

Thomas E Lauria  
State Bar No. 11998025  
**WHITE & CASE LLP**  
Wachovia Financial Center  
200 South Biscayne Blvd.  
Miami, FL 33131  
Telephone: (305) 371-2700  
Facsimile: (305) 358-5744

Robin Phelan  
State Bar No. 15903000  
Judith Elkin  
State Bar No. 06522200  
**HAYNES AND BOONE, LLP**  
901 Main Street  
Suite 3100  
Dallas, TX 75202  
Telephone: (214) 651-5000  
Facsimile: (214) 651-5940

**PROPOSED ATTORNEYS FOR THE DEBTORS AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

_____	)	
In re	)	Chapter 11 Case
	)	
MIRANT CORPORATION, <i>et al.</i> ,	)	Case No. 03-46590-DML
	)	Joint Administration Pending
Debtors.	)	

**REQUEST FOR EMERGENCY AND/OR EXPEDITED CONSIDERATION**

On July 21, 2003, Mirant Corporation and certain of its subsidiaries and affiliates (collectively, the “Debtors”) filed the Emergency Motion of the Debtors Pursuant to Section 105(a), 362 and 541 of the Bankruptcy Code for Interim and Final Order Establishing Procedures for (I) Requiring Notice in Advance of Certain Transactions Regarding Claims Against and Equity Interests in Mirant Corporation, and (II) the Imposition of Sanctions for Violating the Notification Procedures (the “Notification Motion”). The Debtors hereby request expedited and/or emergency consideration of the Notification Motion.

The Debtors request that the Court hear the Notification Motion on an emergency basis at the standing hearing on Mirant Corporation matters on Wednesday, July 23, 2003 at 10:30 a.m. in Fort Worth, Texas. If the Debtors do not obtain emergency consideration of the Notification Motion as soon as possible, the Debtors may be significantly harm.

The Debtors require emergency consideration of the Notification Motion so that the Debtors may put into place procedures regarding trading in claims against the Debtors and equity interests in the Debtors in order to preserve the Debtors' estates. In addition to emergency consideration of the Notification Motion, the Debtors also request that the Court enter a bridge order regarding the relief requested in the Notification Motion until such time as the Court may hear the Notification Motion.

Accordingly, the Debtors request that the Court enter an order setting a hearing on the Notification Motion on Wednesday, July 23, 2003 at 10:30 a.m. in Fort Worth, Texas.

Respectfully submitted this 21<sup>st</sup> day of July, 2003.

HAYNES AND BOONE, LLP  
901 Main Street  
Suite 3100  
Dallas, Texas 75202  
214-651-5000

By: /s/ Robin E. Phelan  
Robin E. Phelan  
State Bar No. 1590300  
Judith Elkin  
State Bar No. 06622200  
and  
Thomas E. Lauria  
State Bar No. 11998025  
Gerard Uzzi  
WHITE & CASE, LLP  
Wachovia Financial Center  
200 South Biscayne Blvd.  
Miami, Florida 33131  
305-371-2700

J. Christopher Shore  
Douglas Eisner  
WHITE & CASE, LLP  
1155 Avenue of the Americas  
New York, New York 10036  
212-819-8200

PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he has authorized BSI as service agent to cause to serve a true and correct copy of the foregoing Application and Affidavit upon all parties on the Limited Service List via United States first class mail, postage prepaid, on the 21<sup>st</sup> day of July, 2003 in accordance with the Federal Rules of Bankruptcy Procedure.

/s/ Robin E. Phelan

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

_____	)	
In re	)	Chapter 11 Case
	)	
MIRANT CORPORATION, <i>et al.</i> ,	)	Case No. 03-46590-DML
	)	Joint Administration Pending
Debtors.	)	

**ORDER EXPEDITING CONSIDERATION OF MOTIONS**

Came before the Court for consideration the Request for Emergency and/or Expedited Consideration (the "Request") of the Emergency Motion of the Debtors Pursuant to Section 105(a), 362 and 541 of the Bankruptcy Code for Interim and Final Order Establishing Procedures for (I) Requiring Notice in Advance of Certain Transactions Regarding Claims Against and Equity Interests in Mirant Corporation, and (II) the Imposition of Sanctions for Violating the Notification Procedures (the "Notification Motion") filed by Mirant Corporation and certain of its subsidiaries and affiliates (collectively, the "Debtors"). After considering the Request and the representations made therein, the Court finds that the Request has merit and should be granted. It is therefore, hereby

**ORDERED** that the Request is granted in full and in all respects; and it is further

**ORDERED** that a hearing on the Notification Motion is set for Wednesday, July 23, 2003 at 10:30 a.m. in Fort Worth, Texas; and it is further

**ORDERED** that the Debtors shall serve immediately a copy of this Order on all parties upon whom the Debtors served the Notification Motion.

Signed this \_\_\_\_ day of July, 2003.

\_\_\_\_\_  
Honorable D. Michael Lynn  
United States Bankruptcy Judge