

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:))	Chapter 11
EDISON MISSION ENERGY, <i>et al.</i> , ¹))	Case No. 12-49219 (JPC)
Debtors.))	(Jointly Administered)

NOTICE OF DEBTORS’ SECOND OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (WRONG DEBTOR CLAIMS)

PLEASE TAKE NOTICE that on the **16th day of October, 2013, at 10:30 a.m. (Central Time)** or as soon thereafter as counsel may be heard, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) shall appear before the Honorable Jacqueline P. Cox or any other judge who may be sitting in her place and stead, in Courtroom 680 in the United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, and present the attached *Debtors’ Second Omnibus Objection to Certain Proofs of Claim (Wrong Debtor Claims)* (the “Objection”).

PLEASE TAKE FURTHER NOTICE that any objection to the Objection must be filed with the Court by **October 7, 2013, at 4:00 p.m. (Central Time)** and served so as to be actually received by: (a) counsel to the Debtors; (b) each holder of a Wrong Debtor Claim (as defined in the Objection) identified on **Schedule 1** to **Exhibit A** to the Objection; (c) the Office of the U.S. Trustee for the Northern District of Illinois; (d) counsel to the official committee of unsecured creditors appointed to these chapter 11 cases; (e) the indenture trustee for the Debtors’ senior unsecured notes; (f) counsel to the ad hoc committee of certain holders of the Debtors’ senior unsecured notes; (g) the indenture trustee for the lessor notes related to the Debtors’ Powerton generating station in Pekin, Illinois, and units 7 and 8 of the Debtors’ Joliet, Illinois, generating station and the pass-through trustee for the related pass-through certificates; (h) counsel to the ad hoc committee of certain holders of pass-through certificates related to the Debtors’ Powerton and Joliet generating stations; (i) the owner trusts and the equity investors for the Debtors’ Powerton and Joliet generating stations and their respective counsel; (j) the lender under Debtor

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Finance Co. (9202); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of parent Debtor Edison Mission Energy’s corporate headquarters and the Debtors’ service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

Edison Mission Energy's letter-of-credit facility; (k) the state attorneys general for states in which the Debtors conduct business; (l) United States Attorney for the Northern District of Illinois; (m) the Internal Revenue Service; (n) the Securities and Exchange Commission; (o) the Environmental Protection Agency and similar state environmental agencies for states in which the Debtors conduct business; and (p) those parties who have requested service of papers in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and the *Order Approving Case Management Procedures* [Docket No. 128].

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these chapter 11 cases are available free of charge by visiting the case website maintained by GCG, Inc., the Debtors' notice and claims agent for these chapter 11 cases, available at www.edisonmissionrestructuring.com or by calling (866) 241-6491. You may also obtain copies of any pleadings by visiting the Court's website at www.ilnb.uscourts.gov in accordance with the procedures and fees set forth therein.

[Remainder of page intentionally left blank.]

Dated: September 16, 2013

/s/ David R. Seligman, P.C.

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

)	
In re:)	Chapter 11
)	
EDISON MISSION ENERGY, <u>et al.</u> , ¹)	Case No. 12-49219 (JPC)
)	
Debtors.)	(Jointly Administered)
)	

**DEBTORS’ SECOND OMNIBUS OBJECTION TO
CERTAIN PROOFS OF CLAIM (WRONG DEBTOR CLAIMS)**

THIS OBJECTION SEEKS TO DISALLOW, EXPUNGE, RECLASSIFY, REDUCE, AND/OR MODIFY CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 TO EXHIBIT A ATTACHED TO THIS OBJECTION.

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully state the following in support of this objection (this “Objection”):

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”) reassigning the claims identified on **Schedule 1** to the Order (collectively, the “Wrong Debtor Claims”) as Claims against the “Correct Debtor” identified on **Schedule 1** to the Order because such claims are asserted against the wrong Debtor. In support

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Finance Co. (9202); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of parent Debtor Edison Mission Energy’s corporate headquarters and the Debtors’ service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

of this Objection, the Debtors submit the declaration of Aaron Moss (the "Moss Declaration"), to be filed in connection herewith.

