

**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' OBJECTION TO CLAIMS
OF MOTION INDUSTRIES, INC.**

Patriot Coal Corporation ("Patriot") and its affiliated debtors (collectively, the "Debtors"), pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, respectfully file this Objection to Claims of Motion Industries, Inc. (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 claims listed on Exhibit A attached hereto (the "Claims") because the Claims do not accurately reflect the amounts and priorities of the Debtors' obligations to Motion Industries, Inc. (the "Creditor"). The Debtors request entry of an order, pursuant to Section 502 of the Bankruptcy Code and Fed. R. Bankr. P. 3007, disallowing and/or modifying the Claims as indicated in the "Modified Amount and Classification" and "Reassigned Debtor" columns of Exhibit A.

2. Exhibit A includes certain liabilities that are highlighted in gray. This Objection is not directed to these liabilities, and they are not included within the defined term "Claims." They are included on Exhibit A so that the Creditor and other interested parties are aware of the

Debtors' understanding of the full scope of their obligations to the Creditor, including both disputed and undisputed amounts.

3. 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

4. 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).

5. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

6. 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.

7. On December 19, 2012, the Debtors' cases were transferred to the United States Bankruptcy Court for the Eastern District of Missouri [Dkt. No. 1789].

8. The bar date for filing proofs of claim was December 14, 2012 [Dkt. No. 1388].

9. On March 1, 2013, the Court entered its Order Establishing Procedures for Claims Objections [Dkt. No. 3021].

Objection and Argument

10. The Debtors object to the Claims identified on Exhibit A, incorporated herein by reference, because the Claims do not accurately reflect the Debtors' obligations to the Creditor.

11. The Debtors have reviewed each of the obligations listed on Exhibit A in an effort to ascertain their validity. Following a review of the Debtors' books and records relating to the Claims, the Debtors have determined that their liabilities to the Creditor are as shown in the "Modified Amount and Classification" and "Reassigned Debtor" columns of Exhibit A. In particular, these columns reflect the correct Debtor, priority, and amount (if any) owed with respect to each of the Claims.¹ Where necessary to reflect the reclassification of Claims, the reassignment of Claims to other Debtors, or other matters reflected in the Debtors' books and records, Exhibit A proposes that Claims be increased from the amounts requested in the Creditor's proofs of claim. *See* Declaration of Robert L. Mead, attached hereto as Exhibit B.

12. In the interest of completeness, Exhibit A also includes rows for obligations reflected in the Debtors' schedules of assets and liabilities filed with the Court on September 19, 2012, as amended. These scheduled amounts are indicated by seven-digit claim numbers and have been reduced to zero in the "Modified Amount and Classification" columns where necessary to avoid duplication of amounts claimed in proofs of claim filed by the Creditor against the same Debtor or proposed to be reassigned to that Debtor in this Objection.

13. The Debtors request that the Court's order sustaining this Objection be without prejudice to the right of any party in interest to object to the Claims, as modified, on any ground.

WHEREFORE, the Debtors respectfully request that this Court:

- (a) disallow and/or modify the Claims, as indicated in the "Modified Amount and Classification" and "Reassigned Debtor" columns of Exhibit A; and
- (b) grant such other and further relief as is just and proper.

¹ The "Reassigned Debtor" column indicates "N/A" if no change in Debtor is proposed (*i.e.*, the Debtors agree that the Claim was asserted against the proper Debtor).

Dated: July 16, 2013
St. Louis, Missouri

Respectfully submitted,
BRYAN CAVE LLP

/s/ Laura Uberti Hughes
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Brian C. Walsh, #58091MO
Laura Uberti Hughes, #60732MO
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*Local Counsel to the Debtors
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-and-

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and Debtors in Possession*

Exhibit A

Omnibus Objection to Claims

Patriot Coal Corporation
 12-51502 (KSS)

Note: Claims on the exhibit are sorted by GCG Claim or Scheduled Number.

