

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
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PATRIOT COAL CORPORATION, *et al.*, : Case No. 12-12900 (SCC)
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: :
Debtors. : Jointly Administered
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**DECLARATION OF JAMES KATCHADURIAN IN SUPPORT OF THE APPLICATION
OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO RETAIN
EPIQ BANKRUPTCY SOLUTIONS, LLC AS INFORMATION AGENT**

I, James Katchadurian, do hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an Executive Vice President of Epiq Bankruptcy Solutions, LLC ("**Epiq**")¹ and I am authorized to make and submit this declaration (the "**Declaration**") on behalf of Epiq. This Declaration is submitted in support of the Application of the Official Committee of Unsecured Creditors (the "**Committee**") of Patriot Coal Corporation and certain of its subsidiaries, debtors and debtors-in-possession (collectively, the "**Debtors**") in the above-captioned jointly administered chapter 11 cases (the "**Chapter 11 Cases**"), to retain Epiq as Information Agent (the "**Application**"). The statements contained herein are based upon personal knowledge.²

2. Epiq is one of the country's leading chapter 11 administrators with expertise in noticing, claims processing, balloting and distribution. In the normal course of its business, Epiq is often called upon to create websites for the purpose of providing access to information to

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Application.

² Certain of the disclosures herein relate to matters within the knowledge of other professionals at Epiq and are based on information provided by them.

creditors. Epiq is well-qualified to provide the Committee and the Debtors' creditors with access to information in connection with these cases. Large chapter 11 cases in which Epiq has created websites to provide creditors access to information include: In re Eastman Kodak Company, et al., No. 12-10202 (ALG) (Bankr. S.D.N.Y.); In re AMR Corporation, et al., No. 11-15463 (SHL) (Bankr. S.D.N.Y.); In re LAD LLC, et al., No. 11-12010 (KG) (Bankr. D. Del.); In re Mesa Air Group, Inc., et al., No. 10-10018 (MG) (Bankr. S.D.N.Y.); In re Motors Liquidation Company, et al., No. 09-50026 (REG) (Bankr. S.D.N.Y.) (on behalf of both the Official Committee of Unsecured Creditors and the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims); In re Dayton Superior Corporation, No. 09-11351 (Bankr. D. Del.); In re Tarragon Corporation, et al., No. 09-10555 (Bankr. D.N.J.); In re Thornburg Mortgage, Inc., et al., No. 09-17787 (Bankr. D. Md.); In re Tropicana Entertainment, LLC, et al., No. 08-10856 (Bankr. D. Del.); In re Washington Mutual, Inc., et al., No. 08-12229 (Bankr. D. Del.). As such, Epiq is well-qualified to prepare the Committee website and to assist the Committee in providing the Debtors' unsecured creditors with access to information in connection with these cases.

3. The Committee selected Epiq to serve as its Information Agent for these cases, as set forth in more detail in the Application filed contemporaneously herewith. To the best of my knowledge, and based solely upon information provided to me by the Committee, and except as provided herein, neither Epiq, nor any employee thereof, has any materially adverse connection to the Committee or the Debtors' estates with respect to any matter upon which Epiq is to be engaged. Epiq may have relationships with certain of the Committee members, the Debtors or the Debtors' creditors as vendors or in connection with chapter 11 cases in which Epiq serves or has served in a neutral capacity as noticing, claims, and/or balloting agent for another chapter 11 debtor.

4. Additionally, “Eastman Kodak Co.” appears to be a significant supplier, shipper, warehouseman, customer or vendor of the Debtors, “XL” appears to be an underwriter of the Debtors, and “Frontier” appears to be a utility of the Debtors. Epiq currently serves, or in the past has served, in a neutral capacity as claims and noticing agent for (a) U.S.A. Floral Products, Inc. and its affiliated debtors, including XL Group, Inc., which may or may not relate to “XL;” (b) Frontier Airlines Holdings, Inc. and its affiliated debtors, certain of which may or may not relate to “Frontier;” and (c) Adelphia Communications Corporation and its affiliated debtors, including several “Frontiervision” entities, that may or may not relate to “Frontier.” Epiq also currently serves in a neutral capacity as information agent to the Official Committee of Unsecured Creditors of Eastman Kodak Company and certain of its affiliated debtors. Epiq does not view such relationships as real or potential conflicts in these Chapter 11 Cases given Epiq’s neutral position as claims and noticing agent or information agent for those clients and the neutral information and administrative services it will provide in the Chapter 11 Cases. Further, to the best of my knowledge, any such relationships are completely unrelated to the Chapter 11 Cases.

5. In addition, Epiq personnel may have relationships with some of the Committee members, the Debtors, the Debtors’ creditors or other parties-in-interest. However, to the best of my knowledge, such relationships, to the extent they exist, are of a personal nature and unrelated to these Chapter 11 Cases. In addition, Epiq has, had, and will continue to have relationships in the ordinary course of its business with certain vendors, professionals and other parties-in-interest that may be Debtors or involved in the Debtors’ cases in matters unrelated to these Chapter 11 Cases. Epiq may also provide professional services to entities or persons that may be Debtors, creditors or parties-in-interest in these Chapter 11 Cases, which services do not directly relate to, or have any direct connection with, these Chapter 11 Cases or the Committee. To the

best of my knowledge, and except as provided herein, neither Epiq, nor any employees thereof, represents any interest materially adverse to the Committee or the Debtors' estates with respect to any matter upon which Epiq is to be engaged. Based on the foregoing, and except as provided herein, I believe that Epiq is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code.

6. Epiq has reviewed its electronic database to determine whether it has any relationships with the entities provided by the Committee. At this time, we are not aware of any relationship that would present a disqualifying conflict of interest. Should Epiq discover any new relevant facts or relationships bearing on the matters described herein during the period of its retention, Epiq will use reasonable efforts to file promptly a supplemental declaration.

7. Epiq shares a corporate parent with certain companies that provide integrated technology products and services to the legal profession for electronic discovery, class action settlements, financial transactions, chapter 7 and 13 bankruptcy, litigation, and regulatory compliance. Given the legal and operational separateness of Epiq from its affiliates and the administrative nature of the services performed by such companies, Epiq does not believe that a conflict would arise solely from any relationship or claim of an Epiq affiliate or its corporate parent.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: October 9, 2012
New York, New York

/s/ James Katchadurian
James Katchadurian