

of the United States Code (the “**Bankruptcy Code**”), in the United States Bankruptcy Court for the Southern District of Mississippi, Southern Division (the “**Court**”). Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors are operating their businesses and managing their properties as debtors-in-possession.

3. An Official Committee of Unsecured Creditors (the “**Committee**”) was appointed by the United States Trustee in these Bankruptcy Cases on November 12, 2014 [Dkt. # 161], and the Court has approved the Committee’s retention of Burr & Forman LLP as counsel for the Committee [Dkt. # 473].

4. The principal place of business of the Debtors is located at 601 Industrial Road, Pascagoula, Mississippi.

Relief Requested

5. In order to supervise the administration of Chapter 11 cases, the Office of the United States Trustee for Region V (the “**United States Trustee**”) has established those certain *Chapter 11 Operating Guidelines and Reporting Requirements of the U.S. Trustee, Region 5, Judicial Districts of Louisiana and Mississippi* (the “**Guidelines**”). The Guidelines require, among other things, a debtor to maintain certain types and amounts of insurance coverage during the bankruptcy case. The particular Guideline at issue here is:

If the debtor has tangible assets susceptible to casualty loss (fire, weather, theft, vandalism, etc.), casualty insurance must be maintained at an amount at least equal to the replacement value of the property.

OGRR-11, Sec. II., D.2.(a) (the “**Insurance Guideline**”).

6. The purpose of the Insurance Guideline is to protect the property of the estate from casualty loss for the benefit of the creditors and parties in interest, particularly secured creditors which have a lien or security interest in the property to be insured, or, for the unsecured

creditors if equity exists in the property over and above the amount of the secured claim. In those instances where the debtor lacks funds to purchase the required property and casualty insurance, the secured creditor may obtain “force-placed insurance” to protect its interest in its collateral. In the vast majority of Chapter 11 cases, the Insurance Guideline provides a helpful and beneficial requirement for the protection and benefit of all parties in interest and for the proper administration of the bankruptcy case. The Debtors, however, respectfully request the Court to waive the Insurance Guideline in these Bankruptcy Cases for the reasons stated herein.

7. The Debtors’ present casualty insurance policy provides a total of \$100 million in coverage on a replacement value basis at an annual premium in the amount of \$1.5 million (plus applicable Surplus Lines Tax). The present deductible for any casualty loss is \$1.0 million per incident for the property.

8. Working with their insurance broker to reduce these premiums, the Debtors discovered that increasing the policy deductibles would not yield any significant premium reduction due to minimum premiums needed and the return on capital. Similarly, simply reducing the amount of the coverage would not produce any significant savings either. The only alternative that would produce any significant premium savings was to reduce the coverage to \$50 million on an actual cash value basis rather than on a replacement value basis. While these changes would reduce the annual premium to \$1.0 million (plus applicable Surplus Lines Tax), a savings of \$500,000, the Debtors still would be responsible for paying this annual premium.²

9. In light of these quotations, the Debtors obtained input from their investment banker on the estimated value of the Debtors’ insurable property based on the current status of the sales process being conducted. Given the costs of maintaining either casualty insurance

² Although the annual premium is being premium-financed by Bank Direct (see *Order Granting Motion of the Debtors to Approve Commercial Insurance Premium Finance and Security Agreement with BankDirect Capital Finance* [Dkt. # 405], the Debtors still have to pay the monthly premiums.

policy, the amount of the deductible, and the estimated value of the property to be insured, the Debtors concluded that under a cost-benefit analysis, having to pay property and casualty insurance premiums at the levels of either the present casualty insurance policy or the alternative policy was a luxury the Debtors could not afford.

10. The Debtors then approached the Agent for the DIP Lenders and the Lenders (collectively, “**Lenders**”)³ to determine whether the Lenders would require the Debtors to continue to maintain casualty insurance on the collateral of the Lenders, either under the present policy or under the reduced coverage policy. The Lenders concurred with the conclusion reached by the Debtors, and agreed to waive the requirement that the Debtors maintain property and casualty insurance on their collateral.

11. The Debtors also participated in a conference call with the Committee and its counsel and financial advisor to discuss the casualty insurance issue and the Debtors’ proposal to cancel its property and casualty insurance on its property.

12. Further, the Debtors have communicated with the United States Trustee concerning the status of the Debtors’ current casualty insurance coverage, the options available to the Debtors in light of the Guidelines, and ultimately, the Debtors’ decision to file this Motion to seek relief from the Insurance Guideline. *See* OGRR-11, Sec. II., D.4.

