

**IN 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

MLP LENDERS' AMENDED WITNESS AND EXHIBIT LIST

The MLP Lenders² submit the following Witness and Exhibit List for the hearing to be held on June 5, 2019 at 10:30 a.m. (CDT) (“Hearing”), in the above-styled, jointly administered bankruptcy cases (the “Bankruptcy Cases”) before the Honorable David R. Jones, Chief United States Bankruptcy Judge, Courtroom 400, 515 Rusk, Houston, Texas 77002.

WITNESSES

The MLP Lenders may call the following witnesses at the Hearing:

1. Keith E. Alessi, Chief Executive Officer, Kemmerer Operations, LLC and Kemmerer Holdings, LLC.
2. Any witness listed, offered, or called by any other party prior to or at the Hearing.
3. Any witness required for rebuttal or impeachment.

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 The “MLP Lenders” refers to the lenders under that certain Financing Agreement, dated December 31, 2014, with Westmoreland Resource Partners, LP and its subsidiaries (as amended, supplemented or modified from time to time).

EXHIBITS

The MLP Lenders may offer the following exhibits at the Hearing:

No.	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
1	<i>Declaration of Keith E. Alessi in Support of the Sale of the Kemmerer Mine and Certain Other Assets to Kemmerer Operations, LLC</i> (Docket No. 1927)						
2	Adequate Assurance of Future Performance Package for Kemmerer Operations, LLC dated June 3, 2019						
3	Redacted Financing Commitment letter to Kemmerer Operations, LLC dated June 4, 2019 and Exhibit A thereto (May 25, 2019 Draft of Financing Agreement)						
4	Email regarding Kemmerer Mine Bonding Solution dated May 31, 2019, from Nenad Osmanovic to Keith Alessi, Amy Bowler, and Kristine Manoukian						
5	Any document or pleading filed in the Bankruptcy Cases						
6	Any exhibit necessary for impeachment and/or rebuttal purposes						
7	Any exhibit identified or offered by any other party						

Notwithstanding the foregoing, the MLP Lenders reserve the right to (i) supplement or amend this Witness and Exhibit List at any time before or at the Hearing, (ii) introduce exhibits not listed above on rebuttal and during cross examination and/or for purposes of impeachment; (iii) not introduce exhibits listed above; (iv) use documents not listed herein to refresh witnesses' recollections; (v) introduce demonstrative exhibits, which could include the exhibits listed above as well as demonstrative exhibits that incorporate material from the exhibits described above and from other sources; and (vi) take any other such actions as permissible under the Federal Rules

of Evidence, the Federal Rules of Bankruptcy Procedures, and the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas.

Dated: June 4, 2019

Respectfully submitted,

/s/ Joseph E. Bain

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-and-

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Counsel to the MLP Lenders

CERTIFICATE OF SERVICE

I certify that on June 4, 2019, I caused a copy of the foregoing document to be served by electronic transmission to all registered ECF users appearing in this case.

/s Joseph E. Bain

Joseph E. Bain