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

)

In Re:

MISSISSIPPI PHOSPHATES CORPORATION, et al.)))))

Case No. 14-51667-KMS Chapter 11

(Joint Administration Requested)

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Paul J. Delcambre, Jr. and the law firm of Balch& Bingham LLP, hereby appears as counsel for Mississippi Power Company ("MPC") and requests that all documents, notices and pleadings be sent to Balch & Bingham LLP, Attorneys at Law.

Please add the following to the list of creditors:

Debtor

Mississippi Power Company Gulfport, Mississippi c/o Paul J. Delcambre, Jr. <u>pdelcambre@balch.com</u> Balch & Bingham LLP Attorneys at Law 1310 Twenty-Fifth Avenue (39501) Post Office Box 130 Gulfport, Mississippi 39502

PLEASE TAKE FURTHER NOTICE that this Entry of Appearance is not intended as, nor is it a consent to, jurisdiction of the Bankruptcy Court over said parties, specifically, but not limited to(i) said party's right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to a trial by jury in any proceeding so triable herein, or in any case, controversy or proceeding related hereto, (iii) the right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which said parties may be

Case 14-51667-KMS Doc 34 Filed 10/28/14 Entered 10/28/14 15:35:27 Desc Main Document Page 2 of 3

entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

DATED, this 28th day of October, 2014.

MISSISSIPPI POWER COMPANY

BY: BALCH & BINGHAM LLP

BY: <u>/s/ Paul J. Delcambre, Jr.</u> PAUL J. DELCAMBRE, Jr.

Paul J. Delcambre, Jr. (MSB # 6034) Matthew W. McDade (MSB # 103207) BALCH & BINGHAM LLP 1310 Twenty-Fifth Avenue (39501) Post Office Box 130 Gulfport, Mississippi 39502 Telephone: (228) 864-9900 Facsimile: (228) 864-8221 pdelcambre@balch.com mmcdade@balch.com

CERTIFICATE

I, Paul J. Delcambre, Jr., Attorney for Mississippi Power Company, do hereby certify that on this day the foregoing paper was filed electronically with the Clerk of the Court using the Court's ECF system, which served a true and correct copy of such paper electronically on all parties enlisted to receive service electronically as of the date hereof, including the following:

Stephen W. Rosenblatt, Christopher R. Maddux, Paul S. Murphy J. Mitchell Carrington Thomas M. Hewitt, Attorneys for Mississippi Phosphates Corporation, et al. <u>Steve.Rosenblatt@butlersnow.com</u> <u>Chris.Maddux@butlersnow.com</u> <u>Paul.Murphy@butlersnow.com</u> <u>Mitch.Carrington@butlersnow.com</u> Thomas.Hewitt@butlersnow.com

David N. Usry Assistant United States Attorney David.Usry@usdoj.gov

U.S. Trustee via the Court's ECF system at <u>USTPRegion05.JA.ECF@usdoj.gov</u>

Christopher J. Steiskal, Sr. Office of the United States Trustee <u>Christopher.J.Steiskal@usdoj.gov</u>

This, the 28th day of October, 2014.

/s/ *Jaul J. Delcambre, Jr.* PAUL J. DELCAMBRE, JR.