

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 C&A CUTTERHEAD, INC. TO
503(b)(9) REPORT AND NOTICE OF OBJECTION PROCEDURES**

C&A Cutterhead, Inc. (hereafter “C&A”) 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. C&A timely filed a Proof of Claim (Claim # 804) 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 on Exhibit A to the Report, which Exhibit is incorporated herein by reference.

2. On February 27, 2013, the Debtor filed the Report stating that the Claim has been paid as its sole grounds for disallowance of the Claim. However, C&A has not received payment upon the Claim or otherwise for amounts asserted in the Claim.

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

WHEREFORE, C&A Cutterhead, 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.

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/s/ Peter D. Kerth