

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:

PATRIOT COAL CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 12-51502-659

(Jointly Administered)

Hearing Date: July 23, 2013

Hearing Time: 10:00 a.m. Central

Location: Courtroom 7-N, St. Louis

DEBTORS' EIGHTH OMNIBUS OBJECTION TO CLAIMS
(Amended and Superseded Claims)

Patriot Coal Corporation and its affiliated debtors (the "Debtors"), pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, file this Eighth Omnibus Objection to Claims (the "Objection"). In support of the Objection, the Debtors show the Court as follows:

Relief Requested

1. By this Objection, the Debtors object to certain proofs of claim (the "Claims") listed on Exhibit A attached hereto because the Claims have been amended by subsequently filed proofs of claim. The Debtors request entry of an order, pursuant to Section 502 of the Bankruptcy Code and Fed. R. Bankr. P. 3007, finding that the Claims have been superseded by amendment and directing that the Claims be disallowed, without prejudice to any party's rights as to the amended and superseding proofs of claim.

2. **Parties receiving this Objection should locate their names on Exhibit A.** Any response to this Objection should include, among other things, (i) an appropriate caption, including the title and date of this Objection; (ii) the name of the claimant, both the EDMO and GCG claim numbers of the claim that the Debtors are seeking to disallow, and a description of

the basis for the amount claimed; (iii) a concise statement setting forth the reasons why the Court should not sustain this Objection, including, but not limited to, the specific factual and legal bases upon which the claimant relies in opposing this Objection; (iv) copies of any documentation and other evidence which the claimant will rely upon in opposing this Objection at a hearing; and (v) the name, address, telephone number and facsimile number of a person authorized to reconcile, settle or otherwise resolve the claim on the claimant's behalf. A claimant that cannot timely provide such documentation and other evidence should provide a detailed explanation as to why it is not possible to timely provide such documentation and other evidence.

Jurisdiction

3. This Court has jurisdiction over this Objection under 28 U.S.C. § 1334. Venue of this proceeding is proper pursuant to 28 U.S.C. § 1409. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

5. The Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code on July 9, 2012 in the United States Bankruptcy Court for the Southern District of New York.

6. On December 19, 2012, the Debtors' cases were transferred to the United States Bankruptcy Court for the Eastern District of Missouri [Dkt. No. 1789].

7. The bar date for filing proofs of claim was December 14, 2012 [Dkt. No. 1388].

8. On March 1, 2013, the Court entered its Order Establishing Procedures for Claims Objections [Dkt. No. 3021].

Objection and Argument

9. The Debtors object to the Claims identified on Exhibit A, incorporated herein by reference, because they have been amended and superseded by subsequently filed proofs of claim.¹

10. In the column entitled “Claims to be Disallowed,” Exhibit A sets forth the creditor’s name, the number assigned to the Claim by the Debtors’ claims agent, the number assigned to the Claim when it was docketed on the Court’s claim register, the Debtor against which the Claim was filed, the case number and the amount and classification of the Claim. In the column entitled “Surviving Claims,” Exhibit A lists the same information for each corresponding superseding claim (the “Surviving Claims”).

11. The Debtors have reviewed each of the Claims listed on Exhibit A. The Claims and the Surviving Claims are substantially similar. Specifically, the Claims correspond to the Surviving Claims in that both refer to the same creditor or an assignee of that creditor, but the Surviving Claim was filed subsequent to the Claim and sets forth an amended proof of claim amount and/or an amended basis for the proof of claim. *See* Declaration of Robert L. Mead, attached hereto as Exhibit B.

12. The Debtors request that the Court disallow the Claims because the relevant proofs of claim are preserved as Surviving Claims.

¹ Certain creditors listed on Exhibit A may be clients of one or more of the law firms representing the Debtors. Any dispute regarding this Objection will be handled by attorneys for the Debtors from a law firm that does not represent the applicable creditor.

13. This Objection does not affect the Surviving Claims; however, the Debtors reserve the right to object to the Surviving Claims in the future on any appropriate grounds.

WHEREFORE, the Debtors respectfully request that this Court:

- (a) disallow the Claims; and
- (b) grant such other and further relief as is just and proper.

Dated: June 20, 2013
St. Louis, Missouri

Respectfully submitted,
BRYAN CAVE LLP

/s/ Brian C. Walsh

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-and-

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Exhibit A - Amended & Superseded Claims

Omnibus Objection to Claims

Patriot Coal Corporation
12-51502 (KSS)

