

Order substantially in the form attached as Exhibit B to the Motion. In support of the Motion to Shorten, the Debtors present the following matters:

1. This Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). This Motion is governed procedurally by 11 U.S.C. § 102(1) and Federal Bankruptcy Rules 2002 and 9006(c).

2. On October 27, 2014 (the “*Petition Date*”), the Debtors filed their voluntary petitions for relief and thereby commenced these Bankruptcy Cases under chapter 11, title 11 of the United States Code (the “*Bankruptcy Code*”), in the United States Bankruptcy Court for the Southern District of Mississippi, Southern Division (the “*Bankruptcy 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. No trustee or examiner has been appointed in any of these Bankruptcy Cases.

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. Because the Motion relates to other matters set for hearing before the Court on July 21, 2015, the Debtors respectfully request that the Court set a hearing on the Motion (the “*Hearing*”) on an expedited basis, with the **objections to be due by 5:00 p.m. on Monday, July 20, 2015 and the Hearing to be held on Tuesday, July 21, 2015 at 10:00 a.m., or as soon as the Motion may be heard**, in the Dan M. Russell, Jr. United States Courthouse, 2012 15th Street, 7th Floor, United States Bankruptcy Courtroom, Gulfport, MS 39501.

5. Good cause exists to shorten the notice and objection periods and expedite the Hearing with respect to entry of an order on the Motion in these particular circumstances pursuant to 11 U.S.C. § 102(1) and Federal Bankruptcy Rules 2002 and 9006(c). Notice will be given 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.²

WHEREFORE, the Debtors respectfully request the Court to enter an order setting an expedited hearing on the Motion with the **objections to be due by 5:00 p.m. on Monday, July 20, 2015 and the Hearing on Tuesday, July 21, 2015 at 10:00 a.m., or as soon as the Application may be heard**, in the Dan M. Russell, Jr. United States Courthouse, 2012 15th Street, 7th Floor, United States Bankruptcy Courtroom, Gulfport, MS 39501 and grant the Debtors such other and further relief as the Court deems just and proper.

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² 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.

Dated: July 13, 2015.

Respectfully submitted,

MISSISSIPPI PHOSPHATES CORPORATION, *et al.*

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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.

Dated: July 13, 2015.

/s/ Stephen W. Rosenblatt
STEPHEN W. ROSENBLATT

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