

U.S. BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
FILED

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

**FEB - 5 2015**

**DANNY L. MILLER, CLERK**  
BY Kwize DEPUTY CLERK

IN RE:

MISSISSIPPI PHOSPHATES CORPORATION

DEBTORS

CASE NO.: 14-51667-KMS

MISSISSIPPI PHOSPHATES CORPORATION

RESPONDENTS

JERRY SHUMOCK

CREDITOR

**MOTION TO LIFT THE AUTOMATIC STAY**

COMES NOW, Jerry Shumock (Creditor), and moves the Court to lift the automatic stay as follows:

1. Creditor has a claim against debtor, Mississippi Phosphates Corporation, for a Workers' Compensation accident which occurred on March 19, 2012. Mississippi Phosphates had Workers' Compensation coverage with The Insurance Company of the State of Pennsylvania at the time of the accident.

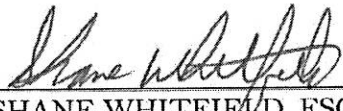
2. The claim is currently in litigation before the Mississippi Workers' Compensation Commission, Claim No: 1206795.

3. Creditor should be granted relief from the automatic stay for the limited purpose of proceeding with the workers' compensation claim against Debtor's workers' compensation insurance carrier.

4. That creditor requests the order granting relief from the stay entered in this case be excepted from the provisions of Bankruptcy Rule 4001(a)(3).

WHEREFORE, creditor moves the Court to lift the automatic stay as aforesaid; and creditor requests such other relief to which she may be entitled in the premises.

RESPECTFULLY SUBMITTED this the 4 day of February, 2015.

  
SHANE WHITFIELD, ESQUIRE  
*Attorney for Jerry Shumock, Creditor*

*Prepared By:*

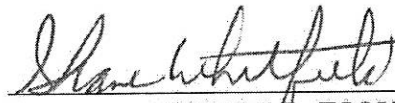
SHANE WHITFIELD, ESQUIRE  
*Attorney for Creditor, Jerry Shumock*  
Mississippi Bar No. 100071  
ANDREW C. BURRELL, P.A.  
750 East Pass Road  
Gulfport, Mississippi 39507  
shane@andrewburrell.com  
Phone: 1.228/896-4016  
Fax: 1.228/896.8372

CERTIFICATE OF SERVICE

I, Shane Whitfield, do hereby certify that I caused to be served a true and correct copy of the foregoing MOTION TO LIFT AUTOMATIC STAY by regular U.S. mail, postage pre-paid upon counsel for the Parties hereto, as follows:

Stephen W. Rosenblatt, Esq.  
Phil B. Abernethy, Esq.  
Michael C. McCabe, Jr., Esq.  
BUTLER SNOW LLP  
2017 20<sup>th</sup> Avenue, Suite A  
Gulfport, Mississippi 39501  
*Attorney for Debtor, Mississippi Phosphates Corporation*

Karl Steinberger, Esq.  
HEIDELBERT, STEINBERGER, COLMER & BURROW  
711 Delmas Avenue  
Pascagoula, MS 39568  
*Attorney for Employer/Carrier*



SHANE WHITFIELD, ESQUIRE

*Attorney for Jerry Shumock, Creditor*

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Mississippi Phosphates Corporation

CASE NO. 14-51667-KMS

DEBTOR.

CHAPTER 11

NOTICE OF HEARING AND DEADLINES

Jerry Shumock has filed a Motion to Lift the Automatic Stay (the "Motion") (Dkt. # 455) with the Court in the above-styled case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you might wish to consult one.)**

The Court will hold a combined and final hearing on March 12, 2015, at 02:00 PM in the Bankruptcy Courtroom, 7th Floor, Dan M. Russell, Jr. U.S. Courthouse, 2012 15th Street, Gulfport, Mississippi, to consider and act upon the Motion.

If you do not want the Court to grant the Motion, or if you want the Court to consider your views on the Motion, you or your attorney must file a written response explaining your position so that the Court receives it on or before March 5, 2015. Attorneys and Registered Users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at U.S. Bankruptcy Court, Dan M. Russell, Jr. U.S. Courthouse, 2012 15th Street, Suite 244, Gulfport, MS, 39501. If you file a response, you or your attorney are required to attend the hearing. The hearing will be electronically recorded by the Court.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion. If no response is filed, the Court may consider the Motion and enter an order granting relief before the hearing date.

Dated: 2/5/15

Danny L. Miller, Clerk of Court  
U.S. Bankruptcy Court  
Dan M. Russell, Jr. U.S. Courthouse  
2012 15th Street, Suite 244  
Gulfport, MS 39501  
228-563-1790

Parties Noticed:

Mississippi Phosphates Corporation

Stephen W. Rosenblatt

J. Mitchell Carrington

Thomas M Hewitt

Christopher R. Maddux

Paul S. Murphy

Shane Whitfield

Karl Steinberger

United States Trustee

Christopher James Steiskal, Sr.

Alan Lee Smith

Allison C Carroll

Amy Lassitter St. Pe

Andrew R Wilson

C. Davin Boldissar

Carey L. Menasco

Grover C. Monroe

Dean Sterling Kidd

Devon J. Eggert

Douglas C Noble

Douglas S Draper

Hovey Slayton Dabney, Jr.

James Lawson Hester

James A McCullough, II

James W O'Mara

Jerome C Hafter

Karl Fingerhood

Kasee Sparks Heisterhagen

Kenneth Gordon Long

Lacey Elizabeth Rochester

Lawrence B Voit

Marcus M Wilson

Matthew Ward McDade

Michael T. Fackler

Paul J. Delcambre, Jr.

