

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

**IN RE: EXPRESS PROCESSING, LLC  
Debtor**

**CHAPTER 11  
CASE NO. 21-11835-SDM**

**MOTION TO DISMISS CASE**

COMES NOW Express Processing, LLC (the “Debtor” or “Movant”), and files this its *Motion to Dismiss Case* (the “Motion”), and in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

1. On September 29, 2021, the Debtor herein filed with this Court its Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the “Petition”). Movant is the Debtor-in-Possession in this Chapter 11 case. Subsequent thereto, the Debtor has been, and is, the duly qualified, and acting Debtor-in-Possession in this Chapter 11 case. The Debtor is in control of its assets and is managing and operating the Debtor-in-Possession’s businesses.

2. This Honorable Court has jurisdiction of the subject matter herein and the parties hereto pursuant to 28 U.S.C. §§ 157 and 1334; 11 U.S.C. §§ 105, 363, 1107, 1109, 1121, related statutes, related rules and various orders of reference. This is a core proceeding.

3. The Debtor is required to file its disclosure statement and plan of reorganization on or before August 8, 2022.

4. However, there are few, if any, assets to be distributed in this case that are not subject to an order or orders lifting the automatic stay.

5. In addition, further administration of this case would only result in additional administrative expenses that can’t and/or won’t be paid.

6. Accordingly, there is no need for this Debtor to remain in Chapter 11 and the dismissal of this case is in the best interest of all creditors, all parties-in-interest and the Debtor. The Court shall retain jurisdiction with respect to the filing of monthly operating reports through the date

the case is dismissed and the payment of fees due and owing to the Office of the United States Trustee.

7. The Motion is in the best interests of all creditors, parties-in-interest and the Debtor moves the Court for an order granting the Motion and dismissing this case.

8. 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 granting the Motion and dismissing this case. Debtor prays for general relief.

THIS, the 5<sup>th</sup> day of August, 2022.

Respectfully submitted,

EXPRESS PROCESSING, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 

Craig M. Geno

OF COUNSEL:

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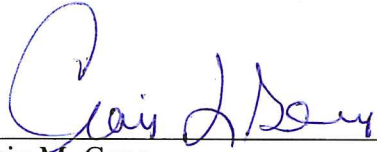
**CERTIFICATE OF SERVICE**

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

Abigail M. Marbury, Esq.  
[abigail.m.marbury@usdoj.gov](mailto:abigail.m.marbury@usdoj.gov)

Mr. Dennis Gerard  
[dennis.gerrard@cr3partners.com](mailto:dennis.gerrard@cr3partners.com)

THIS, the 5<sup>th</sup> day of August, 2022.

  
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Craig M. Geno