

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:

PATRIOT COAL CORPORATION, et al.,

Case No. 12-51502-659

Chapter 11

Debtors.

RESPONSE OF BULLDOG EXCAVATING, LLC TO 503(b)(9) REPORT

This day comes Bulldog Excavating, LLC, by counsel, Joseph W. Caldwell, and files this response to the 503(b)(9) report.

1. Bulldog Excavating, LLC has filed Proofs of Claim in this case as follows:

| | |
|--------------|--------------|
| Panther, LLC | \$102,129.40 |
| Panther, LLC | \$206,722.50 |
| Panther, LLC | \$ 18,000.00 |
| Panther, LLC | \$ 86,300.00 |

2. The work performed included both services and goods.

3. Certain goods were provided to the Debtors within 20 days of the time of the filing of the Chapter 11 bankruptcy reorganization case. A summary of the invoices will be provided.

4. Bulldog Excavating, LLC should be considered for approval of an administrative expense claim pursuant to the 503(b)(9) procedures order and should be added to approved claims under the 503(b)(9) report.

WHEREFORE, for the reasons as set forth herein, Bulldog Excavating, LLC requests that it be deemed to be an eligible creditor for 503(b)(9) treatment; and for such other and further relief as the Court deems appropriate.

BULLDOG EXCAVATING, LLC

By Counsel

/s/ Joseph W. Caldwell
Joseph W. Caldwell, Esquire
WV Bar No. 586
CALDWELL & RIFFEE
P.O. Box 4427
Charleston, WV 25364
(304) 925-2100

**UNITED STATES BANKRUPTCY COURT
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EASTERN DIVISION**

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Case No. 12-51502-659

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Debtors.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the attached **RESPONSE OF BULLDOG EXCAVATING, LLC TO 503(b)(9) REPORT** was served upon the following by United States mail, postage prepaid, on this 18th day of March, 2013:

Michelle McGreal
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017

Office of the U.S. Trustee
ATTN: LENORA S. LONG
Eastern District of Missouri
111 South 10th Street, Suite 6.353
St. Louis, MO 63102

Weil, Gotshal & Manges LLP
ATTN: MARCIA GOLDSTEIN
767 Fifth Avenue
New York, NY 101543

Willkie Farr & Gallagher LLP
ATTN: MARGOT B. SCHONHOLTZ
787 Seventh Avenue
New York, NY 10019-6099

Kramer Levin Naftalis & Frankel LLP
ATTN: ADAM C. ROGOFF
1177 Avenue of the Americas
New York, NY 10036

/s/ Joseph W. Caldwell
Joseph W. Caldwell

BULLDOG EXCAVATING, LLC

Invoice

PO BOX 58
 NAUGATUCK, WV 25685
 PHONE: 304-475-3400
 FAX: 304-475-3900

| Date | Invoice # |
|-----------|-----------|
| 3/15/2011 | 2691 |

| |
|---|
| Bill To |
| PANTHER LLC PATRIOT COAL CORPORATION P.O. BOX 66823 ST. LOUIS, MO 63166-6823 |

| P.O. No. | Terms | Project |
|-------------|-------|---------|
| 543508-2573 | | |

| Quantity | Description | Rate | Amount |
|------------------------------|---|--------------|--------------|
| 11,308 | PARTIAL BILLING FOR WET BRANCH AREA HAUL ROAD EXCAVATION CY | 4.30 | 48,624.40 |
| 14,500 | ROADWAY STRUCTURAL FILL CY | 3.69 | 53,505.00 |
| Thank you for your business. | | Total | \$102,129.40 |

BULLDOG EXCAVATING, LLC

Invoice

PO BOX 58
 NAUGATUCK, WV 25685
 PHONE: 304-475-3400
 FAX: 304-475-3900

| Date | Invoice # |
|-----------|-----------|
| 5/26/2011 | 2706 |

| Bill To |
|---|
| PANTHER LLC PATRIOT COAL CORPORATION P.O. BOX 66823 ST. LOUIS, MO 63166-6823 |

| P.O. No. | Terms | Project |
|-------------|-------|---------|
| 543508-2573 | | |

| Quantity | Description | Rate | Amount |
|----------|--|------|------------|
| 48,075 | PARTIAL BILLING FOR WET BRANCH AREA HAUL ROAD EXCAVATION | 4.30 | 206,722.50 |

| | | |
|------------------------------|--------------|--------------|
| Thank you for your business. | Total | \$206,722.50 |
|------------------------------|--------------|--------------|

BULLDOG EXCAVATING, LLC

Invoice

PO BOX 58
 NAUGATUCK, WV 25685
 PHONE: 304-475-3400
 FAX: 304-475-3900

| Date | Invoice # |
|-----------|-----------|
| 8/29/2011 | 2733 |

| Bill To |
|---|
| PANTHER LLC PATRIOT COAL CORPORATION P.O. BOX 66823 ST. LOUIS, MO 63166-6823 |

| P.O. No. | Terms | Project |
|-------------|-------|---------|
| 543508-2573 | | |

| Quantity | Description | Rate | Amount |
|----------|--------------|----------|-----------|
| 18 | REVEGETATION | 1,000.00 | 18,000.00 |

| | | | |
|------------------------------|--|--------------|-------------|
| Thank you for your business. | | Total | \$18,000.00 |
|------------------------------|--|--------------|-------------|

Invoice

BULLDOG EXCAVATING, LLC

PO BOX 58
NAUGATUCK, WV 25685
PHONE: 304-475-3400
FAX: 304-475-3900

| Date | Invoice # |
|----------|-----------|
| 6/4/2012 | 2878 |

| Bill To |
|---|
| PANTHER LLC PATRIOT COAL CORPORATION P.O. BOX 66823 ST. LOUIS, MO 63166-6823 |

| P.O. No. | Terms | Project |
|-------------|-------|---------|
| 543508-2573 | | |

| Quantity | Description | Rate | Amount |
|------------------------------|--|--------------------------------|-------------------------------------|
| 11,000 | FINAL BILL ON WET BRANCH MOBILIZATION SEEDING EXCAVATION CY | 21,000.00 18,000.00 4.30 | 21,000.00 18,000.00 47,300.00 |
| Thank you for your business. | | Total | \$86,300.00 |