13. In light of the cost-benefit analysis conducted by the Debtors in light of the estimated values of the property to be insured by a casualty insurance policy and the cost of available casualty insurance, it is the business judgment of the Debtors that the preferable course

³ As defined in that certain *Interim Order Pursuant to Sections 105, 361, 362, 363, 364 and 507 of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 2002, 4001 and 9014 (I) Authorizing the Debtors to Incur Post-Petition Senior Secured Superpriority Indebtedness; (II) Authorizing Use of Cash Collateral; (III) Granting Post-Petition Priming and Senior Priority Security Interests and Superpriority Claims; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; and (VI) Scheduling a Final Hearing on the Motion* [Dkt. # 66], as renewed and extended.

of action is to cancel the present casualty insurance policy. Because the Lenders also have consented to assume the primary risk of any casualty loss to their collateral, the Debtors believe the present circumstances warrant relief from the requirements of the Insurance Guideline. Further, by not having to pay the premiums for the property and casualty insurance coverage, the Debtors will reduce the amount of the DIP Loan required to be made by the amount of such premiums.

14. The Debtors, therefore, respectfully request the Court to waive the Insurance Guideline and permit the Debtors to continue in these Bankruptcy Cases without any casualty insurance coverage in place on their property.

WHEREFORE, the Debtors respectfully request the Court to enter an order waiving the requirement of Insurance Guideline and permitting the Debtors to not maintain a property and casualty insurance policy, and granting such other relief as may be necessary and appropriate.

Dated: May 1, 2015.

Respectfully submitted,

MISSISSIPPI PHOSPHATES CORPORATION, *et al.*

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

Steve.Rosenblatt@butlersnow.com

Chris.Maddux@butlersnow.com

Paul.Murphy@butlersnow.com

Mitch.Carrington@butlersnow.com

Thomas.Hewitt@butlersnow.com

ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

I certify that the foregoing pleading was filed electronically through the Court's ECF system and served electronically on all persons who are registered users of the CM/ECF System for the Bankruptcy Cases, as well as all persons and entities listed on the Shortened Service List approved by the Court in the Bankruptcy Cases.⁴

SO CERTIFIED, this the 1st day of May, 2015.

/s/ Stephen W. Rosenblatt

STEPHEN W. ROSENBLATT

ButlerSnow 25734253

⁴ On January 26, 2015, the Court entered its *Order Approving Motion of the Debtors to Establish Limited Service List* [Dkt. # 425]. The “*Shortened Service List*” is those parties specified in that Order, as the Shortened Service List may be updated and amended from month to month.

SHORTENED SERVICE LIST

ALSTON & BIRD LLP
WILLIAM S. SUGDEN
RE: INTEROCEANIC CORPORATION
ONE ATLANTIC CENTER
1201 W PEACHTREE STREET
ATLANTA, GA 30309

ALSTON & BIRD LLP
SUZANNE N. BOYD
RE: INTEROCEANIC CORPORATION
ONE ATLANTIC CENTER
1201 W PEACHTREE STREET
ATLANTA, GA 30309

ALSTON & BIRD LLP
ALESSANDRA BACKUS
RE: INTEROCEANIC CORPORATION
ONE ATLANTIC CENTER
1201 W PEACHTREE STREET
ATLANTA, GA 30309

ANDREW C. BURRELL, P.A.
SHANE WHITFIELD, ESQ.
RE: JERRY SHUMOCK
750 EAST PASS ROAD
GULFPORT, MS 39507

BAKER DONELSON BEARMAN ET AL
STERLING KIDD ESQ
RE: CATERPILLAR FINANCIAL SERVICES
CORP
PO BOX 14167
JACKSON, MS 39236
(ECF PARTY)

BAKER DONELSON BEARMAN ET AL
ALAN LEE SMITH ESQ
RE: C.E. MCCRAW
4268 I-55 NORTH
MEADOWBROOK OFFICE PARK
JACKSON, MS 39211
(ECF PARTY)

BALCH & BINGHAM LLP
PAUL J. DELCAMBRE, JR
RE: MISSISSIPPI POWER COMPANY
1310 TWENTY-FIFTH AVE
POST OFFICE BOX 130
GULFPORT, MS 39502
(ECF PARTY)

