

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

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CLERK, US BANKRUPTCY COURT  
EASTERN DISTRICT  
ST. LOUIS, MISSOURI

In re:

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

PATRIOT COAL CORPORATION, et al.,

Debtors

Hearing Date: July 23, 2013  
Hearing Time: 10:00 a.m. Central  
Location: Courtroom 7-N, St. Louis

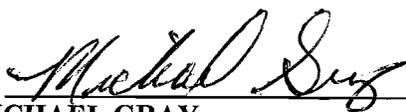
**CREDITOR RESPONSE TO OMNIBUS OBJECTION TO CLAIM**

NOW COMES, Guyan Service Company, a West Virginia Corporation, EDMO/GCG Claim No. 240-1/237, and in response to the aforesaid objection does state and aver as follows:

1. That Guyan Service Company entered into a contract to provide goods and services to Patriot Coal Corp. which issued a purchase order 590552-2290 for the purchase of said goods and services.
2. That the agreement was approved by Toby Waller, an agent for the Debtor herein, in the amount of 140,800.00.
3. That the claim set forth herein represents the unpaid balance upon said contract which was billed to the Debtor of June 28, 2012 by Invoice No. 12-412. (see attached hereto Ex. 1).
4. That upon information and belief, Debtor may have used internal accounting procedures not known to the Creditor to assign the debt to various subsidiaries and/or sister companies.
5. That no objection was made to the invoice at time same was submitted to Debtor and Creditor was not asked to re-bill any other entity for the goods and services provided.
6. That Creditor will be prejudiced by this discharge in so much as no other claim has been filed for this amount with any other debtor.

Wherefore, the Creditor moves that the Objection be denied and that the Court grant such other and further relief as is just and equitable.

**GUYAN SERVICE COMPANY, a West  
Virginia Corporation,**

By   
**MICHAEL GRAY**  
ITS: *Vice President*

**POST OFFICE BOX 1603  
LOGAN, WV 25601**

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**CERTIFICATE OF SERVICE**

The undersigned, Guyan Service Company, a West Virginia Corporation, by Michael Gray, does hereby certify that he has this the 17<sup>th</sup> day of July, 2013, served a true copy of the attached upon Counsel for Debtors and Counsel for the Official Committee of Unsecured Creditors by depositing a true copy of same in the United States Mail at Logan, West Virginia, postage prepaid, or via facsimile, or via hand delivery to the person(s) listed below:

Bryan Cave, LLP  
Brian C. Walsh, Esq.  
One Metropolitan Square  
211 N. Broadway, Suite 3600  
St. Louis, Missouri 63102

-and-

Davis, Polk & Wardwell LLP  
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Damian s. Schaible  
Brian M. Resnick  
Michelle M. McGreal  
450 Lexington Avenue  
New York, New York 10017

-and-

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1177 Avenue of the Americas  
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Attn: Thomas Moers Mayer, Adam C. Rogoff and  
Gregory G. Plotko

GUYAN SERVICE COMPANY, a West  
Virginia Corporation,

BY: Michael Gray

Michael Gray

ITS: Vice President

Post Office Box 1603  
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