

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
WESTMORELAND COAL COMPANY, <i>et al.</i> , ¹)	Case No. 18-35672 (DRJ)
Debtors.)	(Jointly Administered)
)	

LIMITED RESPONSE AND RESERVATION OF RIGHTS OF THE WLB DEBTORS TO NAVAKAI, INC.’S SECOND AMENDED APPLICATION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE CLAIM AND CORRECTION TO CURE COSTS

TO THE CHIEF U.S. BANKRUPTCY JUDGE HONORABLE DAVID R. JONES:

The WLB Debtors² in the above-captioned cases respectfully represent as follows in support of this limited response and reservation of rights (the “Response”):

1. On April 15, 2019, Navakai, Inc. (“Navakai”) filed *Navakai, Inc.’s Second Amended Application for Allowance and Payment of Administrative Claim and Correction to Cure Costs* (the “Application”) [ECF No. 1668].
2. Through the Application, Navakai requests allowance and payment of administrative claims in the aggregate amount of \$3,210.71 (the “Administrative Claim”).
3. By this Response, the WLB Debtors submit that \$3,203.71 of the Administrative Claim has been paid. Further, the WLB Debtors reserve their right and the right of any other party in interest to file any further response or objection to the Application.

¹ Due to the large number of debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtors and the last four digits of their tax identification, registration, or like numbers is not provided herein. A complete list of such information may be obtained on the website of the debtors’ claims and noticing agent in these chapter 11 cases at www.donlinrecano.com/westmoreland. Westmoreland Coal Company’s service address for the purposes of these chapter 11 cases is 9540 South Maroon Circle, Suite 300, Englewood, Colorado 80112.

² “WLB Debtors” means all Debtors except for Westmoreland Resources GP, LLC, Westmoreland Resource Partners, LP (“WMLP”), and WMLP’s subsidiaries (collectively with WMLP, the “WMLP Debtors”).

Houston, Texas
May 2, 2019

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh (Bar No. 24062656)

Jennifer F. Wertz (Bar No. 24072822)

Vienna F. Anaya (Bar No. 24091225)

JACKSON WALKER L.L.P.

1401 McKinney Street, Suite 1900

Houston, Texas 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: mcavanaugh@jw.com

jwertz@jw.com

vanaya@jw.com

Co-Counsel to the Debtors

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of May 2019, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh _____

Matthew D. Cavanaugh