

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**IN RE: MISSISSIPPI PHOSPHATES
CORPORATION, et al.¹ CASE NO. 14-51667-KMS**

**DEBTOR(S) CHAPTER 11
(Jointly Administered)**

**UNITED STATES TRUSTEE'S MOTION TO EXTEND TIME
TO FILE A RESPONSE TO BURR & FORMAN, LLP'S APPLICATION TO EMPLOY**

COMES NOW Henry G. Hobbs, Jr., Acting United States Trustee for Region 5 ("UST"), by and through undersigned counsel, pursuant to Fed. R. Bankr. P. 9006(b), and files this Motion to Extend Time to File a Response to Burr & Forman LLP's Application to Employ, and in support thereof respectfully submits the following:

1. On December 24, 2014, Burr & Forman, LLP, Counsel for the Official Committee of Unsecured Creditors filed their Application of the Official Committee of Unsecured Creditors for an Order Authorizing the Employment and Retention of Burr & Forman, LLP, as Counsel *Nunc Pro Tunc* to November 14, 2014 (the "Application to Employ," DKT. #336).

2. The current deadline to object to the Application to Employ is January 20, 2015 (DKT. #342).

3. The UST needs additional time to review and, if necessary, file a response to the

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-KMS, Ammonia Tank Subsidiary, Inc. ("ATS"), Case No. 14-51668-KMS, and Sulfuric Acid Tanks Subsidiary, Inc. ("SATS"), Case No. 14-51671-KMS. These chapter 11 cases are sometimes referred to herein as the "Bankruptcy Cases."

Application to Employ.

4. This request is not for the purpose of harassment or delay.

5. Counsel for the Committee consents to the extension of time. The UST has attached a proposed agreed order granting this motion.

WHEREFORE, PREMISES CONSIDERED, the United States Trustee prays for an order granting the United States Trustee through and including February 3, 2015, in which to file a response to the Application to Employ listed above. The United States Trustee further prays for all general and equitable relief to which entitled.

RESPECTFULLY SUBMITTED, this the 15th day of January, 2015.

HENRY G. HOBBS, JR.,
Acting United States Trustee
Region 5, Judicial Districts
of Louisiana and Mississippi

By: /s/Christopher J. Steiskal, Sr.
CHRISTOPHER J. STEISKAL, SR.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served this day on the below named individual(s) via first class U.S. Mail at the address listed below or by Notice of Electronic Filing via the email address on file with the Court's CM/ECF system:

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DATED, this the 15th day of January, 2015.

/s/Christopher J. Steiskal, Sr.
CHRISTOPHER J. STEISKAL, SR.