BALCH & BINGHAM LLP
MATTHEW W. MCDADE
RE: MISSISSIPPI POWER COMPANY
1310 TWENTY-FIFTH AVE
POST OFFICE BOX 130
GULFPORT, MS 39502
(ECF PARTY)

BALCH & BINGHAM LLP
WILLIAM L SMITH
RE: ROBERT E JONES
188 EAST CAPITOL STREET, SUITE 1400
JACKSON, MS 39201
(ECF PARTY)

BALLARD SPAHR LLP
TOBEY M DALUZ
RE: DUPONT
919 N MARKET STREET, 11TH FLOOR
WILMINGTON, DE 19801

BALLARD SPAHR LLP
LESLIE C HEILMAN
RE: DUPONT
919 N MARKET STREET, 11TH FLOOR
WILMINGTON, DE 19801
(ECF PARTY)

BENNETT LOTTERHOS SULSER & WILSON
ANDREW R WILSON
RE: BCBSM/S
PO BOX 98
JACKSON, MS 39205-0098
(ECF PARTY)

BENNETT LOTTERHOS SULSER & WILSON
MARCUS M. WILSON
RE: BCBSM/S
PO BOX 98
JACKSON, MS 39205-0098
(ECF PARTY)

BLANK ROME LLP
ALAN LEE SMITH ESQ
RE: INNOPHOS HOLDINGS INC
130 N 18TH STREET
PHILADELPHIA, PA 19103

BROADBILL PARTNERS II LP
ATTN NEIL SUBIN
C/O BROADBILL INVESTMENT PARTNERS L
20 WEST 22ND STREET SUITE 816
NEW YORK, NY 10010

BROADBILL PARTNERS II, LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

BROADBILL PARTNERS LP
ATTN NEIL SUBIN
C/O BROADBILL INVESTMENT PARTNERS L
20 WEST 22ND STREET SUITE 816
NEW YORK, NY 10010

BROADBILL PARTNERS, LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

BRUNINI GRANTHAM GROWER HEWES PLLC
JAMES A. MCCULLOUGH II
RE: HYDROVAC IND SERVICES
PO DRAWER 119
JACKSON, MS 39205
(ECF PARTY)

BRUNINI GRANTHAM GROWER HEWES PLLC
JAMES A. MCCULLOUGH II
RE: HYDROVAC IND SERVICES, BP ENERGY
THE PINNACLE BUILDING
190 EAST CAPITOL STREET, SUITE 100
JACKSON, MS 39201
(ECF PARTY)

BURR & FORMAN LLP
KASEE SPARKS HEISTERHAGEN
RE: COMMITTEE OF UNS CREDITORS
RSA TOWER
11 N WATER STREET; STE 22200
MOBILE, AL 36602

BURR & FORMAN LLP
MARC SOLOMON
RE: COMMITTEE OF UNS CREDITORS
420 NORTH 20TH STREET, SUITE 3400
BIRMINGHAM, AL 35203

BURR & FORMAN LLP
BESS CRESWELL
RE: COMMITTEE OF UNS CREDITORS
RSA TOWER
11 NORTH WATER STREET/SUITE 22200
MOBILE, AL 36602

BURR & FORMAN LLP
DEREK MEEK
RE: COMMITTEE OF UNS CREDITORS
420 NORTH 20TH STREET, SUITE 3400
BIRMINGHAM, AL 35203

BUTLER SNOW LLP
STEVE ROSENBLATT
RE: MISSISSIPPI PHOSPHATES
CORPORATION
1020 HIGHLAND COLONY PKWY, STE 1400
RIDGELAND, MS 39157
(ECF PARTY)

BUTLER SNOW LLP
J. MITCHELL CARRINGTON II
RE: MISSISSIPPI PHOSPHATES
CORPORATION
1020 HIGHLAND COLONY PKWY, STE 1400
RIDGELAND, MS 39157
(ECF PARTY)

BUTLER SNOW LLP
CHRISTOPHER MADDUX
RE: MISSISSIPPI PHOSPHATES
CORPORATION
1020 HIGHLAND COLONY PKWY, STE 1400
RIDGELAND, MS 39157
(ECF PARTY)

BUTLER SNOW LLP
PAUL S. MURPHY
RE: MISSISSIPPI PHOSPHATES
CORPORATION
1300 25TH AVENUE, STE 204
GULFPORT, MS 39502
(ECF PARTY)

