

Stephen E. Hessler, P.C. (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Michael A. Condyles (VA 27807)
Peter J. Barrett (VA 46179)
Jeremy S. Williams (VA 77469)
KUTAK ROCK LLP
Riverfront Plaza
901 East Byrd Street, Suite 1000
Richmond, Virginia 23219-3500
Telephone: (804) 644-1700
Facsimile: (804) 783-6192

- and -

James H. M. Sprayregen, P.C.
Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)
Garry D. Hartlieb (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

Counsel for the PCC Liquidating Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	
)	Chapter 11
)	
PATRIOT COAL CORPORATION, <u>et al.</u> ,)	Case No. 15-32450 (KLP)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on October 9, 2018, the PCC Liquidating Trust filed with the Court the *Motion for Entry of an Order Extending the Claims Objection Bar Date* [Docket No. 2759] (the "Motion").

PLEASE TAKE FURTHER NOTICE THAT copies of the Motion may be obtained at no charge at <https://cases.primeclerk.com/patriotcoal/> or for a fee via PACER at www.vaeb.uscourts.gov/.

PLEASE TAKE FURTHER NOTICE THAT your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE THAT in connection with the chapter 11 cases, an *Order (I) Establishing Certain Notice, Case Management and Administrative Procedures (II) Granting Related Relief* [Docket No. 79] (the “Case Management Order”) was entered by the Court on May 14, 2015, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at <https://cases.primeclerk.com/patriotcoal/> or for a fee via PACER at www.vaeb.uscourts.gov/.

PLEASE TAKE FURTHER NOTICE THAT if you do not timely file and serve a written objection to the relief requested in the Motion, the Court may deem any opposition waived, treat the Motion as conceded and enter an order granting the relief requested in the Motion without further notice or a hearing.

PLEASE TAKE FURTHER NOTICE THAT in accordance with the Case Management Order, if you wish to oppose the Motion, **on or before 4:00 p.m. prevailing Eastern Time on October 19, 2018, or such shorter time as the Court may hereafter order, and of which you may receive subsequent notice, (collectively, the “Objection Deadline”)**, you must file with the Court, at the address shown below, a written objection pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order:

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, Virginia 23219

PLEASE TAKE FURTHER NOTICE THAT in accordance with the Case Management Order, you must also serve a copy of your written objection on the Core Group, the 2002 List and the Affected Entities, as such terms are defined in the Case Management Order, **on or before the Objection Deadline.**

PLEASE TAKE FURTHER NOTICE THAT the Motion is scheduled to be heard on the Omnibus Hearing date scheduled for **October 23, 2018 at 2:00 p.m.** prevailing Eastern Time, in the United States Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, Virginia 23219. If you fail to file timely a written response and to attend the hearing even if a response is timely filed, the Court may consider any objection you may have waived and enter an order granting the relief requested.

PLEASE TAKE FURTHER NOTICE THAT you should consult the Case Management Order before filing any written objection to the Motion.

Dated: October 9, 2018
Richmond, Virginia

Respectfully submitted,

/s/ Jeremy S. Williams

Michael A. Condyles (VA 27807)

Peter J. Barrett (VA 46179)

Jeremy S. Williams (VA 77469)

KUTAK ROCK LLP

Riverfront Plaza

901 East Byrd Street, Suite 1000

Richmond, Virginia 23219-3500

Telephone: (804) 644-1700

Facsimile: (804) 783-6192

- and -

Stephen E. Hessler, P.C. (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

- and -

James H. M. Sprayregen, P.C.

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)

Garry D. Hartlieb (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Counsel for the PCC Liquidating Trust