

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 PROTECTIVE OBJECTION OF  
UNITED CENTRAL INDUSTRIAL SUPPLY COMPANY, LLC  
TO 503(b)(9) REPORT AND NOTICE OF OBJECTION PROCEDURES**

United Central Industrial Supply Company, LLC (hereinafter “United Central”) by and through its undersigned counsel, for its Response and Protective Objection to the Debtor’s 503(b)(9) Report and Notice of Objection Procedures (hereinafter the “Report”) [Docket # 3006] respectfully states as follows:

1. United Central timely filed seventeen (17) Proof of Claims seeking administrative expense status pursuant to 11 U.S.C. § 503(b)(9) (hereinafter the “Claims”) for goods that were received by the Debtors within twenty (20) days before the date of commencement of these bankruptcy cases. The Claims are listed on Exhibit A to the Report [at pages 41 and 42], which Exhibit is incorporated herein by reference.

2. On February 27, 2013, the Debtor filed the Report stating that the Claims have been paid as its sole grounds for disallowance of the Claims.

3. Pursuant to Letter Agreement dated January 30, 2013 entered into with the Debtors (the “Letter Agreement”), United Central became a participant in the Critical Vendor Payment Program established and authorized pursuant to an Order entered in this case on or about July 16, 2012. Pursuant to the Letter Agreement, the Debtors agreed to pay a negotiated balance of the Claims via twelve (12) monthly installment payments with the final installment



**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 19<sup>th</sup> day of March, 2013.

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**United States Trustee:**

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and Paul A. Randolph, Esq.  
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/s/ Peter D. Kerth