Distance	2.00
Aug-19-15	E105	Long Distance	2.00
	E105	Long Distance	3.00
Aug-25-15	E105	Long Distance	2.00
Aug-26-15	E105	Long Distance	2.00
Sep-10-15	E105	Long Distance	2.00
Oct-21-15	E105	Long Distance	4.00
Oct-22-15	E106	Online research 07/01/15 thru 09/30/15	43.60
Dec-14-15	E105	Long Distance	3.00
Feb-02-16	E106	Online Research 10/15 - 12/31	0.10
Feb-16-16	E105	Long Distance	2.00

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Apr-29-16	E101	Photocopies 261 pages @ .25/page	65.25
Jun-30-16	E106	Online Research 04/01 thru 06/30	2.10
Oct-04-16	E105	Long Distance	2.00
Oct-21-16	E101	Photocopies 207 pages @ .25/page	51.75

Totals	\$440.35
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Total Fee & Disbursements	\$29,665.85
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Balance Now Due	\$29,665.85
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SUMMARY BY TIMEKEEPER

	RATE	HOURS	AMOUNT
Craig M. Geno	\$385.00	61.80	\$23,793.00
Jarret P. Nichols	\$225.00	15.10	\$3,397.50
Beverly R. Pritchard	\$150.00	9.25	\$1,387.50
Joni A. Shaw	\$150.00	4.15	\$622.50
Kathryn L. Carter	\$125.00	0.20	\$25.00

TAX ID Number 45-4013160