

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

In re)	Chapter 11
WALTER ENERGY, INC., <i>et al.</i> ,)	15-02741-TOM11
Debtors.)	Jointly Administered

JOINDER TO DEBTORS’ OBJECTION TO EMERGENCY MOTION BY DOMINION RESOURCES BLACK WARRIOR TRUST TO RECONSIDER, ON A LIMITED BASIS, THE CASH MANAGEMENT ORDER

The Official Committee of Unsecured Creditors (the “Committee”) of Walter Energy, Inc., *et al.*, as debtors and debtors in possession (collectively, the “Debtors”), by and through its undersigned proposed counsel, hereby files this joinder (the “Joinder”) to the *Debtors’ Objection to Emergency Motion by Dominion Resources Black Warrior Trust to Reconsider, on a Limited Basis, the Cash Management Order* (the “Objection”).¹ The Committee respectfully represents as follows:

1. By this Joinder, the Committee joins in, and hereby incorporates by reference, the arguments made by the Debtors in the Objection. The Committee has analyzed the pleadings filed in this matter and supports the Debtors’ positions based on the record that has been and will be established.

2. The Committee echoes the position raised by the Debtors that modification of the Cash Management Order is not the proper procedural vehicle for implementing the relief sought by Dominion. The Committee reserves all rights to respond substantively on the issues raised by Dominion in the appropriate proceedings.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.



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3. For the foregoing reasons, the Committee respectfully requests that the Court enter an order (i) denying the Motion, and (ii) granting such other and further relief as the Court deems just and proper.

Dated: Birmingham, Alabama
August 14, 2015

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