UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION
CASE NO. 19-51200
(Jointly Administered)

IN RE: CAMBRIAN HOLDING COMPANY, INC., et al. CHAPTER 11
DEBTORS

NOTICE OF FILING OF POST PETITION TRADE PAYABLES DUE KEY-WAY, LLC

(ACCRUED PRE-ASSET PURCHASE AGREEMENT)

*** *** ***

Comes now Key-Way, LLC ("Key-Way"), a creditor and critical vendor in the herein bankruptcy proceedings, by and through counsel, and consistent with the Court's direction at the hearing conducted December 16, 2021 with respect to Key-Way's pending Motion to Compel payment of post-petition trade payables from American Resources Corporation [ECF doc. 1889], herewith files in the record copies of all unpaid post-petition invoices representing trade payables due and owing to Key-Way, LLC which accrued and became due and owing ***prior to*** the entry of the this Court's Order approving the sale of substantially all of the debtors' assets and the related Asset Purchase Agreements [ECF Doc. 534].

Attached and marked as **Exhibit 1** (highlighted portion) is a summary of the pre-sale post petition unpaid trade payables invoices for refuse hauling. **Exhibit 2** contains, collectively, the actual pre-sale post petition unpaid trade payables invoices for refuse hauling.

Exhibit 3 (highlighted portion) is a summary of the pre-sale post petition trade payables invoices for extra work Key Way was asked to perform. **Exhibit 4** contains, collectively, the actual pre-sale post petition unpaid trade payables invoices for extra work.

A partial payment was made by the debtors in possession on September 27, 2019 with respect to the pre-sale post-petition trade payables invoices due and owing to Key-Way aforesaid. A copy of the check is attached and marked as **Exhibit 5.**

Respectfully submitted,

HAMM, MILBY & RIDINGS, PLLC
120 NORTH MAIN STREET
LONDON, KY 40741
EMAIL: aaron@hmrkylaw.com
PHONE: 606-864-4126
FAX: 606-878-8144
Counsel for Key-Way, LLC

BY: __/s/ *R. Aaron Hostettler*_____
R. AARON HOSTETTLER

CERTIFICATE OF SERVICE:

The undersigned does hereby certify that a true copy of the foregoing Notice was served this the _17th day of December 2021 electronically in accordance with the method established under this Court's CM/ECF administrative procedures upon all parties in the electronic filing system in this case including the United States Trustee and debtors' counsel and counsel for the unsecured creditors committee.

__/s/ *R. Aaron Hostettler*_____
OF COUNSEL FOR KEY-WAY, LLC

PCC REFUSE

WEEK-ENDING	DATE DUE	AMT. DUE	DATE REC.	AMT. REC.	10%	AMT.REC.
6/222019	7/1/2019	$ 31,104.49	7/1/2019	$ 31,104.49	$ 3,110.45	$ 3,110.45
6/29/2019	7/8/2019	$ 23,548.45	7/13/2019	$ 23,548.45	$ 2,354.85	$ 2,354.85
7/6/2019		$ -		$ -	$ -	$ -
7/13/2019	7/22/2019	$ 14,140.28	7/30/2019	$ 14,140.28	$ 1,414.03	$ 1,414.03
7/20/2019	7/29/2019	$ 25,486.74	8/16/2019	$ 25,486.74	$ 2,548.67	$ 2,548.67
7/27/2019	8/5/2019	$ 30,735.32	8/12/2019	$ 30,735.32	$ 3,073.53	$ 3,073.53
8/3/2019	8/12/2019	$ 30,971.79	9/4/2019	$ 30,971.79	$ 3,097.18	$ 3,097.18
8/10/2019	8/19/2019	$ 29,876.31	8/26/2019	$ 29,876.31	$ 2,987.63	$ 2,987.63
8/17/2019	8/26/2019	$ 23,906.56	9/6/2019	$ 23,906.56	$ 2,390.66	$ 2,390.66
8/24/2019	9/2/2019	$ 18,194.40	9/6/2019	$ 18,194.40	$ 1,819.44	$ 1,819.44
8/31/2019	9/9/2019	$ 38,528.96	9/16/2019	$ 38,528.96	$ 3,852.90	$ 3,852.90
9/7/2019	9/16/2019	$ 22,340.78	9/27/2019	$ 22,340.78	$ 2,234.08	$ -
9/14/2019	9/23/2019	$ 19,655.91	9/27/2019	$ 19,655.91	$ 1,965.59	$ -
9/21/2019	9/30/2019	$ 12,016.68		$ -	$ 1,201.67	$ -
9/28/2019	10/7/2019	$ 31,794.36		$ -	$ 3,179.44	$ -
		$ 43,811.04			$ 8,580.77	

