

Dated: May 19, 2014

Respectfully submitted,

By: /s/ Joseph D. Frank
One of their attorneys

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Counsel to NRG Energy Holdings Inc. and the
Post-Effective Date Debtor Subsidiaries

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)

PURCHASER PARTIES’ TWENTY-SIXTH² OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (NO-LIABILITY CLAIMS)

NRG Energy Holdings Inc. (“NRG”) and the Post-Effective Date Debtor Subsidiaries³ (collectively, the “Purchaser Parties”), respectively as successors-in-interest or reorganized debtors with respect to certain claims against Edison Mission Energy (“EME”) and certain of its debtor affiliates (together with EME, the “Debtors”), object as follows:

RELIEF REQUESTED

1. The Purchaser Parties seek entry of an order, substantially in the form attached hereto as Exhibit A, expunging and disallowing each claim identified on Schedule 1 to the proposed order (each a “Paid Cure Cost-Related Claim”) in its entirety because each such Paid

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 the Reorganization Trust’s service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

² Although this is the second omnibus claims objection filed by the Purchaser Parties, it has been captioned in sequential order with the previous omnibus objections filed by the Debtors and their other successor-in-interest with respect to certain claims, the Reorganized Trust, in accordance with the Court-approved omnibus procedures for filing and resolving objections to Claims. See Docket No. 1022.

³ Capitalized terms used but not otherwise defined in this Objection will have the meanings ascribed to them in the Plan (as defined herein).

Cure Cost-Related Claim relates to a debt that has been: (i) superseded by an acknowledged cure claim relating to one or more executory contracts and/or unexpired leases that have been assumed by the Debtors; and (ii) satisfied in full by the Purchaser Parties by payment of the allowed Cure Costs in accordance with the Plan. In support of this Objection, the Purchaser Parties submit the Declaration of Emily S. Gottlieb (the "Gottlieb 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 under 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 under 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested in this Objection 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 Bankruptcy Rules").

BACKGROUND

5. On December 17, 2012, certain of the Debtors filed petitions with the Court under chapter 11 of the Bankruptcy Code.⁴ The Court approved procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) [Docket Nos. 115, 154, 780].

⁴ For the purposes of this Objection, dates exclusively concerning later-filing Debtors EME Homer City Generation L.P., Edison Mission Westside, Inc., and Homer City Property Holdings, who were not acquired by NRG on the Effective Date, are not relevant and are, therefore, not addressed herein.

6. On March 6, 2014, the Debtors filed the *Debtor's Third Amended Joint Chapter 11 Plan of Reorganization (with Technical Modifications)* [Docket No. 2187] (together with all additional modifications, the "Plan").⁵

7. On March 11, 2014, the Court entered an order [Docket No. 2206] confirming the Plan (the "Confirmation Order").

8. On April 1, 2014, the Effective Date of the Plan occurred. Among other things, the Purchaser Parties consummated a sale of substantially all of EME's assets to NRG pursuant to an Asset Purchase Agreement dated October 18, 2013 between such parties (the "APA")⁶ and the Confirmation Order, as provided for in Article IV.B. of the Plan. In addition to acquiring the equity interest in the Post-Effective Date Debtor Subsidiaries, NRG assumed certain liabilities pursuant and subject to the terms of the APA and Plan, including the responsibility for resolving and paying certain Claims, as further described in section 1.6 of the APA and Article III of the Plan.⁷

9. Also pursuant to the Plan and APA, the Debtors assumed, and in some cases assigned, certain executory contracts and unexpired leases. The Debtors filed a Schedule of Assumed Executory Contracts and Unexpired Leases,⁸ provided notice to the counterparties to these contracts and leases of their intent to assume and/or assign the contract or lease, provided notice to such parties of the proposed cure amounts, and gave all parties in interest the opportunity to object.

⁵ Capitalized terms used but not otherwise defined in this Objection will have the meanings ascribed to them in the Plan.

⁶ An executed copy of the APA is available on the Court's docket in these cases [Docket No. 1424].

⁷ All references in this Objection to the assumption of liability for any claims against the Debtors are subject to the terms of the APA and the Plan. Nothing in this Objection or the relief requested by this Objection is intended to, and nothing shall be construed to, modify the Plan or the APA. Accordingly, nothing contained in this Objection or the relief requested by this Objection modifies any of the rights, defenses, or counterclaims of Purchaser Parties, the Acquired Companies or the Reorganized Trust with respect to any liabilities asserted in the proofs of claim on **Schedule 1** to the proposed order.

⁸ See Docket No. 2318.

10. Pursuant to Article V.D of the Plan, the Purchaser Parties have now paid the allowed Cure Costs associated with the Assumed Executory Contracts and Unexpired Leases.

THE CLAIMS RECONCILIATION PROCESS

11. On February 14, 2013, certain of the Debtors 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 by section 521 of the Bankruptcy Code. On July 2, 2013, December 15, 2013, and January 16, 2014, certain Debtors filed amendments to their respective Schedules.

