UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MISSISSIPPI

In re:

EXPRESS GRAIN TERMINALS, LLC et al.,

Debtor.

Case No. 21-11832-SDM

Chapter 11

Jointly Administered

MOTION FOR IMMEDIATE PAYMENT OF ALLOWED ADMINISTRATIVE EXPENSE CLAIM

In accordance with (i) §§ 105(a), 503(b), and 507(a)(2) of the Bankruptcy Code, (ii) the *Agreed Order Resolving Motion for Allowance and Payment of Administrative Expense Claim* (Dkt. 291), (iii) the *Plan of Liquidation* (Dkt. 2932), and (iv) the *Agreed Order Confirming Plan of Liquidation* (Dkt. 3105), Maples Gas Company, Inc ("<u>MGC</u>") hereby respectfully requests entry of an Order requiring immediate payment in full of MGC's allowed administrative expense claim of \$51,092.43.

WHEREFORE, Maples Gas Company, Inc. respectfully requests that the Court enter an Order substantially in the form attached hereto as <u>Exhibit A</u>, granting the relief requested herein, and grant MGC such other and further relief this Court deems proper and just.

Dated: March 29, 2023

Respectfully submitted,

MAPLES GAS COMPANY, INC.

/s/ Andrew R. Wilson

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Attorney for Maples Gas Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was filed through the Court's electronic document filing system and was served electronically by ECF on all parties who are registered to receive electronic service in this case.

Dated: March 29, 2023

/s/ Andrew R. Wilson