

**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: September 24, 2013

Hearing Time: 10:00 a.m. Central

Location: Courtroom 7-N, St. Louis

**DEBTORS' FIFTEENTH OMNIBUS OBJECTION TO CLAIMS**  
**(Redundant Claims)**

Patriot Coal Corporation and its affiliated debtors (the "Debtors"), pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, respectfully file this Fifteenth 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 are redundant of other proofs of claim filed by the same creditors, and there is no legal or factual basis for the Claims. 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 redundantly filed and directing that the Claims be disallowed, without prejudice to any party's rights as to the surviving counterpart 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 are redundant of other proofs of claim filed against the Debtors.<sup>1</sup>

10. In the column entitled “Claim(s) 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, and the amount and classification of the Claim. In the column entitled “Surviving Claim(s),” Exhibit A lists the same information for each corresponding proof of claim filed by the same creditor (the “Surviving Claims”).

11. The Debtors have reviewed each of the Claims listed on Exhibit A. The Claims are identical to the Surviving Claims, except that they were filed against a second Debtor. For certain of the Claims, the amount claimed differs from that sought in the corresponding Surviving Claim because the Surviving Claim amount reflects previous sustained objections, or because the creditor has aggregated several claims against multiple Debtors into a claim against another Debtor.

12. The Debtors have performed a review of their records and believe that each Surviving Claim was filed against the correct Debtor. The Debtors further believe that there is

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<sup>1</sup> 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.

no legal or factual basis on which the Debtor against which each Claim was asserted would be liable therefor. *See* Declaration of Robert L. Mead, attached hereto as Exhibit B.

13. The Debtors request that the Court disallow the Claims because the Surviving Claims reflect the only legitimate liabilities of the Debtors relating to the facts and circumstances underlying the Surviving Claims.

14. The Debtors request that the Court's order sustaining this Objection be without prejudice to the right of any party in interest to object to the Claims, as modified, on any ground.

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: August 23, 2013  
St. Louis, Missouri

Respectfully submitted,  
BRYAN CAVE LLP

/s/ Laura Uberti Hughes  
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Brian C. Walsh, #58091MO  
Laura Uberti Hughes, #60732MO  
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(314) 259-2000  
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*Local Counsel to the Debtors  
and Debtors in Possession*

-and-

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*Counsel to the Debtors  
and Debtors in Possession*

## Exhibit A - Redundant 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	ALPHA ENGINEERING SERVICES INC 216 BUSINESS STREET BECKLEY, WV 25801  Date Filed: 05/31/13 ED MO Date Filed: 02/27/13 Debtor: PATRIOT COAL CORPORATION	4065	948-2	Secured: \$214,010.28	ALPHA ENGINEERING SERVICES INC 216 BUSINESS STREET BECKLEY, WV 25801  Date Filed: 05/31/13 ED MO Date Filed: 02/27/13 Debtor: KANAWHA EAGLE COAL, LLC	4064	460-2	Secured: \$214,010.28
2	BLACK DIAMOND 2 CONSTRUCTION INC C/O ALLEN KUEHNLE STOVALL & NEUMAN LLP ATTN THOMAS R ALLEN 17 S HIGH ST STE 1220 COLUMBUS, OH 43215  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	1842	1150-1	Unsecured: \$107,597.00	BLACK DIAMOND 2 CONSTRUCTION INC C/O ALLEN KUEHNLE STOVALL & NEUMAN LLP ATTN THOMAS R ALLEN 17 S HIGH ST STE 1220 COLUMBUS, OH 43215  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: PANTHER LLC	1841	1149-1	Unsecured: \$107,597.00
3	BLACK DIAMOND 2 CONSTRUCTION INC C/O ALLEN KUEHNLE STOVALL & NEUMAN LLP ATTN THOMAS R ALLEN 17 S HIGH ST STE 1220 COLUMBUS, OH 43215  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION	1843	1152-1	Unsecured: \$18,353.58	BLACK DIAMOND 2 CONSTRUCTION INC C/O ALLEN KUEHNLE STOVALL & NEUMAN LLP ATTN THOMAS R ALLEN 17 S HIGH ST STE 1220 COLUMBUS, OH 43215  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: HOBET MINING, LLC	1844	1151-1	Unsecured: \$18,353.58
4	BLACK DIAMOND 2 CONSTRUCTION INC C/O ALLEN KUEHNLE STOVALL & NEUMAN LLP ATTN THOMAS R ALLEN 17 SOUTH HIGH ST STE 1220 COLUMBUS, OH 43215  Date Filed: 12/12/12 ED MO Date Filed: 02/28/13 Debtor: PATRIOT COAL CORPORATION	1839	3692-1	Unsecured: \$37,402.00	BLACK DIAMOND 2 CONSTRUCTION INC C/O ALLEN KUEHNLE STOVALL & NEUMAN LLP ATTN THOMAS R ALLEN 17 S HIGH ST STE 1220 COLUMBUS, OH 43215  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC	1840	1147-1	Unsecured: \$37,402.00
5	CSX TRANSPORTATION INC C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E. CARY ST ONE JAMES CT RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: PATRIOT COAL CORPORATION	3583	3647-1	Unsecured: \$636,438.36*	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E. CARY ST ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: TC SALES COMPANY, LLC	3581	3649-1	Unsecured: \$636,438.36*