12. On April 10, 2013, the Court entered the *Order (A) Setting Bar Dates for Filing Proofs of Claim, Including 503(b)(9) Proofs of Claim and (B) Approving the Form and Manner of Notice Thereof* [Docket No. 669] (the “Bar Date Order”). The Bar Date Order applies to all claims (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose before the petition date (each, a “Claim”). Notice of the Bar Date Order was provided in accordance with the procedures outlined therein.

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

14. Over 2,000 proofs of claim were filed against the debtors on an aggregate basis, collectively asserting more than \$12.2 billion in aggregate liabilities. The Purchaser Parties and the Reorganization Trust, and their respective 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 claim 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 the review to

date, the Purchaser Parties have determined that the Paid Cure Cost-Related Claims should be expunged and disallowed as requested herein.

OBJECTION

15. The Purchaser Parties have reviewed the applicable books and records and determined that the Paid Cure Cost-Related Claims on Schedule 1 represent the prepetition claims filed by creditors that were parties with the Debtors to one or more executory contracts and/or unexpired leases that were assumed on the Effective Date of the Plan and for which, as set forth in the Gottlieb Declaration, the applicable Cure Cost has been paid in full. As a result, these Paid Cure Cost-Related Claims have been satisfied and are duplicative of, or superseded by, the Cure Costs paid pursuant to Article V.D of the Plan. Accordingly, the Purchaser Parties request that the Court enter an order expunging and disallowing each Paid Cure Cost-Related Claim identified on Schedule 1 to the proposed order in its entirety.

BASIS FOR RELIEF

16. 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 has the duty to object to the allowance of any claim that is improper. *See* 11 U.S.C. § 1106(a)(1).

17. 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).

18. As set forth herein and in the Gottlieb Declaration, each Paid Cure Cost-Related Claim should be expunged and disallowed. Because the Cure Costs to which the Paid Cure Cost-Related Claims relate have already been paid by the Purchaser Parties, the claimants would receive duplicate recoveries if the claims on Schedule 1 are not expunged.

COMPLIANCE WITH BANKRUPTCY RULE 3007(e)

19. This Objection complies with the requirements for omnibus objections set forth by Bankruptcy Rule 3007(e). The Purchaser Parties—together with GCG, Inc., the Debtors' notice and claims agent—have created a personalized form of notice that will 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; and (d) proposed treatment pursuant to the Objection. As a result, each claimant can readily identify its Claim and proposed treatment and respond accordingly. This Objection identifies the Purchaser Parties' as the objecting party and addresses fewer than 100 Claims. Accordingly, the Purchaser Parties respectfully submits that this Objection complies with Bankruptcy Rule 3007(e).

SEPARATE CONTESTED MATTER

20. Each of the above objections to the proofs of claim constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Purchaser Parties request that

any order entered by the Court with respect to an objection asserted in this Objection be treated as a separate order with respect to each Claim.

RESERVATION OF RIGHTS

21. The Purchaser Parties expressly reserve the right to amend, modify, or supplement this Objection and to file additional substantive or nonsubstantive objections to the Paid Cure Cost-Related Claims objected to herein, or any other Claims, filed or not, that may be asserted against the Debtors' estates. Should the grounds of objection stated in this Objection be overruled, the Purchaser Parties reserve the right to object, or seek a reduction, on any other applicable grounds, including objections under section 502(d) of the Bankruptcy Code. Nothing in this Objection or the relief requested herein shall limit the Purchaser Parties' right to bring future and/or additional objections to any of the Paid Cure Cost-Related Claims on any basis.

NOTICE

22. The Purchaser Parties have provided notice of this Objection to: (a) each holder of a Paid Cure Cost-Related Claim; (b) counsel to the Reorganization Trust; (c) the U.S. Trustee; (d) the United States Attorney for the Northern District of Illinois; (e) the Internal Revenue Service; and (f) 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]. In light of the nature of the relief requested herein, the Purchaser Parties respectfully submit that no further notice is necessary.

[Remainder of page intentionally left blank]

WHEREFORE, the Purchaser Parties respectfully request that the Court enter an order, substantially in the form attached to this Objection as Exhibit A, granting the related relief requested herein and such other and further relief as the Court deems appropriate.

