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

IN RE:
MISSISSIPPI PHOSPHATES CORPORATION **DEBTORS**

CASE NO.: 14-51667-KMS

MISSISSIPPI PHOSPHATES CORPORATION **RESPONDENTS**

KRISTOFER STEEL **CREDITOR**

MOTION TO LIFT THE AUTOMATIC STAY

COMES NOW, Kristofor Steel (Creditor), and moves the Court to lift the automatic stay as follows:

1. Creditor has a claim against debtor, Mississippi Phosphates Corporation, for debtor's negligent construction of a safety rail support that gave way and caused Creditor to fall approximately sixteen feet to the ground sustaining serious personal injuries

2. The claim is currently in litigation in the Circuit Court of Jackson County, Mississippi, Nineteenth Judicial District, Cause No. 2012-00,23(2).

3. Debtor has errors and omissions and/or liability insurance coverage which covers the stated claim. Creditor should be granted relief from the automatic stay for the limited purpose of proceeding with the claim against Debtor's insurance coverage.

4. That creditor requests the order granting relief from the stay entered in this case be excepted from the provisions of Bankruptcy Rule 4001(a)(3).

WHEREFORE, creditor moves the Court to lift the automatic stay as aforesaid; and creditor requests such other relief to which she may be entitled in the premises.

RESPECTFULLY SUBMITTED this the 18th day of December, 2014.

/s/ *Andrew C. Burrell*

ANDREW C. BURRELL, ESQUIRE
Attorney for Kristofor Steel, Creditor

/s/ *Joel Blackledge*

JOEL L. BLACLEDGE, ESQUIRE
Co-Counsel for Kristofor Steel, Creditor

Prepared By:

ANDREW C. BURRELL, ESQUIRE
Attorney for Creditor, Kristofer Steel
Mississippi Bar No. 9575
ANDREW C. BURRELL, P.A.
750 East Pass Road
Gulfport, Mississippi 39507
andrew@andrewburrell.com
Phone: 1.228/896-4016
Fax: 1.228/896.8372

and

JOEL L. BLACLEDGE, ESQUIRE
Attorney for Creditor, Kristofer Steel
Mississippi Bar No. 10606
BLACKLEDGE LAW FIRM, P.A.
P.O. Box 8155
Gulfport, Mississippi 39506-8155
joel@blackledgelawfirm.com
Phone: 1.228/669-6254
Fax: 1.866/604-0786

CERTIFICATE OF SERVICE

I, Joel L. Blackledge, do hereby certify that on this date, I electronically filed the foregoing Motion, via the United States District Court ECF System, which sent electronic notification of such filing to:

Stephen W. Rosenblatt, Esq.
Phil B. Abernethy, Esq.
Michael C. McCabe, Jr., Esq.
BUTLER SNOW LLP
2017 20th Avenue, Suite A
Gulfport, Mississippi 39501
Attorney for Debtor, Mississippi Phosphates Corporation

DUKES, DUKES, KEATING & FANECA, P.A.
Post Office Drawer W
Gulfport, Mississippi 39502
Attorney for Intervenor

Kimberly R. Lentz, Trustee
U. S. BANKRUPTCY TRUSTEE
2012 23rd Avenue (39501)
P. O. Box 927
Gulfport, Mississippi 39502

/s/ Joel L. Blackledge

JOEL L. BLACKLEDGE, ESQUIRE
Attorney for Kristofor Steel, Creditor

ANDREW C. BURRELL, ESQUIRE
ATTORNEY FOR PLAINTIFF (MSB #9575)
ANDREW C. BURRELL, P.A.
750 EAST PASS ROAD
GULFPORT, MISSISSIPPI 39507
PHONE: 228\896-4016
FAX: 228\896-8372