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

| In re: |) |
|----------------------------------|------------------------------------|
| |) |
| MISSISSIPPI PHOSPHATES |) |
| CORPORATION, et al. ¹ |) CASE NO. 14-51667-KMS |
| |) Chapter 11 |
| |) |
| |) (Joint Administration Requested) |
| Debtors |) |
| |) |

NOTICE OF MOTION OF DEBTORS TO APPROVE COMMERCIAL INSURANCE PREMIUM FINANCE AND SECURITY AGREEMENT WITH BANKDIRECT CAPITAL FINANCE [Dkt. # 334]

PLEASE TAKE NOTICE that Mississippi Phosphates Corporation, *et al.*, the Debtors and debtors-in-possession herein ("*Debtors*"), in these jointly administered chapter 11 cases, has filed with the United States Bankruptcy Court the *Motion of the Debtors to Approve Commercial Insurance Premium Finance and Security Agreement with BankDirect Capital Finance (the "<i>Motion*") [Dkt. #334]. This Notice, as well as a copy of the Motion, which is attached hereto as Exhibit "A," is being sent to all parties listed on the matrix for this case maintained by the clerk of the Bankruptcy Court, a copy of which is attached hereto as Exhibit "B".

NOTICE IS FURTHER GIVEN that any objection or other response to the Motion must be in writing and must be (i) filed with the Clerk of Court for the United States Bankruptcy Court, Southern District of Mississippi, 2012 15th Street, Suite 244, Gulfport, MS 39501, and (ii) served upon the Debtors' attorney, Stephen W. Rosenblatt, Butler Snow LLP, Post Office Box 6010, Ridgeland, MS 39158-6010, on or before Tuesday, January 13, 2015.

NOTICE IS FURTHER GIVEN that in the event no written objection or other responsive pleading is timely filed, the Court may consider and rule upon the Motion *ex parte*.

THIS, the 23rd day of December, 2014.

Respectfully submitted,

By: <u>S/Thomas M. Hewitt</u> THOMAS M. HEWITT ONE OF THE ATTORNEYS FOR DEBTORS

¹ The following affiliated Debtors have requested joint administration herein: Mississippi Phosphates Corporation ("MPC"), Ammonia Tank Subsidiary, Inc. ("ATS") and Sulfuric Acid Tanks Subsidiary, Inc. ("SATS").

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