Dated: May 19, 2014

Respectfully submitted,

By: /s/ Joseph D. Frank
One of their attorneys

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Counsel to NRG Energy Holdings Inc. and the
Post-Effective Date Debtor Subsidiaries

EXHIBIT A

Proposed Order

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)
)	
)	Re: Docket No. ____

**ORDER GRANTING THE PURCHASER PARTIES’
TWENTY-SIXTH² OMNIBUS OBJECTION TO CERTAIN
PROOFS OF CLAIM (NO-LIABILITY CLAIMS)**

Upon the objection (the “Objection”) of NRG Energy Holdings Inc. (“NRG”), and the Post-Effective Date Debtor Subsidiaries³ (collectively, the “Purchaser Parties”), as successors-in-interest with regard to certain claims against Edison Mission Energy (“EME”) and its debtor affiliates (collectively with EME, the “Debtors”), for entry of this Order expunging and disallowing each Paid Cure Cost-Related Claim identified on the attached Schedule 1, pursuant to sections 502 and 1106(a)(1) of the Bankruptcy Code, Bankruptcy Rule 3007, Local Bankruptcy Rule 3007-1, and the Objection Procedures, all as more fully set forth in the

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 the Reorganization Trust’s service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

² Although this is the second omnibus claims objection filed by the Purchaser Parties, it has been captioned in sequential order with the previous omnibus objections filed by the Debtors and their other successor-in-interest with respect to certain claims, the Reorganized Trust, in accordance with the Court-approved omnibus objection procedures. *See* Docket No. 1022.

³ Capitalized terms used but not otherwise defined in this Order will have the meanings ascribed to them in the Objection.

Objection; upon the full record in these cases; and after due deliberation and sufficient cause appearing therefore the Court; the Court HEREBY FINDS AS FOLLOWS:

- (a) This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334;
- (b) The Objection is a core proceeding pursuant to 28 U.S.C. § 157(b)(2);
- (c) Venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409;
- (d) The relief requested in the Objection is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and
- (e) The Purchaser Parties provided adequate and appropriate notice of the Objection under the circumstances; and that no other or further notice is required.

Therefore, having reviewed the Objection and the Gottlieb Declaration and having heard the statements in support of the relief requested in the Objection 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 in this Order; 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 in this Order.
- 2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
- 3. Each Paid Cure Cost-Related Claim identified on **Schedule 1** attached to this Order is disallowed and expunged in its entirety.

4. GCG, Inc. 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 will be construed as: (a) an admission or finding as to the validity of any claim against the Purchaser Parties or the Reorganization Trust; (b) a waiver of the right of the Purchaser Parties or the Reorganization Trust to dispute any claim against the Purchaser Parties or the Reorganization Trust on any grounds whatsoever, at a later date; (c) a promise by, or requirement on the Purchaser Parties or the Reorganization Trust to pay any claim other than in accordance with the terms of the Plan and the APA; (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 Purchaser Parties or the Reorganization Trust under the Plan, the APA, the Bankruptcy Code, or any other applicable law.

6. Nothing in the Objection or this Order modifies the Plan or the APA. Nothing contained in the Objection or this Order modifies any of the Purchaser Parties' rights, defenses, or counterclaims with respect to any liabilities asserted in the proofs of claim on Schedule 1 to this Order, including whether any liabilities are due or required under the applicable terms of the benefit plan or under applicable law.

7. Each Claim and the objections by the Purchaser Parties to such Claim, as addressed in the Objection and set forth on Schedule 1, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be treated as 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 will only apply to the contested matter that involves that claimant and will not act to stay the applicability or finality of this Order with respect to the other contested matters identified in the Objection or this Order.

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

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

Dated: _____, 2014
Chicago, Illinois

Jacqueline P. Cox
United States Bankruptcy Judge

Schedule 1

No Liability Claims

(Superseded by Cure Costs)

