UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

IN RE: MISSISSIPPI PHOSPHATES

CORPORATION, et al.¹ CASE NO. 14-51667-KMS

DEBTOR(S) CHAPTER 11

(Jointly Administered)

UNITED STATES TRUSTEE'S SECOND MOTION TO EXTEND TIME TO FILE A RESPONSE TO BURR & FORMAN LLP'S AMENDED FIRST INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES

COMES NOW Henry G. Hobbs, Jr., Acting United States Trustee for Region 5 ("UST"), by and through undersigned counsel, pursuant to Fed. R. Bankr. P. 9006(b), and files this Second Motion to Extend Time to File a Response to Burr & Forman LLP's Amended First Interim Application for Compensation and Reimbursement of Expenses (DKT. #667), and in support thereof respectfully submits the following:

- 1. On March 30, 2015, Burr & Forman, LLP, Counsel for the Unsecured Creditors Committee, filed their Amended First Interim Application for Compensation and Reimbursement of Expenses (the "Burr & Forman First Fee Application," DKT. #667).
- 2. The current deadline to object to the Burr & Forman First Fee Application is May 5, 2015 (DKT. #699).
 - 3. The UST needs additional time to review and, if necessary, file a response to the

¹ 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-KMS, Ammonia Tank Subsidiary, Inc. ("ATS"), Case No. 14-51668-KMS, and Sulfuric Acid Tanks Subsidiary, Inc. ("SATS"), Case No. 14-51671-KMS. These chapter 11 cases are sometimes referred to herein as the "Bankruptcy Cases."

Burr & Forman First Fee Application.

4. This request is not for the purpose of harassment or delay.

5. Counsel for the Committee consents to the extension of time. The UST has

attached a proposed agreed order granting this motion.

WHEREFORE, PREMISES CONSIDERED, the United States Trustee prays for an order

granting the United States Trustee through and including May 15, 2015, in which to file a

response to the Burr & Forman First Fee Application listed above. The United States Trustee

further prays for all general and equitable relief to which entitled.

RESPECTFULLY SUBMITTED, this the 4th day of May, 2015.

HENRY G. HOBBS, JR., Acting United States Trustee Region 5, Judicial Districts of Louisiana and Mississippi

By:

/s/Christopher J. Steiskal, Sr.

CHRISTOPHER J. STEISKAL, SR.

CHRISTOPHER J. STEISKAL, SR. (MSB #101654)

TRIAL ATTORNEY

U.S. DEPARTMENT OF JUSTICE

OFFICE OF THE U.S. TRUSTEE, REGION 5

100 WEST CAPITOL STREET, SUITE 706

JACKSON, MISSISSIPPI 39269

TEL: (601) 965-5241

FAX: (601) 965-5226

EMAIL: christopher.j.steiskal@usdoj.gov

2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served this day on the below named individual(s) via first class U.S. Mail at the address listed below or by Notice of Electronic Filing via the email address on file with the Court's CM/ECF system:

Stephen W. Rosenblatt Bess M. Parrish Creswell

Christopher R. Maddux Derek F. Meek

DATED, this the 4th day of May, 2015.

/s/Christopher J. Steiskal, Sr. CHRISTOPHER J. STEISKAL, SR.