

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. 4460

**DEBTORS' MOTION FOR LEAVE TO EXCEED THE PAGE LIMITATION
IN THE MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER PURSUANT TO
11 U.S.C. §§ 363(b), 1113, 1114(e) AND 105(a) AND FED. R. BANKR. P. 9019(a)
AUTHORIZING ENTRY INTO COLLECTIVE BARGAINING AGREEMENTS
AND MEMORANDUM OF UNDERSTANDING
WITH THE UNITED MINE WORKERS OF AMERICA**

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 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 the Motion of the Debtors for Entry of an Order pursuant to 11 U.S.C. §§ 363(b), 1113, 1114(e) and 105(a) and Fed. R. Bankr. P. 9019(a) Authorizing Entry into Collective Bargaining Agreements and Memorandum of Understanding with the United Mine Workers of America [ECF No. 4460] (the “**Motion**”).² In support of this motion, the Debtors state as follows:

¹ The Debtors are the entities listed on Schedule 1 attached to the 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 Motion.

1. The Debtors are seeking authority to, among other things, enter into new collective bargaining agreements and a memorandum of understanding with the UMWA. The Settlements consensually resolve numerous issues regarding the Debtors' legacy labor costs and are possibly the most significant development in these chapter 11 cases. The Settlements are the result of months of complex negotiations between the Debtors and the UMWA.

2. The Debtors have made every effort to comply with the applicable page limitation. However, given the breadth, complexity and importance of the issues involved, the Debtors are unable to adequately provide the Court and other parties in interest with sufficient background on, and explanation of, the Settlements in fifteen pages. Additional pages were required to describe the Settlements and fully articulate the Debtors' positions with respect thereto.

3. The Debtors respectfully request leave to exceed the applicable page limitation by 9 pages.

WHEREFORE, for the foregoing reasons, the Debtors respectfully request leave to exceed the applicable page limitation by 9 pages in their Motion, and for such other relief as the Court deems just and proper.

Dated: August 13, 2013
New York, New York

Respectfully submitted,

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