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
1	ABB INC 29801 EUCLID AVE WICKLIFFE, OH 44092 Date Filed: 02/05/14 Debtor: Midwest Generation, LLC	2041	Unsecured: \$103,462.04**	pg. 5
2	ABM JANITORIAL SERVICES - NORTH CENTRAL INC ATTN LISA LILES 8101 W SAM HOUSTON PARKWAY S STE 150 HOUSTON, TX 77072 Date Filed: 07/06/13 Debtor: Midwest Generation EME, LLC	1796	Unsecured: \$2,902.12	pg. 5
3	ABM JANITORIAL SERVICES - NORTH CENTRAL INC ATTN LISA LILES 8101 W. SAM HOUSTON PARKWAY S STE 150 HOUSTON, TX 77072 Date Filed: 07/06/13 Debtor: Midwest Generation, LLC	1795	Unsecured: \$52,389.31	pg. 5
4	ALTORFER INC ATTN TIM KIRCHNER 1 CAPITOL DR EAST PEORIA, IL 61611 Date Filed: 08/26/13 Debtor: Midwest Generation, LLC	1852	Unsecured: \$69,456.16	pg. 5
5	AMERITEMP LTD 3314 N RICHMOND RD STE 100 JOHNSBURG, IL 60051 Date Filed: 11/12/13 Debtor: Midwest Generation, LLC	2006	Unsecured: \$24,541.15 503(b)(9): \$2,676.00	pg. 5
6	ARGO PARTNERS 12 W 37 St 9TH FLOOR NEW YORK, NY 10018 Date Filed: 10/07/13 Debtor: Midwest Generation, LLC	1926-B	Unsecured: \$7,201.61	pg. 5
7	ASM CAPITAL 7600 JERICHO TURNPIKE STE 302 WOODBURY, NY 11797 Date Filed: 09/28/13 Debtor: Midwest Generation, LLC	1916	Unsecured: \$3,000.00	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
8	ASM CAPITAL LP - ALSTOM POWER INC C/O ASM CAPITAL LP 7600 JERICHO TURNPIKE STE 302 WOODBURY, NY 11797 Date Filed: 01/13/14 Debtor: Midwest Generation, LLC	2032	503(b)(9): \$1,665.60 Unsecured: \$15,704.57	pg. 5
9	ATLANTIC PLANT SERVICES LLC 2210 OAK LEAF ST JOLIET, IL 60436 Date Filed: 10/02/13 Debtor: Midwest Generation, LLC	1922	Unsecured: \$9,704.52	pg. 5
10	BABCOCK & WILCOX POWER GENERATION GROUP ATTN JENNIFER SCHREIBER 20 S VAN BUREN AVE BARBERTON, OH 44203 Date Filed: 10/17/13 Debtor: Midwest Generation, LLC	1948	503(b)(9): \$4,908.00 Unsecured: \$6,881.26	pg. 5
11	BENETECH INC 2245 SEQUOIA DR STE 300 AURORA, IL 60506 Date Filed: 09/03/13 Debtor: Midwest Generation, LLC	1863	Unsecured: \$25,656.62	pg. 5
12	BRIESER CONSTRUCTION COMPANY ATTN BRENT SOUTHALL 24101 S MUNICIPAL DR CHANNAHON, IL 60410 Date Filed: 10/09/13 Debtor: Midwest Generation, LLC	1934	Unsecured: \$44,283.05	pg. 5
13	CATSI, INC. PO BOX 263 7991 OHIO RIVER ROAD WHEELERSBURG, OH 45694 Date Filed: 08/27/13 Debtor: Midwest Generation, LLC	1854	Unsecured: \$3,000.00	pg. 5
14	CLAIMS RECOVERY GROUP LLC AS ASSIGNEE OF DIAMOND TECHNICAL SERVICES 92 UNION AVENUE CRESSKILL, NJ 07626 Date Filed: 06/17/13 Debtor: Midwest Generation, LLC	1678	Unsecured: \$42,934.00	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
15	CLAIMS RECOVERY GROUP LLC AS ASSIGNEE OF MARTIN ENGINEERING 92 UNION AVENUE CRESSKILL, NJ 07626 Date Filed: 06/17/13 Debtor: Midwest Generation, LLC	1677	503(b)(9): \$4,930.17 Unsecured: \$14,414.54	pg. 5
16	CLAIMS RECOVERY GROUP LLC (AS ASSIGNEE OF AMERISAFE SAFETY & INSULATION SUPPLIES & SERVICES) 92 UNION AVE CRESSKILL, NJ 07626 Date Filed: 12/14/13 Debtor: Midwest Generation, LLC	2022	503(b)(9): \$6,391.15 Unsecured: \$7,774.29	pg. 5
17	CLENNON ELECTRIC INC 210 N MAIN ST PO BOX 368 WILMINGTON, IL 60481 Date Filed: 09/03/13 Debtor: Midwest Generation, LLC	1862	Unsecured: \$242,729.18	pg. 5
18	CON-WAY FREIGHT C/O RMS PO BOX 5126 TIMONIUM, MD 21094 Date Filed: 10/12/13 Debtor: Midwest Generation, LLC	1942	Unsecured: \$1,036.08	pg. 5
19	CONTRARIAN FUNDS, LLC ATTN ALISA MUMOLA 411 WEST PUTNAM AVE., STE 425 GREENWICH, CT 06830 Date Filed: 09/11/13 Debtor: Midwest Generation, LLC	1876-B	Unsecured: \$421,448.16	pg. 5
20	CONTRARIAN FUNDS, LLC ATTN ALISA MUMOLA 411 WEST PUTNAM AVE., STE 425 GREENWICH, CT 06830 Date Filed: 10/16/13 Debtor: Midwest Generation, LLC	1947-B	Unsecured: \$68,880.64	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
21	CONTRARIAN FUNDS, LLC ATTN ALISA MUMOLA 411 WEST PUTNAM AVE., STE 425 GREENWICH, CT 06830 Date Filed: 11/02/13 Debtor: Midwest Generation, LLC	2001-B	Unsecured: \$46,297.14	pg. 5
22	CONTROL-TECH INC 8938 N PRAIRIE POINTE PEORIA, IL 61615 Date Filed: 10/28/13 Debtor: Midwest Generation, LLC	1969	503(b)(9): \$7,298.38	pg. 5