Jurisdiction

2. The United States Bankruptcy Court for the Northern District of Illinois (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are sections 502 and 1106(a)(1) of title 11 of the United States Code (the "Bankruptcy Code"), rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 3007-1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Illinois (the "Local Rules").

Background

5. Edison Mission Energy, together with its Debtor and non-Debtor affiliates, is a leading independent power producing enterprise specializing in developing, operating, and selling energy and capacity from approximately 40 generating facilities in 12 states and the Republic of Turkey. The Debtors have approximately 800 employees and maintain headquarters in Chicago, Illinois and Santa Ana, California.

6. On December 17, 2012 (the "Original Petition Date"), seventeen of the Debtors (collectively, the "Original Debtors") filed petitions with the Court under chapter 11 of the Bankruptcy Code. On May 2, 2013 (the "Homer City Petition Date"), three additional Debtors (collectively, the "Homer City Debtors")² filed petitions with the Court under chapter 11 of the Bankruptcy Code. The Court has approved procedural consolidation and joint administration of

² The Original Debtors and the Homer City Debtors are collectively referred to in this Objection as the "Debtors."

these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) [Docket Nos. 115, 154, 780]. No party has requested the appointment of a trustee or examiner in these chapter 11 cases. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On January 7, 2013, the United States Trustee for the Northern District of Illinois appointed an official committee of unsecured creditors (the “Committee”) in these chapter 11 cases [Docket No. 202] (as amended on January 18, 2013 [Docket No. 308]).

The Claims Reconciliation Process

7. On February 14, 2013 and May 16, 2013, the Original Debtors and the Homer City Debtors, respectively, filed their schedules of assets and liabilities and executory contracts and unexpired leases (as amended, collectively, the “Schedules”) and statements of financial affairs, as required pursuant to section 521 of the Bankruptcy Code. On July 2, 2013, certain Debtors filed amendments to their respective Schedules.

8. On April 10, 2013, the Court entered the *Order (A) Setting the Bar Dates for Filing Proofs of Claim, Including Claims Arising Under 11 U.S.C. § 503(b)(9) Proofs of Claim and (B) Approving the Form and Manner of Notice Thereof* [Docket No. 669] (the “Original Bar Date Order”), which, among other things, established June 17, 2013, as: (a) the deadline (the “General Bar Date”) for all persons and entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against any of the Original Debtors that arose before the Original Petition Date (each, a “Claim”), including any claim arising under section 503(b)(9) of the Bankruptcy Code, to file proof of such Claim in writing; and (b) the deadline (the “Governmental Bar Date”) for all governmental units holding or wishing to assert a Claim against any of the Original Debtors that arose before the Original Petition Date to file proof of such Claim in writing.

9. On August 21, 2013, the Court entered the *Order (A) Setting Bar Dates for Filing Proof of Claim, Including Section 503(b)(9) Claims, Against EME Homer City Generation L.P., Edison Mission Finance Co., and Homer City Property Holdings, Inc. and (B) Approving the Form and Manner of Notice Thereof* [Docket No. 1137] (the “Homer City Bar Date Order” and, together with the Original Bar Date Order, the “Bar Date Orders”), which, among other things, established October 29, 2013, as the deadline for governmental and non-governmental entities to file proofs of claim against the Homer City Debtors. Together, the Bar Date Orders apply to all purported Claims against the Debtors arising before the Original Petition Date and the Homer City Petition Date, as applicable. Notice of the Bar Date Orders was provided in accordance with the procedures outlined therein.

10. On July 17, 2013, the Court approved certain omnibus procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases [Docket No. 1022] (the “Objection Procedures”).

11. To date, entities have filed approximately 1,800 proofs of claim against the Debtors on an aggregate basis, collectively asserting more than \$11.86 billion in aggregate liabilities. The Debtors and their advisors are in the process of reviewing the proofs of claim, including supporting documentation, if any, filed together with any proof of claim, and reconciling the proofs of claims with the Debtors’ books and records to determine the validity of the proofs of claim. For the reasons set forth in more detail below, and based on their review to date, the Debtors have determined that the Disputed Claims should be expunged and disallowed as set forth herein.

