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

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In Re:

### MISSISSIPPI PHOSPHATES CORPORATION, et al.

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Case No. 14-51667-KMS Chapter 11

# NOTICE OF BALCH & BINGHAM LLP OF MULTIPLE REPRESENTATION OF CREDITORS PURSUANT TO RULE 2019 OF THE FEDERAL RULES OF <u>BANKRUPTCY PROCEDURE</u>

Jeremy L. Retherford, Paul J. Delcambre and Matthew W. McDade on behalf of Balch &

Bingham LLP ("Counsel"), pursuant to Rule 2019 of the Federal Rules of Bankruptcy

Procedure, file this verified statement regarding Counsel's representation of multiple creditors in

the above-styled bankruptcy case (the "Bankruptcy Case") of Mississippi Phosphates Company

(the "<u>Debtor</u>") and shows the Court as follows:

- 1. Counsel is representing the following creditors in the Bankruptcy Case:
  - A. APRM, Inc. d/b/a Plant Maintenance Services Southbelt Industrial Drive Houston, TX 77047
  - B. Mississippi Power Company PO Box 4079 Gulfport, MS 39502

**Debtor** 

- C. Scott Company, LLC 192 Park Drive Lucedale, MS 39452
- D. VIP International, Inc. 6638 Pecue Lane Baton Rouge, LA 70817

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2. The claims of APRM, Inc. d/b/a Plant Maintenance Services ("<u>Plaint</u> <u>Maintenance</u>") are for construction or maintenance services and materials provided to the Debtor prior to commencement of this bankruptcy case in the amount of \$359,136.48.

3. The claim of Mississippi Power Company is for money owed for electric services provided to the Debtor in an amount of \$1,082,562.09.

3. The claims of Scott Company ("<u>Scott Company</u>") are for construction or maintenance services and materials provided to the Debtor prior to commencement of this bankruptcy case in the amount of \$84,358.59.

4. The claims of VIP International, Inc. ("<u>VIP</u>") are for construction or maintenance services and materials provided to the Debtor prior to commencement of this bankruptcy case in the amount of \$221,406.26.

5. Plant Maintenance, Mississippi Power Company, Scott Company and VIP have been advised of the multiple representations in the Bankruptcy Case and have consented to such representation.

6. Counsel reserves the right to amend this notice as may be necessary from time to time.

Dated: March 4, 2015.

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Attorney for APRM, Inc. d/b/a Plant Maintenance Services

/s/ Matthew W. McDade Matthew W. McDade BALCH & BINGHAM, LLP 1310 Twenty Fifth Avenue Gulfport, MS 39501 Telephone: (228) 214-0409 Facsimile: (888) 506-8672

Attorney for Scott Company, LLC and VIP International, Inc.

/s/ Paul J. Delcambre, Jr. Paul J. Delcambre, Jr. BALCH & BINGHAM, LLP 1310 Twenty Fifth Avenue Gulfport, MS 39501 Telephone: (228) 214-0409 Facsimile: (888) 506-8672

Attorney for Mississippi Power Company

# **CERTIFICATE**

I, Matthew W. McDade, 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, but not limited to, 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> <u>Thomas.Hewitt@butlersnow.com</u>

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 4th day of March, 2015.

<u>/s Matthew W. McDade</u> Matthew W. McDade