

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

**IN RE: EXPRESS GRAIN TERMINALS, LLC<sup>1</sup>  
Debtor**

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

**MOTION TO EXPEDITE HEARING**

COMES NOW Heather Williams, the Liquidating Trustee in this Chapter 11 case (the “Liquidating Trustee”), and files this her *Motion to Expedite Hearing* (the “Motion”), and in support thereof, would respectfully show as follows, to-wit:

1. The Liquidating Trustee has sought to engage the law firm of The Law Offices of Craig M. Geno, PLLC (the “Firm”) to serve as counsel to the Liquidating Trustee in connection with general representation (application at Docket No. 3212) and as special counsel with respect to the pursuit of certain adversary proceedings and related claims (application at Docket No. 3213), collectively the “Applications.”

2. The only objection to the Applications was filed by Dr. Michael Coleman and John Coleman. The joint objection at Docket No. 3242 (the “Objection”) objects to both Applications.

3. There are significant deadlines that are fast approaching in this Chapter 11 case that require the services of counsel to not only file pleadings to meet those deadlines but also to investigate whether certain actions should be taken with respect to those deadlines. Moreover, the Debtor’s affiliates have ongoing obligations.

4. The Objection is obviously a roadblock to those investigations and filings. Currently, the objection is scheduled for hearing on August 24, 2023, and there are deadlines which must be respected that actually occur prior to that date.

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<sup>1</sup>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, an urgent situation exists justifying the Court in expediting the hearings in connection with the Applications so that the Court can consider the Applications as well as the Objection.

6. The Liquidating Trustee respectfully suggests or requests hearings on any of the following dates: July 27, 2023, August 1, 4, 2023.

7. The hearings should not take an inordinate amount of time or preparation, but it is critical to the deadlines that exist in this case that the Court hear, consider and rule upon the Applications and the Objection thereto immediately.

8. Other grounds to be assigned upon a hearing hereof if necessary.

WHEREFORE, PREMISES CONSIDERED, Liquidating Trustee respectfully prays that upon a hearing hereof this Honorable Court will enter its order setting a trial date in connection with the application and the objection at the Court's earliest convenience. The Liquidating Trustee prays for general relief.

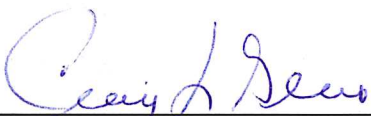
THIS, the 25<sup>th</sup> day of July, 2023.

Respectfully submitted,

HEATHER WILLIAMS, LIQUIDATING TRUSTEE

By Her Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
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**CERTIFICATE OF SERVICE**

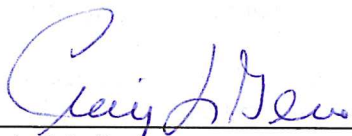
I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Abigail M. Marbury, Esq.  
Office of the United States Trustee  
[abigail.m.marbury@usdoj.gov](mailto:abigail.m.marbury@usdoj.gov)

Heather Williams  
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Charles S. Kelley, Esq.  
[ckelley@mayerbrown.com](mailto:ckelley@mayerbrown.com)

THIS, the 25<sup>th</sup> day of July, 2023.

  
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Craig M. Geno