TOTAL REFUSE $ 52,391.81



Key-Way, LLC

201 South Main Street
Suite 202
Winchester, KY 40391

Invoice

Date	Invoice #
9/7/2019	2077

Bill To

PERRY COUNTY COAL
P.O. BOX 2100
PIKEVILLE, KY 41502

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
14,507	Messer Branch Haul, Week Ending 9/07/2019	1.75	25,387.25
14,507	Fuel Adjustment	-0.21	-3,046.47
		Total	$22,340.78

EXHIBIT
2

Key-Way, LLC

201 South Main Street
Suite 202
Winchester, KY 40391

Invoice

Date	Invoice #
9/14/2019	2081

Bill To

PERRY COUNTY COAL
P.O. BOX 2100
PIKEVILLE, KY 41502

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
12,847	Messer Branch Haul, W/E 9/14/2019	1.75	22,482.25
12,847	Fuel Adjustment	-0.22	-2,826.34
	Total		$19,655.91

Key-Way, LLC

201 South Main Street
Suite 202
Winchester, KY 40391

Invoice

Date	Invoice #
9/21/2019	2087

Bill To
PERRY COUNTY COAL P.O. BOX 2100 PIKEVILLE, KY 41502

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
7,703	Messer Branch Haul, Week Ending 9/21/2019	1.75	13,480.25
7,703	Fuel Adjustment	-0.19	-1,463.57
		Total	$12,016.68

PCC EXTRA WORK

WEEK-ENDING	DATE DUE	AMT.DUE	DATE REC.	AMT.REC.	10%	AMT.REC.
7/21/2019	7/26/2019	$ 9,250.00	7/31/2019	$ 9,250.00	$ 925.00	$ 925.00
7/28/2019	8/2/2019	$ 26,375.00	8/5/2019	$ 26,375.00	$ 2,637.50	$ 2,637.50
8/4/2019	8/9/2019	$ 19,750.00	8/16/2019	$ 19,750.00	$ 1,975.00	$ 1,975.00
8/11/2019	8/16/2019	$ 3,687.50	9/6/2019	$ 3,687.50	$ 368.75	$ 368.75
8/18/2019	8/23/2019	$ 33,100.00	9/6/2019	$ 33,100.00	$ 3,310.00	$ 3,310.00
8/25/2019	8/30/2019	$ 32,424.00		$ -	$ 3,242.40	$ -
9/1/2019	9/6/2019	$ 6,975.00	9/27/2019	$ 6,975.00	$ 697.50	$ -
9/8/2019	9/13/2019	$ 6,150.00	9/27/2019	$ 6,150.00	$ 615.00	$ -
9/15/2019	9/20/2019	$ 11,050.00		$ -	$ 1,105.00	$ -
9/22/2019	9/27/2019	$ 7,137.50		$ -	713.75	$ -
9/29/2019	10/4/2019	$ 4,725.00		$ -	$ 472.50	$ -
10/6/2019	10/11/2019	$ 1,400.00		0	$ 140.00	$ -
		$ 55,336.50			$ 6,986.15	

TOTAL EXTRA WORK	$ 62,322.65
TOTAL REFUSE	$ 52,391.81
UNPAID BALANCE	$ 114,714.46



KEY-L AY,LLC

P.O. BOX 75
WINCHESTER,KY 40392

WEEK-ENDING: 8-19-19/8-25-2019

	M	T	W	T	F	S	S	TOTAL		AMT. DUE
D6 DOZER	10.5	6	10.5	11	2	11		51 hours	$150.00	$7,650.00
D8 DOZER	10	-	10	4	6	-	1	31 hours	$125.00	$3,875.00
LONG BOOM EXCAVATOR	-	9	-	5.5	-	10	9	33.5 hours	$150.00	$5,025.00
336 EXCAVATOR	10	9	10	9.5	6	10	9	63.5 hours	$125.00	$7,937.00
40 TON TRUCK	10	9	10	9.5	6	10	9	63.5 hours	$125.00	$7,937.00
40 TON TRUCK										
40 TON TRUCK									TOTAL	$32,424.00

