

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re)	Chapter 11
)	
Patriot Coal Corporation., <i>et al.</i> ,)	Case No. 12-51502-659
)	
Debtors.)	Jointly Administered

**SECOND SUPPLEMENTAL DECLARATION OF KENNETH A. HILTZ
OF AP SERVICES, LLC AS CHIEF RESTRUCTURING OFFICER
TO THE DEBTORS AND DEBTORS IN POSSESSION**

I, Kenneth A. Hiltz declare, pursuant to section 1746 of title 28 of the United States Code, as follows:

1. I am a managing director of AlixPartners, LLP (“AlixPartners”) and an authorized representative of its affiliate, AP Services, LLC (“APS”), a Michigan limited liability company, which has a place of business at 2000 Town Center, Suite 2400, Southfield, Michigan 48075.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. I am filing this second declaration to supplement my original declaration (the “Original Declaration”) executed on July 19, 2012 and my supplemental declaration (the “Supplemental Declaration”) executed on August 3, 2012, in support of the application of Patriot Coal Corporation, and its affiliated debtors and debtors in possession (the “Debtors”) for entry of an order authorizing the Debtors to employ and retain APS as their restructuring advisor, pursuant to section 363(b) of the Bankruptcy Code and under the terms and conditions set forth

in the Application. On August 16, 2012 the retention order was filed in the Southern District of New York ((docket no. 371), retaining APS.

4. In the Original Declaration, APS reserved the right to supplement its declaration in the event that APS discovered any facts bearing on matters described in the Original Declaration regarding APS' employment by the Debtors. Accordingly, APS would like to disclose the following:

- There are two confidential clients of AlixPartners that are notice of appearance and rejection parties in this bankruptcy matter. The confidential clients are current and former AlixPartners client in matters unrelated to the Debtors.
- Aramark Uniform Services ("Aramark"), a rejection party in this bankruptcy matter, is a vendor to a former AlixPartners client and a former AlixPartners client in matters unrelated to the Debtors.
- Cintas Corp., a rejection party in this bankruptcy matter, is a vendor to AlixPartners.
- Cole, Schotz, Meisel, Forman & Leonard, P.A., a professional in interest in this bankruptcy matter, is an adverse party, professional in interest and creditor to current and former AlixPartners clients in matters unrelated to the Debtors.
- Curtis-Mallet Prevost, Colt & Mosle, LLP, a professional in interest in this bankruptcy matter, is a professional in interest, material contract party and co-counsel to current and former AlixPartners clients in matters unrelated to the Debtors.
- Deutsche Bank Securities, Inc. ("Deutsche Bank"), a notice of appearance party in this bankruptcy matter, is affiliated with entities that are shareholders, lenders, adverse parties, indenture trustees, creditors, limited partners and professionals in interest to current and former AlixPartners clients in matters unrelated to the Debtors. Deutsche Bank is a former AlixPartners client in matters unrelated to the Debtors. Also, Deutsche Bank AG provides banking services to AlixPartners in matters unrelated to the Debtors.
- EPIQ Bankruptcy Solutions LLC, a professional in interest in this bankruptcy matter, is a professional in interest to current and former AlixPartners clients in matters unrelated to the Debtors.
- Houlihan Lokey Capital, Inc. ("Houlihan"), a professional in interest in this bankruptcy matter, is affiliated with an entity that is a professional in interest and investment banker to current and former AlixPartners clients in matters unrelated

to the Debtors. Houlihan is an affiliate of a former AlixPartners client in matters unrelated to the Debtors.

- Iron Mountain Information Management (“Iron Mountain”), a notice of appearance party in this bankruptcy matter, is a vendor, creditor and professional in interest to current and former AlixPartners clients in matters unrelated to the Debtors. Iron Mountain is vendor to AlixPartners.
- Jones Day, professional in interest in this bankruptcy matter, is a current and former AlixPartners client in matters unrelated to the Debtors. Jones Day is a professional in interest to current and former AlixPartners clients in matters unrelated to the Debtors. Jones Day provides legal services to AlixPartners.
- Kirkland & Ellis LLP, a professional in interest in this bankruptcy matter, is counsel, adverse counsel and professional in interest to current and former AlixPartners’ clients in matters unrelated to the Debtors. Kirkland & Ellis, LLP is a current and former AlixPartners client in matters unrelated to the Debtors. In addition, Kirkland & Ellis, LLP currently provides services to AlixPartners, LLP, in matters unrelated to the Debtors.
- Mayer Brown, LLP, a professional in interest in this bankruptcy matter, is a current and former AlixPartners client in matters unrelated to the Debtors. Mayer Brown, LLP is a professional in interest and adverse party to former AlixPartners clients in matters unrelated to the Debtors. Mayer Brown, LLP is a vendor to AlixPartners.
- Mesirow Financial Consulting, LLC, (“Mesirow”) a professional in interest in this bankruptcy matter, is a significant shareholder and bondholder to current and former AlixPartners clients in matters unrelated to the Debtors. Mesirow is the previous employer of current AlixPartners employees and a vendor to AlixPartners.
- Microsoft Corporation and Microsoft Licensing, GP (“Microsoft”), notice of appearance parties in this bankruptcy matter, are vendors, lenders, creditors, material contract parties and customers to current and former AlixPartners clients in matters unrelated to the Debtors. Microsoft is a former AlixPartners client in matters unrelated to the Debtors. Microsoft is a vendor to AlixPartners.
- Monster Worldwide, Inc., a rejection party in this bankruptcy matter, is a former AlixPartners client in matters unrelated to the Debtors.
- Morgan Stanley & Co., LLC (“Morgan Stanley”), notice of appearance party in this bankruptcy matter, is affiliated with entities that are lenders, bondholders, creditors, shareholders and professionals in interest to current and former AlixPartners clients in matters unrelated to the Debtor. Morgan Stanley is a current and former AlixPartners client in matters unrelated to the Debtor. Morgan Stanley is the previous employer of a current AlixPartners employee.

- Oracle America (“Oracle”), a notice of appearance party in this bankruptcy matter, is a current and former AlixPartners client in matters unrelated to the Debtor. Oracle is a creditor and adverse party to former AlixPartners clients in matters unrelated to the Debtor. Oracle is the previous employer of a current AlixPartners employee.
- Pension Benefit Guaranty Corporation, a notice of appearance party in this bankruptcy matter, is a creditor, vendor, adverse party, and significant shareholder to current and former AlixPartners clients in matters unrelated to the Debtors.
- Union Pacific Railroad Company, a notice of appearance party in this bankruptcy matter, is a creditor, customer, adverse party, director affiliated company and lessor to current and former AlixPartners clients in matters unrelated to the Debtors. Union Pacific Railroad is the previous employer of a current AlixPartners employee.
- Willkie Farr & Gallagher, LLP (“Willkie Farr”), a professional in interest in this bankruptcy matter, is a current and former AlixPartners client in matters unrelated to the Debtors. Willkie Farr is a professional in interest to current and former AlixPartners clients in matters unrelated to the Debtors. Willkie Farr is a vendor to AlixPartners.
- Xerox Corporation (“Xerox”), a rejection party in this bankruptcy, is an adverse party, lessee, customer and vendor to current and former AlixPartners clients in matters unrelated to the Debtors. Xerox is a vendor to AlixPartners in matters unrelated to the Debtors.

5. APS continues to reserve the right to supplement its disclosures in the event that APS discovers any facts bearing on matters regarding APS’ employment by the Debtors. If any new material relevant facts or relationships are discovered or arise, APS will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

Dated this 13th day of September, 2013



Kenneth A. Hiltz