

**UNITED STATES BANKRUPTCY COURT
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)
)	

**CERTIFICATION OF NO OBJECTION
REGARDING DEBTORS’ TWENTY-SECOND OMNIBUS
OBJECTION TO CERTAIN PROOFS OF CLAIM (NO LIABILITY CLAIMS)**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “Complex Case Procedures”), the undersigned counsel to Westmoreland Coal Company certifies as follows:

1. On July 23, 2019, Westmoreland Coal Company and certain of its subsidiaries (“WCC”) filed the *Debtors’ Twenty-Second Omnibus Objection to Certain Proofs of Claim (No Liability Claims)* [Docket No. 2219] (the “Claims Objection”) with the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

2. The deadline for parties to object or file responses to the relief requested in the Claims Objection was set for September 3, 2019 (the “Objection Deadline”).

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.

3. The Complex Case Procedures provide that a motion may be granted without a hearing, provided that, after the passage of the Objection Deadline, the movant submits a certificate that no objection or other response has been filed or served.

4. To the best of WCC's knowledge, no answer, objection, or other responsive pleading to the Claims Objection has been (a) filed with the Court on the docket of the above-captioned chapter 11 cases or (b) served on WCC or its counsel.

5. It is therefore respectfully requested that the proposed order filed with the Claims Objection be entered at the earliest convenience of the Court. If the proposed order is not entered prior to the omnibus hearing currently scheduled for September 5, 2019 at 2:00 p.m. (prevailing Central Time), counsel to WCC will present the Claims Objection at such hearing.

[Remainder of page intentionally left blank]

Houston, Texas
September 3, 2019

/s/ Gregory F. Pesce

James H.M. Sprayregen, P.C.
Michael B. Slade (Bar No. 24013521)
Gregory F. Pesce (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: james.sprayregen@kirkland.com
michael.slade@kirkland.com
gregory.pesce@kirkland.com

-and-

Edward O. Sassower, P.C.
Stephen E. Hessler, P.C. (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: edward.sassower@kirkland.com
stephen.hessler@kirkland.com

-and-

Anna G. Rotman, P.C. (Bar No. 24046761)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
609 Main Street
Houston, Texas 77002
Telephone: (713) 836-3600
Email: anna.rotman@kirkland.com

Counsel to Westmoreland Coal Company

Certificate of Service

I certify that on September 3, 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

Gregory F. Pesce