

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

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

**CERTIFICATION OF NO OBJECTION REGARDING FINAL FEE APPLICATIONS**

The undersigned, as counsel to the above-captioned debtors (collectively, the “Debtors”), hereby certifies:

1. Professionals filed the following fee applications (the “WMLP Final Fee Applications”) with the United States Bankruptcy Court for the Southern District of Texas (the “Court”) in connection with services provided to the WMLP Debtors:<sup>2</sup>

- First and Final Application (WMLP Debtors) of Drinker Biddle & Reath LLP as Special Labor and Employee Benefits Counsel to the Debtors and Debtors in Possession for the Period of January 7, 2019 through June 21, 2019 [Docket No. 2147];
- First and Final Fee Application of Baker & Hostetler LLP as Ordinary Course Professional to the WMLP Debtors for the Period from October 9, 2018 through and including June 21, 2019 [Docket No. 2150];
- Second Interim and Final Fee Application of Lazard Frères and Co. LLC, as Investment Banker for the Conflicts Committee of the Westmoreland Resources GP, LLC Board of Directors and for Westmoreland Resource

<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 Reorganized 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 Reorganized 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> “WMLP Debtors” and “WLB Debtors” have the meanings ascribed to these terms in the the *Amended Joint Plan of Liquidation for the WMLP Debtors, as Modified*, dated June 5, 2019 [Docket No. 1967] (the “WMLP Chapter 11 Plan”).

Partners, LP and Its Subsidiaries for Allowance of Compensation and Reimbursement of Expenses for the Period from October 9, 2018 Through June 21, 2019 [Docket No. 2159]; and

- Jackson Walker LLP's First and Final Fee Application for Allowance and Payment of Fees and Expenses as Co-Counsel to the WMLP Debtors for the Period from March 1, 2019 Through June 21, 2019 [Docket No. 2162].

2. Pursuant to the procedures set forth in the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* dated November 14, 2018 [Docket No. 495] (the "Interim Compensation Order")<sup>3</sup> and the WMLP Chapter 11 Plan, objections to the WMLP Final Fee Applications were to be served no later than August 12, 2019.

3. The undersigned certifies that he has caused a review of the Court's docket in this case and no answer, objection, or other responsive pleading to the WMLP Final Fee Applications appears thereon. The WMLP Final Applications were filed and served in accordance with the Interim Compensation Order and the WMLP Chapter 11 Plan. Consequently, the WMLP Debtors respectfully request that the Court enter the orders granting the WMLP Final Fee Applications and authorizing the WMLP Debtors to pay one hundred percent (100%) of the fees and one hundred percent (100%) of the expenses as requested in the WMLP Final Fee Applications.

4. Professionals filed the following fee applications (the "WLB Final Fee Applications") with the Court in connection with services provided to the WLB Debtors:

- Final Application of Ernst & Young LLP for Compensation and Reimbursement of Expenses for the WCC Debtors the Period from October 9, 2018 through March 2, 2019 [Docket No. 1724];

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<sup>3</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

- Final Fee Statement of PricewaterhouseCoopers LLP for Services Rendered and Reimbursement of Expenses as Consultants for the Debtors for the Period October 9, 2018 through March 15, 2019 [Docket No. 1725];
- Second Interim and Final Fee Application of Jackson Walker LLP for Allowance and Payment of Fees and Expenses as Co-Counsel to the WLB Debtors for the Period from October 9, 2018 through February 28, 2019 [Docket No. 1731];
- First and Final Fee Application of Baker & Hostetler LLP as Ordinary Course Professional to the WLB Debtors [Docket No. 1738]; and
  - *Renewed* Final Fee Application of Baker & Hostetler LLP as Ordinary Course Professional to the WLB Debtors for the Period from October 9, 2018 Through and Including March 2, 2019 [Docket No. 2194]
- Second and Final Fee Application for the WLB Debtors and Second Interim Fee Application for the WMLP Debtors of Alvarez & Marsal North America, LLC, Restructuring Advisor to the Debtors and Debtors in Possession for the Period from January 1, 2019 Through and Including March 1, 2019 [Docket No. 1746].

5. On June 18, 2019, pursuant to the procedures set forth in the Interim Compensation Order and the *Amended Joint Plan Chapter 11 Plan of Westmoreland Coal Company and Certain of Its Debtor Affiliates* [Docket No. 1561] (with all supplements and exhibits thereto, the “WLB Plan”), the Court entered an interim order [Docket No. 2059] approving the WLB Final Fee Applications, among others, without prejudice to the applicants’ rights to seek final approval of the WLB Final Fee Applications if no further objections were raised.

6. The undersigned certifies that he has caused a review of the Court’s docket in this case and no further answer, objection, or other responsive pleading to the WLB Final Fee Applications appears thereon. The WLB Final Applications were filed and served in accordance with the Interim Compensation Order and the WLB Chapter 11 Plan. Consequently, the WLB Debtors respectfully request that the Court enter the orders granting the WLB Final Fee

Applications and authorizing the WLB Debtors to pay one hundred percent (100%) of the fees and one hundred percent (100%) of the expenses as requested in the WLB Final Fee Applications.

Houston, Texas  
August 13, 2019

*/s/ Gregory F. Pesce*

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*Counsel to the Debtors and Debtors in Possession*

**Certificate of Service**

I certify that on August 13, 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/ Gregory F. Pesce*

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Gregory F. Pesce