

**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 DEBTORS.)	Case No. 18-35672 (DRJ)
)	
)	(Jointly Administered)
)	

**ZURICH AMERICAN INSURANCE COMPANY AND AFFILIATE’S WITNESS
AND EXHIBIT LIST RELATED TO JUNE 5, 2019 HEARINGS ON JOINT PLAN OF
LIQUIDATION FOR THE WMLP DEBTORS AND KEMMERER SALE MOTION**

Zurich American Insurance Company, and its affiliate, Fidelity and Deposit Company of Maryland (collectively, “**Zurich**”), file this Witness and Exhibit List related to confirmation of the Joint Plan of Liquidation for the WMLP Debtors [Dkt No. 1612] and the Kemmerer Sale Motion [Dkt. No. 1863] in connection with the hearing scheduled for June 5, 2019 at 10:30 a.m. (Prevailing Central time).

Exhibits:

No.	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1.	Line Sheet (09/24/2018)				
2.	General Agreement of Indemnity (01/30/2012)				
3.	General Agreement of Indemnity (02/13/2013)				
4.	General Agreement of Indemnity (09/29/2017)				
5.	Collateral Trust Agreement – The Bank of New York Mellon # 858733 (03/26/2012)				

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 listed. A complete list of such information may be obtained on the website of the claims and noticing agent in these chapter 11 cases at www.donlinrecano.com/westmoreland.

No.	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
6.	Collateral Trust Agreement – The Bank of New York Mellon # 873704 (08/23/2013)				
7.	Collateral Trust Agreement – The Bank of New York Mellon # 543269 (04/08/2014)				
8.	Securities Account Control Agreement – Wells Fargo Securities, LLC (04/28/2014)				

Zurich reserves the right to use any exhibits presented by any other party, to use any other documents for impeachment purposes, and to amend or supplement this exhibit list.

Witnesses:

1. Brian M. Hodges, SVP, Head of Commercial Surety, or other representative from Zurich.

Zurich reserves the right to call any witness designated by any other party for impeachment purposes, and to amend or supplement this witness list

Respectfully submitted,

/s/ Duane J. Brescia

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Witness and Exhibit List was served via CM/ECF for the United States Bankruptcy Court for the Southern District of Texas to all parties entitled to such notice, and also on the parties listed below, on this the 3rd day of June, 2019.

/s/ Duane J. Brescia

Duane J. Brescia

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