BUTLER SNOW LLP
THOMAS HEWITT
RE: MISSISSIPPI PHOSPHATES
CORPORATION
1020 HIGHLAND COLONY PKWY, STE 1400
RIDGELAND, MS 39157
(ECF PARTY)

BYRD & WISER
ROBERT A. BYRD
RE: STUW LLC
145 MAIN STREET
BILOXI, MS 39530
(ECF PARTY)

CAPSTONE ADVISORY GROUP, LLC
EDWIN N ORDWAY JR
104 WEST 40TH STREET
16TH FLOOR
NEW YORK, NY 10018

CATERPILLAR FINANCIAL SERVICES CORP
P. O. BOX 730681
DALLAS, TX 75373-0681

CITY OF MOSS POINT TAX COLLECTOR
4320 MCINNIS AVENUE
MOSS POINT, MS 39563

CITY OF PASCAGOULA
CODE ENFORCEMENT
4015 14TH STREET
PASCAGOULA, MS 39567-1618

CITY OF PASCAGOULA
CITY ATTORNEY
603 WATTS AVENUE
JACKSON, MS 39567-4220

COVINGTON & BURLING, LLP
DIANNE F. COFFINO
RE: OCP S.A.
THE NEW YORK TIMES BUILDING
620 EIGHTH AVENUE
NEW YORK, NY 10018

DAVID N. USRY
ASSISTANT UNITED STATES ATTORNEY
501 EAST COURT STREET SUITE 4-430
JACKSON, MS 39201
(ECF PARTY)

DEAKLE, SHOLTIS & HAMIL, LLC
JONATHAN E. SHOLTIS
RE: JERRY DON SCUDDER JR.
PO BOX 1031
MOBILE, AL 36633
(ECF PARTY)

DELOITTE (DTBA)
JONATHAN J. NASH
CHIEF RESTRUCTURING OFFICER
400 W 15TH STREET, STE 1700
AUSTIN, TX 78701

DOGAN & WILKINSON PLLC
AMY LASSITTER ST. PE'
RE: CITY ELECTRIC SUPPLY COMPANY
734 DELMAS AVENUE
PO BOX 1618
PASCAGOULA, MS 39567
(ECF PARTY)

DUNBARMONROE PA
G. CLARK MONROE II
RE: PREMIER CHEMICAL & SERVICES LLC
270 TRACE COLONY PARK, STE A
RIDGELAND, MS 39157
(ECF PARTY)

DUNBARMONROE, PA
G. CLARK MONROE II
RE: SHRIEVE CHEMICAL COMPANY
270 TRACE COLONY PARK, SUITE A
RIDGELAND, MS 39157
(ECF PARTY)

FREEBORN & PETERS LLP
DEVON J. EGGERT
RE: WABASH POWER
311 S WACKER DR, STE 3000
CHICAGO, IL 60606

GIBBS, WHITWELL & TRAVIS PLLC
WILLIAM LEE WATT
RE: NICHOLAS INSULATION, RANGER
ENVIRON
1400 MEADOWBROOK ROAD, SUITE 100
JACKSON, MS 39211
(ECF PARTY)

GORE KILPATRICK & DAMBRINO PLLC
ROGER ADAM KIRK
RE: BROCK SERVICES LLC
PO BOX 901
GRENADA, MS 38901
(ECF PARTY)

HAYNES AND BOONE LLP
LENARD M. PARKINS
RE: STUW LLC
1221 MCKINNEY STREET, STE 2100
HOUSTON, TX 77010
(ECF PARTY)

HAYNES AND BOONE LLP
KARL D. BURRER
RE: STUW LLC
1221 MCKINNEY STREET, STE 2100
HOUSTON, TX 77010
(ECF PARTY)

HELLER DRAPER PATRICK ET AL
WILLIAM PATRICK
RE: PHOSPHATE HOLDINGS INC
650 POYDRAS STREET, STE 2500
NEW ORLEANS, LA 70130
(ECF PARTY)

HELLER DRAPER PATRICK ET AL
DOUGLAS DRAPER
RE: PHOSPHATE HOLDINGS INC
650 POYDRAS STREET, STE 2500
NEW ORLEANS, LA 70130
(ECF PARTY)

HELLER DRAPER PATRICK ET AL
HOVEY SLAYTON DABNEY, JR.
RE: PHOSPHATE HOLDINGS INC
650 POYDRAS STREET, STE 2500
NEW ORLEANS, LA 70130
(ECF PARTY)

