

United States Bankruptcy Court  
Southern District of Mississippi

In re:  
Mississippi Phosphates Corporation  
Debtor

Case No. 14-51667-KMS  
Chapter 11

### CERTIFICATE OF NOTICE

District/off: 0538-6

User: mfarrell  
Form ID: pdf012

Page 1 of 3  
Total Noticed: 3

Date Rcvd: Mar 20, 2015

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 22, 2015.

|         |   |                        |                                    |
|---------|---|------------------------|------------------------------------|
| db      | #+Mississippi Phosphates Corporation,   | 601 Industrial Road,   | Pascagoula, MS 39581-3233          |
| cr      | +ACE American Insurance Company, et al, | c/o Sheryl Bey,        | 4268 I-55 North,                   |
|         | Jackson, MS 39211-6391                  |                        |                                    |
| 3903948 | +ACE American Insurance Company,        | c/o Wendy M. Simkulak, | Duane Morris, LLP, 30 S. 17th St., |
|         | Philadelphia, PA 19103-4196             |                        |                                    |

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update.  
While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Mar 22, 2015

Signature: /s/Joseph Speetjens

### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 20, 2015 at the address(es) listed below:

Alan Lee Smith on behalf of Creditor C.E. McCraw asmith@bakerdonelson.com  
Allison Cecile Carroll on behalf of Creditor United States of America on behalf of its Agency the Internal Revenue Service allison.c.carroll@usdoj.gov, southern.taxcivil@usdoj.gov  
Amy Lassitter St. Pe' on behalf of Creditor City Electric Supply Co. astpe@dwattorneys.com, kwilkinson@dwattorneys.com  
Andrew R. Wilson on behalf of Creditor Blue Cross & Blue Shield of Mississippi awilson@blswlaw.com, sdaniels@blswlaw.com  
BMC Group, Inc. ecfservice@bmcgroup.com  
Bess M. Parrish Creswell on behalf of Creditor Committee Official Committee of Unsecured Creditors of Mississippi Phosphates Corporation bcreswell@burr.com, mtomes@burr.com;khoffmann@burr.com;dmeek@burr.com;mstinson@burr.com  
Carey L. Menasco on behalf of Creditor Committee Premier Chemicals & Services, LLC clmenasco@liskow.com, gletman@liskow.com  
Carey L. Menasco on behalf of Creditor Committee Shrieve Chemical clmenasco@liskow.com, gletman@liskow.com  
Carter S Dobbs, III on behalf of Creditor Gregory McCloud cdobbs@pollandobbs.com, lal@pollandobbs.com  
Christopher James Steiskal, Sr. on behalf of U.S. Trustee United States Trustee Christopher.J.Steiskal@usdoj.gov, brian.r.henault@usdoj.gov;terryl.yelverton@usdoj.gov;lois.e.walker@usdoj.gov  
Christopher R. Maddux on behalf of Debtor Mississippi Phosphates Corporation chris.maddux@butlersnow.com, vj.money@butlersnow.com;velvet.johnson@butlersnow.com/ecf.notices@butlersnow.com  
Christopher R. Maddux on behalf of Debtor Sulfuric Acid Tanks Subsidiary, Inc. chris.maddux@butlersnow.com, vj.money@butlersnow.com;velvet.johnson@butlersnow.com/ecf.notices@butlersnow.com  
Christopher R. Maddux on behalf of Debtor Ammonia Tank Subsidiary, Inc. chris.maddux@butlersnow.com, vj.money@butlersnow.com;velvet.johnson@butlersnow.com/ecf.notices@butlersnow.com  
Corby Davin Boldissar on behalf of Creditor Brock Services, LLC nobankecf@lockelord.com  
David Wheeler on behalf of Interested Party Phosphate Holdings, Inc. david@wheelerattys.com  
Dean Sterling Kidd on behalf of Creditor Caterpillar Financial Services Corporation skidd@bakerdonelson.com  
Douglas C. Noble on behalf of Creditor Interoceanic Corporation dnoble@mmqnlaw.com, lrichardson@mmqnlaw.com

