

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC¹
Debtor

CHAPTER 11
CASE NO. 21-11832-SDM

**ANSWER AND RESPONSE TO MOTION FOR
ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM**

COMES NOW Express Grain Terminals, LLC (the “Debtor”), and files this its Answer and Response to the *Motion for Allowance of Administrative Expense Claim* (the “Motion”) [DK #2617], filed herein by Borton, LC (“Borton”), and would respectfully respond as follows, to-wit:

1. Debtor admits the contracts attached to the Motion speak for themselves.
2. Debtor denies the allegations, inferences and conclusions contained in Paragraph 2 of the Motion.
3. Debtor denies the allegations, inferences and conclusions contained in Paragraph 3 of the Motion.
4. Debtor denies the allegations, inferences and conclusions contained in Paragraph 4 of the Motion, except the Debtor admits that Borton was advised of the bankruptcy filing. Affirmatively, any work performed or materials provided by Borton, post-petition, are pre-petition claims and do not rise to the level of administrative expense claims.
5. Debtor denies the allegations, inferences and conclusions contained in Paragraph 5 of the Motion.
6. Admitted.
7. Debtor denies the allegations, inferences and conclusions contained in Paragraph 7 of the Motion.

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

Last Unnumbered Paragraph

Debtor denies that Borton is entitled to the relief demanded within the Last Unnumbered Paragraph of the Motion or to other relief in the premises.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order denying the Motion, with prejudice. Debtor prays for general relief.

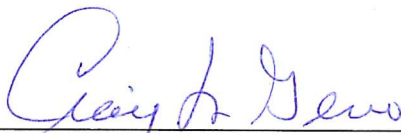
THIS, the 20th day of April, 2022.

Respectfully submitted,

EXPRESS GRAIN TERMINALS, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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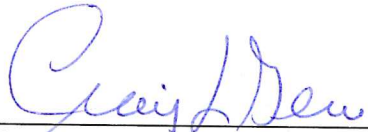
CERTIFICATE OF SERVICE

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

Abigail M. Marbury, Esq.
abigail.m.marbury@usdoj.gov

Douglas C. Noble, Esq.
dnoble@mmqnlaw.com

THIS, the 20th day of April, 2022.



Craig M. Geno