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

) )

In re:

MISSISSIPPI PHOSPHATES CORPORATION, et al.<sup>1</sup>

Debtors

CASE NO. 14-51667-KMS Chapter 11

Jointly Administered

# NOTICE OF DEBTORS' AGREEMENT TO EXTEND THE DEADLINE FOR INVESTIGATION TERMINATION DATE, OBJECTIONS, AND CHALLENGE PERIOD UNDER INTERIM DIP FINANCING ORDER ONLY FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, AND <u>MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY</u>

[Dkt. ## 066; 155; 296; 312; 350; 371; 376; 411; 429; 451; 471; 481; 485; 505; 537; 575]

PLEASE TAKE NOTICE that Mississippi Phosphates Corporation and each of the affiliated debtors, each as debtor-in-possession (collectively, the "*Debtors*"), with the consent of the United States Environmental Protection Agency, Mississippi Department of Environmental Quality (collectively, the "*Governments*"), the Official Committee of Unsecured Creditors (the "*Committee*"), and the Agent and Pre-Petition Lenders (collectively, the "*Lenders*"), file this Notice of Debtors' Agreement to Extend the Deadline for Investigation Termination Date, Objections, and Challenge Period under Interim DIP Financing Order only for United States Environmental Protection Agency and Mississippi Department of Environmental Quality ("Notice to Extend Challenge Period") in order to extend the March 16, 2015 Investigation Termination Date and Challenge Period deadline under the Notice of Debtors' Agreement to

<sup>&</sup>lt;sup>1</sup> 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."

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Extend the Deadline for Investigation Termination Date, Objections, and Challenge Period under Interim DIP Financing Order only for the United States Environmental Protection Agency, and Mississippi Department of Environmental Quality [Dkt. # 537] until and including

Monday, March 30, 2015, at 5:00 p.m. (central time).

**NOTICE IS FURTHER GIVEN** that the March 16, 2015 Investigation Termination Date and Challenge Period deadline under the previous *Notice to Extend Challenge Period* is extended until and including **Monday**, **March 30**, 2015, at 5:00 p.m. (central time) to permit the Governments, and only those entities, but no others, to file an adversary proceeding or contested matter (i) challenging or objecting to the validity, perfection, enforceability, or priority of the Agent's and Pre-Petition Lenders' security interests in and liens on the Pre-Petition Collateral or the amount and allowance of the Pre-Petition Indebtedness, or (ii) otherwise asserting any claims or causes of action against the Agent or Pre-Petition Lenders (any action under (i) or (ii), a "*Challenge*").

Dated: March 16, 2015.

By: /s/ Stephen W. Rosenblatt Stephen W. Rosenblatt (Miss. Bar No. 5676) Christopher R. Maddux (Miss. Bar No. 100501) Paul S. Murphy (Miss. Bar No. 101396) J. Mitchell Carrington (Miss. Bar No. 104228) Thomas M. Hewitt (Miss. Bar No. 104589) BUTLER SNOW LLP 1020 Highland Colony Parkway, Suite 1400 Ridgeland, MS 39157 Telephone: (601) 985-4504 Fax: (601) 985-4500 Steve.Rosenblatt@butlersnow.com Chris.Maddux@butlersnow.com Paul.Murphy@butlersnow.com Mitch.Carrington@butlersnow.com Thomas.Hewitt@butlersnow.com

## **ATTORNEYS FOR THE DEBTORS**

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# **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: March 16, 2015.

By: <u>/s/Stephen W. Rosenblatt</u> STEPHEN W. ROSENBLATT

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