

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: wwatson
Form ID: pdf012

Page 1 of 3
Total Noticed: 1

Date Rcvd: May 15, 2015

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 17, 2015.

db +Mississippi Phosphates Corporation, 601 Industrial Road, Pascagoula, MS 39581-3233

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.

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: May 17, 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 May 15, 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@bmgroup.com
Bess M. Parrish Creswell on behalf of Financial Advisor Capstone Advisory Group LLC bcreswell@burr.com, mtomes@burr.com;khoffmann@burr.com;dmeek@burr.com;mstinson@burr.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, lai@pollandobbs.com
Christopher James Steiskal, Sr. on behalf of U.S. Trustee United States Trustee christopher.j.steiskal@usdoj.gov, lois.e.walker@usdoj.gov;sarita.dukes@usdoj.gov;anita.f.benson@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, hbreland@mmqnlaw.com
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

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Form ID: pdf012Page 2 of 3
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The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

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
jmcullough@brunini.com, dgarmon@brunini.com
James A. McCullough, II on behalf of Creditor Hydrovac Industrial Services, Inc.
jmcullough@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. omaraj@phelps.com,
jo.bankruptcy.ecf@phelps.com; donalddg@phelps.com
James W. O'Mara on behalf of Creditor Committee Trammo, Inc. omaraj@phelps.com,
jo.bankruptcy.ecf@phelps.com; donalddg@phelps.com
James W. O'Mara on behalf of Interested Party Trammo, Inc., f/k/a Transammonia, Inc.
omaraj@phelps.com, jo.bankruptcy.ecf@phelps.com; donalddg@phelps.com
James W. O'Mara on behalf of Creditor Mississippi Ammonia Leasing, Inc. omaraj@phelps.com,
jo.bankruptcy.ecf@phelps.com; donalddg@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
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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
Lloyd H Randolph on behalf of Interested Party United States on behalf of Federal
Communications Comm'n lloyd.randolph@usdoj.gov, janice.murray@usdoj.gov
Marc. P. Solomon on behalf of Creditor Committee Official Committee of Unsecured Creditors of
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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
Michael T Fackler on behalf of Creditor Bastech, LLC mfackler@milamhoward.com,
hdurham@milamhoward.com
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
Paul S. Murphy on behalf of Debtor Mississippi Phosphates Corporation
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)

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 Creditor STUW LLC, as Administrative Agent rab@byrdwiser.com, wrs@byrdwiser.com;WandaRitaStanovich@gmail.com
 Robert Alan Byrd on behalf of Plaintiff 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. rmcginley@mcdowellknight.com, rgaal@mcdowellknight.com;aminor@mcdowellknight.com;ssmith@mcdowellknight.com;mkrscourtdocs@gmail.com
 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 roy_furrh@deq.state.ms.us, royhfurrh@aol.com
 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, mmathews@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 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
 Thomas M Hewitt on behalf of Debtor Ammonia Tank Subsidiary, Inc. 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: 91



SO ORDERED,

Katharine M. Samson

Judge Katharine M. Samson
United States Bankruptcy Judge
Date Signed: May 15, 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> ¹	)	CASE NO. 14-51667-KMS
	)	Chapter 11
	)	
Debtors	)	Jointly Administered
	)	

**AGREED ORDER RESOLVING THE LIMITED OBJECTION OF
BROCK SERVICES LLC TO THE MOTION OF DEBTORS TO DETERMINE CURE
AMOUNTS FOR EXECUTORY CONTRACTS AND UNEXPIRED LEASES THAT
MAY BE ASSUMED AND ASSIGNED AS PART OF THE SALES MOTION**

[Dkt. ## 512, 604]

This matter came before the Court on the Debtors' *Motion of Debtors to Determine Cure Amounts for Executory Contracts and Unexpired Leases that May Be Assumed and Assigned as Part of the Sales Motion* [Dkt. # 512] (the "**Cure Amount Motion**") and the *Limited Objection of Brock Services to the Motion of Debtors to Determine Cure Amounts for Executory Contracts and Unexpired Leases that May Be Assumed and Assigned as Part of the Sales Motion*

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, 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**."

[Dkt. # 604] (the “**Objection**”)² filed by Brock Services LLC (“**Brock**”). Brock and the Debtors are collectively referred to herein as the “**Parties**.”

The Court 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. On February 20, 2015, Brock filed its Proof of Claim # 175-1 in these Bankruptcy Cases asserting a prepetition claim in the amount of \$275,592.32. On March 10, 2015, Brock amended the Proof of Claim by filing Amended Proof of Claim # 175-2 asserting a prepetition claim in the amount of \$298,874.20. Additionally, as of the time of the filing of the Objection, MPC owed \$3,089.73 to Brock for two unpaid post-petition invoices. The total cure amount asserted by Brock is \$301,963.93.

4. The Debtors filed the Cure Amount Motion on February 20, 2015, asserting a Cure Amount under the *Mississippi Phosphates Corporation Master Services Agreement*, dated June 8, 2010, between MPC and Brock (including all amendments and exhibits (together, the “**Master Agreement**”) of \$269,470.00.³

5. Brock filed the Objection to the Cure Amount Motion on March 16, 2015. A hearing on the Motion and the Objection has not yet been scheduled as this Court entered that certain *Agreed Order for Continuing Hearing on Brock’s Limited Objection of Brock Services, LLC to the Motion of Debtors to Determine Cure Amounts for Executory Contracts and Unexpired Leases that May Be Assumed and Assigned as Part of the Sales Motion* [Dkt. # 629] on March 20, 2015.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

³ The Cure Amount Motion defines **Cure Amount** as any applicable cure amounts as of the Petition Date.

6. The Parties have reached an agreement concerning the Cure Amount, and have agreed that the Cure Amount for Brock concerning the Master Agreement is \$301,799.45 as of the time of the filing of the Objection.⁴

IT IS, THEREFORE, ORDERED that the Cure Amount for Brock concerning the Management Agreement shall be \$301,799.45.

IT IS FURTHER ORDERED that the *Limited Objection of Brock Services to the Motion of Debtors to Determine Cure Amounts for Executory Contracts and Unexpired Leases that May Be Assumed and Assigned as Part of the Sales Motion* [Dkt. # 604], is fully resolved as set forth herein.

##END OF ORDER##

ORDER PREPARED AND SUBMITTED BY:

Thomas M. Hewitt (Miss. Bar No. 104589)
BUTLER SNOW LLP
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Ridgeland, MS 39157
Telephone: (601) 985-4415
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ONE OF THE ATTORNEYS FOR THE DEBTORS

AGREED TO AND APPROVED FOR ENTRY:

/s/ C. Davin Boldissar

C. Davin Boldissar
(admitted pro hac vice)
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New Orleans, LA 70130-6036
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dboldiss@lockelord.com

ATTORNEY FOR BROCK SERVICES, LLC

ButlerSnow 25218275v1

⁴ This amount may be reduced by any amounts paid by the Debtors to Brock on account of post-petition invoices.