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Attorneys for debtor-in-possession,
Mineral Resources International, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

In re MINERAL RESOURCES INTERNATIONAL, INC., Debtor.	Bankruptcy No. 13-30606 (RKM) Chapter 11

NOTICE OF DEBTOR'S MOTION TO EXTEND DEADLINE UNDER BANKRUPTCY CODE § 1129(e) THROUGH AND INCLUDING DECEMBER 23, 2014, AND NOTICE OF OPPORTUNITY FOR HEARING

(Objection Deadline: October 6, 2014 at 5:00 p.m.)
(Hearing Date: October 14, 2014 at 3:00 p.m.)

PLEASE TAKE NOTICE that Mineral Resources International, Inc. (the "Debtor"), through its undersigned counsel, has filed the Debtor's Motion to Extend Deadline Under Bankruptcy Code § 1129(e) Through and Including December 23, 2014 (the "Motion").

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief requested in the Motion, then you or your lawyer must **both**:

(1) on or before October 3, 2014 at 5 p.m., file with the Bankruptcy Court a written objection to the Motion, explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before October 3, 2014 at 5 p.m. You also must mail a copy to the undersigned counsel at:

Adam Reiser
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84101

and

(2) attend the hearing on the Motion which is set for October 14, 2014 at 3:00 p.m. in Courtroom 369, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah 84101. **Failure to attend the hearing will be deemed a waiver of your objection.**

If you or your attorney do not take both of the above-described steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion, and may enter an order granting that relief.

In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing enter an order approving the Motion without hearing.

Dated: September 18, 2014

PARSONS KINGHORN HARRIS
A Professional Corporation

/s/ Adam Reiser
GEORGE HOFMANN
ADAM REISER

Attorneys for the Debtor

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Attorneys for debtor-in-possession
Mineral Resources International, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION

In re MINERAL RESOURCES INTERNATIONAL, INC., Debtor.	Bankruptcy No. 13-30606 (RKM) Chapter 11

DEBTOR'S MOTION TO EXTEND DEADLINE UNDER BANKRUPTCY CODE § 1129(e) THROUGH AND INCLUDING DECEMBER 23, 2014

Mineral Resources International, Inc., debtor and debtor-in-possession in the above-captioned case (the "Debtor"), hereby moves this Court (the "Motion") for entry of an Order extending the deadline under Bankruptcy Code § 1129(e) through and including December 23, 2014, which represents an extension of approximately 60 days from the present deadline of October 24, 2014. In support of this Motion, the Debtor respectfully states as follows:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Debtor filed a voluntary chapter 11 petition on September 16, 2013. The Debtor continues to operate its business and manage its property as a debtor in possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. No examiner or trustee has been appointed in this case.

4. On July 11, 2014, the Debtor filed its Plan of Reorganization (the "Plan").

5. The Debtor indicated on its Chapter 11 petition that it is a "small business debtor" as defined in Bankruptcy Code § 101(51D).[1]

6. Accordingly, under Bankruptcy Code § 1121(e)(2), the Debtor was initially required to file its plan not later than Sunday, July 13, 2014 (which moved the deadline to the following Monday, July 14, 2014).

7. The same day the Plan was filed, the Debtor requested conditional approval of its Disclosure Statement, which was subsequently granted, and for the Court to fix a hearing to consider confirmation of the Plan.

8. The first available date for confirmation of the Plan on the Court's calendar was August 26, 2014 at 3:00 p.m.

9. The August 26 confirmation hearing focused primarily on consideration of the Disclosure Statement, the Court ultimately ruling that additional disclosures would be required before the Disclosure Statement would be approved. The Court scheduled

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[1] The Debtor reserves the right to amend its petition as appropriate concerning its status or non-status as a "small business debtor." Without limiting the generality of the foregoing, should the Debtor's unsecured creditors form an official committee, the Debtor would by definition no longer be a "small business debtor."

additional hearings on September 18, 2014 and November 13, 2014 for approval of the Disclosure Statement and confirmation of the Plan, respectively.[2] The Court also directed the Debtor's counsel to file a motion for an additional extension pursuant to Bankruptcy Code § 1129(e).

10. Under Bankruptcy Code § 1129(e), in a small business case, a plan which complies with the Bankruptcy Code shall be confirmed "not later than 45 days after the plan is filed unless the time for confirmation is extended in accordance with section 1121(e)(3)" (the "45 day deadline").

11. In turn, Bankruptcy Code § 1121(e)(3) permits the Court to extend the 45 day deadline if the Debtor demonstrates that it is more likely than not that the Court will confirm a plan within a reasonable period of time, a new deadline is imposed at the time the extension is granted, and the order extending time is signed before the existing deadline has expired.

12. The present deadline expires on October 24, 2014. The Debtor respectfully requests entry of an Order extending the deadline through and including December 23, 2014, which is an extension of approximately 60 days.

13. The Debtor submits that good grounds exist to extend the deadline based on the following:

A. The Debtor diligently filed its Plan in advance of the 300 day deadline;

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[2] On September 9, 2014, the Debtor filed its Amended Disclosure Statement.

B. The Debtor immediately requested the Court's earliest hearing date to consider confirmation of the Plan, which date was August 26, 2014;

C. The Debtor immediately requested conditional approval of its related Disclosure Statement, which the Court granted;

D. An application to employ the undersigned counsel was filed just three days before the Plan was filed; thus the undersigned counsel has acted extremely promptly to comply with the deadlines imposed in the Bankruptcy Code;

E. The Debtor submits that the Plan, on its face, is confirmable and satisfies the requirements of Bankruptcy Code § 1129;

F. In the event the Plan is not confirmed as filed, the Debtor will act promptly to file an amended plan and seek its confirmation.

WHEREFORE, the Debtor respectfully requests the Court to enter an Order extending the current October 24, 2014 deadline through and including December 23, 2014, and granting such other and further relief as is just.

Dated: September 18, 2014

PARSONS KINGHORN HARRIS
A Professional Corporation

/s/ Adam Reiser
GEORGE HOFMANN
ADAM REISER

Attorneys for the Debtor