

SO ORDERED

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Apr 01, 2013

Kathy A. Surratt - States
KATHY A. SURRATT-STATES
Chief United States Bankruptcy Judge

In re:

PATRIOT COAL CORPORATION, *et al.*,
Debtors.

Chapter 11
Case No. 12-51502-659
(Jointly Administered)

ROBIN LAND COMPANY, LLC,

Plaintiff,

v.

Adv. Pro. No. 12-04355-659

STB VENTURES, INC.,

Defendant,

ARCH COAL, INC., ARK LAND COMPANY,
and ARK LAND KH, INC.,

Intervenor-Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO EXCEED THE PAGE LIMITATION IN ITS
OBJECTION TO THE MOTION OF STB VENTURES, INC. UNDER 11 U.S.C.
§ 365(D)(3) TO COMPEL ROBIN LAND COMPANY TO PAY PART OR ALL OF THE
POST-PETITION AMOUNTS DUE UNDER THE STB OVERRIDE AGREEMENT,
AND, IN THE ALTERNATIVE, TO PROVIDE STB VENTURES ADEQUATE
PROTECTION OF ITS INTERESTS UNDER THE STB OVERRIDE AGREEMENT**

Plaintiff Robin Land Company, LLC (“**Robin Land**”), one of the affiliated debtor entities in the above-captioned chapter 11 case, by and through its undersigned attorneys, hereby moves the Court for an Order pursuant to Local Bankruptcy Rule 9004(C) granting Robin Land leave to exceed the Court’s page limitation (the “**Motion**”) in its Objection (the “**Objection**”) [ECF No. 55] to the Motion of STB Ventures, Inc. (“**STB**”), Under 11 U.S.C. § 365(d)(3) to Compel Robin Land Company to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement, and, in the Alternative, to Provide STB Ventures Adequate Protection of Its Interests Under the STB Override Agreement (the “**STB Motion**”) [ECF No. 40]. In support of its Motion, Robin Land states as follows:

1. The STB Motion, filed on March 5, 2013, exceeded this Court’s page limitation by approximately twelve pages. Concurrently with the STB Motion, STB filed a Motion to Exceed the Page Limitation [ECF No. 39]. This Court granted STB’s Motion to Exceed the Page Limitation on March 8, 2013 [ECF No. 42].

2. Robin Land has made every effort to comply with the Court’s page limitation. However, given the length of the STB Motion – which is twenty-seven pages – Robin Land is unable to adequately respond to STB’s arguments in fifteen pages.

3. Robin Land respectfully requests leave to exceed the Court’s page limitation by five pages.

WHEREFORE, for the foregoing reasons, Robin Land respectfully requests leave to exceed the Court’s page limitation by five pages in its Objection to the Motion of STB Ventures, Inc., Under 11 U.S.C. § 365(d)(3) to Compel Robin Land Company to Pay Part or All of the Post-Petition Amounts Due Under the STB Override Agreement, and, in the Alternative, to Provide STB Ventures Adequate Protection of Its Interests Under the STB Override Agreement,

and for such other relief as the court deems just and proper.

Dated: New York, New York
March 25, 2013

Respectfully Submitted,

DAVIS POLK & WARDWELL LLP

By: /s/ Jonathan D. Martin

Marshall S. Huebner
Benjamin S. Kaminetzky
Brian M. Resnick
Jonathan D. Martin

450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 607-7983
jonathan.martin@davispolk.com

*Counsel to Plaintiff/Debtor and Debtor in
Possession*