23	CORRE OPPORTUNITIES FUND LP (AS ASSIGNEE OF CHRISTY INDUSTRIAL SERVICES LLC) 1370 AVE OF THE AMERICAS 29TH FL NEW YORK, NY 10019 Date Filed: 06/17/13 Debtor: Midwest Generation, LLC	1697	Unsecured: \$14,794.30	pg. 5
24	CORRE OPPORTUNITIES FUND LP (AS ASSIGNEE OF PINNACLE SALES INC) 1370 AVENUE OF THE AMERICAS 29TH FL NEW YORK, NY 10019 Date Filed: 06/17/13 Debtor: Midwest Generation, LLC	1698	Unsecured: \$2,088.00	pg. 5
25	CORRE OPPORTUNITIES FUND, L.P. ATTN CLAIMS PROCESSING (BANKRUPTCY) 1370 AVENUE OF THE AMERICAS 29TH FL NEW YORK, NY 10019 Date Filed: 01/07/14 Debtor: Midwest Generation, LLC	2031-B***	Unsecured: \$1,989.00	pg. 5
26	CORRE OPPORTUNITIES QUALIFIED MASTER FUND, L.P. ATTN: CLAIMS PROCESSING (BANKRUPTCY) 1370 AVE OF THE AMERICAS, 29TH FL NEW YORK, NY 10019 Date Filed: 01/07/14 Debtor: Midwest Generation, LLC	2031-C***	Unsecured: \$459,897.25	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
27	DIAMOND POWER INTERNATIONAL INC ATTN CHRISTINE MCINTIRE 2600 E MAIN ST LANCASTER, OH 43130 Date Filed: 11/21/13 Debtor: Midwest Generation, LLC	2015	503(b)(9): \$32,616.15 Unsecured: \$41,829.36	pg. 5
28	DRAXTON-KARLEN GROUP LLC ATTN KIM KARLEN 8349 WHITE OAK AVE MUNSTER, IN 46321 Date Filed: 11/09/13 Debtor: Midwest Generation, LLC	2002	Unsecured: \$28,232.43	pg. 5
29	DU-MONT CO PO BOX 3473 PEORIA, IL 61612 Date Filed: 10/07/13 Debtor: Midwest Generation, LLC	1929	503(b)(9): \$1,680.00 Unsecured: \$7,754.98	pg. 5
30	EATON CORPORATION C/O EATON GLOBAL TRADE CREDIT DEPT MAIL CODE 3N 1000 EATON BLVD CLEVELAND, OH 44122 Date Filed: 09/07/13 Debtor: Midwest Generation, LLC	1868	Unsecured: \$140.10	pg. 5
31	EPM POWER AND WATER SOLUTIONS C/O EMERSON PROCESS MANAGEMENT LLLP ATTN TYLER CHESTNUT 8000 NORMAN CTR DR STE 1200 BLOOMINGTON, MN 55347 Date Filed: 09/30/13 Debtor: Midwest Generation, LLC	1919	Unsecured: \$27,905.39	pg. 5
32	GE CAPITAL INFORMATION TECHNOLOGY SOLUTIONS INC (GECTIS) ATTN BANKRUPTCY ADMINISTRATION PO BOX 13708 MACON, GA 31208 Date Filed: 01/21/14 Debtor: Midwest Generation EME, LLC	2035	Unsecured: \$171.73	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
33	GE CAPITAL INFORMATION TECHNOLOGY SOLUTIONS INC (GECTIS) ATTN BANKRUPTCY ADMINISTRATION PO BOX 13708 MACON, GA 31208 Date Filed: 01/21/14 Debtor: Midwest Generation, LLC	2036	Unsecured: \$4,478.37**	pg. 5
34	GLENN WULPERN 15652 WILLIAMS ST. APT 1F TUSTIN, CA 92780 Date Filed: 06/20/13 Debtor: Edison Mission Energy	1773	Unsecured: \$360.00	pg. 5
35	INDUSTRIAL TOOL PRODUCTS INC 919 N CENTRAL (ITP INC) WOOD DALE, IL 60191 Date Filed: 11/15/13 Debtor: Midwest Generation, LLC	2009	Unsecured: \$5,489.28 503(b)(9): \$630.87	pg. 5
36	INFILCO DEGREMONT INC 8007 DISCOVERY DR RICHMOND, VA 23229 Date Filed: 09/27/13 Debtor: Midwest Generation, LLC	1914	503(b)(9): \$21,078.62 Unsecured: \$3,918.50	pg. 5
37	IRON MOUNTAIN INFORMATION MANAGEMENT INC 1 FEDERAL STREET BOSTON, MA 02110 Date Filed: 10/11/13 Debtor: Midwest Generation EME, LLC	1938	Unsecured: \$2,714.36	pg. 5
38	IRON MOUNTAIN INFORMATION MANAGEMENT INC 1 FEDERAL STREET BOSTON, MA 02110 Date Filed: 10/11/13 Debtor: Edison Mission Energy	1939	Unsecured: \$7,014.44	pg. 5
39	JEANS SEPTIC INC ATTN ANGELA CHALMERS 26603 S GOVERNORS HWY STE 1 MONEE, IL 60449 Date Filed: 09/07/13 Debtor: Midwest Generation, LLC	1870	Unsecured: \$562.50	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
40	JEFFERIES LEVERAGED CREDIT PRODUCTS, LLC ONE STATION PLACE THREE NORTH STAMFORD, CT 06902 Date Filed: 11/15/13 Debtor: Midwest Generation, LLC	2010-B	503(b)(9): \$42,656.85 Unsecured: \$225,157.72	pg. 5
41	KPRG AND ASSOCIATES INC ATTN RICHARD R GNAT PG 14665 W LISBON RD STE 2B BROOKFIELD, WI 53005 Date Filed: 09/04/13 Debtor: Midwest Generation, LLC	1866	Unsecured: \$3,593.11	pg. 5
42	LATISYS-IRVINE LLC ATTN DAVE STEVENS 393 INVERNESS PKWY ENGLEWOOD, CO 80112 Date Filed: 09/24/13 Debtor: Midwest Generation EME, LLC	1909	Unsecured: \$20,492.47	pg. 5
43	LATISYS-IRVINE LLC ATTN DAVE STEVENS 393 INVERNESS PKWY ENGLEWOOD, CO 80112 Date Filed: 09/24/13 Debtor: Edison Mission Energy	1910	Unsecured: \$31,045.07	pg. 5
44	LILLY ENGINEERING CO 217 CATALPA AVE ITASCA, IL 60143 Date Filed: 09/05/13 Debtor: Midwest Generation, LLC	1867	503(b)(9): \$2,719.00 Unsecured: \$3,225.00	pg. 5
