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

In re:	)	
	)	
MISSISSIPPI PHOSPHATES	)	
CORPORATION, et al. <sup>1</sup>	)	CASE NO. 14-51667-KMS
	)	Chapter 11
Debtors	)	-
	)	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 MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

[Dkt. ## 066; 155; 738]

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"), 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 May 11, 2015 Investigation Termination Date and Challenge Period deadline under the Notice of Debtors' Agreement to Extend the Deadline for Investigation Termination Date, Objections, and

<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*."

Challenge Period under Interim DIP Financing Order only for the United States Environmental

Protection Agency, and Mississippi Department of Environmental Quality [Dkt. # 738] until and

including Monday, July 13, 2015, at 5:00 p.m. (central time).

**NOTICE IS FURTHER GIVEN** that the May 11, 2015 Investigation Termination Date

and Challenge Period deadline under the previous Notice to Extend Challenge Period is extended

until and including Monday, July 13, 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: May 8, 2015.

By: /s/ Stephen W. Rosenblatt

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ATTORNEYS FOR THE DEBTORS

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## **CERTIFICATE OF SERVICE**

I certify that the foregoing Notice was filed electronically through the Court's CM/ECF system and served electronically on all parties enlisted to receive service electronically.

Dated: May 8, 2015.

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

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