

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC¹
Debtor

CHAPTER 11
CASE NO. 21-11832-SDM

**MOTION TO EXTEND FINAL CASH COLLATERAL
ORDER PAST THE HEARING ON THE SALE MOTION**

COMES NOW Express Grain Terminals, LLC (the “Debtor”) and files this its *Motion to Extend Final Cash Collateral Order Past the Hearing on the Sale Motion* (the “Motion”), and in support thereof, would respectfully show as follows, to-wit:

1. The Court has entered its *Final Order (I) Authorizing Use of Cash Collateral, (II) Authorizing Continued Use of Existing Bank Accounts and Cash Management System, (III) Granting Adequate Protection, and (IV) for Other Relief* (the “Final Order”) [DK #1787]. A copy of the Final Order is attached, incorporated by reference and marked as **Exhibit “A”**.

2. The Final Order authorizes the Debtor to engage in its wind down and close down of the Debtor’s business, and authorizes use of cash collateral through and including February 25, 2022.

3. An auction is scheduled for the sale of substantially all of the assets of the Debtor-in-possession for February 25, 2022, but it is clear that the Debtor’s wind down business (as approved by the Court under the Debtor’s previously announced “scenario number 2”) will continue well past February 25, 2022. The Debtor is currently operating under the wind down budget previously submitted, but the Debtor has modified that budget in accordance with current developments and anticipated cash needs in the future, pursuant to the attached wind down budget that is incorporated by reference and marked as **Exhibit “B”**.

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

4. Since the Court has already approved the Debtor's wind down and its wind down under Debtor's previously announced scenario number 2, there is no need to "start over" with respect to the use of cash collateral, but to merely extend the reach of the existing Final Order for an additional two weeks after the expiration of use of cash collateral on February 25, 2022. That extension should allow the Debtor to consummate and close, or determine when consummation and closing will occur, of its sale(s) of assets that is set to occur on February 25, 2022.

5. In the meantime, the Debtor will have adequate experience with the wind down costs that do not include overhead and related costs of its crushing operation, which will drastically reduce the need for cash. Further, the Court has set for trial on March 4, 2022, the § 557 procedures and the outcome of that litigation will also have a direct and significant impact upon future use of cash collateral.

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

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully pray that upon a hearing hereof, this Honorable Court will enter its order extending the reach of the Final Order for an additional two weeks. Debtors pray for general relief.

THIS, the 18th day of February, 2022.

Respectfully submitted,

EXPRESS GRAIN TERMINALS, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: Craig M. Geno
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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 and/or U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing to the following:

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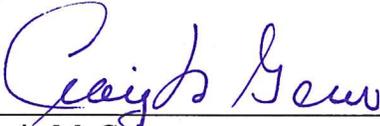
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THIS, the 18th day of February, 2022.



Craig M. Geno