HUDSON BAY CREDIT OPPORTUNITIES
ATTN: STUW, LLC
INTERMEDIATE FUND LTD.
777 THIRD AVE.
NEW YORK, NY 10009

HUDSON BAY FUND LP
LENARD M PARKINS ESQ, HAYNES AND BO
1221 MCKINNEY STREET, SUITE 2100
HOUSTON, TX 77010
(ECF PARTY)

HUDSON BAY FUND, LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

HUDSON BAY INTERMEDIATE FUND LTD
LENARD M PARKINS ESQ, HAYNES AND BO
1221 MCKINNEY STREET, SUITE 2100
HOUSTON, TX 77010
(ECF PARTY)

HUDSON BAY INTERMEDIATE FUND, LTD.
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

HUDSON BAY MASTER FUND LTD
LENARD M PARKINS ESQ, HAYNES AND BO
1221 MCKINNEY STREET, SUITE 2100
HOUSTON, TX 77010
(ECF PARTY)

HUDSON BAY MASTER FUND LTD
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

IFC ACQUISITION GROUP LLC
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

IFC ACQUISITION GROUP LLC
ATTN NICK WALSH
C/O WILFRID AUBREY LLC
405 LEXINGTON AVENUE SUITE 3503
NEW YORK, NY 10174

IRS
C/O ASST. U. S. ATTORNEY
1575 20TH AVENUE, 2ND FLOOR
GULFPORT, MS 39501-2040

IRS
C/O ASST. U. S. ATTORNEY
501 E. COURT STREET, SUITE 4.430
JACKSON, MS 39201-5025

IRS
ALLISON CECILE CARROLL
DEPT. OF JUSTICE, TAX DIV.
PO BOX 14198
WASHINGTON, DC 20004
(ECF PARTY)

JACKSON CITY PORT AUTHORITY
PO BOX 70
PASCAGOULA, MS 39568-0070

JACKSON COUNTY CHANCERY COURT
TERRY MILLER, CHANCERY CLERK
PO BOX 998
PASCAGOULA, MS 39568

JACKSON COUNTY ECONOMIC DEV.
P. O. BOX 1558
PASCAGOULA, MS 39568-1558

JACKSON COUNTY PORT AUTHORITY
WILLIAM P. WESSLER
1624 24TH AVENUE
GULFPORT, MS 39501
(ECF PARTY)

JOE TUCKER, TAX COLLECTOR
JACKSON COUNTY
P. O. BOX 998
PASCAGOULA, MS 39568-0998

JOHN DEERE FINANCIAL
P. O. BOX 650215
DALLAS , TX 75265-0215

KELLEY DRYE & WARREN LLP
JAMES S. CARR
RE: BP ENERGY COMPANY
101 PARK AVE.
NEW YORK, NY 10178
(ECF PARTY)

LAW OFFICES OF CRAIG M GENO, PLLC
CRAIG M GENO
RE: SPECIAL COUNSEL TO DEBTORS
587 HIGHLAND COLONY PARKWAY
RIDGELAND, MS 39157

LENTZ & LITTLE PA
W JARRETT LITTLE
RE: HC2 HOLDING INC
PO BOX 927
GULFPORT, MS 39502

LENTZ & LITTLE PA
W J LITTLE JR
RE: HC2 HOLDING INC
PO BOX 927
GULFPORT, MS 39502
(ECF PARTY)

LISKOW & LEWIS
CAREY L. MENASCO
RE: PREMIER CHEMICAL & SERVICES LLC
701 POYDRAS STREET, SUITE 5000
NEW ORLEANS, LA 70139
(ECF PARTY)

LISKOW & LEWIS
CAREY L. MENASCO
RE: SHRIEVE CHEMICAL
ONE SHELL SQUARE
701 POYDRAS STREET, SUITE 5000
NEW ORLEANS, LA 70139
(ECF PARTY)

LISKOW & LEWIS
LACEY ELIZABETH ROCHESTER
RE: SHRIEVE CHEMICAL
701 POYDRAS STREET, SUITE 5000
NEW ORLEANS, LA 70139
(ECF PARTY)

LISKOW & LEWIS
PHILIP K. JONES, JR.
RE: SHRIEVE CHEMICAL
701 POYDRAS STREET, SUITE 5000
NEW ORLEANS, LA 70139
(ECF PARTY)

