UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

In re: WALTER ENERGY, INC. *et al.*, Debtors.[1]	Chapter 11 Case No. 15-02741-TOM11 Jointly Administrated
DOMINION RESOURCES BLACK WARRIOR TRUST, by and through its TRUSTEE, SOUTHWEST BANK, Plaintiff, V. WALTER BLACK WARRIOR BASIN, LLC, Defendant.	Adversary No. 15-00102-TOM

RESPONSE TO MOTION TO QUASH

COMES NOW Dominion Resources Black Warrior Trust ("Dominion") by and through its Trustee, Southwest Bank, hereby responds to the Debtor's Motion to Quash Subpoena as follows:

1. Dominion does not claim it has perfected service on Carol Farrell. Dominion did attempt service upon Ms. Farrell on Friday based on the testimony provided by William Harvey,

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Walter Energy, Inc. (9953); Atlantic Development and Capital, LLC (8121); Atlantic Leaseco, LLC (5308); Blue Creek Coal Sales, Inc. (6986); Blue Creek Energy, Inc. (0986); J.W. Walter, Inc. (0648); Jefferson Warrior Railroad Company, Inc. (3200); Jim Walter Homes, LLC (4589); Jim Walter Resources, Inc. (1186); Maple Coal Co., LLC (6791); Sloss-Sheffield Steel & Iron Company (4884); SP Machine, Inc. (9945); Taft Coal Sales & Associates, Inc. (8731); Tuscaloosa Resources, Inc. (4869); V Manufacturing Company (9790); Walter Black Warrior Basin LLC (5973); Walter Coke, Inc. (9791); Walter Energy Holdings, LLC (1596); Walter Exploration & Production LLC (5786); Walter Home Improvement, Inc. (1633); Walter Land Company (7709); Walter Minerals, Inc. (9714); and Walter Natural Gas, LLC (1198). The location of the Debtors' corporate headquarters is 3000 Riverchase Galleria, Suite 1700, Birmingham, Alabama 35244-2359

but Dominion was unable to locate her in order to perfect service. Dominion has not filed a Return of Service for the subpoena indicating that it believes service was perfected.

2. However, based on paragraph #8 of Debtor's Motion to Quash and its express representation that 1) there will be other witnesses of the Debtor available to testify on Tuesday as to the invoicing, payment and migration of funds (if those are not established by stipulation) and 2) that the facts regarding the Alagasco invoices, the manner in which Alagasco pays for the production, the bank account these funds go into, and the bank accounts the funds migrate to are undisputed and should be the subject of stipulation, Dominion will withdraw its subpoena to Ms. Farrell.

BASED ON THE FOREGOING, Dominion hereby withdraws its subpoena to Carol Farrell and requests the Court enter an Order cancelling the emergency hearing scheduled today for 1:00 p.m. Dominion prays for such other and further relief as may be necessary.

Dated: August 17, 2015

Respectfully Submitted,

BENTON & CENTENO, LLP

By: */s/ Lee R. Benton*

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ATTORNEYS FOR THE DOMINION RESOURCES BLACK WARRIOR TRUST

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of August, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system, and served a copy of the above and foregoing, **and parties listed below** via email:

Counsel for Debtor:
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/s/ Jamie A. Wilson
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