

CASE NO. 03-02984 WEE
Chapter 11
Jointly Administered

3. The Court entered an Order directing joint administration of the affiliated cases for procedural purposes and in the interest of convenience and judicial economy pursuant to Rule 1015(b), on May 15, 2003.

4. The Debtors have continued in possession and in operation of their businesses as debtors-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108.

5. The last day for creditors and parties-in-interest, with the exception of the government, to file claims or proofs of interest against the Debtors was September 26, 2003 (the "Bar Date"). The Bar Date for governmental units was November 11, 2003.

III. RELIEF REQUESTED

6. The Debtors are seeking entry of an Order, pursuant to Bankruptcy Code Sections 102(1), 105(a), and 502(b) and FED. R. BANKR. P. 3007, directing the disallowance of the proofs of claim identified on Exhibit A as detailed below.

7. The No Liability Employee Claims: Various employee claimants have filed proofs of claim claiming amounts associated with amounts which Debtors believe are not due and owing by the Debtors; but rather are due and owing to said claimants by the Debtors' Pension Plan, which is an entirely separate entity. According to the Debtors' books and records, the proofs of claim identified on **Exhibit A** attached hereto are "No Liability Employee Claims." The Debtors object to the No Liability Employee Claims and request that such claims be disallowed and expunged for all purposes.

8. The Debtors expressly reserve the right to amend, modify or supplement this Objection, and to file additional objections to the proofs of claim or any other claims (filed or not) that have been or may be asserted against the Debtors. Should any of the grounds of

objection stated in this Objection be dismissed, the Debtors reserve their rights to object on other grounds.

9. Nothing contained in this Objection is intended to or shall be construed to constitute a waiver of any additional defenses, claims or other issues Debtors may have with the allowance or propriety of the claims identified in **Exhibit A**. Furthermore, nothing contained in this Objection is intended to or shall be construed as a representation that **Exhibit A** is a complete and final list of all objectionable claims filed in these Chapter 11 proceedings.

WHEREFORE, the Debtors respectfully request that this Court enter an order disallowing and expunging, as appropriate, each claim described in this Objection and shown on the Exhibit attached hereto and for such further relief as is just and proper.

THIS the 29th day of October, 2004.

Respectfully submitted,

MISSISSIPPI CHEMICAL CORPORATION, et al.

By: 

James W. O'Mara, MS Bar No. 3929
Douglas C. Noble, MS Bar No. 10526
Christopher R. Maddux, MS Bar No. 100501

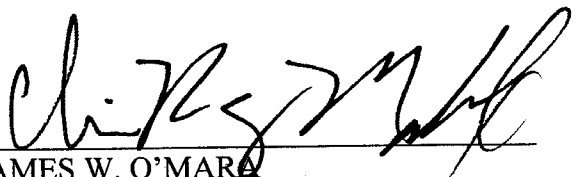
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CERTIFICATE OF SERVICE

I do hereby certify that I have this date caused to be served via electronic mail and/or U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing pleading to all parties listed below.

Thomas L. Kent Orrick, Herrington & Sutcliffe LLP 666 Fifth Avenue New York, New York 10103	Craig M. Geno Harris Geno, P.A. P.O. Box 3919 Jackson, MS 39207-3919
Ronald H. McAlpin Assistant U.S. Trustee 100 W. Capitol Street, Suite 706 Jackson, Mississippi 39269	Bankruptcy Management Corporation Attn: Tinamarie Feil 1330 E. Franklin Ave. El Segundo, CA 90245
John C. Tishler Waller, Lansden, Dortch & Davis 511 Union Street, Suite 2100 Nashville, TN 37219	J. Walter Newman, IV Newman & Newman 539 Trustmark Building Jackson, MS 39201
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SO CERTIFIED, this the 29th day of October, 2004.