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The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Douglas Scott Draper on behalf of Interested Party Phosphate Holdings, Inc.  
ddraper@hellerdraper.com, kfritscher@hellerdraper.com;lwright@hellerdraper.com  
Grover C Monroe, II on behalf of Creditor Committee Premier Chemicals & Services, LLC  
gcmmonroe@dunbarmonroe.com, slambert@dunbarmonroe.com;mbrown@dunbarmonroe.com  
Grover C Monroe, II on behalf of Creditor Committee Shrieve Chemical  
gcmmonroe@dunbarmonroe.com, slambert@dunbarmonroe.com;mbrown@dunbarmonroe.com  
Hovey Slayton Dabney, Jr. on behalf of Interested Party Phosphate Holdings, Inc.  
sdabney@hellerdraper.com, cnobles@hellerdraper.com  
J Mitchell Carrington on behalf of Debtor Ammonia Tank Subsidiary, Inc.  
Mitch.Carrington@butlersnow.com, ecf.notices@butlersnow.com,velvet.johnson@butlersnow.com  
J Mitchell Carrington on behalf of Debtor Mississippi Phosphates Corporation  
Mitch.Carrington@butlersnow.com, ecf.notices@butlersnow.com,velvet.johnson@butlersnow.com  
J Mitchell Carrington on behalf of Debtor Sulfuric Acid Tanks Subsidiary, Inc.  
Mitch.Carrington@butlersnow.com, ecf.notices@butlersnow.com,velvet.johnson@butlersnow.com  
James A. McCullough, II on behalf of Interested Party BP Energy Company  
jmccullough@brunini.com, dgarmon@brunini.com  
James A. McCullough, II on behalf of Creditor Hydrovac Industrial Services, Inc.  
jmccullough@brunini.com, dgarmon@brunini.com  
James Lawson Hester on behalf of Creditor E. I. du Pont de Nemours and Company  
lhester@wyattfirm.com, cmohon@wyattfirm.com;slancaster@wyattfirm.com  
James S Carr on behalf of Interested Party BP Energy Company  
KDWBankruptcyDepartment@KelleyDrye.com  
James W. O'Mara on behalf of Creditor Trammo, Inc. omaraaj@phelps.com,  
jo.bankruptcy.ecf@phelps.com;donaldg@phelps.com  
James W. O'Mara on behalf of Creditor Committee Trammo, Inc. omaraaj@phelps.com,  
jo.bankruptcy.ecf@phelps.com;donaldg@phelps.com  
James W. O'Mara on behalf of Interested Party Trammo, Inc., f/k/a Transammonia, Inc.  
omaraaj@phelps.com, jo.bankruptcy.ecf@phelps.com;donaldg@phelps.com  
James W. O'Mara on behalf of Creditor Mississippi Ammonia Leasing, Inc. omaraaj@phelps.com,  
jo.bankruptcy.ecf@phelps.com;donaldg@phelps.com  
Jerome C Hafter on behalf of Interested Party Trammo, Inc., f/k/a Transammonia, Inc.  
hafterj@phelps.com, spellt@phelps.com  
Joel L. Blackledge on behalf of Creditor KRISTOFER STEEL joel@blackledgelawfirm.com  
Jonathan E Sholtis on behalf of Creditor Jerry Don Scudder, Jr. jsholtis@dshfirm.com,  
lconner@dshfirm.com  
Karl Fingerhood on behalf of Interested Party US Dept. Of Justice, Env. Enf. Sec  
karl.fingerhood@usdoj.gov, kenneth.long@usdoj.gov  
Karl Fingerhood on behalf of Interested Party Mississippi Department of Environmental  