| SEQ NO. | CLAIMS TO BE DISALLOWED OR MODIFIED [CLAIMS IN GRAY LISTED FOR REFERENCE ONLY] | | | | | | |
|---------|--|----------------------------|-----------------|--|--|------------------------------|----------------------------------|
| | NAME | GCG CLAIM OR SCHEDULED NO. | ED MO CLAIM NO. | CLAIMED AMOUNT AND CLASSIFICATION | MODIFIED AMOUNT AND CLASSIFICATION | CLAIMED DEBTOR | REASSIGNED DEBTOR |
| 1 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: APOGEE COAL COMPANY, LLC | 1285 | 798-1 | Unsecured: \$5,722.85 | Unsecured: \$5,722.85 | APOGEE COAL COMPANY, LLC | N/A |
| 2 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION | 1286-A | 799-1 | Admin: \$12,373.97 503(b)(9): \$12,373.97* Unsecured: \$124,726.32 | Admin: \$2,350.74 Unsecured: \$14,805.60 | PATRIOT COAL CORPORATION | DODGE HILL MINING COMPANY, LLC |
| 3 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION | 1286-B | N/A | Admin: \$12,373.97 503(b)(9): \$12,373.97* Unsecured: \$124,726.32 | Admin: \$428.04 Unsecured: \$11,378.82 | PATRIOT COAL CORPORATION | GRAND EAGLE MINING, LLC |
| 4 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION | 1286-C | N/A | Admin: \$12,373.97 503(b)(9): \$12,373.97* Unsecured: \$124,726.32 | Admin: \$998.50 Unsecured: \$39,543.38 | PATRIOT COAL CORPORATION | HERITAGE COAL COMPANY LLC |
| 5 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: PATRIOT COAL CORPORATION | 1286-D | N/A | Admin: \$12,373.97 503(b)(9): \$12,373.97* Unsecured: \$124,726.32 | Admin: \$7,261.38 Unsecured: \$30,630.11 | PATRIOT COAL CORPORATION | HIGHLAND MINING COMPANY, LLC |
| 6 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: CATENARY COAL COMPANY, LLC | 1287 | 801-1 | Admin: \$8,000.34 503(b)(9): \$8,000.34* Unsecured: \$16,691.55 | Admin: \$6,683.06 Unsecured: \$16,707.16 | CATENARY COAL COMPANY, LLC | N/A |
| 7 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC | 1288-A | 802-1 | Admin: \$37,054.03 503(b)(9): \$37,054.03* Unsecured: \$155,334.12 | Admin: \$12,514.47 Unsecured: \$80,157.20 | EASTERN ASSOCIATED COAL, LLC | N/A |
| 8 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC | 1288-C | N/A | Admin: \$37,054.03 503(b)(9): \$37,054.03* Unsecured: \$155,334.12 | Admin: \$20,310.02 Unsecured: \$97,439.12 | EASTERN ASSOCIATED COAL, LLC | BLACK STALLION COAL COMPANY, LLC |

Exhibit A

Omnibus Objection to Claims

**Patriot Coal Corporation
 12-51502 (KSS)**

Note: Claims on the exhibit are sorted by GCG Claim or Scheduled Number.

| SEQ NO. | CLAIMS TO BE DISALLOWED OR MODIFIED [CLAIMS IN GRAY LISTED FOR REFERENCE ONLY] | | | | | | |
|---------|--|----------------------------|-----------------|--|--|------------------------------|----------------------------------|
| | NAME | GCG CLAIM OR SCHEDULED NO. | ED MO CLAIM NO. | CLAIMED AMOUNT AND CLASSIFICATION | MODIFIED AMOUNT AND CLASSIFICATION | CLAIMED DEBTOR | REASSIGNED DEBTOR |
| 9 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC | 1288-D | N/A | Admin: \$37,054.03 503(b)(9): \$37,054.03* Unsecured: \$155,334.12 | Admin: \$173.16 Unsecured: \$488.26 | EASTERN ASSOCIATED COAL, LLC | HILLSIDE MINING COMPANY |
| 10 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: EASTERN ASSOCIATED COAL, LLC | 1288-E | N/A | Admin: \$37,054.03 503(b)(9): \$37,054.03* Unsecured: \$155,334.12 | Admin: \$1,424.78 Unsecured: \$8,916.15 | EASTERN ASSOCIATED COAL, LLC | MIDLAND TRAIL ENERGY LLC |
| 11 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: HOBET MINING, LLC | 1289 | 804-1 | Admin: \$24,321.79 503(b)(9): \$24,321.79* Unsecured: \$13,452.26 | Admin: \$23,033.21 Unsecured: \$14,740.84 | HOBET MINING, LLC | N/A |
| 12 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: KANAWHA EAGLE COAL, LLC | 1290 | 806-1 | Admin: \$850.10 503(b)(9): \$850.10* Unsecured: \$38,068.19 | Admin: \$410.10 Unsecured: \$38,215.15 | KANAWHA EAGLE COAL, LLC | N/A |
| 13 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: LITTLE CREEK LLC | 1291 | 805-1 | Unsecured: \$1,391.47 | Unsecured: \$1,391.47 | LITTLE CREEK LLC | N/A |
| 14 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: COAL CLEAN LLC | 1292 | 807-1 | Admin: \$9,948.17 503(b)(9): \$9,948.17* Unsecured: \$1,143.04 | Admin: \$8,973.17 Unsecured: \$2,118.04 | PANTHER LLC | N/A |
| 15 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: PINE RIDGE COAL COMPANY, LLC | 1293 | 808-1 | Unsecured: \$9,183.19 | Unsecured: \$9,183.19 | PINE RIDGE COAL COMPANY, LLC | BLACK STALLION COAL COMPANY, LLC |
| 16 | MOTION INDUSTRIES INC C/O BARACK FERRAZZANO KIRSCHBAUM NAGELBERG LLP ATTN KIMBERLY J ROBINSON 200 W MADISON ST STE 3900 CHICAGO, IL 60606 Date Filed: 12/07/12 ED MO Date Filed: 02/25/13 Debtor: SPEED MINING LLC | 1294 | 809-1 | Admin: \$4,145.80 503(b)(9): \$4,145.80* Unsecured: \$1,197.56 | Admin: \$4,145.80 Unsecured: \$1,197.56 | SPEED MINING LLC | PANTHER LLC |
| 17 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: APOGEE COAL COMPANY, LLC | 1036663 | N/A | Unsecured: \$5,722.85 | Unsecured: \$0.00 | APOGEE COAL COMPANY, LLC | N/A |

