

**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: August 20, 2013

Hearing Time: 10:00 a.m. Central

Location: Courtroom 7-N, St. Louis

DEBTORS' THIRTEENTH OMNIBUS OBJECTION TO CLAIMS
(Amended and Superseded Claims)

Patriot Coal Corporation and its affiliated debtors (the "Debtors"), pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, file this Thirteenth 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 have been amended by subsequently filed proofs of claim. 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 P. 3007, finding that the Claims have been superseded by amendment and directing that the Claims be disallowed, without prejudice to any party's rights as to the amended and superseding proofs of claim.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 have been amended and superseded by subsequently filed proofs of claim.¹

10. In the column entitled “Claims 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 Claims,” Exhibit A lists the same information for each corresponding superseding claim (the “Surviving Claims”).

11. The Debtors have reviewed each of the Claims listed on Exhibit A. The Claims and the Surviving Claims are substantially similar. Specifically, the Claims correspond to the Surviving Claims in that both refer to the same creditor or an assignee of that creditor, but the Surviving Claim was filed subsequent to the Claim and sets forth an amended proof of claim amount and/or an amended basis for the proof of claim. *See* Declaration of Robert L. Mead, attached hereto as Exhibit B.

12. The Debtors request that the Court disallow the Claims because the relevant proofs of claim are preserved as Surviving Claims.

¹ 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.

13. This Objection does not affect the Surviving Claims; however, the Debtors reserve the right to object to the Surviving Claims in the future on any appropriate grounds.

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: July 19, 2013
St. Louis, Missouri

Respectfully submitted,
BRYAN CAVE LLP

/s/ Laura Uberti Hughes
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*Local Counsel to the Debtors
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-and-

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Exhibit A - Amended & Superseded 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	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: REMINGTON LLC	3735	2345-1	Secured: \$369,901.03	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: REMINGTON LLC	4047	2345-2	Secured: Unliquidated Unsecured: \$369,901.03
2	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: OHIO COUNTY COAL COMPANY, LLC	3737	2347-1	Secured: \$623,868.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: OHIO COUNTY COAL COMPANY, LLC	4046	2347-2	Secured: Unliquidated Unsecured: \$623,868.00
3	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: COYOTE COAL COMPANY LLC	3738	2348-1	Secured: \$300.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: COYOTE COAL COMPANY LLC	4045	2348-2	Secured: Unliquidated Unsecured: \$300.00
4	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: GATEWAY EAGLE COAL COMPANY, LLC	3740	2350-1	Secured: \$555,946.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: GATEWAY EAGLE COAL COMPANY, LLC	4044	2350-2	Secured: Unliquidated Unsecured: \$555,946.00

Exhibit A - Amended & Superseded 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
5	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: APOGEE COAL COMPANY, LLC	3741	2351-1	Secured: \$142,225.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: APOGEE COAL COMPANY, LLC	4043	2351-2	Secured: Unliquidated Unsecured: \$142,225.00
6	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: CATENARY COAL COMPANY, LLC	3742	2352-1	Secured: \$1,665.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: CATENARY COAL COMPANY, LLC	4042	2352-2	Secured: Unliquidated Unsecured: \$1,665.00
7	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: EMERALD PROCESSING, L.L.C.	3743	2353-1	Secured: \$1,026.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: EMERALD PROCESSING, L.L.C.	4041	2353-2	Secured: Unliquidated Unsecured: \$1,026.00
8	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: GRAND EAGLE MINING, LLC	3744	2354-1	Secured: \$9,243.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: GRAND EAGLE MINING, LLC	4040	2354-2	Secured: Unliquidated Unsecured: \$9,243.00

Exhibit A - Amended & Superseded 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
9	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: PINE RIDGE COAL COMPANY, LLC	3745	2355-1	Secured: \$1,740,108.53	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: PINE RIDGE COAL COMPANY, LLC	4039	2355-2	Secured: Unliquidated Unsecured: \$1,740,108.53
10	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: HERITAGE COAL COMPANY LLC	3746	2356-1	Secured: \$10,604.00	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: HERITAGE COAL COMPANY LLC	4038	2356-2	Secured: Unliquidated Unsecured: \$10,604.00
11	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: IO COAL LLC	3748	2358-1	Secured: \$10,922.00	MINE SAFETY AND HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: IO COAL LLC	4037	2358-2	Secured: Unliquidated Unsecured: \$10,922.00
12	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: WEATHERBY PROCESSING LLC	3749	2359-1	Secured: \$745.00	MINE SAFETY AND HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: WEATHERBY PROCESSING LLC	4036	2359-2	Secured: Unliquidated Unsecured: \$745.00

Exhibit A - Amended & Superseded 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
13	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: COAL CLEAN LLC	3751	2361-1	Secured: \$1,376.00	MINE SAFETY AND HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: COAL CLEAN LLC	4035	2361-2	Secured: Unliquidated Unsecured: \$1,376.00*
14	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: RIVERS EDGE MINING, INC.	3753	2363-1	Secured: \$82,899.00	MINE SAFETY AND HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: RIVERS EDGE MINING, INC.	4034	2363-2	Secured: Unliquidated Unsecured: \$82,899.00
15	MINE SAFETY & HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 01/17/13 ED MO Date Filed: 02/27/13 Debtor: DODGE HILL MINING COMPANY, LLC	3755	2365-1	Secured: \$100,171.31	MINE SAFETY AND HEALTH ADMINISTRATION (MSHA) US DEPARTMENT OF LABOR ATTN MELANIE GARRIS 1100 WILSON BLVD 25TH FL ARLINGTON, VA 22209 Date Filed: 04/25/13 ED MO Date Filed: 06/12/13 Debtor: DODGE HILL MINING COMPANY, LLC	4033	2365-2	Secured: Unliquidated Unsecured: \$100,171.31

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' THIRTEENTH 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' Thirteenth Omnibus Claims Objection.
3. The Claims correspond to the Surviving Claims in that both refer to the same creditor or an assignee of that creditor, but, in each case, the Surviving Claim was filed subsequent to the Claim and sets forth an amended proof of claim amount and/or an amended basis for the proof of claim.
4. 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.

Dated: July 18, 2013

/s/ Robert L. Mead

Robert L. Mead