Richard A Montague

Robert Alan Byrd

Robert Ball McGinley, Jr.

Roy Hendee Furrh

Ted Lampton

Toby M Daluz

William H Patrick, III

William J Little, Jr.

William P Wessler

**CERTIFICATE OF SERVICE**

I, Shane Whitfield, do hereby certify that I have this date transmitted via Electronic Case Filing, and/or Via U.S. Mail, postage prepaid, a true and correct copy of *MOTION TO LIFT AUTOMATIC STAY* and *NOTICE OF HEARING* to the below parties:

**Service provided via Notice of Electronic Filing (NEF) through ECF system:**

Mississippi Phosphates Corporation

Stephen W. Rosenblatt

J. Mitchell Carrington

Thomas M Hewitt

Christopher R. Maddux

Paul S. Murphy

Karl Steinberger

United States Trustee

Christopher James Steiskal, Sr.

Alan Lee Smith

Allison C. Carroll

Amy Lassitter St. Pe

Andrew R Wilson

---

C. Davin Boldissar

Carey L. Menasco

Grover C. Monroe

Douglas S. Draper

Hovey Slayton Dabney, Jr.

James Lawson Hester

James A McCullough, II

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Jerome C Hafter

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Kenneth Gordon Long

Lacey Elizabeth Rochester

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Marcus M Wilson

Matthew Ward McDade

Michael T Fackler

Paul J Delcambre, Jr

Richard A Montague

Rober Alan Byrd

Robert Ball McGinley, Jr

Roy Hendee Furrh

Ted Lampton

Toby M Daluz

William H Patrick, III

William J Little, Jr.

William P Wessler

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**Notice Provided via First Class U.S. Mail:**

**CREDITORS**

**Brook Services LTD**  
P. O. Box 8406  
Dallas, TX 75284-0640

**Carrier Rental Systems**  
6282 Hwy 73  
Geismar, LA 70734



**Central Maintenance & Weld**  
2620 Keysville Road  
Lithia, FL 33547

**Duponte Sulfur Prod.**  
586 Hwy 44  
La Place, LA 70068

**Envir. Acid Solutions**  
24838 NC Hwy 33 East  
Aurora, NC 27806

**FLEXICREW**  
c/o Richard M. Gaal  
PO Box 350  
Mobile, AL 36601

**Hydrovac Industrial Services, Inc.**  
Attn: Mike Lenig  
4896 Old Louisville Rd.  
Savannah, GA 31408

**Int'l Welding & Fabricatio**  
11401 Hwy 63  
Moss Point, MS 39562

**Jackson Cty Port Auth.**  
P. O. Box 70  
Pascagoula, MS 39568-0070

**Mississippi Export Railroad Company**  
c/o Patrick R. Buchanan  
Brown Buchanan P.A.  
Post Office Box 1377  
Biloxi, MS 39533-1377

**MS Power Company**  
P. O. Box 4275  
Gulfport, MS 39502-4275

---

**OCP S.A.**  
c/o Covington & Burling LLP  
Attn: Dianne Coffino, Ronald Hewitt  
620 Eighth Ave.  
New York, NY 10018-1618

**Oxbow Sulphur Inc.**  
1450 Lake Robbins Dr.  
Ste 500  
The Woodlands, TX 77380

**Plant Maintenance Ser.**  
3605 Delta Dr.  
St. Gabriel, LA 70776

**Premier Chemicals**  
4664 James Ave  
Ste 125  
Baton Rouge, LA 70808

**RPW, Inc.**  
P. O. Box 2151  
Pascagoula, MS 39569

**Shrieve Chemical Company**  
ATTN: Kristina Mordaunt  
1755 Woodstead Court  
The Woodlands, TX 77380

**Transammonia, Inc.**  
320 Park Ave  
10th Floor  
New York, NY 10022

**Unimin Lime**  
P. O. Box 181  
Calera, AL 35040

**VIP International**  
6638 Pecue Lane  
Baton Rouge, LA 70817-4400

**CREDITORS COMMITTEE**

**Central Maintenance & Welding, Inc.**  
c/o Hugo S. deBeaubien, Shumaker Loop Ke  
Bank of America Plaza  
101 East Kennedy Blvd., Suite 2800  
Tampa, FL 33602

**Hydrovac Industrial Services, Inc.**  
c/o James A. McCullough, II  
Brunini Grantham Grower & Hewes, PLLC  
P.O. Drawer 119  
Jackson, MS 39205

**Mississippi Power Company**  
c/o Paul J. Delcambre, Balch & Bingham L  
1310 Twenty Fifth Avenue  
Gulfport, MS 39501-1931

**OCP S.A.**

c/o Dianne Coffino, Covington & Burling  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018

**Premier Chemicals & Services, LLC**

Francis Mayer  
4856 Revere Avenue, Suite A  
Baton Rouge, LA 70808

**Trammo, Inc.**

c/o James W. OMara, Phelps Dunbar  
4270 I-55 North  
Jackson, MS 39211

**Shrieve Chemical**

c/o Carey Menasco, Liskow & Lewis  
One Shell Square  
701 Poydras Street, Suite 5000  
New Orleans, LA 70139

\_\_\_\_\_  
/s/ Shane Whitfield  
SHANE WHITFIELD, ESQUIRE  
*Attorney for Jerry Shumock, Creditor*