Quality karl.fingerhood@usdoj.gov, kenneth.long@usdoj.gov  
Karl D. Burrer on behalf of Creditor STUW LLC, as Administrative Agent  
karl.burrer@haynesboone.com, ishmael.kamara@haynesboone.com  
Kasee S. Heisterhagen on behalf of Creditor Committee Official Committee of Unsecured  
Creditors of Mississippi Phosphates Corporation kheisterhagen@burr.com, severett@burr.com  
Kenneth Gordon Long on behalf of Interested Party US Dept. Of Justice, Env. Enf. Sec  
Kenneth.long@usdoj.gov, efile\_ees@usdoj.gov  
Kenneth Gordon Long on behalf of Interested Party Mississippi Department of Environmental  
Quality Kenneth.long@usdoj.gov, efile\_ees@usdoj.gov  
Lacey Elizabeth Rochester on behalf of Creditor Committee Premier Chemicals & Services, LLC  
lrochester@liskow.com, lprice@liskow.com  
Lacey Elizabeth Rochester on behalf of Creditor Committee Shrieve Chemical  
lrochester@liskow.com, lprice@liskow.com  
Lawrence B. Voit on behalf of Creditor Nicholas Insulation Services, Inc. lvoit@silvervoit.com  
Lawrence B. Voit on behalf of Creditor SPI/Mobile Pulley Works, Inc. lvoit@silvervoit.com  
Lawrence B. Voit on behalf of Creditor Ranger Environmental Services, LLC lvoit@silvervoit.com  
Lenard M. Parkins on behalf of Creditor STUW LLC, as Administrative Agent  
lenard.parkins@haynesboone.com  
Leslie C. Heilman on behalf of Creditor E. I. du Pont de Nemours and Company  
heilmanl@ballardspahr.com  
Marc. P. Solomon on behalf of Creditor Committee Official Committee of Unsecured Creditors of  
Mississippi Phosphates Corporation msolomon@burr.com  
Marcus M. Wilson on behalf of Creditor Blue Cross & Blue Shield of Mississippi  
mwilson@blswlaw.com, sdaniels@blswlaw.com  
Matthew Ward McDade on behalf of Creditor VIP International, Inc. mmcdade@balch.com,  
bmarshall@balch.com;smhollis@balch.com  
Matthew Ward McDade on behalf of Creditor Scott Company, LLC mmcdade@balch.com,  
bmarshall@balch.com;smhollis@balch.com  
Matthew Ward McDade on behalf of Creditor APRM, Inc. d/b/a Plant Maintenance Services  
mmcdade@balch.com, bmarshall@balch.com;smhollis@balch.com  
Matthew Ward McDade on behalf of Creditor Mississippi Power Company mmcdade@balch.com,  
bmarshall@balch.com;smhollis@balch.com  
Michael D Watson, Jr on behalf of Creditor International Welding & Fabrication, Inc.  
michael@watsonlegal.ms  
Paul J. Delcambre, Jr on behalf of Creditor Mississippi Power Company pdelcambre@balch.com,  
dbeal@balch.com;smhollis@balch.com  
Paul S. Murphy on behalf of Debtor Sulfuric Acid Tanks Subsidiary, Inc.  
paul.murphy@butlersnow.com, kitty.logan@butlersnow.com;ecf.notices@butlersnow.com  
Paul S. Murphy on behalf of Debtor Ammonia Tank Subsidiary, Inc. paul.murphy@butlersnow.com,  
kitty.logan@butlersnow.com;ecf.notices@butlersnow.com