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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
6	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E. CARY ST ONE JAMES CTR RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: ROBIN LAND COMPANY, LLC	3576	3702-1	Unsecured: \$161,934.16*	CSX TRANSPORTATION INC C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E CARY STREET ONE JAMES CTR RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: TC SALES COMPANY, LLC	3582	3700-1	Unsecured: \$161,934.16*
7	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN: JOHN H. MADDOCK, III, ESQ. 901 E. CARY STREET, ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: CATENARY COAL COMPANY, LLC	3579	3698-1	Unsecured: \$161,934.16*	CSX TRANSPORTATION INC C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E CARY STREET ONE JAMES CTR RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: TC SALES COMPANY, LLC	3582	3700-1	Unsecured: \$161,934.16*
8	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN: JOHN H. MADDOCK, III, ESQ. 901 E. CARY STREET, ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: ROBIN LAND COMPANY, LLC	3580	3650-1	Unsecured: \$636,438.36*	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E. CARY ST ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: TC SALES COMPANY, LLC	3581	3649-1	Unsecured: \$636,438.36*
9	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN: JOHN H. MADDOCK, III, ESQ. 901 E. CARY STREET, ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: PATRIOT COAL CORPORATION	3584	3699-1	Unsecured: \$161,934.16*	CSX TRANSPORTATION INC C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E CARY STREET ONE JAMES CTR RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: TC SALES COMPANY, LLC	3582	3700-1	Unsecured: \$161,934.16*

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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
10	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN: JOHN H. MADDOCK, III, ESQ 901 E. CARY STREET, ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: CATENARY COAL COMPANY, LLC	3578	3648-1	Unsecured: \$636,438.36*	CSX TRANSPORTATION, INC. C/O MCGUIREWOODS LLP ATTN JOHN H MADDOCK III, ESQ 901 E. CARY ST ONE JAMES CENTER RICHMOND, VA 23219  Date Filed: 12/14/12 ED MO Date Filed: 02/28/13 Debtor: TC SALES COMPANY, LLC	3581	3649-1	Unsecured: \$636,438.36*
11	ENVIRONMENTAL RESOURCE MANAGEMENT CONSULTING LLC C/O DINSMORE & SHOHL LLP ATTN ELLEN ARVIN KENNEDY ESQ 250 W MAIN ST STE 1400 LEXINGTON, KY 40504  Date Filed: 12/14/12 ED MO Date Filed: 02/27/13 Debtor: HERITAGE COAL COMPANY LLC	3097	2044-1	Unsecured: \$39,133.10	ENVIRONMENTAL RESOURCE MANAGEMENT CONSULTING LLC C/O DINSMORE & SHOHL LLP ATTN ELLEN ARVIN KENNEDY ESQ 250 W MAIN ST STE 1400 LEXINGTON, KY 40507  Date Filed: 12/14/12 ED MO Date Filed: 02/27/13 Debtor: PATRIOT COAL COMPANY, L.P.	3098	2046-1	Unsecured: \$2,262.50
12	HAUHINCO LP C/O COHEN & GRIGSBY PC ATTN JILL LOCNIKAR BRADLEY ESQ 625 LIBERTY AVE PITTSBURGH, PA 15222  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: SPEED MINING LLC	1870	1136-1	Unsecured: \$81,353.21	HAUHINCO LP C/O COHEN & GRIGSBY PC ATTN JILL LOCNIKAR BRADLEY ESQ 625 LIBERTY AVE PITTSBURGH, PA 15222  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: PANTHER LLC	1873	1139-1	Unsecured: \$79,050.86
13	HAUHINCO LP C/O COHEN & GRIGSBY PC ATTN JILL LOCNIKAR BRADLEY ESQ 625 LIBERTY AVE PITTSBURGH, PA 15222  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: MAGNUM COAL COMPANY LLC	1877	1143-1	Unsecured: \$81,353.21	HAUHINCO LP C/O COHEN & GRIGSBY PC ATTN JILL LOCNIKAR BRADLEY ESQ 625 LIBERTY AVE PITTSBURGH, PA 15222  Date Filed: 12/12/12 ED MO Date Filed: 02/25/13 Debtor: PANTHER LLC	1873	1139-1	Unsecured: \$79,050.86

