

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC¹
Debtor

CHAPTER 11
CASE NO. 21-11832-SDM

FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF NECESSARY EXPENSES
FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC

COMES NOW the Law Offices of Craig M. Geno, PLLC (“Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), counsel for the Debtor, and in support thereof, would show as follows:

1. Debtor initiated this Chapter 11 case by the filing a Voluntary Petition on September 29, 2021. Subsequent thereto, the Debtor has been, and is, the duly qualified, and acting Debtor-in-Possession in this Chapter 11 case. The Debtor is in control of its assets and is managing and operating the Debtor-in-Possession’s businesses.

2. On December 14, 2021, an Order [DK #1466] approving the employment of the Law Offices of Craig M. Geno, PLLC, as attorneys for the Debtor was entered by the Court.

3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as **Exhibit “A”**. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as **Exhibit “B”** and incorporated by reference.

¹Jointly administered with *In re Express Biodiesel, LLC*, Case No. 21-11834-SDM and *In re Express Processing, LLC*, Case No. 21-11835-SDM.

4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel's obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from September 28, 2021, to and including January 19, 2022, and is for the sum of \$252,445.65 (\$247,156.00 in fees and \$5,289.65 in expenses), less any retainer balance remaining.

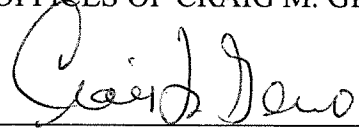
WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing the Debtor to pay said attorneys' fees and expenses. Applicant prays for general relief.

THIS, the 20th day of January, 2022.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: _____


Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
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Ridgeland, MS 39157
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Abigail M. Marbury, Esq.
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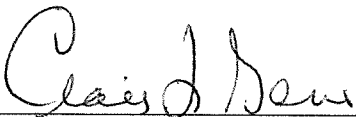
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THIS, the 20th day of January, 2022.



Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

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Debtor**

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EXHIBIT "A"

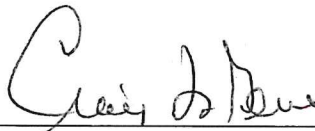
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AFFIDAVIT

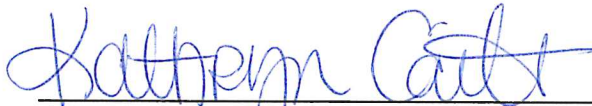
PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.



Craig M. Geno

STATE OF MISSISSIPPI
COUNTY OF Madison

SWORN TO AND SUBSCRIBED BEFORE ME, this the 20th day of January, 2022.



NOTARY PUBLIC

MY COMMISSION EXPIRES June 21, 2025

