

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
AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

COMES NOW Express Grain Terminals, LLC (the “Debtor”), and files this its Answer and Response to the *Motion for Allowance and Payment of Administrative Expense Claim* (the “Motion”) [DK #2652], filed herein by Maples Gas Company, Inc. (“MGC”), and would respectfully respond as follows, to-wit:

1. Admitted.
2. Admitted.
3. Admitted.
4. Debtor admits MGC sold fuel and that invoices are attached to the Motion as Exhibit A. The remaining allegations, inferences and conclusions contained in Paragraph 4 of the Motion are denied.
5. Admitted as to what MGC requests; denied as to entitlement thereto.
6. Debtor admits the noted authority speaks for itself.
7. The allegations, inferences and conclusions contained in Paragraph 7 of the Motion are denied.
8. The allegations, inferences and conclusions contained in Paragraph 8 of the Motion are denied. Affirmatively, there are no funds available in this case which have not already been assigned, claimed, compromised, settled and/or determined to be the property, or subject to the lien

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

rights, of creditors other than MGC. As a result, there are no funds available to pay the claims of MGC, much less pay those claims within seven days.

Last Unnumbered Paragraph

Debtor denies that MGC 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 26th 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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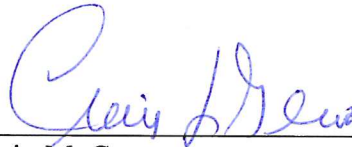
CERTIFICATE OF SERVICE

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

Andrew R. Wilson, Esq.
awilson@blswlaw.com

THIS, the 26th day of April, 2022.



Craig M. Geno