

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI

In re: )  
)  
PATRIOT COAL CORPORATION, ET AL. ) Chapter 11  
) Case No. 12-51502-659 (SCC)  
Debtors. ) Jointly Administered

**RESPONSE AND OBJECTION OF LONGWALL ASSOCIATES, INC. TO  
503(b)(9) REPORT AND NOTICE OF OBJECTION PROCEDURES**

Longwall Associates, Inc. (hereinafter “Longwall”) by and through its undersigned counsel, hereby objects to the Debtor’s 503(b)(9) Report and Notice of Objection Procedures (hereinafter the “Report”) [Docket # 3006] and in support thereof states as follows:

1. Longwall timely filed a Proof of Claim (Claim # 805) seeking administrative expense status pursuant to 11 U.S.C. § 503(b)(9) (hereinafter the “Claim”) for goods that were received by the Debtor within twenty (20) days before the date of commencement of this bankruptcy case. The Claim is listed in Exhibit A to the Report, which Exhibit is incorporated herein by reference.

2. On February 26, 2013, the Debtor filed the Report stating that the Claim has been paid as its sole grounds for disallowance of the Claim. However, Longwall has not received payment upon the Claim or otherwise for amounts asserted in the Claim.

3. Longwall expressly reserves all of its rights to assert additional objections to the Report on any and all grounds

WHEREFORE, Longwall Associates, Inc. respectfully requests that the Court sustain this Objection, that the Claim be allowed as filed, and such other and further relief as is proper and just.

Respectfully submitted.

JENKINS & KLING, P.C.

By:         /s/ Peter D. Kerth        

Peter D. Kerth #31680 MO  
150 North Meramec Ave., Ste. 400  
St. Louis, MO 63105  
(314) 721-2525  
(314) 721-5525 (facsimile)  
[pkerth@jenkinsklings.com](mailto:pkerth@jenkinsklings.com)

Attorneys for Longwall Associates, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the above and foregoing was served via electronic filing in the CM/ECF system of the U.S. Bankruptcy Court, Eastern District of Missouri upon all parties to this case requesting service by electronic filing and via facsimile transmission and United States Mail, postage prepaid, on the following parties on the 19th day of March, 2013.

**Debtors:**

Attn: Marguerite A. O'Connell, 503(b)(9) Claims  
Patriot Coal Corporation  
12312 Olive Boulevard, Suite 400  
St. Louis, Missouri 63141  
Facsimile: (314) 275-3626

**Debtor's Notice and Claims Agent:**

Patriot Coal Corporation  
c/o GCG, Inc.  
PO Box 9898  
Dublin, Ohio 43017  
Facsimile: (855) 687-2627

**Counsel to the Debtors:**

Attn: Michelle M. McGreal, Esq.  
and Brian M. Resnick, Esq.

Davis Polk & Wardwell, LLP  
450 Lexington Avenue  
New York, New York 10017  
Facsimile: (212) 607-7983

Attn: Lloyd A. Palans, Esq.  
and Brian C. Walsh, Esq.  
Bryan Cave LLP  
211 North Broadway, Suite 3600  
St. Louis, Missouri 63102  
Facsimile: (314) 259-2020

**Counsel to Administrative Agent for Debtor's Post-Petition Lenders:**

Attn: Marcia Goldstein, Esq.  
and Joseph Smohnsky, Esq.  
Weil, Gotshal & Manges, LL  
767 Fifth Avenue  
New York, New York 10153  
Facsimile: (212) 310-8007

Attn: Margot B. Schonholtz, Esq.  
and Ann Alfonso, Esq.  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, New York 10019  
Facsimile: (212) 728-8111

**Counsel to the Committee:**

Attn: Adam C. Rogoff, Esq.  
and Gregory G. Plotko, Esq.  
Kramer Levin Naftalis & Fankel LLP  
1177 Avenue of the Americas  
New York, New York 10036  
Facsimile: (212) 715-8000

Attn: Gregory D. Willard, Esq.  
and Angela L. Schisler, Esq.  
Carmody MacDonald PC  
120 South Central Avenue  
St. Louis, Missouri 63105-1705  
Facsimile: (314) 854-8660

**United States Trustee:**

Attn: Leonora S. Long, Esq.  
and Paul A. Randolph, Esq.  
Office of the United States Trustee  
111 South Tenth Street  
Suite 6353  
St. Louis, Missouri 63102  
Facsimile: (314) 539-2990

/s/ Peter D. Kerth