JAMES W. O'MARA
DOUGLAS C. NOBLE
CHRISTOPHER R. MADDUX

In re: Mississippi Chemical Corporation
OMNIBUS 1: EXHIBIT A - NO LIABILITY - EMPLOYEE CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars	Claim Class*	Reason For Proposed Disallowance
1	BARTLETT, DANNIE M 225 MEADOWVIEW DR ISLAND KY 42350-2029	03-02984	221	BLANK	(P)	EMPLOYEE CLAIM
2	BILLIOT, MELODY 159 VARSITY CIR ALTAMONTE SPRINGS FL 32714-2836	03-02984	35	\$6,972.60	(U)	EMPLOYEE CLAIM
3	BOUDREAUX, GUY 116 FLOYD DR PIERRE PART LA 70339-4174	03-02992	1061	UNASCERTAINABLE	(U)	EMPLOYEE CLAIM
4	DAVIS, DEBRA G PO BOX 377 BENTON MS 39039-0377	03-02984	419	BLANK	(P)	EMPLOYEE CLAIM
5	DAVIS, MARLON K PO BOX 377 BENTON MS 39039-0377	03-02984	420	BLANK	(P)	EMPLOYEE CLAIM
6	DECKER JR, DALLAS S 281 BAILEY RD SMITHS GROVE KY 42171-8844	03-02984	657	BLANK	(U)	EMPLOYEE CLAIM
7	EIDSON, RONALD L 1322 E WOOD ST CARLSBAD NM 88220-9745	03-02984	540	BLANK	(P)	EMPLOYEE CLAIM
8	FOSTER, JERRY D 1013 ALBERT ST CARLSBAD NM 88220-4527	03-02984	761	BLANK	(P)	EMPLOYEE CLAIM
9	GARCIA, SUSANO 1708 RADIO BLVD CARLSBAD NM 88220-6424	03-02991	86	BLANK	(P)	EMPLOYEE CLAIM
10	HARPER, FRANK J 1752 JACKSON AVE YAZOO CITY MS 39194-2408	03-02984	273	\$291.00	(U)	EMPLOYEE CLAIM
11	HIRSCH, MICHEL 214 CLINIC DR DONALDSONVILLE LA 70346-4309	03-02984	474	\$1,455.00	(U)	EMPLOYEE CLAIM
12	KELLEY, MELVIN L 305 N 3RD ST CARLSBAD NM 88220-3805	03-02984	546	BLANK	(U)	EMPLOYEE CLAIM
13	LARRY, JULIUS 187 WADE COOPER RD LEXINGTON MS 39095-6816	03-02984	95	BLANK	(P)	EMPLOYEE CLAIM

In re: Mississippi Chemical Corporation
OMNIBUS 1: EXHIBIT A - NO LIABILITY - EMPLOYEE CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars	Claim Class*	Reason For Proposed Disallowance
14	LEDBETTER JR, DAVID WILLIAM 1969 LEDBETTER RD BENTON MS 39039-8088	03-02984	521	BLANK	(U)	EMPLOYEE CLAIM
15	NANCE, DAVID M 1231 S COCHRAN ST HOBBS NM 88240-7302	03-02984	742	BLANK	(P)	EMPLOYEE CLAIM
16	PHILLIPS, BILLY W PO BOX 5213 CARLSBAD NM 88221-5213	03-02984	560	BLANK	(P)	EMPLOYEE CLAIM
17	PLUNKETT, MARY E 7499 HIGHWAY 49 FRONTAGE RD YAZOO CITY MS 39194-4480	03-02984	354	\$486.12 \$486.12	(P) (U)	EMPLOYEE CLAIM
18	PORTER, WILLIAM B 1021 MIRROR LAKE LN CORDOVA TN 38018	03-02984	1079	UNKNOWN	(P)	EMPLOYEE CLAIM
19	PRESTENBACH, KEITH 22730 N ROSARY ST VACHERIE LA 70090-4227	03-02992	939	UNKNOWN	(U)	EMPLOYEE CLAIM
20	RUSSUM, JULIA 4318 WELCH AVE MOSS POINT MS 39563-2834	03-02984	977	UNKNOWN	(P)	EMPLOYEE CLAIM
21	SCOTT, DARRELL D 2074 JOE HALL RD FLORA MS 39071-9562	03-02984	312	BLANK	(P)	EMPLOYEE CLAIM
22	SMITH, DWAYNE 227 FLETCHERS CHAPEL RD BENTONIA MS 39040-9054	03-02984	467	BLANK	(P)	EMPLOYEE CLAIM
23	SOJOURNER, BETTY ANN 118 SANDIFER RD HARRISVILLE MS 39082-4053	03-02984	458	\$25,000.00	(U)	EMPLOYEE CLAIM
24	TURNER, PARHAM W 2101 FOOT HILL RD CARLSBAD NM 88220-2501	03-02984	452	BLANK	(P)	EMPLOYEE CLAIM
25	TWINER, THOMAS C 2454 ANDING OIL CITY RD BENTONIA MS 39040-9708	03-02984	347	\$4,618.46	(P)	EMPLOYEE CLAIM

In re: Mississippi Chemical Corporation
OMNIBUS 1: EXHIBIT A - NO LIABILITY - EMPLOYEE CLAIMS

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars	Claim Class*	Reason For Proposed Disallowance
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totals:			\$5,104.58	(P)	
			\$34,204.72	(U)	