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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
14	INDUSTRIAL CONTRACTING OF FAIRMONT, INC. ATTN: DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ASSOCIATED COAL, LLC	3983	3966-1	Unsecured: \$118,000.00	INDUSTRIAL CONTRACTING OF FAIRMONT, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ROYALTY, LLC	3977	3967-1	Secured: \$118,000.00* Unsecured: \$0.00
15	INDUSTRIAL CONTRACTING OF FAIRMONT, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: HOBET MINING, LLC	3980	3968-1	Unsecured: \$223,709.00	INDUSTRIAL CONTRACTING OF FAIRMONT, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: ROBIN LAND COMPANY, LLC	3975	3969-1	Secured: \$223,709.00*
16	INDUSTRIAL RESOURCES, INC. ATTN: DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ASSOCIATED COAL, LLC	3984	3970-1	Unsecured: \$34,734.00	INDUSTRIAL RESOURCES, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ROYALTY, LLC	3978	3971-1	Secured: \$34,734.00*
17	METSO MINERALS INDUSTRIES, INC. PO BOX 945859 ATLANTA, GA 30394  Date Filed: 01/14/13 ED MO Date Filed: 02/27/13 Debtor: PATRIOT COAL CORPORATION	3694	2899-1	Unsecured: \$44,566.79	METSO MINERALS INDUSTRIES INC PO BOX 945859 ATLANTA, GA 30394  Date Filed: 01/14/13 ED MO Date Filed: 02/27/13 Debtor: HERITAGE COAL COMPANY LLC	3695	2316-1	Unsecured: \$44,566.79
18	PETROLEUM PRODUCTS LLC ATTN KRISTIN K SEABROOK, GENERAL COUNSEL PILOT FLYING J 5508 LONAS DR KNOXVILLE, TN 37909  Date Filed: 12/14/12 ED MO Date Filed: 03/21/13 Debtor: PATRIOT COAL CORPORATION	2572	3872-2	Admin: \$2,583,349.82 503(b)(9): \$2,583,349.82* Unsecured: \$291,639.03	PETROLEUM PRODUCTS LLC ATTN KRISTIN K SEABROOK, GENERAL COUNSEL PILOT FLYING J 5508 LONAS DR KNOXVILLE, TN 37909  Date Filed: 12/13/12 ED MO Date Filed: 03/21/13 Debtor: APOGEE COAL COMPANY, LLC	2361	3869-2	Admin: \$1,255,534.23 503(b)(9): \$1,255,534.23* Unsecured: \$53,486.95

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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
19	SALEM ELECTRIC COMPANY C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ASSOCIATED COAL, LLC	3981	3979-1	Unsecured: \$7,280.00	SALEM ELECTRIC COMPANY C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ROYALTY, LLC	3974	3978-1	Secured: \$7,280.00*
20	WEST VIRGINIA ELECTRIC INDUSTRIES, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: HOBET MINING, LLC	3982	3983-1	Unsecured: \$3,001.02	WEST VIRGINIA ELECTRIC INDUSTRIES, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: ROBIN LAND COMPANY, LLC	3976	3980-1	Secured: \$3,001.02*
21	WEST VIRGINIA ELECTRIC INDUSTRIES, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ASSOCIATED COAL, LLC	3985	3982-1	Unsecured: \$106,809.00	WEST VIRGINIA ELECTRIC INDUSTRIES, INC. C/O DAVID A. SOSNE 8909 LADUE ROAD ST. LOUIS, MO 63124  Date Filed: 03/13/13 ED MO Date Filed: 04/15/13 Debtor: EASTERN ROYALTY, LLC	3979	3981-1	Secured: \$106,809.00*

\* 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' FIFTEENTH 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' Fifteenth Omnibus Claims Objection.
3. The Debtors have reviewed each of the Claims listed on Exhibit A. The Claims are identical to the Surviving Claims, except that they were filed against a second Debtor. For certain of the Claims, the amount claimed differs from that sought in the corresponding Surviving Claim because the Surviving Claim amount reflects previous sustained objections, or because the creditor has aggregated several claims against multiple Debtors into a claim against another Debtor.
4. The Debtors have performed a review of their records and believe that each Surviving Claim was filed against the correct Debtor. The Debtors further believe that there is no legal or factual basis on which the Debtor against which each Claim was asserted would be liable therefor.

5. 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.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed on August 22, 2013.

/s/ Robert L. Mead  
Robert L. Mead