

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Westmoreland Coal Company, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-35672 (DRJ)

(Jointly Administered)

**THE DEBTORS' AMENDED WITNESS AND EXHIBIT  
LIST FOR THE JUNE 11, 2019 HEARING**

The WLB Debtors<sup>2</sup> and the WMLP Debtors<sup>3</sup> (collectively, with the WLB Debtors, the “Debtors”) in the above-captioned cases, file their Witness and Exhibit List for the hearing to be held on June 11, 2019 at 2:00 p.m. (prevailing Central Time) (the “Hearing”) as follows:

**WITNESSES**

The Debtors may call the following witnesses at the Hearing:

1. Robert P. Esposito; and
2. The Debtors reserve the right to call any other witness designated by another party, any witness used for impeachment, and any witness necessary to lay the foundation for admission of exhibits.

---

<sup>1</sup> 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](http://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.

<sup>2</sup> “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”).

<sup>3</sup> Specifically, the WMLP Debtors are: (a) WMLP; (b) Westmoreland Kemmerer, LLC; (c) Oxford Mining Company, LLC; (d) Harrison Resources, LLC; (e) Oxford Mining Company-Kentucky, LLC; (f) Daron Coal Company, LLC; (g) Oxford Conesville, LLC; and (h) Westmoreland Kemmerer Fee Coal Holdings, LLC.

**EXHIBITS**

The Debtors reserve the right to introduce into evidence the following exhibits at the

Hearing:

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
1.	Declaration of Robert P. Esposito in Support of Debtors' First Omnibus Objection to Certain Proofs of Claim (Amended Claims) [ECF No. 1784]				
2.	Declaration of Robert P. Esposito in Support of Debtors' Second Omnibus Objection to Certain Proofs of Claim (Exact Duplicate Claims) [ECF No. 1785]				
3.	Declaration of Robert P. Esposito in Support of Debtors' Third Omnibus Objection to Certain Proofs of Claim (Incorrect Debtor Claims) [ECF No. 1786]				
4.	Declaration of Robert P. Esposito in Support of Debtors' Fourth Omnibus Objection to Certain Proofs of Claim (Incorrect Debtor Claims) [ECF No. 1787]				
5.	Declaration of Robert P. Esposito in Support of Debtors' Fifth Omnibus Objection to Certain Proofs of Claim (No Liability Claims) [ECF No. 1788]				
6.	Declaration of Robert P. Esposito in Support of Debtors' Sixth Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims) [ECF No. 1789]				
7.	Declaration of Robert P. Esposito in Support of Debtors' Seventh Omnibus Objection to Certain Proofs of Claim (No Liability Claims) [ECF No. 1790]				
8.	Declaration of Robert P. Esposito in Support of Debtors' Eighth Omnibus Objection to Certain Proofs of Claim (No Liability Claims) [ECF No. 1791]				

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
9.	Declaration of Robert P. Esposito in Support of Debtors' Ninth Omnibus Objection to Certain Proofs of Claim (Satisfied Claims) [ECF No. 1792]				
10.	Declaration of Robert P. Esposito in Support of Debtors' Tenth Omnibus Objection to Certain Proofs of Claim (Satisfied Claims) [ECF No. 1793]				
11.	Declaration of Robert P. Esposito in Support of Debtors' Eleventh Omnibus Objection to Certain Proofs of Claim (Satisfied Claims) [ECF No. 1794]				
12.	Declaration of Robert P. Esposito in Support of Debtors' Twelfth Omnibus Objection to Certain Proofs of Claim (Satisfied Claims) [ECF No. 1795]				
13.	Declaration of Robert P. Esposito in Support of Debtors' Thirteenth Omnibus Objection to Certain Proofs of Claim (Satisfied Claims) [ECF No. 1796]				
14.	Declaration of Robert P. Esposito in Support of Debtors' Fourteenth Omnibus Objection to Certain Proofs of Claim (Amended Claims and Cross Debtor Duplicate Claims) [ECF No. 1797]				
15.	Declaration of Robert P. Esposito in Support of WMLP Debtors' Objection to Proof of Claim No. 77-1 Filed in Case No. 18-35696 by GT Nix Construction, Inc. [ECF No. 1822]				
16.	Affidavits of Service for Mailings for the Period from April 21, 2019 through April 27, 2019 [ECF No. 1817]				

**RESERVATION OF RIGHTS**

The Debtors reserve (a) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing and (b) the right to use additional exhibits for purposes of rebuttal

or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. The Debtors also reserve the right to rely upon and use as evidence (a) exhibits included on the exhibit lists of any other parties in interest and (b) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Houston, Texas  
June 11, 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 certify that on June 11, 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