

each Plan is separately and uniquely affected by the Debtors' 1113/1114 Motion, more space is required to articulate the significant interests of each Plan with respect to the 1113/1114 Motion.

2. The Motion to Intervene also requires additional space to adequately explain the Plans' interest in the relief requested by the Debtors their 86-page memorandum of law filed in support of the 1113/1114 Motion.¹

3. In the interest of expediency, the Plans have combined the Motion to Intervene, the supporting memorandum of law and the motion for an emergency hearing into a single pleading. That pleading is 19 pages in length, including the signature of counsel and therefore exceeds the Court's page limitation by four pages.

4. For these reasons, the Plans respectfully request leave to file their Motion to Intervene.

WHEREFORE, for the reasons set forth herein, the Plans respectfully request that this Court grant them leave to file their Motion to Intervene in excess of the page limitation of L.R. 9004(C).

Dated: March 29, 2013

Respectfully submitted,

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¹ On March 28, 2013, the Debtors wrote to this Court, requesting that the Court schedule a teleconference to regarding third-party participation in the hearing on the 1113/1114 Motion (the "Letter"), asserting, among other things, that no parties other than the Debtors and the United Mine Workers of America ("UMWA") should be permitted to participate in the hearing on the 1113/1114 Motion. Because the Plans are interested parties in this contested matter, the Plans seek leave to intervene.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was filed on March 29, 2013 using the Court's CM/ECF system and that service will be accomplished by operation of that system upon all counsel of record, which includes counsel for all core parties.

/s/ Edward L. Dowd, Jr.