

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) Case No. 12-51502-659
) Chapter 11
PATRIOT COAL CORPORATION, et al.,) (Jointly Administered)
)
Debtors.)
) Hearing Date: January 28, 2014
) Hearing Time: 10:00 a.m. Central
) Location: Courtroom 7-N, St. Louis
)

RESPONSE TO REORGANIZED DEBTOR'S TWENTY-FOURTH
OMNIBUS OBJECTION TO CLAIMS
(Late-Filed Claims)

COMES NOW Tracy A. Brown and The Law Office of Tracy A. Brown, P.C. on behalf of Mark Alan Atkinson, of the law firm of Atkinson & Polak, PLLC, and respectfully requests that the hearing scheduled for January 28, 2014 be continued. A Motion to Allow the Claims for both Josh D. Chafin (Claim # 4140) and Albert L. Hoosier (Claim #4141) to be allowed as Tardy / Late Filed Claims.

Dated: January 21, 2014

The Law Office of Tracy A. Brown, P. C.

By: /s/Tracy A. Brown
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Certificate of Service

The undersigned hereby certifies that a copy of the above and foregoing was served upon Bryan Cave LLP c/o Laura Uberti Hughes, 211 N. Broadway, Suite 3600, St. Louis, MO 63102, Davis Polk & Wardell LLP, 450 Lexington Ave., New York, New York 10017 and any attorneys who have requested Notice by operation of the Court's CM/ECF system on this 21st day of January, 2014.

/s/
Debbie Gibson