LISKOW & LEWIS
LACEY ELIZABETH ROCHESTER
RE: PREMIER CHEMICAL & SERVICES LLC
701 POYDRAS STREET, SUITE 5000
NEW ORLEANS, LA 70139
(ECF PARTY)

LLOYD I MILLER TRUST A-1
ATTN ERIC W FANGMANN
3300 S DIXIE HIGHWAY SUITE 1-365
WEST PALM BEACH, FL 33405

LLOYD I MILLER TRUST A-1
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

LLOYD I MILLER TRUST A-2
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

LLOYD I MILLER TRUST A-2
ATTN ERIC W FANGMANN
3300 S DIXIE HIGHWAY SUITE 1-365
WEST PALM BEACH, FL 33405

LMA SPC FOR AND ON BEHALF OF THE MA
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

LOCKE LORD LLP
C DAVIN BOLDISSAR
RE: BROCK SERVICES LLC
601 POYDRAS STREET, STE 2660
NEW ORLEANS, LA 70130-6036
(ECF PARTY)

LOCKE LORD LLP
STEVE BRYANT
RE: BROCK SERVICES LLC
2800 JPMORGAN CHASE TOWER
600 TRAVIS
HOUSTON, TX 77002

MCCRANEY MONTAGNET QUIN NOBLE PLLC
DOUGLAS C NOBLE
RE: INTEROCEANIC CORPORATION
602 STEED ROAD, STE 200
RIDGELAND, MS 39157
(ECF PARTY)

MCDOWELL KNIGHT ROEDDER&SLEDGE LLC
RICHARD GAAL
RE: FLEXICREW STAFFING INC
11 NORTH WATER STREET, STE 13290
MOBILE, AL 36602
(ECF PARTY)

MCDOWELL KNIGHT ROEDDER&SLEDGE LLC
ROBERT B MCGINLEY JR
RE: FLEXICREW STAFFING INC
11 NORTH WATER STREET, STE 13290
MOBILE, AL 36602
(ECF PARTY)

MDEQ
515 E. AMITE STREET
JACKSON, MS 39201-2709

MDEQ AND COMMISSION
C WELLS
PO BOX 2261
JACKSON, MS 39225-2261

MDEQ AND COMMISSION
R FURRH
PO BOX 2261
JACKSON, MS 39225-2261
(ECF PARTY)

MDEQ AND COMMISSION
T LAMPTON
PO BOX 2261
JACKSON, MS 39225-2261
(ECF PARTY)

MILAM HOWARD NICANDRI DEES & GILLAM
MICHAEL T FACKLER ESQ
RE: BASTECH LLC
14 EAST BAY STREET
JACKSONVILLE, FL 32202

MILFAM I LP
ATTN ERIC W FANGMANN
3300 S DIXIE HIGHWAY SUITE 1-365
WEST PALM BEACH, FL 33405

MILFAM I LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

MILFAM II LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

MILFAM II LP
ATTN ERIC W FANGMANN
3300 S DIXIE HIGHWAY SUITE 1-365
WEST PALM BEACH, FL 33405

MOTLEY RICE LLC
JOSEPH F RICE
RE: SPECIAL COUNSEL FOR DEBTORS
38 BRIDGESIDE BLVD
MT. PLEASANT, SC 29464

MS AND JACKSON COUNTY PORT
P. O. BOX 720399
JACKSON, MS 39272-0399

MS COURT COLLECTIONS
26 EASTGATE DRIVE
BRANDON, MS 39042

MS DEPARTMENT OF TRANS.
401 NORTH WEST STREET
JACKSON, MS 39201-1010

MS DEPT. OF ENVIR. QUALITY
ATTN: JENNIFER PARISH
P. O. BOX 2339
JACKSON, MS 39225-2339

MS DEPT. OF REVENUE
500 CLINTON CENTER DRIVE
CLINTON, MS 39056-5673

MS SECRETARY OF STATE
DELBERT HOSEMAN
401 MISSISSIPPI STREET
JACKSON, MS 39201-1004

MS STATE DEPT. OF HEALTH
BUREAU OF PUBLIC WATER SUPPLY
SUITE U-232
P. O. BOX 1700
JACKSON, MS 39215-1700

MS STATE HWY. DEPT.
P. O. BOX 958
JACKSON, MS 39205-0958

MS STATE TAX COMMISSION
BANKRUPTCY SECTION
P. O. BOX 22808
JACKSON, MS 39225-2808

OFFICE OF THE UNITED STATES TRUSTEE
501 EAST COURT STREET SUITE 6-430
JACKSON, MS 39201
(ECF PARTY)

