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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Apr 22, 2013

Kathy A. Surratt - States
KATHY A. SURRETT-STATES
Chief United States Bankruptcy Judge

In re)
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PATRIOT COAL CORPORATION, *et al.*,)
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Debtors.)
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**Chapter 11
Case No. 12-51502-659
(Jointly Administered)**

Re: ECF No. 3739

**NOTEHOLDERS' MOTION FOR LEAVE TO EXCEED THE PAGE LIMITATION IN
THEIR REPLY IN SUPPORT OF MOTION FOR ENTRY OF
AN ORDER, PURSUANT TO 11 U.S.C. §§ 105(a) AND 1104(a), DIRECTING THE
APPOINTMENT OF A CHAPTER 11 TRUSTEE**

Aurelius Capital Management, LP (“**Aurelius**”), and Knighthead Capital Management, LLC (“**Knighthead**”), solely on behalf of certain funds and accounts that they manage or advise and that hold a substantial amount of certain Patriot Coal Corporation (“**Patriot**”) notes (collectively, the “**Noteholders**”),¹ as creditors and parties in interest in the above-captioned jointly-administered Chapter 11 cases, by and through their undersigned counsel, hereby respectfully submit this motion for an order pursuant to Rule 9004(C) of the Local Rules of the Bankruptcy Court for the Eastern District of Missouri granting the Noteholders leave to exceed

¹ The notes are the 3.25% Convertible Senior Notes due 2013 (the “**3.25% Notes**”) and the 8.25% Senior Notes due 2018 (the “**8.25% Notes**”). Entities managed by Aurelius or Knighthead are, collectively, the beneficial owners of a majority of the 8.25% Notes. Entities managed by Aurelius alone are also the beneficial owners of a substantial amount of the 3.25% Notes. None of the Noteholders has any fiduciary duties to any party in interest in this case, nor is any Noteholder an insider of Patriot or any of its subsidiaries or affiliates.

the Court's page limitation in their reply ("**Reply**") in support of the Motion of Aurelius Capital Management, LP, and Knighthead Capital Management, LLC, For Entry Of An Order, Pursuant To 11 U.S.C. §§ 105(a) and 1104(a), Directing The Appointment Of A Chapter 11 Trustee ("**Trustee Motion**") (Dkt. 3423). In support of this motion, the Noteholders state as follows.

1. The Noteholders respectfully seek a modest enlargement of the page limitation in their Reply in order to respond adequately to the filings submitted in response to the Trustee Motion.

2. Four parties filed objections to the Trustee Motion; two parties filed joinders in an objection to the Trustee Motion, and one party filed a response to the Trustee Motion. *See* Draft Notice Of Matters Scheduled For Hearing On April 23, 2013 At 10:00 A.M. (Dkt. 3727) ¶ 12 (listing filings). These filings together comprise more than 50 pages.

3. For the convenience of the Court and the parties, the Noteholders have responded to each of the above filings in their single Reply. In doing so, the Noteholders made every effort to comply with the Court's page limitations. But in light of the number of filings the Noteholders must respond to, and the importance of the issues, the Noteholders seek leave to exceed the applicable page limitation of 15 pages by 5 pages.

4. The Noteholders respectfully submit that this modest enlargement of the page limitation is appropriate under the circumstances.

WHEREFORE, for the foregoing reasons, the Noteholders respectfully request leave to exceed the applicable page limitation by 5 pages in their Reply, and for such other relief as the Court deems just and proper.

Dated: April 19, 2013

Respectfully submitted,

By: /s/ Alan D. Strasser
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Noteholders' Motion For Leave To Exceed The Page Limitation In Their Reply In Support Of Motion For Entry Of An Order, Pursuant To 11 U.S.C. §§ 105(a) And 1104(a), Directing The Appointment Of A Chapter 11 Trustee* was filed on April 19, 2013 using the Court's CM/ECF system, which sent a copy to all parties receiving electronic notices in this case.

/s/ Alan D. Strasser
Alan D. Strasser