

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**IN RE:           MISSISSIPPI PHOSPHATES  
                  CORPORATION, *et al.*<sup>1</sup>**

**CASE NO.   14-51667-KMS**

**DEBTOR(S)**

**CHAPTER   11  
(Jointly Administered)**

---

**UNITED STATES TRUSTEE’S SUPPLEMENTAL RESPONSE TO DEBTORS’  
MOTION FOR RELIEF FROM CERTAIN UNITED STATES TRUSTEE CHAPTER 11  
OPERATING GUIDELINES**

---

COMES NOW Henry G. Hobbs, Jr., Acting United States Trustee for Region 5 (“UST”), by and through undersigned counsel, and files this Supplemental Response to the Debtors’ Motion for Relief from Certain United States Trustee Chapter 11 Operating Guidelines (DKT. #725) in the above styled and numbered cause, and in support thereof respectfully submits the following:

1.       The UST does not dispute the information presented by the Debtors in their Supplement to the Motion of the Debtors for Relief from Certain United States Trustee Chapter 11 Operating Guidelines (DKT. #812).
2.       The UST incorporates and reiterates his arguments from the prior evidentiary hearing held before this Court on June 4, 2015.
3.       Pursuant to the UST’s *Chapter 11 Operating Guidelines and Reporting Requirements* (“OGRR-11”), the UST avers that the Debtors should remain required to maintain

---

<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-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.”

casualty insurance on any tangible assets susceptible to casualty loss (fire, weather, theft, vandalism, etc.) at an amount at least equal to the replacement value of the property.

4. The UST will not present any additional testimony or evidentiary support on this insurance issue, so the UST avers that no further hearing on this matter is necessary.

WHEREFORE, PREMISES CONSIDERED, the United States Trustee prays that the Court deny the Debtors' Motion for Relief from Certain United States Trustee Chapter 11 Operating Guidelines, or in the alternative, grant such relief as the Court deems appropriate. The United States Trustee further prays for all general and equitable relief to which entitled.

RESPECTFULLY SUBMITTED, this the 18th day of June, 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  
501 EAST COURT STREET, SUITE 6-430  
JACKSON, MISSISSIPPI 39201  
TEL: (601) 965-5241  
FAX: (601) 965-5226  
EMAIL: christopher.j.steiskal@usdoj.gov

**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:

Steven W. Rosenblatt  
Christopher R. Maddux  
Robert A. Byrd

Derek F. Meek  
Bess M. Parrish Creswell

DATED, this the 18th day of June, 2015.

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