

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re

PATRIOT COAL CORPORATION, *et al.*,

Debtors.<sup>1</sup>

Chapter 11  
Case No. 12-51502-659  
(Jointly Administered)

Hearing Date:  
April 29, 2013 at 10:00 a.m.  
(prevailing Central Time)

Hearing Location:  
Courtroom 7 North

Re: ECF No. 3831

**THE DEBTORS' OBJECTIONS TO THE INTRODUCTION OF CERTAIN  
EXHIBITS IN CONNECTION WITH THE HEARING ON THE DEBTORS'  
MOTION TO REJECT COLLECTIVE BARGAINING AGREEMENTS AND  
TO MODIFY RETIREE BENEFITS PURSUANT TO 11 U.S.C. §§ 1113, 1114**

The Debtors hereby object to the introduction of the following exhibit by the United Mine Workers of America (the "UMWA") for use at the hearing relating to the Motion:

1. **Akunuri Expert Materials, Wood Mackenzie Coal Market Service as of November 2012:** Although relied upon by the UMWA's designated expert witness Srinivas Akunuri, the UMWA has produced only a selection of the November 2012 Wood Mackenzie coal forecast report and has refused to disclose all portions upon which Akunuri relied. The UMWA's suggestion that the Debtors purchase the report, at a cost of approximately \$20,000 to the estate, is not acceptable.

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<sup>1</sup> The Debtors are the entities listed on Schedule 1 attached to the Debtors' Motion to Reject Collective Bargaining Agreements and to Modify Retiree Benefits Pursuant to 11 U.S.C. §§ 1113, 1114 [ECF No. 3214] (the "**Motion**"). The employer tax identification numbers and addresses for each of the Debtors are set forth in the Debtors' chapter 11 petitions.

Dated: April 25, 2013  
New York, New York

Respectfully submitted,

/s/ Elliot Moskowitz

DAVIS POLK & WARDWELL LLP

Marshall S. Huebner  
Benjamin S. Kaminetzky  
Elliot Moskowitz  
Jonathan D. Martin  
Lara Samet

450 Lexington Avenue  
New York, New York 10017  
(212) 450-4000  
Fax: (212) 607-7983

*Counsel to the Debtors  
and Debtors in Possession*

-and-

BRYAN CAVE LLP

Lloyd A. Palans, #22650MO  
Brian C. Walsh, #58091MO  
Laura Uberti Hughes, #60732MO  
One Metropolitan Square  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
(314) 259-2000  
Fax: (314) 259-2020

*Local Counsel to the Debtors  
and Debtors in Possession*