

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

In re:)	
)	
MISSISSIPPI PHOSPHATES)	
CORPORATION, <i>et al.</i> ¹)	CASE NO. 14-51667-KMS
)	Chapter 11
)	
Debtors)	Jointly Administered
_____)	

NOTICE OF DEBTORS' AGREEMENT TO EXTEND TIME TO RESPOND TO MOTION OF DEBTORS, PURSUANT TO BANKRUPTCY CODE SECTIONS 105(A), 363, 365, 503, AND 507, AND BANKRUPTCY RULES 2002, 3007, 6004, 6006, 9007, AND 9014 FOR ENTRY OF: (I) ORDER (A) APPROVING SALES AND BIDDING PROCEDURES IN CONNECTION WITH SALE OF ASSETS OF THE DEBTORS, (B) APPROVING FORM AND MANNER OF NOTICE, (C) SCHEDULING AUCTION AND SALE HEARING, (D) AUTHORIZING PROCEDURES GOVERNING ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND (E) GRANTING RELATED RELIEF; AND (II) ORDER (A) APPROVING PURCHASE AGREEMENT, (B) AUTHORIZING SALE FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS, AND (C) GRANTING RELATED RELIEF

[Dkt. ## 066; 155; 296; 312; 350]

PLEASE TAKE NOTICE that Mississippi Phosphates Corporation and each of the affiliated debtors, each as debtor and debtor-in-possession (collectively, the "*Debtors*") file this *Notice of Debtors' Agreement to Extend Time to Respond to Motion of Debtors, pursuant to Bankruptcy Code Sections 105(a), 363, 365, 503, and 507, and Bankruptcy Rules 2002, 3007, 6004, 6006, 9007, and 9014 for Entry of: (I) Order (A) Approving Sales and Bidding Procedures in Connection with Sale of Assets of the Debtors, (B) Approving Form and Manner of Notice, (C) Scheduling Auction and Sale Hearing, (D) Authorizing Procedures Governing Assumption and*

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*."

Assignment of Certain Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Purchase Agreement, (B) Authorizing Sale Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, and (C) Granting Related Relief (the “Sale Motion”) in order to extend the deadline for filing objections to the Sale Motion until **January 19, 2015**.

NOTICE IS FURTHER GIVEN that by agreement of the Debtors, the DIP Lenders, and the Committee, any objection or other response to the Sale 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 **January 19, 2015**.

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

Dated: January 8, 2015.

By: /s/ Stephen W. Rosenblatt
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ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

I certify that the foregoing Notice was filed electronically through the Court's ECF system and served electronically on all parties enlisted to receive service electronically.

Dated: January 8, 2015.

By: /s/ Stephen W. Rosenblatt
STEPHEN W. ROSENBLATT

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