Exhibit A

Omnibus Objection to Claims

**Patriot Coal Corporation
 12-51502 (KSS)**

Note: Claims on the exhibit are sorted by GCG Claim or Scheduled Number.

| SEQ NO. | CLAIMS TO BE DISALLOWED OR MODIFIED [CLAIMS IN GRAY LISTED FOR REFERENCE ONLY] | | | | | | |
|---------|--|----------------------------|-----------------|-----------------------------------|------------------------------------|----------------------------------|-------------------|
| | NAME | GCG CLAIM OR SCHEDULED NO. | ED MO CLAIM NO. | CLAIMED AMOUNT AND CLASSIFICATION | MODIFIED AMOUNT AND CLASSIFICATION | CLAIMED DEBTOR | REASSIGNED DEBTOR |
| 18 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: BLACK STALLION COAL COMPANY, LLC | 1060586 | N/A | Unsecured: \$132,833.11 | Unsecured: \$0.00 | BLACK STALLION COAL COMPANY, LLC | N/A |
| 19 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: CATENARY COAL COMPANY, LLC | 1060587 | N/A | Unsecured: \$23,464.01 | Unsecured: \$0.00 | CATENARY COAL COMPANY, LLC | N/A |
| 20 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Debtor: COYOTE COAL COMPANY LLC | 1060588 | N/A | Unsecured: \$33,966.64 | Unsecured: \$33,966.64 | COYOTE COAL COMPANY LLC | N/A |
| 21 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: DODGE HILL MINING COMPANY, LLC | 1060589 | N/A | Unsecured: \$17,352.08 | Unsecured: \$0.00 | DODGE HILL MINING COMPANY, LLC | N/A |
| 22 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: EASTERN ASSOCIATED COAL, LLC | 1060590 | N/A | Unsecured: \$94,811.78 | Unsecured: \$0.00 | EASTERN ASSOCIATED COAL, LLC | N/A |
| 23 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: GRAND EAGLE MINING, LLC | 1060591 | N/A | Unsecured: \$11,709.49 | Unsecured: \$0.00 | GRAND EAGLE MINING, LLC | N/A |
| 24 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: HERITAGE COAL COMPANY LLC | 1060592 | N/A | Unsecured: \$33,159.55 | Unsecured: \$0.00 | HERITAGE COAL COMPANY LLC | N/A |
| 25 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: HIGHLAND MINING COMPANY, LLC | 1060593 | N/A | Unsecured: \$37,636.40 | Unsecured: \$0.00 | HIGHLAND MINING COMPANY, LLC | N/A |
| 26 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: HILLSIDE MINING COMPANY | 1060594 | N/A | Unsecured: \$661.42 | Unsecured: \$0.00 | HILLSIDE MINING COMPANY | N/A |
| 27 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: HOBET MINING, LLC | 1060595 | N/A | Unsecured: \$45,335.70 | Unsecured: \$0.00 | HOBET MINING, LLC | N/A |
| 28 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: KANAWHA EAGLE COAL, LLC | 1060596 | N/A | Unsecured: \$26,748.31 | Unsecured: \$0.00 | KANAWHA EAGLE COAL, LLC | N/A |
| 29 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: LITTLE CREEK LLC | 1060597 | N/A | Unsecured: \$1,391.47 | Unsecured: \$0.00 | LITTLE CREEK LLC | N/A |

