

Exhibit 1

Esposito Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

WESTMORELAND COAL COMPANY, *et al.*,¹

Debtors.

Chapter 11

Case No.: 18-35672 (DRJ)

(Jointly Administered)

**DECLARATION OF ROBERT P. ESPOSITO IN SUPPORT OF
WLB LIQUIDATING TRUST'S TWENTY-NINTH OMNIBUS OBJECTION TO
CERTAIN SATISFIED CLAIMS**

I, **Robert P. Esposito**, hereby declare under penalty of perjury:

1. I am a Director of Alvarez & Marsal North America, LLC ("A&M"). A&M was retained by the above-captioned WLB Debtors² and the WMLP Debtors³ (collectively, with the WMLP Debtors, the "Debtors"), as well as the WMLP Liquidating Trust and the WLB Liquidating Trust, as restructuring advisor in connection with these chapter 11 cases. I have more than ten (10) years of restructuring experience.

2. I am generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and books and records that reflect, among other things, the Debtors' liabilities and the amount thereof owed to their creditors as of the Petition Date. I have read the

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 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 "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").

³ 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.

WLB Liquidating Trust's Twenty-Ninth Omnibus Objection to Certain Satisfied Claims (the "Objection"), filed contemporaneously herewith.⁴

3. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the Objected Claims, the Reviewing Parties have reviewed the Debtors' books and records and the relevant proofs of claim, as well as the supporting documentation provided by each claimant, and have determined that each Satisfied Claim should be disallowed and expunged. As such, I believe that the disallowance and expungement of the Satisfied Claims on the terms set forth in the Objection is appropriate.

Satisfied Claims

4. To the best of my knowledge, information, and belief, the Reviewing Parties have thoroughly reviewed the Debtors' books and records, and the claims register, and determined that the Satisfied Claims identified on **Exhibit A** to the Order were satisfied or released during these chapter 11 cases in accordance with the Bankruptcy Code, any applicable rules, or a Court order. Failure to disallow and expunge the Satisfied Claims would result in the applicable claimants receiving an unwarranted recovery against the WLB Liquidating Trust to the detriment of other similarly situated creditors. As such, I believe that disallowance and expungement of the Satisfied Claims on the terms set forth in the Objection and **Exhibit A** is appropriate.

⁴ Capitalized but undefined terms herein shall have the same meaning ascribed to them in the Objection.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing declaration are true and correct to the best of my knowledge, information and belief.

Dated: September 6, 2019

/s/ Robert P. Esposito
Robert P. Esposito
Alvarez & Marsal North America, LLC