45	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1878	Unsecured: \$8,363.31	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
46	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1879	Unsecured: \$531.68	pg. 5
47	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1880	Unsecured: \$2,695.74	pg. 5
48	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1881	Unsecured: \$675.00	pg. 5
49	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1882	Unsecured: \$822.58	pg. 5
50	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1883	Unsecured: \$23,145.33	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
51	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1884	Unsecured: \$2,050.31	pg. 5
52	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1885	Unsecured: \$720.00	pg. 5
53	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1886	Unsecured: \$1,101.23	pg. 5
54	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1887	Unsecured: \$5,918.81	pg. 5
55	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1888	Unsecured: \$720.00	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
56	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1889	Unsecured: \$2,563.71	pg. 5
57	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1890	Unsecured: \$1,912.50	pg. 5
58	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1891	Unsecured: \$6,488.88	pg. 5
59	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1892	Unsecured: \$1,713.02	pg. 5
60	LINDE LLC ATTN JEFFREY J JOHNS COMMERCIAL DIRECTOR, NORTH AMERICA TONNAGE 575 MOUNTAIN AVE MURRAY HILL, NJ 07974 Date Filed: 09/12/13 Debtor: Midwest Generation, LLC	1893	Unsecured: \$815.00	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
61	MAGID GLOVE & SAFETY MFG CO 2060 N KOLMAR AVE CHICAGO, IL 60639 Date Filed: 12/27/13 Debtor: Midwest Generation, LLC	2029	Unsecured: \$1,631.66	pg. 5
62	MID-AMERICA DYNAMICS INC 5403 PATTON DR STE 211 LISLE, IL 60532 Date Filed: 11/01/13 Debtor: Midwest Generation, LLC	2000	503(b)(9): \$1,021.41 Unsecured: \$2,923.74	pg. 5
63	MIDCO INC. ATTN KAREN GUZAN 221 SHORE COURT BURR RIDGE, IL 60527 Date Filed: 05/06/13 Debtor: Midwest Generation, LLC	395	Unsecured: \$3,667.78	pg. 5
64	MIDCO INC. ATTN KAREN GUZAN 221 SHORE COURT BURR RIDGE, IL 60527 Date Filed: 05/06/13 Debtor: Midwest Generation EME, LLC	395	Unsecured: \$371.89	pg. 5
65	MOTION INDUSTRIES PO BOX 1477 BIRMINGHAM, AL 35201 Date Filed: 11/13/13 Debtor: Midwest Generation, LLC	2007	Unsecured: \$3,493.20	pg. 5
66	MOTION INDUSTRIES PO BOX 1477 BIRMINGHAM, AL 35201 Date Filed: 11/13/13 Debtor: Midwest Generation, LLC	2008	503(b)(9): \$18,386.25	pg. 5
67	NATURAL RESOURCE TECHNOLOGY INC 234 W FLORIDA ST FIFTH FL MILWAUKEE, WI 53204 Date Filed: 09/13/13 Debtor: Midwest Generation, LLC	1897	Unsecured: \$5,062.98	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
68	NORTH AMERICAN CORP ATTN PRESIDENT, MANAGING OR GENERAL AGENT 2101 CLAIRE CT GLENVIEW, IL 60025 Date Filed: 09/07/13 Debtor: Midwest Generation, LLC	1872	Unsecured: \$27,636.84	pg. 5
69	NOVA MACHINE PRODUCTS INC 18001 SHELDON RD MIDDLEBURG HEIGHTS, OH 44130 Date Filed: 09/27/13 Debtor: Midwest Generation, LLC	1913	503(b)(9): \$2,149.32 Unsecured: \$5,506.39	pg. 5
70	NOVASPECT INC 1124 TOWER RD SCHAUMBURG, IL 60173 Date Filed: 11/15/13 Debtor: Midwest Generation, LLC	2011	503(b)(9): \$21,705.96 Unsecured: \$647.86	pg. 5
71	ONSITE COMMUNICATIONS USA INC 17347 OLEANDER AVE TINLEY PARK, IL 60477 Date Filed: 09/14/13 Debtor: Midwest Generation, LLC	1900	Unsecured: \$16,966.84	pg. 5
72	PIONEER INDUSTRIAL CORPORATION 400 RUSSELL BLVD SAINT LOUIS, MO 63104 Date Filed: 11/25/13 Debtor: Midwest Generation, LLC	2018	503(b)(9): \$15,495.40 Unsecured: \$6,337.46	pg. 5
73	POMPS TIRE SERVICE INC PO BOX 1630 GREEN BAY, WI 54305 Date Filed: 11/23/13 Debtor: Midwest Generation, LLC	2017	Unsecured: \$32,472.85	pg. 5
74	RENDEL'S INC 40 MILLS RD JOLIET, IL 60433 Date Filed: 11/11/13 Debtor: Midwest Generation, LLC	2004	503(b)(9): \$28.69 Unsecured: \$7,459.14	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

