

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI

In Re: Patriot Coal Corporation, <i>et al.</i>, Debtors.	Chapter 11 Cause No. 12-51502-659 Hon. Kathy A. Surratt-States (Jointly Administered)
Robin Land Company, LLC, Plaintiff, v. STB Ventures, Inc., <i>et al.</i>, Defendants.	Adv. Proc. No. 12-04355-659

**STB VENTURES, INC.’S MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS
IN ITS REPLY TO ROBIN LAND COMPANY, LLC’S OBJECTION TO THE MOTION
OF STB VENTURES, INC. UNDER 11 U.S.C. § 365(D)(3) TO (I) COMPEL ROBIN
LAND COMPANY, LLC TO PAY PART OR ALL OF THE POST-PETITION
AMOUNTS DUE UNDER THE STB OVERRIDE AGREEMENT OR, (II) IN THE
ALTERNATIVE, TO PROVIDE STB VENTURES, INC. ADEQUATE PROTECTION
OF ITS INTERESTS UNDER THE STB OVERRIDE AGREEMENT**

Defendant STB Ventures, Inc. (“STB”) hereby moves the Court pursuant to Local Rule 9004C for an order granting it leave to exceed this Court’s 15-page limitation in its Reply to Robin Land Company, LLC’s Objection to the Motion of STB Ventures, Inc. under 11 U.S.C. § 365(d)(3) to (I) Compel Robin Land Company, LLC to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement or, (II) in the Alternative, to Provide STB Ventures, Inc. Adequate Protection of Its Interests Under the STB Override Agreement (the “Motion to Exceed Page Limitations”). In support of its Motion to Exceed Page Limitations, STB states as follows:

1. STB has filed concurrently herewith its Reply to Robin Land Company, LLC's Objection to the Motion of STB Ventures, Inc. under 11 U.S.C. § 365(d)(3) to (I) Compel Robin Land Company, LLC to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement or, (II) in the Alternative, to Provide STB Ventures, Inc. Adequate Protection of Its Interests Under the STB Override Agreement (the "Reply") [CM/ECF Doc. No. 65].

2. The Reply necessarily identifies the factual and legal misstatements made by Robin Land Company, LLC in its Objection to the Motion of STB Ventures, Inc. under 11 U.S.C. § 365(d)(3) to (I) Compel Robin Land Company, LLC to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement or, (II) in the Alternative, to Provide STB Ventures, Inc. Adequate Protection of Its Interests Under the STB Override Agreement (the "Objection").

3. The Reply also provides additional analysis in support of its requested relief under STB Ventures, Inc.'s Motion (I) Under Bankruptcy Code § 365(d)(3) to Compel Robin Land Company to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement Because (A) Payment of the STB Override is a Condition of at Least One Unexpired Nonresidential Real Property Lease, and/or (B) the STB Override Agreement is Integrated with Two Unexpired Nonresidential Real Property Leases, or (II) in the Alternative, under Bankruptcy Code § 363 to Provide STB Ventures Adequate Protection of its Interests under the STB Override Agreement (the "Motion").

4. As a consequence, the Motion exceeds the Court's 15-page limitations by approximately five pages.

5. STB has endeavored to be concise in its Reply, but believes that the additional pages in excess of the 15-page limitation are necessary to adequately set forth the relevant facts and argue the applicable legal theories.

6. Thus, STB requests leave to exceed the Court's 15-page limitation by approximately five pages in its Reply.

WHEREFORE, for the foregoing reasons, STB respectfully requests (i) leave from this Court to file its Reply in its current form, notwithstanding the fact that the Reply exceeds this Court's 15-page limitation by approximately five pages, and (ii) such other relief as this Court deems just and proper.

Dated: April 8, 2013

Respectfully submitted,

By: /s/ Joseph G. Bunn
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of April, 2013, a true and correct copy of *STB Ventures, Inc.'s Motion for Leave to Exceed Page Limitations in its Reply to Robin Land Company, LLC's Objection to the Motion of STB Ventures, Inc. under 11 U.S.C. § 365(d)(3) to (I) Compel Robin Land Company, LLC to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement or, (II) in the Alternative, to Provide STB Ventures, Inc. Adequate Protection of Its Interests Under the STB Override Agreement* was served via CM/ECF notification on all parties receiving such notification.

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