Note: Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

SEQ NO.	CLAIM(S) TO BE DISALLOWED				SURVIVING CLAIM(S)			
	NAME	GCG CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT
1	CHAIN SUPPLY CO., INC. PO BOX 305 MABSCOTT, WV 25871 Date Filed: 11/30/12 ED MO Date Filed: 03/07/13 Debtor: APPALACHIA MINE SERVICES, LLC	984	3948	Unsecured: \$214.86	CHAIN SUPPLY CO INC PO BOX 305 MABSCOTT, WV 25871 Date Filed: 12/14/12 ED MO Date Filed: 02/27/13 Debtor: APPALACHIA MINE SERVICES, LLC	3422	2150	Unsecured: \$119.16
2	CHAIN SUPPLY CO., INC. PO BOX 305 MABSCOTT, WV 25871 Date Filed: 11/30/12 ED MO Date Filed: 02/27/13 Debtor: EASTERN ASSOCIATED COAL, LLC	985	2901	Unsecured: \$9,753.30	CHAIN SUPPLY CO INC PO BOX 305 MABSCOTT, WV 25871 Date Filed: 12/14/12 ED MO Date Filed: 02/27/13 Debtor: EASTERN ASSOCIATED COAL, LLC	3423	2137	Unsecured: \$1,238.30
3	ENERGY MACHINERY INC C/O TANNOR PARTNERS CREDIT FUND, LP 150 GRAND STREET, SUITE 401 WHITE PLAINS, NY 10601 TRANSFEROR: ENERGY MACHINERY INC PO BOX 1022 BECKLEY, WV 25802 Date Filed: 08/27/12 ED MO Date Filed: 02/25/13 Debtor: KANAWHA EAGLE COAL, LLC	161	167	Secured: Unliquidated Unsecured: \$147,300.00	TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE OF ENERGY MACHINERY 150 GRAND ST STE 401 WHITE PLAINS, NY 10601 Date Filed: 12/13/12 ED MO Date Filed: 02/27/13 Debtor: KANAWHA EAGLE COAL, LLC	2255	1571	Admin: \$146,800.00 503(b)(9): \$146,800.00* Unsecured: \$500.00
4	ENERGY MACHINERY INC C/O TANNOR PARTNERS CREDIT FUND, LP 150 GRAND STREET, SUITE 401 WHITE PLAINS, NY 10601 TRANSFEROR: ENERGY MACHINERY INC PO BOX 1022 BECKLEY, WV 25802 Date Filed: 08/27/12 ED MO Date Filed: 02/25/13 Debtor: CATENARY COAL COMPANY, LLC	162	168	Secured: Unliquidated Unsecured: \$41,285.00	TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE OF ENERGY MACHINERY 150 GRAND ST STE 401 WHITE PLAINS, NY 10601 Date Filed: 12/13/12 ED MO Date Filed: 02/27/13 Debtor: CATENARY COAL COMPANY, LLC	2256	1572	Admin: \$41,085.00 503(b)(9): \$41,085.00* Unsecured: \$200.00

Exhibit A - Amended & Superseded Claims

Omnibus Objection to Claims

Patriot Coal Corporation
12-51502 (KSS)

Note: Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

SEQ NO.	CLAIM(S) TO BE DISALLOWED				SURVIVING CLAIM(S)			
	NAME	GCG CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT
5	JOHNSON INDUSTRIES INC C/O SIERRA LIQUIDITY FUND, LLC 2699 WHITE ROAD, SUITE 255 IRVINE, CA 92614 TRANSFEROR: JOHNSON INDUSTRIES INC 101 PINE FORK PIKEVILLE, KY 41501 Date Filed: 08/17/12 ED MO Date Filed: 02/25/13 Debtor: BLACK STALLION COAL COMPANY, LLC	101	107	Unsecured: \$12,222.34	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR JOHNSON INDUSTRIES - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614 Date Filed: 11/12/12 ED MO Date Filed: 02/25/13 Debtor: BLACK STALLION COAL COMPANY, LLC	470	426	Unsecured: \$4,433.59
5	JOHNSON INDUSTRIES INC C/O SIERRA LIQUIDITY FUND, LLC 2699 WHITE ROAD, SUITE 255 IRVINE, CA 92614 TRANSFEROR: JOHNSON INDUSTRIES INC 101 PINE FORK PIKEVILLE, KY 41501 Date Filed: 08/17/12 ED MO Date Filed: 02/25/13 Debtor: BLACK STALLION COAL COMPANY, LLC	101	107	Unsecured: \$12,222.34	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR JOHNSON INDUSTRIES - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614 Date Filed: 11/12/12 ED MO Date Filed: 02/25/13 Debtor: BLACK STALLION COAL COMPANY, LLC	471	427	Unsecured: \$7,788.75
6	JOHNSON INDUSTRIES INC C/O SIERRA LIQUIDITY FUND, LLC 2699 WHITE ROAD, SUITE 255 IRVINE, CA 92614 TRANSFEROR: JOHNSON INDUSTRIES INC 101 PINE FORK PIKEVILLE, KY 41501 Date Filed: 08/17/12 ED MO Date Filed: 02/25/13 Debtor: REMINGTON LLC	102	108	Unsecured: \$21,151.94	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR JOHNSON INDUSTRIES INC - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614 Date Filed: 11/12/12 ED MO Date Filed: 02/25/13 Debtor: REMINGTON LLC	472	428	Admin: \$8,066.82 503(b)(9): \$8,066.82* Unsecured: \$13,081.12

Exhibit A - Amended & Superseded Claims

Omnibus Objection to Claims

Patriot Coal Corporation
12-51502 (KSS)

