

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

**IN RE: EXPRESS GRAIN TERMINALS, LLC¹
Debtor**

**CHAPTER 11
CASE NO. 21-11832-SDM**

**DEBTOR'S ANSWER AND RESPONSE TO GRESHAM PETROLEUM COMPANY'S
MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE
CLAIM PURSUANT TO 11 U.S.C. § 503(b)**

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 Pursuant to 11 U.S.C. § 503(b)* (the "Motion") [DK #3122], filed herein by Gresham Petroleum Company ("Gresham"), and, answering the allegations of the Motion paragraph by paragraph, Debtor answers and alleges as follows, to-wit:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.

8. The Debtor respectfully submits that the course of business dealings and the ordinary course of business between the Debtor and Gresham are more accurately reflected in the actual documents (invoices, credit memos, payments, payment history and payment credits) than allegations. Accordingly, to the extent the allegations of Paragraph 8 vary the actual transactions involving the parties, they are denied.

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

9. The Debtor admits the noted authority in Paragraph 9 speaks for itself.

10. The Debtor admits that Gresham sold Fuel to the Debtor and that certain Fuel was received within 20 days of the petition date. The remaining allegations, inferences and conclusions of Paragraph 10 are denied, on lack of knowledge, information or belief.

11. Admitted.

12. Admitted.

13. Admitted.

14. The Debtor denies that Gresham is entitled to the relief demanded within Paragraph 14 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. Debtor prays for general relief.

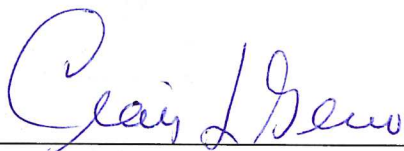
THIS, the 22^d day of May, 2023.

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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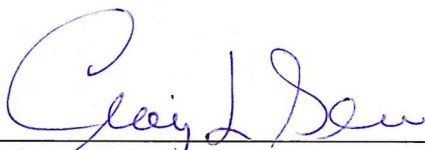
CERTIFICATE OF SERVICE

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
Office of the U.S. Trustee
abigail.m.marbury@usdoj.gov

Jeremy Retherford
jretherford@balch.com

THIS, the 22nd day of May, 2023.



Craig M. Geno