Objection

12. The Debtors object to the 31 Wrong Debtor Claims. As set forth in the Moss Declaration, the Debtors have reviewed the Wrong Debtor Claims and determined that the

Wrong Debtor Claims are asserted against the wrong Debtor. Failure to reassign the Wrong Debtor Claims could result in the relevant claimants receiving an unwarranted recovery against certain Debtors to the detriment of other similarly-situated creditors. Accordingly, the Debtors respectfully request that the Court reassign the Wrong Debtor Claims as Claims against the “Correct Debtor” identified on **Schedule 1** to the Order.

Basis for Relief

13. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). A debtor in possession has the duty to object to the allowance of any claim that is improper. See 11 U.S.C. § 1106(a)(1).

14. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. See In re Salem, 465 F.3d 767, 779 (7th Cir. 2006). To receive the benefit of *prima facie* validity, however, the proof of claim must “set forth facts necessary to support the claim.” In re Stoecker, 143 B.R. 879, 883 (N.D. Ill. 1992), aff’d in part, vacated in part by 5 F.3d 1022 (7th Cir. 1993). Additionally, a claimant’s proof of claim is entitled to the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) only until an objecting party refutes at least one of the allegations that is essential to the claim’s legal sufficiency. See In re Relford, 323 B.R. 669, 672–73 (Bankr. S.D. Ind. 2004). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence. Id. In other words, once the *prima facie* validity of a claim is rebutted, “it is for the claimant to prove his claim, not for the objector to disprove it.” In re Kahn, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

15. As set forth herein and in the Moss Declaration, the Court should reassign the Wrong Debtor Claims as set forth herein. If the Wrong Debtor Claims are not formally reassigned, as requested herein, the potential exists for the applicable claimants to receive recoveries to which they are not entitled, to the detriment of the Debtors' other stakeholders. Thus, this relief is necessary to prevent any inappropriate distribution of estate funds and to facilitate the administration of the claims allowance process.

Compliance with Bankruptcy Rule 3007(e)

16. The Debtors respectfully submit that this Objection complies with the requirements for omnibus objections set forth by Bankruptcy Rule 3007(e). Namely, the Debtors and GCG, Inc., their notice and claims agent, have created a personalized form of notice that shall be served upon each claimant affected by this Objection. Each such notice prominently identifies the claimant's: (a) name; (b) address; (c) applicable claim number; (d) proposed treatment pursuant to the Objection; and (e) does not include any other claimant's information on the notice.

17. As a result, each claimant can readily identify its Claim and proposed treatment and respond accordingly. The proposed form of Order further identifies each claimant by category of claims subject to objection. This Objection conspicuously identifies the Debtors as the objecting parties, identifies this Objection as the Debtors' second omnibus claims objection, and contains objections to fewer than 100 Claims. Accordingly, the Debtors respectfully submit that this Objection complies with Bankruptcy Rule 3007(e).

Separate Contested Matter

18. Each of the above objections to the proofs of claim constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtors request that any order

entered by the Court with respect to an objection asserted herein shall be deemed a separate order with respect to each Claim.

Reservation of Rights

19. The Debtors expressly reserve the right to amend, modify, or supplement this Objection and to file additional substantive or non-substantive objections to the Claims objected to herein, or any other Claims, filed or not, which may be asserted against the Debtors. Should one or more of the grounds of objection stated in this Objection be overruled, the Debtors reserve the right to object on any other applicable grounds. In addition, the Debtors reserve the right to seek to reduce any Claim for any reason, including to the extent such Claim has been paid. The Debtors reserve the right to raise further objections, including objections under section 502(d) of the Bankruptcy Code. Nothing in this Objection or the relief requested herein shall limit the right of the Debtors, the Committee, or the ad hoc committee of certain holders of the Debtors' senior unsecured notes (the "Noteholder Group") to bring future and/or additional objections to any of the Wrong Debtor Claims on any basis.

