

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 IMMEDIATE
PAYMENT OF ALLOWED ADMINISTRATIVE EXPENSE CLAIM**

COMES NOW Express Grain Terminals, LLC (the “Debtor”), and files this its Answer and Response to the *Motion for Immediate Payment of Allowed Administrative Expense Claim* (the “Motion”) [DK #3108], filed herein by Maples Gas Company, Inc. (“MGC”), and responding to the Motion, would respectfully respond as follows, to-wit:

1. The Debtor has a number of administrative expense claims that were not anticipated that are “lining up”, in light of the late-April deadline for filing administrative expense claims.

2. Also, the Debtor will change its format to that of a liquidating trust when the Agreed Order Confirming Plan of Liquidation [DK #3105] allows the Plan to go effective, which will not be for another month or so.

3. Accordingly, the Court should defer ruling upon the Motion until such time as the Liquidating Trustee is actually in place and has engaged counsel and until such time as the remaining administrative expense claims can be filed and heard.

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

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order deferring ruling upon the Motion until a future date. Debtor prays for general relief.

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

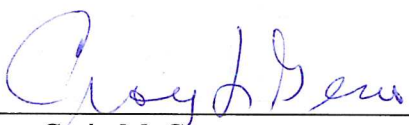
THIS, the 25th day of April, 2023.

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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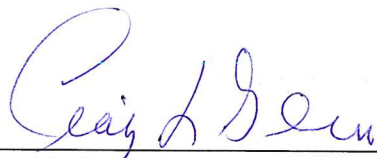
CERTIFICATE OF SERVICE

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.
Office of the United States Trustee
abigail.m.marbury@usdoj.gov

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

THIS, the 25th day of April, 2023.


Craig M. Geno