5AM Parry Plant 6064369121

tabbies
EXHIBIT
4

KEY-I AY,LLC
P.O. BOX 75
WINCHESTER,KY 40392

WEEK-ENDING: 8-26-19/9-1-2019

	M	T	W	T	F	S	S	TOTAL		AMT. DUE
D6 DOZER										
D8 DOZER										
LONG BOOM EXCAVATOR	10.5	10	9.5	6	10.5	-	-	46.5	$150.00	$6,975.00
336 EXCAVATOR										
40 TON TRUCK										
40 TON TRUCK										
40 TON TRUCK										

TOTAL $ 6,975.00

Sep 04 2019 07:48AM Perry Plant 6064369121

KEY-[AY,LLC

P.O. BOX 75

WINCHESTER,KY 40392

WEEK-ENDING: 9-2-2019/9-8-2019

	M	T	W	T	F	S	S	TOTAL		AMT. DUE
D6 DOZER										
D8 DOZER	-	-	5	5	9	11	11	41	$150.00	$6,150.00
LONG BOOM EXCAVATOR										
336 EXCAVATOR										
40 TON TRUCK										
40 TON TRUCK										
40 TON TRUCK										
									TOTAL	$ 6,150.00

Sep 09 2019 07:35AM Perry Plant 6064369121

KEY-[illegible]AY,LLC
P.O. BOX 75
WINCHESTER,KY 40392

WEEK-ENDING: 9-9-2019/9-15-2019

	M	T	W	T	F	S	S	TOTAL		AMT. DUE
D6 DOZER	-	11.5	-	-	-	-	-	11.5	$150.00	$1,725.00
D8 DOZER	4	2	5	10	-	-	-	21	$150.00	$3,150.00
LONG BOOM EXCAVATOR										
336 EXCAVATOR					9.5	20.5	21	51	$125.00	$6,375.00
40 TON TRUCK										
40 TON TRUCK										
40 TON TRUCK										
									TOTAL	$11,250.00

Sep 16 2019 07:03AM Parry Plant 6064369121

KEY-[illegible]AY,LLC
P.O. BOX 75
WINCHESTER,KY 40392

WEEK-ENDING: 9-16-2019/9-22-2019

	M	T	W	T	F	S	S	TOTAL		AMT. DUE
D6 DOZER										
D8 DOZER			5				10.5	15.5	$150.00	$2,325.00
LONG BOOM EXCAVATOR										
336 EXCAVATOR										
40 TON TRUCK	22.5	12	4					38.5	$125.00	$4,812.50
40 TON TRUCK										
40 TON TRUCK										
									TOTAL	$7,137.50

Sep 23 2019 07:44AM Perry Plant 6064369121

PERRY COUNTY COAL LLC

CHECK NO. 088764 DATE 9/27/19
VENDOR 039870 KEY-WAY LLC

PURCHASE ORDER NUMBER	INVOICE DATE	INVOICE DESCRIPTION		GROSS AMOUNT	DISCOUNT AMOUNT	PAYMENT AMOUNT
07900001	09/07/19	P-2077	CONTRACTOR TO FURN			22,340.7
07900001	09/14/19	P-2081	CONTRACTOR TO FURN			19,655.9
07901199	09/01/19	P-9/01/2019	CLEANING PONDS			6,975.0
07901203	09/08/19	P-9/8/2019	CLEANING PONDS			6,150.0
						55,121.69

THIS CHECK CONTAINS MULTIPLE SECURITY FEATURES DESIGNED TO DETECT DUPLICATION OR ALTERATION

PERRY COUNTY COAL LLC
PO BOX 2100
PIKEVILLE, KY 41502

Debtor-In-Possession

No.088764

COMMUNITY TRUST BANK
PIKEVILLE, KY 41501

DATE 9/27/19 CHECK NO. 088764

FIFTY-FIVE THOUSAND ONE HUNDRED TWENTY-ONE AND 69/100 ********** DOLL

AMOUNT $55,121.69

PAY TO THE ORDER OF

KEY-WAY LLC
P O BOX 75
WINCHESTER KY 40392-0000

Amanda D Hewell

"088764"

EXHIBIT 5