

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

PATRIOT COAL CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 12-51502-659

(Jointly Administered)

Re: ECF No. 4415

**DEBTORS' MOTION FOR LEAVE TO EXCEED THE PAGE LIMITATION
IN THEIR THIRD MOTION FOR AN ORDER EXTENDING DEBTORS'
EXCLUSIVE PERIODS WITHIN WHICH TO FILE A PLAN OF
REORGANIZATION AND SOLICIT VOTES THEREON**

Patriot Coal Corporation and its subsidiaries that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**”), by and through their undersigned counsel, hereby respectfully submit this motion (the “**Motion**”) for an order pursuant to rule 9004(C) of the Local Rules of the Bankruptcy Court for the Eastern District of Missouri granting the Debtors leave to exceed the Court’s page limitation in their Third Motion for an Order Extending Debtors’ Exclusive Periods Within Which to File a Plan of Reorganization and Solicit Votes Thereon [ECF No. 4415] (the “**Exclusivity Motion**”).² In support of this Motion, the Debtors state as follows:

1. By the Exclusivity Motion, the Debtors seek an order extending the Debtors’ exclusive periods within which to file and solicit acceptances of a plan of reorganization. The Debtors seek these extensions to avoid the necessity of having to file

¹ The Debtors are the entities listed on Schedule 1 to the Exclusivity Motion. The employer tax identification numbers and addresses for each of the Debtors are set forth in the Debtors’ chapter 11 petitions.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Exclusivity Motion.

and prosecute a plan of reorganization prematurely and to ensure that their plan of reorganization best addresses the interests of the Debtors and their employees, creditors and estates.

2. The Debtors have made every effort to comply with the applicable page limitation. However, given the substantial progress that has been made on multiple fronts over the past few months, the Debtors are unable to adequately summarize the current status of the case and the necessity for an extension of the Debtors' Exclusive Periods in fifteen pages. Additional pages were required to fully articulate the Debtors' positions.

3. The Debtors respectfully request leave to exceed the applicable page limitation by 2 pages.

WHEREFORE, for the foregoing reasons, the Debtors respectfully request leave to exceed the applicable page limitation by 2 pages in their Exclusivity Motion, and for such other relief as the Court deems just and proper.

Dated: July 30, 2013
New York, New York

Respectfully submitted,

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