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

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
75	ROSEMOUNT ANALYTICAL INC C/O EMERSON PROCESS MANAGMENT LLLP ATTN TYLER CHESTNUT 8000 NORMAN CTR DR STE 1200 BLOOMINGTON, MN 55347 Date Filed: 09/30/13 Debtor: Midwest Generation, LLC	1920	Unsecured: \$1,420.00	pg. 5
76	ROTATING EQUIPMENT SERVICES INC 28 N WEST RD LOMBARD, IL 60148 Date Filed: 09/27/13 Debtor: Midwest Generation, LLC	1915	Unsecured: \$31,892.51	pg. 5
77	SAIC ENERGY ENVIRONMENT & INFRASTRUCTURE LLC 9400 BROADWAY EXT STE 300 OKLAHOMA CITY, OK 73114 Date Filed: 08/31/13 Debtor: Midwest Generation, LLC	1861	Unsecured: \$2,775.98	pg. 5
78	SGS NORTH AMERICA INC FORMERLY COMMERCIAL TESTING & ENGINEERING CO 1919 S HIGHLAND AVE LOMBARD, IL 60148 Date Filed: 12/09/13 Debtor: Midwest Generation, LLC	2020	Unsecured: \$38,893.62	pg. 5
79	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT- IN-FACT FOR DEGROATE PETROLEUM SVC - ASSIGNOR 2699 WHITE RD #255 IRVINE, CA 92614 Date Filed: 08/30/13 Debtor: Midwest Generation, LLC	1858	503(b)(9): \$58,955.50	pg. 5
80	STOCK EQUIPMENT COMPANY C/O BUCKINGHAM DOOLITTLE & BURROUGHS LLP ATTN MATTHEW MATHENEY, ESQ 1375 E 9TH ST STE 1700 CLEVELAND, OH 44114 Date Filed: 10/23/13 Debtor: Midwest Generation, LLC	1959	503(b)(9): \$27,624.00	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

Edison Mission Energy, et al.
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Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
81	STOCK EQUIPMENT COMPANY C/O BUCKINGHAM DOOLITTLE & BURROUGHS LLP ATTN MATTHEW MATHENEY, ESQ 1375 E 9TH ST STE 1700 CLEVELAND, OH 44114 Date Filed: 10/28/13 Debtor: Midwest Generation, LLC	1972	Unsecured: \$228,961.00	pg. 5
82	STRUCTURAL INTEGRITY ASSOCIATES INC 5215 HELLYER AVE STE 210 SAN JOSE, CA 95138 Date Filed: 09/07/13 Debtor: Midwest Generation, LLC	1869	Unsecured: \$11,200.00	pg. 5
83	TANNOR PARTNERS CREDIT FUND, LP ATTN ROBERT TANNOR 150 GRAND STREET, STE 401 WHITE PLAINS, NY 10601 Date Filed: 08/26/13 Debtor: Midwest Generation, LLC	1853-B	Unsecured: \$5,979.36	pg. 5
84	TANNOR PARTNERS CREDIT FUND, LP ATTN ROBERT TANNOR 150 GRAND STREET, STE 401 WHITE PLAINS, NY 10601 Date Filed: 10/09/13 Debtor: Midwest Generation, LLC	1931-B	Unsecured: \$156,976.44	pg. 5
85	TESTAMERICA LABORATORIES INC 4101 SHUFFEL STREET NW NORTH CANTON, OH 44720 Date Filed: 07/25/13 Debtor: Midwest Generation, LLC	1841	Unsecured: \$15,903.00	pg. 5
86	TRINITY CONSULTANTS ATTN MR VALE REYNA 12770 MERIT DR STE 900 DALLAS, TX 75251 Date Filed: 11/21/13 Debtor: Midwest Generation, LLC	2016	Unsecured: \$14,052.09	pg. 5
87	WALBRIDGE EQUIPMENT INSTALLATION LLC C/O THOMAS D DYZE 777 WOODWARD AVE STE 300 DETROIT, MI 48226 Date Filed: 09/10/13 Debtor: Midwest Generation, LLC	1875	Unsecured: \$40,382.00	pg. 5

