

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

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
)	Jointly Administered
Debtors.)	
_____)	

**REQUEST FOR EMERGENCY AND/OR EXPEDITED CONSIDERATION
OF DEBTORS' MOTION PURSUANT TO 11 U.S.C. § 365(a) TO ASSUME
TAX ABATEMENT CONTRACT WITH THE CITY OF ZEELAND**

On October 10, 2003, Mirant Corporation and certain of its subsidiaries and affiliates (collectively, the "Debtors") filed their Debtors' Motion Pursuant to 11 U.S.C. § 365(a) to Assume Tax Abatement Contract with the City of Zeeland (the "Motion"). The Debtors hereby request expedited and/or emergency consideration of the Motion, as set out more fully herein. **The Debtors request that the Court hear the Motion on an emergency and/or expedited basis on October 22, 2003 at 10:30 a.m.**

The Debtors request expedited consideration of the Motion wherein so that the hearing on the Motion will coincide with the hearings on the City of Zeeland's Motion to Vacate or Annul Automatic Stay and on the City of Zeeland's Motion for Entry of an Order to Compel Debtor Mirant Zeeland, LLC to Assume or Reject an Executory Contract filed by the City of Zeeland, which are currently set for hearing on October 22, 2003 at 10:30 a.m.

The Debtors also request that any oppositions to the Motion be filed and served upon counsel for the Debtors so any oppositions are actually received by no later than the close of business **October 20, 2003**.

Accordingly, the Debtors request that the Court enter an Order setting hearing on the Motion on October 22, 2003 at 10:30 a.m. and further ordering that any oppositions to the Motion be filed and served upon counsel for the Debtors (so any oppositions are actually received) by no later than the close of business October 20, 2003.

Respectfully submitted this 10TH day of October, 2003.

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

By: /s/ Robin Phelan
Robin E. Phelan
State Bar No. 1590300
Judith Elkin
State Bar No. 06622200

and

Thomas E. Lauria
State Bar No. 11998025
Michelle C. Campbell
State Bar No. 24001828
WHITE & CASE, LLP
Wachovia Financial Center
200 South Biscayne Blvd.
Miami, Florida 33131
305-371-2700

ATTORNEYS FOR THE DEBTORS AND DEBTORS-
IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she has authorized BSI as service agent to cause to serve a true and correct copy of the foregoing document upon the parties listed below and upon all parties on the Limited Service List via United States mail on the 10TH day of October, 2003 in accordance with the Federal Rules of Bankruptcy Procedure.

James G. Vantine, Jr.
Miller Canfield Paddock & Stone, PLC
444 West Michigan Avenue
Kalamazoo, MI 49007

Karen Jipping, Deputy City Clerk
City of Zeeland
21 South Elm Street
Zeeland, Michigan 49464-1783

Tim Klunder, City Manager
City of Zeeland
21 South Elm Street
Zeeland, MI 49464

Mark E. MacDonald, Esq.
MacDonald & MacDonald, P.C.
325 N. St. Paul Street, Suite 2400
Dallas, Texas 75201

/s/ Michelle Campbell