OFFICE OF THE UNITED STATES TRUSTEE
CHRISTOPHER J. STEISKAL, SR.
501 EAST COURT STREET SUITE 6-430
JACKSON, MS 39201
(ECF PARTY)

PAUL WEISS RIFKIND ET AL
BRIAN HERMANN
RE: HC2 HOLDING INC
1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019-6064

PAUL WEISS RIFKIND ET AL
JULIE MARTINELLI
RE: HC2 HOLDING INC
1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019-6064

PAUL WEISS RIFKIND ET AL
D MEYERS
RE: HC2 HOLDING INC
1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019-6064

PHELPS DUNBAR LLP
RICHARD MONTAGUE
RE: TRAMMO INC FKA TRANSAMMONIA INC
4270 I-55 NORTH
PO BOX 16114
JACKSON, MS 39225-6114
(ECF PARTY)

PHELPS DUNBAR LLP
JEROME C HAFTER
RE: TRAMMO INC FKA TRANSAMMONIA INC
4270 I-55 NORTH
PO BOX 16114
JACKSON, MS 39225-6114
(ECF PARTY)

PHELPS DUNBAR LLP
JIM O'MARA
RE: TRAMMO INC FKA TRANSAMMONIA INC
4270 I-55 NORTH
PO BOX 16114
JACKSON, MS 39225-6114
(ECF PARTY)

PINE RIVER CREDIT RELATIVE VALUE MA
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

PINE RIVER DEERWOOD FUND, LTD.
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

PINE RIVER FIXED INCOME MASTER FUND
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

PINE RIVER MAP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

PINE RIVER MASTER FUND LTD.
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

POLLAN DOBBS PLLC
ROB LUNSFORD, CARTER DOBBS
RE: GREGORY MCCLLOUD
125 S CONGRESS STREET, SUITE 1208
JACKSON, MS 39201

PREMIER CHEMICALS & SERVICES, LLC
FRANCIS MAYER
4856 REVERE AVENUE, SUITE A
BATON ROUGE, LA 70808

RICOH USA INC
OLIVIA MOODY
RECOVERY & BANKRUPTCY GROUP
3920 ARKWRIGHT ROAD, STE 400
MACON, GA 31210

ROETZEL & ANDRESS LPA
PATRICIA B FUGÉE
RE: DRESSER-RAND
ONE SEAGATE, STE 1700
TOLEDO, OH 43604

SEC
C/O ASST. U. S. ATTORNEY
1575 20TH AVENUE, 2ND FLOOR
GULFPORT, MS 39501-2040

SEC
C/O ASST. U. S. ATTORNEY
501 E. COURT STREET, SUITE 4.430
JACKSON, MS 39201-5025

SHUMAKER, LOOP & KENDRICK, LLP
HUGO S. 'BRAD' DEBEAUBIEN
RE: CENTRAL MAINTENANCE & WELDING,
INC.
BANK OF AMERICA PLAZA
101 EAST KENNEDY BLVD., SUITE 2800
TAMPA, FL 33602

SILVER VOIT & THOMPSON
LAWRENCE B VOIT
RE: SPI/MOBILE PULLEY WORKS INC
ATTORNEYS AT LAW PC
4317-A MIDMOST DRIVE
MOBILE, AL 36609-5589
(ECF PARTY)

SILVER, VOIT & THOMPSON
LAWRENCE B VOIT
RE: NICHOLAS INSULATION, RANGER
ENVIRON
ATTORNEYS AT LAW, PC
4317-A MIDMOST DRIVE
MOBILE, AL 36609-5589
(ECF PARTY)

SIROTE & PERMUTT PC
STEPHEN B PORTERFIELD
RE: SHOOK & FLETCHER INSULATION CO
PO BOX 55727
2311 HIGHLAND AVENUE SOUTH
BIRMINGHAM, AL 35255-5727

STUW LLC AS ADMINISTRATIVE AGENT
LENARD M PARKINS ESQ
HAYNES AND BOONE LLP
1221 MCKINNEY STREET, SUITE 2100
HOUSTON, TX 77010
(ECF PARTY)

STUW LLC, AS ADMINISTRATIVE AGENT
TREVOR R. HOFFMAN
HAYNES AND BOONE, LLP
30 ROCKERFELLER PLAZA, 26TH FL
NEW YORK, NY 10112

