UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:	)	In Proceedings Under Chapter 11
	)	
PATRIOT COAL CORPORATION, *et al.*,	)	Case No. 12-52096 (SCC)
	)	
	)	Hon. Kathy Surratt-States
Debtors.	)	

SUPPLEMENTAL DECLARATION OF JAMES KATCHADURIAN IN SUPPORT OF THE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO RETAIN EPIQ BANKRUPTCY SOLUTIONS, LLC AS INFORMATION AGENT

I, James Katchadurian, do hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1.   I am an Executive Vice President of Epiq Bankruptcy Solutions, LLC (**"Epiq"**) and I am authorized to make and submit this declaration (the **"Supplemental Declaration"**) on behalf of Epiq. This Supplemental Declaration is submitted to supplement my previous declaration dated and filed October 12, 2012 in support of the Application of the Official Committee of Unsecured Creditors (the **"Committee"**) of Patriot Coal Corporation and certain of its subsidiaries, debtors and debtors-in-possession (collectively, the **"Debtors"**) in the above-captioned jointly administered chapter 11 cases (the **"Chapter 11 Cases"**)[1], to retain Epiq as Information Agent (the **"Original Declaration"**)(Doc. 1211). The statements contained herein are based upon personal knowledge.[2]

2.   In the Original Declaration, I stated that Epiq was not aware of any relationship with any of the entities related to the Chapter 11 Cases that would present a disqualifying

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[1] The prior declaration was filed in the United States Bankruptcy Court, Southern District of New York, Case No. 12-12900 (SCC), which, effective December 19, 2012, was transferred to this United States Bankruptcy Court for the Eastern District of Missouri by Order of the Honorable Shelley C. Chapman.

[2] Certain of the disclosures herein relate to matters within the knowledge of other professionals at Epiq and are based on information provided by them.

conflict of interest, and that to the best of my knowledge, neither Epiq Systems, Inc. nor any affiliates thereof have any adverse connections with these Chapter 11 Cases. However, I also went on to state in the Original Declaration that should Epiq discover any new relevant facts or relationships bearing on the matters described therein during the period of its retention, Epiq would promptly file a supplemental declaration.

3.   As described in the Original Declaration, Epiq shares a corporate parent, Epiq Systems, Inc., with certain companies that provide integrated technology products and services to the legal profession including but not limited to electronic discovery services. Epiq eDiscovery Solutions, Inc. (**"EDS"**) is a subsidiary of Epiq Systems, Inc. that provides electronic discovery services. EDS operates completely separate and apart from Epiq, including each company having separate and distinct physical locations, separate and distinct employees, separate and distinct electronic databases, and very minimal overlap of customers. As a result, there is no overlap whatsoever of personnel or facilities, and no sharing of data between the two entities.

4.   Epiq has recently learned that EDS has entered into an agreement with Debtors and their counsel, Davis Polk & Wardwell LLP, to provide electronic discovery services. As a result, I am filing this Supplemental Declaration to bring this engagement to the attention of the Court and other entities associated with the Chapter 11 Cases. However, because of the previously explained distinction between Epiq and EDS as completely separate entities, Epiq still does not consider this potential engagement by EDS to cause an adverse connection or a disqualifying conflict of interest with the Chapter 11 Cases.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: 17 April 2013
New York, New York

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James Katchadurian