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The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Paul S. Murphy on behalf of Debtor Mississippi Phosphates Corporation  
paul.murphy@butlersnow.com, kitty.logan@butlersnow.com/ecf.notices@butlersnow.com  
Philip K. Jones, Jr on behalf of Creditor Committee Shrieve Chemical pkjones@liskow.com,  
dleblanc@liskow.com  
Richard A. Montague, Jr. on behalf of Creditor Trammo, Inc. montagur@phelps.com,  
colleen.wheeler@phelps.com  
Richard A. Montague, Jr. on behalf of Interested Party Trammo, Inc., f/k/a Transammonia, Inc.  
montagur@phelps.com, colleen.wheeler@phelps.com  
Richard Mark Gaal on behalf of Creditor Flexicrew Staffing, Inc. ,  
pholder@mcdowellknight.com/aminor@mcdowellknight.com  
Robert Alan Byrd on behalf of Plaintiff STUW LLC, as Administrative Agent rab@byrdwiser.com,  
wrs@byrdwiser.com/WandaRitaStanovich@gmail.com  
Robert Alan Byrd on behalf of Creditor STUW LLC, as Administrative Agent rab@byrdwiser.com,  
wrs@byrdwiser.com/WandaRitaStanovich@gmail.com  
Robert Ball McGinley, Jr. on behalf of Creditor Flexicrew Staffing, Inc.  
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Roger Adam Kirk on behalf of Creditor Brock Services, LLC akirk@gorekilpatrick.com  
Roy Hendee Furrh on behalf of Interested Party US Dept. Of Justice, Env. Enf. Sec  
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Roy Hendee Furrh on behalf of Interested Party Mississippi Department of Environmental  
Quality roy\_furrh@deq.state.ms.us, royhfurrh@aol.com  
Shane Whitfield on behalf of Creditor Jerry Shumock shane@andrewburrell.com,  
kristina@andrewburrell.com  
Sheryl W. Bey on behalf of Creditor ACE American Insurance Company, et al  
sbey@bakerdonelson.com,  
larcher@bakerdonelson.com/sgreer@bakerdonelson.com/mbufkin@bakerdonelson.com  
Stephen W. Rosenblatt on behalf of Debtor Mississippi Phosphates Corporation  
Steve.Rosenblatt@butlersnow.com,  
velvet.johnson@butlersnow.com/VJ.Money@butlersnow.com/ecf.notices@butlersnow.com  
Stephen W. Rosenblatt on behalf of Debtor Sulfuric Acid Tanks Subsidiary, Inc.  
Steve.Rosenblatt@butlersnow.com,  
velvet.johnson@butlersnow.com/VJ.Money@butlersnow.com/ecf.notices@butlersnow.com  
Stephen W. Rosenblatt on behalf of Debtor Ammonia Tank Subsidiary, Inc.  
Steve.Rosenblatt@butlersnow.com,  
velvet.johnson@butlersnow.com/VJ.Money@butlersnow.com/ecf.notices@butlersnow.com  
Ted Lampton on behalf of Interested Party Mississippi Department of Environmental Quality  
ted\_lampton@deq.state.ms.us  
Ted Lampton on behalf of Interested Party US Dept. Of Justice, Env. Enf. Sec  
ted\_lampton@deq.state.ms.us  
Thomas A McKnight, Jr. on behalf of Creditor McCain Engineering Co., Inc.  
tmcknight@wallacejordan.com, rrogers@wallacejordan.com  
Thomas J Butler on behalf of Creditor Alabama Electric Motor Services, LLC d/b/a TMC Electric  
Motor Services tbutler@maynardcooper.com  
Thomas M Hewitt on behalf of Debtor Ammonia Tank Subsidiary, Inc.  
thomas.hewitt@butlersnow.com, ecf.notices@butlersnow.com,velvet.johnson@butlersnow.com  
Thomas M Hewitt on behalf of Debtor Sulfuric Acid Tanks Subsidiary, Inc.  
thomas.hewitt@butlersnow.com, ecf.notices@butlersnow.com,velvet.johnson@butlersnow.com  
Thomas M Hewitt on behalf of Debtor Mississippi Phosphates Corporation  
thomas.hewitt@butlersnow.com, ecf.notices@butlersnow.com,velvet.johnson@butlersnow.com  
United States Trustee USTPRegion05.JA.ECF@usdoj.gov  
William H Patrick, III on behalf of Interested Party Phosphate Holdings, Inc.  
wpatrick@hellerdraper.com, kfritscher@hellerdraper.com  
William J. Little, Jr. on behalf of Creditor HC2 Holding Inc. ecf@lentzlittle.com  
William L Smith on behalf of Creditor Robert E Jones bsmith@balch.com, bbryant@balch.com  
William Lee Watt on behalf of Creditor Nicholas Insulation Services, Inc.  
lwatt@gibbswhitwell.com, akelly@gibbswhitwell.com  
William P. Wessler on behalf of Creditor Bastech, LLC wwessler@cableone.net  
William P. Wessler on behalf of Creditor Jackson County Port Authority wwessler@cableone.net