Schedule 1 - No Liability Claims (Superseded by Cure Costs)

Twenty-Sixth Omnibus Objection to Claims

Edison Mission Energy, *et al.*
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SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	
88	WASTE MANAGEMENT C/O JACQUOLYN MILLS 1001 FANNIN ST STE 4000 HOUSTON, TX 77002 Date Filed: 12/16/13 Debtor: Midwest Generation, LLC	2023	Unsecured: \$44,590.99	pg. 5
89	WESTERN OILFIELDS SUPPLY CO INC DBA RAIN FOR RENT PO BOX 2248 BAKERSFIELD, CA 93303 Date Filed: 10/28/13 Debtor: Midwest Generation, LLC	1966	Unsecured: \$74,322.71	pg. 5
90	WESTERN OILFIELDS SUPPLY CO INC DBA RAIN FOR RENT PO BOX 2248 BAKERSFIELD, CA 93303 Date Filed: 10/28/13 Debtor: Midwest Generation, LLC	1967	Unsecured: \$8,190.40	pg. 5
91	WW GRAINGER INC 7300 N MELVINA MES17840146864 NILES, IL 60714 Date Filed: 09/24/13 Debtor: Midwest Generation, LLC	1911	503(b)(9): \$9,472.80 Unsecured: \$7,693.75	pg. 5

Total: \$3,248,289.50

* Denotes an unliquidated component.

** Denotes an allowed claim component, which was paid on April 17, 2014.

*** Claimant owns all or part of a claim subject to a final claim transfer. In instances of a partial transfer, additional holders of a claim are listed separately on this exhibit in alphabetical order.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

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

**ORDER GRANTING PURCHASER PARTIES' TWENTY-SIXTH OMNIBUS OBJECTION
TO CERTAIN PROOFS OF CLAIM (NO-LIABILITY CLAIMS)**

THIS MATTER BEING HEART upon the objection (the “Objection”) of NRG Energy Holdings Inc. (“NRG”) and the Post-Effective Date Debtor Subsidiaries (collectively, the “Purchaser Parties”), as successors-in-interest with regard to certain claims against Edison Mission Energy (“EME”) and its debtor affiliates (collectively with EME, the “Debtors”), for entry of this Order expunging and disallowing each Paid Cure Cost-Related Claim identified on the attached Schedule 1, pursuant to sections 502 and 1106(a)(1) of the Bankruptcy Code, Bankruptcy Rule 3007, Local Bankruptcy Rule 3007 1, and the Objection Procedures, all as more fully set forth in the Objection; upon the full record in these cases; and after due deliberation and sufficient cause appearing therefore the Court; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Objection being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the relief requested in the Objection being in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and the Purchaser Parties having provided adequate and appropriate notice of the Objection under the circumstances; and that no other or further notice is required; and the Court having reviewed the Objection and the Gottlieb Declaration and having heard the statements in support of the relief requested in the Objection 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 in this Order; 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 in this Order.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. Each Paid Cure Cost-Related Claim identified on Schedule 1 attached to this Order is disallowed and expunged in its entirety.
4. GCG, Inc. 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 will be construed as: (a) an admission or finding as to the validity of any claim against the Purchaser Parties or the Reorganization Trust; (b) a waiver of the right of the Purchaser Parties or the Reorganization Trust to dispute any claim against the Purchaser Parties or the Reorganization Trust on any grounds whatsoever, at a later date; (c) a promise by, or requirement on the Purchaser Parties or the Reorganization Trust to pay any claim other than in

accordance with the terms of the Plan and the APA; (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 Purchaser Parties or the Reorganization Trust under the Plan, the APA, the Bankruptcy Code, or any other applicable law.

6. Nothing in the Objection or this Order modifies the Plan or the APA. Nothing contained in the Objection or this Order modifies any of the Purchaser Parties' rights, defenses, or counterclaims with respect to any liabilities asserted in the proofs of claim on Schedule 1 to this Order, including whether any liabilities are due or required under the applicable terms of the benefit plan or under applicable law.

7. Each Claim and the objections by the Purchaser Parties to such Claim, as addressed in the Objection and set forth on Schedule 1, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be treated as 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 will only apply to the contested matter that involves that claimant and will not act to stay the applicability or finality of this Order with respect to the other contested matters identified in the Objection or this Order.

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

9. 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:

Jeremy C. Kleinman (IL Bar No. 6270080)
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