Notice

20. The Debtors have provided notice of this Objection to: (a) the Office of the United States Trustee for the Northern District of Illinois; (b) holders of Wrong Debtor Claims identified on **Schedule 1** to the Order; (b) counsel to the Committee; (c) the indenture trustee for the Debtors' senior unsecured notes; (d) counsel to the ad hoc committee of certain holders of the Debtors' senior unsecured notes; (e) the indenture trustee for the lessor notes related to the Debtors' Powerton generating station in Pekin, Illinois, and units 7 and 8 of the Debtors' Joliet, Illinois, generating station and the pass-through trustee for the related pass-through certificates; (f) counsel to the ad hoc committee of certain holders of pass-through certificates related to the Debtors' Powerton and Joliet generating stations; (g) the owner trusts and the equity investors for

the Debtors' Powerton and Joliet generating stations and their respective counsel; (h) the lender under Debtor Edison Mission Energy's letter-of-credit facility; (i) the state attorneys general for states in which the Debtors conduct business; (j) United States Attorney for the Northern District of Illinois; (k) the Internal Revenue Service; (l) the Securities and Exchange Commission; and (m) the Environmental Protection Agency and similar state environmental agencies for states in which the Debtors conduct business. In light of the nature of the relief requested herein, the Debtors respectfully submit that no further notice is necessary.

[Remainder of page intentionally left blank.]

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the related relief requested herein and such other and further relief as the Court deems appropriate.

Dated: September 16, 2013

/s/ David R. Seligman, P.C.

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*Counsel to Debtor Camino Energy Company
and Conflicts Counsel to the other Debtors
and Debtors in Possession*

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

In Re:) BK No.: 12-49219
EDISON MISSION ENERGY, et al.,) (Jointly Administered)
) Chapter: 11
) Honorable Jacqueline Cox
)
)
Debtor(s))

Re: Docket No. ____

**ORDER GRANTING DEBTORS' SECOND OMNIBUS OBJECTION
TO CERTAIN PROOFS OF CLAIM (WRONG DEBTOR CLAIMS)**

Upon the objection (the "Objection") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") reassigning the Wrong Claims identified on Schedule 1 attached hereto, pursuant to sections 502 and 1106(a)(1) of the Bankruptcy Code, Bankruptcy Rule 3007, Local Rule 3007-1, and the Objection Procedures, all as more fully set forth in the Objection; and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Objection is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors provided appropriate notice of the Objection and the opportunity for a hearing on the Objection under the circumstances; and the Court having reviewed the Objection and the Moss Declaration and having heard the statements in support of the relief requested therein at a hearing before the Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is granted as set forth herein. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. The Wrong Debtor Claims identified on Schedule 1 attached hereto are reassigned as Claims against the "Correct Debtor" identified on Schedule 1 attached hereto.
4. GCG, Inc., the Debtor's notice and claims agent, is directed to update the claims register to reflect the relief granted in this Order.
5. Except as provided in this Order, nothing in this Order shall be deemed: (a) an admission or finding as to the validity of any claim against a Debtor entity; (b) a waiver of the right of the Debtors, the Committee, or the Noteholder Group to dispute any claim against any Debtor on any grounds whatsoever, at a later date; (c) a promise by or requirement on any Debtor to pay any claim; (d) an

implication or admission that any particular claim is of a type specified or defined in this Order; or (e) a waiver of the rights of the Debtors, the Committee, or the Noteholder Group under the Bankruptcy Code or any other applicable law.