Note: Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

SEQ NO.	CLAIM(S) TO BE DISALLOWED				SURVIVING CLAIM(S)			
	NAME	GCG CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT
7	KROFF CHEMICAL COMPANY C/O COFACE NORTH AMERICA INSURANCE CO 50 MILLSTONE RD BLDG 100 STE 360 EAST WINDSOR, NJ 08520 Date Filed: 08/13/12 ED MO Date Filed: 02/22/13 Debtor: PATRIOT COAL CORPORATION	72	77	Unsecured: \$33,971.75	KROFF CHEMICAL CO C/O COFACE NORTH AMERICAN INSURANCE CO 50 MILLSTONE RD BLDG 100 STE 360 EAST WINDSOR, NJ 08520 Date Filed: 12/13/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	2104	1373	Unsecured: \$77,896.30
8	PRESSURE TECH INDUSTRIAL CLEANING SERVICES INC PO BOX 84 WORTHINGTON, KY 41183 Date Filed: 09/14/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	211	215	Unsecured: \$41,116.12	PRESSURE TECH INDUSTRIAL CLEANING SERVICES INC PO BOX 84 WORTHINGTON, KY 41183 Date Filed: 12/10/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	1408	848	Unsecured: \$29,070.87
9	VERES QUALITY WATER INC 74 VERES DR CHAPMANVILLE, WV 25508 Date Filed: 10/27/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC	344	344	Admin: \$53,826.25 503(b)(9): \$53,826.25* Unsecured: \$4,473.75	CLAIMS RECOVERY GROUP LLC AS ASSIGNEE OF VERES QUALITY WATER INC 92 UNION AVENUE CRESSKILL, NJ 07626 Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: EASTERN ASSOCIATED COAL, LLC	2957	3677	Admin: \$53,826.25 503(b)(9): \$53,826.25*
9	VERES QUALITY WATER INC 74 VERES DR CHAPMANVILLE, WV 25508 Date Filed: 10/27/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC	344	344	Admin: \$53,826.25 503(b)(9): \$53,826.25* Unsecured: \$4,473.75	CLAIMS RECOVERY GROUP LLC AS ASSIGNEE OF VERES QUALITY WATER INC 92 UNION AVENUE CRESSKILL, NJ 07626 Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: EASTERN ASSOCIATED COAL, LLC	2958	3679	Unsecured: \$4,473.75
10	WEST VIRGINIA STATE TAX DEPARTMENT PO BOX 766 CHARLESTON, WV 25323 Date Filed: 11/03/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	381	363	Priority: \$3,559,138.52* Unsecured: \$105,701.17	WEST VIRGINIA STATE TAX DEPARTMENT PO BOX 766 CHARLESTON, WV 25323 Date Filed: 04/23/13 ED MO Date Filed: 04/23/13 Debtor: PATRIOT COAL CORPORATION	4003	363	Priority: \$5,159,410.61 Unsecured: \$160,540.06

Exhibit A - Amended & Superseded Claims

Omnibus Objection to Claims

Patriot Coal Corporation
12-51502 (KSS)

Note: Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

SEQ NO.	CLAIM(S) TO BE DISALLOWED				SURVIVING CLAIM(S)			
	NAME	GCG CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	ED MO CLAIM NO.	CLAIM AMOUNT
11	WHITE ARMATURE WORKS INC ATTN STEVE SONGER 4 STONECREST DRIVE HUNTINGTON, WV 25701 Date Filed: 09/14/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	224	224	Unsecured: \$68,802.00	WHITE ARMATURE WORKS INC PO BOX 330 MALLORY, WV 25634 Date Filed: 11/19/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	711	501	Unsecured: \$62,098.56
12	WHITE ARMATURE WORKS INC PO BOX 330 MALLORY, WV 25634 Date Filed: 11/19/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	711	501	Unsecured: \$62,098.56	WHITE ARMATURE WORKS CORP 1150 HUFF CREEK HWY MALLORY, WV 25634 Date Filed: 12/10/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	1460	915	Unsecured: \$47,227.94

* Denotes an unliquidated component.

Any 503(b)(9) amount is included in the Admin amount as a subset.

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:

PATRIOT COAL CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 12-51502-659

(Jointly Administered)

**DECLARATION OF ROBERT L. MEAD IN SUPPORT
OF DEBTORS' EIGHTH OMNIBUS OBJECTION TO CLAIMS**

Robert L. Mead declares, pursuant to 28 U.S.C. § 1746, to the best of his knowledge and based upon the documents available to him, as follows:

1. I am Vice President & Treasurer of Patriot Coal Corporation.
2. I, or my colleagues, have reviewed each of the claims listed on Exhibit A to the Debtors' Eighth Omnibus Claims Objection.
3. The Claims correspond to the Surviving Claims in that both refer to the same creditor or an assignee of that creditor, but, in each case, the Surviving Claim was filed subsequent to the Claim and sets forth an amended proof of claim amount and/or an amended basis for the proof of claim.
4. The facts set forth in this declaration are based on my firsthand knowledge as the person at Patriot responsible for the overseeing the claims reconciliation process, as well as on information provided to me by other employees of the Debtors involved in the claims reconciliation process.

Dated: June 20, 2013

/s/ Robert L. Mead

Robert L. Mead