Exhibit A

Omnibus Objection to Claims

Patriot Coal Corporation
 12-51502 (KSS)

Note: Claims on the exhibit are sorted by GCG Claim or Scheduled Number.

| SEQ NO. | CLAIMS TO BE DISALLOWED OR MODIFIED [CLAIMS IN GRAY LISTED FOR REFERENCE ONLY] | | | | | | |
|---------|--|----------------------------|-----------------|-----------------------------------|------------------------------------|--|-------------------|
| | NAME | GCG CLAIM OR SCHEDULED NO. | ED MO CLAIM NO. | CLAIMED AMOUNT AND CLASSIFICATION | MODIFIED AMOUNT AND CLASSIFICATION | CLAIMED DEBTOR | REASSIGNED DEBTOR |
| 30 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: MIDLAND TRAIL ENERGY LLC | 1060598 | N/A | Unsecured: \$10,340.93 | Unsecured: \$0.00 | MIDLAND TRAIL ENERGY LLC | N/A |
| 31 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: OHIO COUNTY COAL COMPANY, LLC | 1060599 | N/A | Unsecured: \$949.22 | Unsecured: \$769.22 | OHIO COUNTY COAL COMPANY, LLC | N/A |
| 32 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: PANTHER LLC | 1060600 | N/A | Unsecured: \$17,459.15 | Unsecured: \$0.00 | PANTHER LLC | N/A |
| 33 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: REMINGTON LLC | 1060601 | N/A | Unsecured: \$2,359.16 | Unsecured: \$2,359.16 | REMINGTON LLC | N/A |
| 34 | MOTION INDUSTRIES, INC. 1514 PARKWAY VIEW DRIVE PITTSBURGH, PA 15205 Date Filed: 01/01/00 ED MO Date Filed: 01/01/00 Debtor: WINIFREDE DOCK LIMITED LIABILITY COMPANY | 1060602 | N/A | Unsecured: \$53.04 | Unsecured: \$53.04 | WINIFREDE DOCK LIMITED LIABILITY COMPANY | N/A |

Any 503(b)(9) amount is included in the Admin amount as a subset.

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' OBJECTION TO CLAIMS
OF MOTION INDUSTRIES, INC.**

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 liabilities identified on Exhibit A to the Debtors' Objection to Claims of Motion Industries, Inc.
3. The liabilities highlighted in gray on Exhibit A are consistent with the Debtors' records of their obligations to Motion Industries, Inc. (the "Creditor"). These liabilities are listed on Exhibit A so that the Creditor and other interested parties are informed of the Debtors' understanding of the of the full scope of their obligations to the Creditor.
4. The claims that are *not* highlighted on Exhibit A (the "Claims") are not consistent with the Debtors' records of their obligations to the Creditor. Rather, the Debtors' liabilities to the Creditor are as shown in the "Modified Amount and Classification" and "Reassigned Debtor" columns of Exhibit A. These columns reflect the correct Debtor, priority, and amount (if any) owed with respect to each of the Claims. Where necessary to reflect the reclassification of the

Claims, the reassignment of the Claims to other Debtors, or other matters reflected in the Debtors' books and records, Exhibit A proposes that the Claims be increased from the amounts requested in the Creditor's proofs of claim.

5. In the interest of completeness, Exhibit A also includes rows for obligations reflected in the Debtors' schedules of assets and liabilities filed with the Court on September 19, 2012, as amended. These scheduled amounts are indicated by seven-digit claim numbers and have been reduced to zero in the "Modified Amount and Classification" columns where necessary to avoid duplication of amounts claimed in proofs of claim filed by the Creditor against the same Debtor or proposed to be reassigned to that Debtor.

6. The facts set forth in this Declaration are based on my firsthand knowledge as the person responsible for overseeing the Debtors' claims reconciliation process, as well as on information provided to me by other employees of the Debtors involved in the claims reconciliation process.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed on July 15, 2013.

/s/ Robert L. Mead
Robert L. Mead