STUW, LLC
ATTN: MARK SOLE
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

U. S. DEPT. OF JUSTICE
KENNETH G. LONG
ENV. AND NATURAL RESOURCES DIV.
BEN FRANKLIN STATION P. O. BOX 7611
WASHINGTON, DC 20044-7611
(ECF PARTY)

U.S. SECURITIES AND EXCHANGE COM.
OFFICE OF REORGANIZATION
950 EAST PACES FERRY ROAD SUITE 900
ATLANTA, GA 30326-1382

U.S. SECURITIES AND EXCHANGE COM.
C/O ASST. U. S. ATTORNEY
501 E. COURT STREET, SUITE 4.430
JACKSON, MS 39201-5025

US DEPARTMENT OF JUSTICE
LLOYD H RANDOLPH ESQ
RE: UNITED STATES OF AMERICA
CIVIL DIVISION
1100 L STREET, NW ROOM 10032
WASHINGTON, DC 20005
(ECF PARTY)

US DEPARTMENT OF JUSTICE
KARL J FINGERHOOD
RE: US ENVIRONMENTAL PROTECTION
AGENCY
ENVIRONMENTAL ENFORCEMENT SECTION
PO BOX 7611
WASHINGTON, DC 20044-7611
(ECF PARTY)

US ENVIRONMENTAL PROTECTION AGENCY
C/O ASST. U. S. ATTORNEY
501 E. COURT STREET, SUITE 4.430
JACKSON, MS 39201-5025

US ENVIRONMENTAL PROTECTION AGENCY
ATTN: JOAN REDLEAF-RUBIN/REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GA 30303-8960

US FUSION
2324 S. COMMERCE AVE.
GONZALES, LA 70737

VIRTUS ANGELS FUND LP
ATTN STEVE GIDUMAL
C/O VIRTUS CAPITAL LP
14 WALL STREET 20TH FLOOR
NEW YORK, NY 10005

VIRTUS ANGELS FUND, LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

VIRTUS CAPITAL LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

VIRTUS CAPITAL LP
STEVE GIDUMAL
14 WALL STREET 20TH FLOOR
NEW YORK, NY 10005

VIRTUS DB RECOVERY LP
STEVE GIDUMAL
VIRTUS CAPITAL LP
14 WALL STREET 20TH FLOOR
NEW YORK, NY 10005

VIRTUS DB RECOVERY LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

VIRTUS KG FUND LP
ATTN STEVE GIDUMAL
C/O VIRTUS CAPITAL LP
14 WALL STREET 20TH FLOOR
NEW YORK, NY 10005

VIRTUS KG FUND LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

VIRTUS TK LLC
ATTN STEVE GIDUMAL
C/O VIRTUS CAPITAL LP
14 WALL STREET 20TH FLOOR
NEW YORK, NY 10005

VIRTUS TK LLC
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

WALLACE, JORDAN, RATLIFF & BRANDT
THOMAS A. MCKNIGHT, JR.
RE: MCCAIN ENGINEERING CO., INC.
800 SHADES CREEK PARKWAY, SUITE 400
BIRMINGHAM, AL 35209

WATSON LEGAL PLLC
MICHAEL D WATSON JR
RE: INTERNATIONAL WELDING &
FABRICATION
PO BOX 964
PASCAGOULA, MS 39568
(ECF PARTY)

WHEELER & WHEELER, PLLC
DAVID WHEELER
RE: PHOSPHATE HOLDINGS INC
PO BOX 265
BILOXI, MS 39533
(ECF PARTY)

WILFRID GLOBAL OPPORTUNITY FUND LP
ATTN NICK WALSH
C/O WILFRID AUBREY LLC
405 LEXINGTON AVENUE SUITE 3503
NEW YORK, NY 10174

WILFRID GLOBAL OPPORTUNITY FUND, LP
ATTN: STUW, LLC
777 THIRD AVE.
NEW YORK, NY 10009

WILLIAM P WESSLER ATTORNEY AT LAW
WILLIAM P WESSLER
RE: BASTECH LLC
1624 24TH AVENUE
GULFPORT, MS 39501
(ECF PARTY)

WYATT TARRANT & COMBS LLP
J LAWSON HESTER
RE: DUPONT
4450 OLD CANTON ROAD, STE 210
JACKSON, MS 39211
(ECF PARTY)