

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

WESTMORELAND COAL COMPANY, *et al.*,  
Debtors.

Chapter 11

Case No. 18-35672 (DRJ)

(Jointly Administered)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

SUNEDISON, INC., *et al.*,  
Debtors.

Case No. 16-10992 (SMB)

Chapter 11

(Jointly Administered)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re:

OLD ANR, LLC, *et al.*,  
Debtors.

Case No. 19-00302 (KRH)

Miscellaneous Proceeding

**PRELIMINARY OBJECTION OF MAR-BOW VALUE PARTNERS, LLC,  
TO THE PROPOSED SETTLEMENT BETWEEN MCKINSEY  
RECOVERY & TRANSFORMATION SERVICES U.S., LLC AND  
CERTAIN OF ITS AFFILIATES AND THE UNITED STATES TRUSTEE**

Mar-Bow Value Partners, LLC (“**Mar-Bow**”), a creditor, by counsel files this preliminary objection regarding the proposed settlement between McKinsey Recovery & Transformation Services U.S., LLC, and Certain of Its Affiliates and the United States Trustee which was filed at Docket No. 5830 in the above-captioned *SunEdison* case, at Docket No. 28 in the above-captioned miscellaneous proceeding in *Old ANR LLC*, and at Docket No. 1589 in the above-captioned *Westmoreland Coal* case and respectfully states as follows:

1. Mar-Bow objects to the proposed settlement.
2. Mar-Bow intends to file a more fulsome objection on or before March 28, 2019, which is 21 days after service of the proposed settlement, and the presentment date noticed by the movants in the *SunEdison* case.
3. Mar-Bow intends to request a hearing when it files its more fulsome objection.
4. Mar-Bow reserves all rights to supplement and amend this preliminary objection, including by filing a more fulsome objection, and reserves all rights and remedies related thereto.

Respectfully submitted, March 8, 2019.

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**Certificate of Service**

I certify that on March 8, 2019, I caused a copy of this pleading to be filed through the Court's electronic filing system in *In re: Westmoreland Coal Co.*, Case No. 18-35672 (Bankr. S.D. Tex.) and thereby served all parties registered to receive such service.

/s/ Christopher Murray

Christopher Murray