6. Each Claim and the objections by the Debtors to such Claim, as addressed in the Objection and set forth on Schedule 1 hereto, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each Claim. Any stay of this Order pending appeal by any Claimants whose claims are subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters identified in the Objection or this Order.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

8. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Enter:

Dated:

United States Bankruptcy Judge

Prepared by:

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Schedule 1

Wrong Debtor Claims

Schedule 1- Wrong Debtor Claims

Second Omnibus Objection to Claims

**Edison Mission Energy, et al.
 12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE REASSIGNED					OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME OF ORIGINAL DEBTOR	CORRECT DEBTOR	
1	AIR CURE INCORPORATED 8501 EVERGREEN BLVD NW COON RAPIDS, MN 55433 Date Filed: 05/10/13	530	503(b)(9): \$1,533.69 Unsecured: \$163.75	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
2	CHILDERS BANQUET AND EVENTS CENTER C/O DACA VI LLC 1565 HOTEL CIR S #310 SAN DIEGO, CA 92108 Date Filed: 04/19/13	103	Unsecured: \$550.93	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
3	COMPLETE SAFETY INC C/O DACA VI LLC 1565 HOTEL CIR S #310 SAN DIEGO, CA 92108 Date Filed: 03/28/13	38	Unsecured: \$1,437.50	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
4	CRESCENT ELECTRIC SUPPLY CO 200 S LARKIN AVE P O BOX 2128 JOLIET, IL 60436 Date Filed: 05/11/13	576	503(b)(9): \$744.19	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
5	HAROLD BECK & SONS 11 TERRY DR NEWTOWN, PA 18940 Date Filed: 04/29/13	199	Unsecured: \$5,597.60	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
6	LAKELAND LARSON ELEVATOR ATTN: WILLIAM J. KOWALKE, SECRETARY 731 MCALISTER WAUKEGAN, IL 60085 Date Filed: 05/22/13	790	Unsecured: \$8,435.85	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
7	MCMASTER CARR SUPPLY COMPANY 600 COUNTY LINE RD ELMHURST, IL 60126 Date Filed: 01/11/13	55	Unsecured: \$5,689.55	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5

Schedule 1- Wrong Debtor Claims

Second Omnibus Objection to Claims

**Edison Mission Energy, et al.
 12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE REASSIGNED					OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME OF ORIGINAL DEBTOR	CORRECT DEBTOR	
8	MERRILL COMMUNICATIONS LLC ONE MERRILL CIR ST PAUL, MN 55108 Date Filed: 02/19/13	57	Unsecured: \$13,576.47	Edison Mission Holdings Co.	Edison Mission Energy	Pgs 4-5
9	MET PRO CORPORATION DBA MET PRO ENVIRONMENTAL AIR SOLUTIONS ATTN NEAL E MURPHY, VP-FINANCE CFO 160 CASSELL RD HARLEYSVILLE, PA 19438 Date Filed: 01/29/13	50	Unsecured: \$242.04	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
10	MID-STATES ENGR & SALES, INC 5001 CHASE AVE DOWNERS GROVE, IL 60515 Date Filed: 05/17/13	720	Unsecured: \$9,615.24	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
11	MIDCO INC. ATTN KAREN GUZAN 221 SHORE COURT BURR RIDGE, IL 60527 Date Filed: 05/06/13	395	Unsecured: \$4,039.67	Edison Mission Energy	Midwest Generation, LLC: \$3,667.78 Midwest Generation EME, LLC: \$371.89	Pgs 4-5
12	NOVA MACHINE PRODUCTS CORP 18001 SHELDON RD CLEVELAND, OH 44130 Date Filed: 05/14/13	625	503(b)(9): \$555.96	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
13	PATRICK ENGINEERING INC. ATTN: PRESIDENT, MANAGING OR GENERAL AGENT 4970 VARSITY DRIVE LISLE, IL 60532 Date Filed: 06/11/13	1217	Unsecured: \$157,226.84	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
14	REED SMITH LLP C/O COLLECTIONS 20 STANWIX ST PITTSBURGH, PA 15222 Date Filed: 03/13/13	33	Unsecured: \$767.15	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5

