

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC¹
Debtor

CHAPTER 11
CASE NO. 21-11832-SDM

**MOTION FOR AUTHORITY TO SELL EQUIPMENT
OUTSIDE THE ORDINARY COURSE OF BUSINESS
FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS**

COMES NOW Express Grain Terminals, LLC (the “Debtor”) and files this its *Motion for Authority to Sell Equipment Outside the Ordinary Course of Business Free and Clear of Liens, Claims and Interests* (the “Motion”), and in support thereof, would respectfully show unto the Court as follows, to-wit:

1. On September 29, 2021, the Debtor herein filed with this Court its Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the “Petition”).
2. This Honorable Court has jurisdiction of the subject matter herein and the parties hereto pursuant to 28 U.S.C. § 157, 1334; 11 U.S.C. § 105, 363, 541, 1107, related statutes, related rules and various orders of reference. This is a core proceeding.
3. In the exercise of the Debtor’s best business judgment, the Debtor has made the decision to liquidate certain equipment in an effort to generate credits to pay the indebtedness of creditors.
4. Specifically, the equipment that forms the subject matter of this Motion are thirty-four (34) various vehicles and trailers (the “Vehicles”). It is the Vehicles the Debtor desires to sell. A copy of a list of the Vehicles is attached, incorporated by reference and marked as **Exhibit “A”**.

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

5. The decision to liquidate the Vehicles is in the best interest of all creditors and parties-in-interest herein. The Debtor does not yet have purchasers for the Vehicles but is seeking purchasers for the following “floor” prices:

#	VEHICLE	“FLOOR” PRICE
1	2000 Ford F-350 (VIN 6681)	\$5,600
2	2008 Chevrolet Silverado (VIN 0404)	\$5,440
3	2007 Ford F-350 (VIN 1967)	\$6,000
4	2015 Dodge Ram 1500 (VIN 9247)	\$18,800
5	2015 Dodge Ram 1500 (VIN 9232)	\$18,800
6	2012 CTS Hopper Bottom Trailer (SN 0312)	\$8,000
7	1999 Wilson Hopper Bottom Trailer (SN 8750)	\$9,600
8	1997 Cornhusker Hopper Trailer (SN 7609)	\$6,400
9	2016 Triple R 7'x16' Trailer (SN 3193)	\$2,800
10	2007 International Boom Truck (VIN 6337)	\$14,400
11	2005 Peerless Live Floor Trailer (SN 5210)	\$16,000
12	2006 Timppte Hopper Trailer (SN 9998)	\$11,200
13	2001 Timppte Hopper Trailer (SN 9278)	\$8,000
14	2010 Timppte Hopper Trailer (SN 3882)	\$12,800
15	2014 Ford F-450 (VIN 5956)	\$27,600
16	2016 Dodge Ram 1500 (VIN 8819)	\$19,760
17	2016 Triple R Flat Bed Trailer (SN 4346)	\$6,400
18	2016 Triple R Flat Bed Trailer (SN 4478)	\$2,560
20	2001 Freightliner Truck/Tractor (VIN 6285)	\$2,500
21	1993 Fontaine Lowboy (SN7857)	\$14,400
22	2007 IMCO WF3-07 Trailer (SN 3829)	\$12,000
23	2014 Trip Trailer (SN 6288)	\$6,400
24	2019 Trip Trailer (SN 3280)	\$7,500

25	Trailmobile Yard Tanker (SN V41338)	\$2,000
26	Trailmobile Yard Tanker (SN V41616)	\$2,000
27	Vac Truck/Trailer (SN R036)	\$6,000
28	Transcraft Step Deck Trailer (SN 2949)	\$3,500
29	2012 Jet Trailer (SN 0296)	\$3,200
30	2011 Jet Trailer (SN 0353)	\$5,600
31	2003 ITI Trailer (SN 9034)	\$12,000
32	2004 INNO Walking Floor Trailer (SN 9040)	\$2,500
33	2005 Jet Trailer (SN 0480)	\$1,000
34	2010 Timpte Hopper Bottom Trailer (SN 4184)	\$12,800
35	2009 C&W 20' Utility Trailer (SN0241)	\$800

These “floor” prices are the minimum fair market values of the Vehicles.

6. The purchasers of the Vehicles will be good faith purchasers and the sale transactions will be arms-length transactions.

7. The Debtor seeks authority of the Court to execute such bills of sale, transfers of title or other related documents which are reasonably necessary to consummate and close the sales of the Vehicles once it secures purchasers. Debtor requests that Dennis Gerrard, the duly appointed CRO of the Debtor, be authorized to execute the transfer documents.

8. The Vehicles are to be sold free and clear of liens, claims and interests, since there are no liens upon the vehicles.

9. Upon closing, the sales proceeds shall be placed in an interest bearing escrow account at an Office of the United States Trustee authorized depository by counsel for the Debtor, with the funds to be disbursed only upon further order of the Court, after notice and a hearing.

10. The Debtor requests that the Court approve the sales of the Vehicles for the fair, reasonable, and appropriate “floor” prices as set forth above, so that further orders are not necessary, so long as the Debtor sells the vehicles for the prices in Paragraph 5.

11. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will grant the Motion authorizing Debtor to sell the Vehicles free and clear of liens, claims and interests, and to execute such bills of sale, transfers of title or other related documents to transfer good title to the Vehicles. Debtor prays for general relief.

THIS, the 17th day of May, 2022.

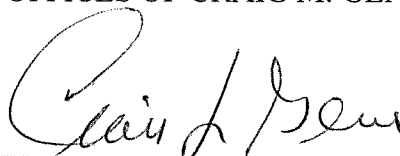
Respectfully submitted,

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 Notice of Electronic Filing, a true and correct copy of the above and foregoing to the following:

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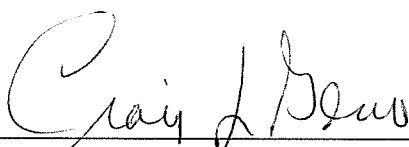
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THIS, the 19th day of May, 2022.



Craig M. Geno

					High End	Low End
1	2000	FORD	PU 350	3FTSW31F3YMA56681	\$ 7,000.00	\$ 5,600.00
2	2008	Chev	Silverado PU	1GCEK14C38Z310404	\$ 6,800.00	\$ 5,440.00
3	2007	Ford	F350	1FDWF36P47EA60967		\$ 6,000.00
4	2015	Dodge	Ram 1500 P/U	1C6RR7PT8FS719247	\$ 23,500.00	\$ 18,800.00
5	2015	Dodge	Ram 1500 P/U	1C6RR7PT6FS719232	\$ 23,500.00	\$ 18,800.00
6	2012	CTS	Hopper Bottom Trlr	5TU124025CS000312	\$ 10,000.00	\$ 8,000.00
7	1999	Wilson	Hopper Bottom Trlr	1W1MCF1A1XA228750	\$ 12,000.00	\$ 9,600.00
8	1997	Cornhusker	Hopper Trlr	1T92C422XV0007609	\$ 8,000.00	\$ 6,400.00
9	2016	Triple R	7'x16' Trailer	59N1E1525GB003193	\$ 3,500.00	\$ 2,800.00
10	2007	International	Boom Truck	1HTWYAHT57J406337	\$ 18,000.00	\$ 14,400.00
11	2005	PEERLESS	LIVE FLOOR TRLR	1PLE045227PG55210	\$ 20,000.00	\$ 16,000.00
12	2006	TIMPTE	HOPPER TRAILER	1TDH4222X6B109998	\$ 14,000.00	\$ 11,200.00
13	2001	TIMPTE	HOPPER TRAILER	1TDH422201B099278	\$ 10,000.00	\$ 8,000.00
14	2010	TIMPTE	HOPPER TRAILER	1TDH42225AB123882	\$ 16,000.00	\$ 12,800.00
15	2014	FORD	F450 PU	1FD0W4HT5EEA95956	\$ 34,500.00	\$ 27,600.00
16	2016	DODGE	Ram 1500 P/U	1C6RR7KKGXS158819	\$ 24,700.00	\$ 19,760.00
17	2016	TRIPLE R	FLAT BED TRAILER	59N1U1625GB004346	\$ 8,000.00	\$ 6,400.00
18	2016	TRIPLE R	FLAT BED TRAILER	59N1U2027KB014478	\$ 3,200.00	\$ 2,560.00
20	2001	Freighliner	Truck/Tractor	1FUJAHBD01L126285		\$ 2,500.00
21	1993	Fontaine	Low Boy	13NE47409P1557857	\$ 18,000.00	\$ 14,400.00
22	WF3-07	TRAILER	2007 IMCO	1M9L148287C343829	\$ 15,000.00	\$ 12,000.00
23	2014	TRAILER	TRIP	1T9BA1421EB506288	\$ 8,000.00	\$ 6,400.00
24	2019	TRAILER	TRIP	59N1E1625KB013280		\$ 7,500.00
25	TANKER	YARD TANKER	TRAILMOBILE V41338	V41338	\$ 2,500.00	\$ 2,000.00
26	TANKER	YARD TANKER	Trailmobile	V41616	\$ 2,500.00	\$ 2,000.00
27	VAC TRAILER	TRUCK/TRAILER		5V6141103BR036	\$ 7,500.00	\$ 6,000.00
28	TRANSCAFT	TRAILER	STEP DECK	1TTE482004Y1062949		\$ 3,500.00
29	EGT-3-12	TRAILER	2012 JET	5JHGS4024CH000296	\$ 4,000.00	\$ 3,200.00
30	EGT-4-11	TRAILER	2011 JET	5JNG54021CH000353	\$ 7,000.00	\$ 5,600.00
31	WF1-03	TRAILER	2003 ITI	1Z92B48223T199034	\$ 15,000.00	\$ 12,000.00
32	2004	INNO	Walking Floor Trlr	1Z92B46224T199040		\$ 2,500.00
33	HB1-05	TRAILER	2005 JET	5JNGS42285H000480		\$ 1,000.00
34	2010	Timpte	Hopper Bottom Trlr	1TDH4222AB124184	\$ 16,000.00	\$ 12,800.00
35	2009	C&W	20' UTILITY TRAILER	46CFB20209M010241	\$ 1,000.00	\$ 800.00

EXHIBIT "A"