TOTAL: 88



SO ORDERED,

*Katharine M. Samson*

Judge Katharine M. Samson  
United States Bankruptcy Judge  
Date Signed: March 20, 2015

The Order of the Court is set forth below. The docket reflects the date entered.

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

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

**AGREED ORDER CONTINUING HEARING ON RESPONSE OF THE ACE  
INSURANCE COMPANIES TO MOTION OF DEBTORS TO DETERMINE CURE  
AMOUNTS FOR EXECUTORY CONTRACTS AND UNEXPIRED LEASES THAT  
MAY BE ASSUMED AND ASSIGNED AS PART OF THE SALE MOTION**

[Dkt. ## 512, 603]

This matter came for consideration by the Court on the *Motion of Debtors to Determine Cure Amounts for Executory Contracts and Unexpired Leases that May Be Assumed and*

<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**"). and, collectively with MPC and ATS, the "**Debtors**"). Case No. 14-51671. These chapter 11 cases are sometimes referred to herein as the "**Bankruptcy Cases**."

*Assigned as Part of the Sales Motion* [Dkt. # 512] (the “**Cure Amount Motion**”)<sup>2</sup> and the *Reservation of Rights of the ACE Companies to Motion of Debtors to Determine Cure Amounts for Executory Contracts and Unexpired Leases that May Be Assumed and Assigned as Part of the Sale Motion* [Dkt. # 603] (the “**Reservation**”) filed herein by ACE American Insurance Company, ACE Property and Casualty Insurance Company, and Westchester Fire Insurance Company (together with each of their respective affiliates, the “**ACE Insurance Companies**”). The ACE Companies and the Debtors are collectively referred to herein as the “**Parties**.”

The Parties are seeking to resolve the cure amount, if any, applicable under the ACE Companies’ insurance program, but need additional time to resolve these matters. Accordingly, the Parties desire that the Cure Amount Motion and the Reservation not be heard by the Court on Friday, March 20, 2015 so the Parties can have an opportunity to present to the Court an Agreed Order to address the issues raised in the Cure Amount Motion and the Reservation. The Court has been informed that the Parties have agreed to continue the scheduled hearing on the Motion until further Order of the Court pursuant to the terms of this Agreed Order.

The Court, therefore, finds as follows:

1. On October 27, 2014, each of the Debtors filed a voluntary petition in this Court for reorganization relief under Chapter 11 of the United States Bankruptcy Code.
2. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 157 and 1334(b). This is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A), (B), and (O). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The Debtors filed the Cure Amount Motion on February 20, 2015. ACE Insurance Companies filed the Reservation on March 16, 2015. A hearing on the Motion has been scheduled for March 20, 2015 (the “**Hearing**”).

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.



4. The Parties have consented to the entry of this Agreed Order and a continuance of the Hearing until further Order of the Court.

5. In light of this Agreed Order, the Hearing on the Motion previously scheduled for March 20, 2015, should be removed from the Court's hearing calendar and will be re-set for hearing only upon further Order of the Court.

**IT IS, THEREFORE, ORDERED** that the Hearing on the Motion scheduled for March 20, 2015, is hereby removed from the hearing calendar, and will be re-set for hearing only upon further Order of the Court.

**###END OF ORDER###**

**ORDER PREPARED AND SUBMITTED BY:**

Thomas M. Hewitt (Miss. Bar No. 104589)  
BUTLER SNOW LLP  
1020 Highland Colony Parkway, Suite 1400  
Ridgeland, MS 39157  
Telephone: (601) 985-4415  
[thomas.hewitt@butlersnow.com](mailto:thomas.hewitt@butlersnow.com)

ONE OF THE ATTORNEYS FOR THE DEBTORS

**AGREED TO AND APPROVED FOR ENTRY:**

/s/ Sheryl W. Bey  
Sheryl W. Bey  
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC  
Meadowbrook Office Park  
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(601) 351-2400

ATTORNEY FOR THE ACE INSURANCE COMPANIES

ButlerSnow 25196602v2