Schedule 1- Wrong Debtor Claims

Second Omnibus Objection to Claims

**Edison Mission Energy, et al.
 12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE REASSIGNED					OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME OF ORIGINAL DEBTOR	CORRECT DEBTOR	
15	SAFWAY SERVICES LLC N19 W24200 RIVERWOOD DR WAUKESHA, WI 53188 Date Filed: 04/26/13	131	Unsecured: \$15,100.70	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
16	SARGENT'S PERSONNEL AGENCY INC 210 MAIN ST JOHNSTOWN, PA 15901 Date Filed: 03/08/13	31	Unsecured: \$10,958.57	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
17	SIMS RECYLCING SOLUTIONS, INC. 1600 HARVESTER RD WEST CHICAGO, IL 60185 Date Filed: 06/14/13	1453	Unsecured: \$158.00	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
18	SMARTBURN, LLC 579 D'ONOFRIO DRIVE MADISON, WI 53719 Date Filed: 06/10/13	1099	Unsecured: \$6,897.95	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
19	SMO-KING PIT INC 2200 W WAR MEMORIAL DR PEORIA, IL 61613 Date Filed: 04/26/13	155	503(b)(9): \$2,999.74	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
20	STEINER ELECTRIC CO 1250 TOUHY AVE ELK GROVE VILLAGE, IL 60007 Date Filed: 05/29/13	843	Unsecured: \$453.47	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
21	STEVENSON SALES & SERVICE, LLC 410 STEVENSON DRIVE BOLINGBROOK, IL 60440 Date Filed: 05/29/13	857	Unsecured: \$3,889.57	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
22	TEAM INDUSTRIAL SERVICES 13131 DAIRY ASHFORD STE 600 SUGAR LAND, TX 77478 Date Filed: 04/22/13	359	Unsecured: \$655.35	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5

Schedule 1- Wrong Debtor Claims

Second Omnibus Objection to Claims

**Edison Mission Energy, et al.
 12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE REASSIGNED					OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME OF ORIGINAL DEBTOR	CORRECT DEBTOR	
23	TESTAMERICA LABORATORIES INC 4101 SHUFFEL STREET NW NORTH CANTON, OH 44720 Date Filed: 07/25/13	1841	Unsecured: \$15,903.00	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
24	TRACK SERVICES, INC 810 W AVENUE H GRIFFITH, IN 46319 Date Filed: 06/01/13	905	Unsecured: \$27,688.26	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5
25	UCC DRY SORBENT INJECTION, LLC ATTN: PRESIDENT, MANAGING OR GENERAL AGENT 2100 NORMAN DRIVE WEST WAUKEGAN, IL 60085 Date Filed: 05/31/13	883	Unsecured: \$501,692.60	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
26	UHY ADVISORS FLVS, INC. ATTN JOHN YOUENS 2929 ALLEN PKWY 20TH FL HOUSTON, TX 77019 Date Filed: 05/29/13	876	Unsecured: \$3,091.81	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
27	UNICCO SERVICE COMPANY 275 GROVE STREET AUBURNDALE, MA 02466 Date Filed: 04/29/13	362	Unsecured: \$2,304.17	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
28	UNIVERSITY OF IOWA OFFICE OF GENERAL COUNSEL 120 JESSUP HALL 5 W JEFFERSON ST IOWA CITY, IA 52242 Date Filed: 04/30/13	228	Unsecured: \$20,502.50	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
29	VEOLIA ES INDUSTRIAL SERVICES, INC. 121 E CHAIN OF ROCKS RD MITCHELL, IL 62040 Date Filed: 04/22/13	108	Unsecured: \$38,325.00	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5

Schedule 1- Wrong Debtor Claims

Second Omnibus Objection to Claims

**Edison Mission Energy, et al.
 12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE REASSIGNED					OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME OF ORIGINAL DEBTOR	CORRECT DEBTOR	
30	WILLIAM FRICK & COMPANY 2600 COMMERCE DRIVE LIBERTYVILLE, IL 60048 Date Filed: 06/04/13	931	Unsecured: \$310.30	Midwest Generation EME, LLC	Midwest Generation, LLC	Pgs 4-5
31	WORKRITE AN AFFILIATE OF WILLIAMSON-DICKIE MFG COMPANY ATTN GLEN LOVEDAY PO BOX 1779 FORT WORTH, TX 76101 Date Filed: 03/05/13	64	Unsecured: \$1,116.99	Edison Mission Energy	Midwest Generation, LLC	Pgs 4-5

Total: \$862,224.41