

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE:) CHAPTER 11
)
EXPRESS GRAIN TERMINALS, LLC¹,) CASE NO. 21-11832-SDM
)
)
Debtor.)
)
)
_____)

**JOINT MOTION TO EXTEND TIME TO FILE ADMINISTRATIVE-EXPENSE CLAIM
PURSUANT TO 11 U.S.C. § 503**

COME NOW the Debtor, Express Grain Terminals, LLC (the “Debtor”), and Louis Dreyfus Company Claypool Holdings, LLC (“Louis Dreyfus”), a creditor and party-in-interest in the above-captioned matter, and hereby move this Court for entry of an order extending the deadline for Louis Dreyfus to file an application for allowance and payment of an administrative-expense claim under 11 U.S.C. § 503. In support of this motion, the parties would show the Court as follows:

1. On March 24, 2023, this Court entered an order (the “Confirmation Order”) confirming the chapter 11 plan proposed by the Debtor (the “Plan”). (Docket No. 3105). However, the effective date of the Plan will not occur until sixty days after the Confirmation Order was entered (Docket No. 2932, p. 6). Consequently, the Liquidating Trust has not yet been established, and the Liquidating Trustee has not yet been appointed. (Docket No. 2932, p. 6).

2. The Confirmation Order provides that applications for allowance of administrative-expense claims must be filed within thirty-five days after the entry of the Confirmation Order. (Docket No. 3105, p. 10). This would make the deadline for filing such applications April 28, 2023.

3. Louis Dreyfus asserts an administrative claim under 11 U.S.C. § 503(b)(9).

4. Louis Dreyfus and the Debtor have exchanged information and had discussions regarding Louis Dreyfus’s claim. However, in light of the fact that the Confirmation Order has been entered but the Plan is not yet effective, there is currently no one authorized to settle such claims.

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

5. Accordingly, the Debtor and Louis Dreyfus believe it would be in all parties' interest and could lead to conservation of judicial resources to extend the deadline for Louis Dreyfus to file its application for an administrative-expense claim by sixty days to and including June 27, 2023. This would allow time for the Liquidating Trustee to be appointed and the parties to attempt to settle this claim without the need for a formal application.

WHEREFORE, the Debtor and Louis Dreyfus respectfully request that the Court extend Louis Dreyfus's deadline for filing an administrative-expense claim and grant such other and further relief as this Court may deem just and proper.

DATED, this 27th day of April, 2023.

Respectfully submitted,

EXPRESS GRAIN TERMINALS, LLC

By: /s/Craig M. Geno, Esq.

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that a copy of the foregoing was filed electronically through the Court's CM/ECF system and served electronically on all parties enlisted to receive service of electronic notice, and the Notice of Electronic Filing indicates that the foregoing was electronically mailed to all parties-in-interest.

THIS, 27th day of April, 2023.

/s/Craig M. Geno, Esq.
Craig M. Geno