THOMAS PERSINGER PLLC

P. O. Box 2828

Charleston, WV 25330-2828
Telephone: (304) 343-0850
Telecopier: (304) 343-1677
E: mtplaw@frontier.com
Thomas Persinger, Esq.
(Motion for admission
pro hac vice pending)

Counsel for Southern Land Company Limited Partnership, et al.

UNITED STATES BANKRUPTCY
COURT SOUTHERN DISTRICT OF
NEW YORK

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In re: Chapter 11

PATRIOT COAL CORPORATION, et al., Case No.: 12-12900 (SCC)

Jointly Administered

Debtor

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NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Thomas Persinger, Esq., of THOMAS PERSINGER PLLC, hereby enters his appearance in the above-styled jointly administered cases of Patriot Coal Corporation, et al., as counsel for Lessors and Creditors (i) Southern Land Company Limited Partnership, a West Virginia limited partnership ("Southern"), (ii) Dickinson Properties Limited Partnership, a West Virginia limited partnership ("Dickinson"), (iii) Chesapeake Mining Company, a West Virginia corporation ("Chesapeake"), (iv) The Imperial Coal Company, a West Virginia corporation ("Imperial"), (v) Quincy Center, a West Virginia partnership ("Quincy Center"), (vi)

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Quincy Coal Company, a West Virginia corporation ("Quincy Coal"), (vii) Branch Banking &

Trust Company, a North Carolina banking corporation, Nelle Ratrie Chilton, and Charles C.

Dickinson, III, Successor Trustees of the Charles C. Dickinson Testamentary Trust U/W of

Charles C. Dickinson dtd. 02.28.59 ("C. C. Dickinson Testamentary Trust"), (viii) Horse Creek

Land & Mining Company, a West Virginia corporation ("Horse Creek"), and (ix) Payne-Gallatin

Company, a West Virginia corporation ("Payne-Gallatin"), hereinafter sometimes collectively

"the Clients."

Pursuant to Bankruptcy Code § 102(1), 11 U.S.C. § 102(1), Bankruptcy Code § 342, 11

U.S.C. § 342, and Bankruptcy Code § 1109(b), 11 U.S.C. § 1109(b), and to the Rules of

Bankruptcy Procedure ("Bankruptcy Rules") 2002, 9007 and 9010, Thomas Persinger, Esq.

hereby requests that all notices given or required to be given and all papers served in these jointly

administered cases be given to and served upon him at the following address:

Thomas Persinger, Esq.

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code Section

1109(b), 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers

referred to in the Bankruptcy Rules specified hereinabove but also includes, without limitation,

any notice, application, complaint, demand, motion, petition, pleading, plan of reorganization,

disclosure statement order or request, whether formal or informal, written or oral, and whether

transmitted or conveyed by mail, hand delivery, facsimile, courier service, electronic filing,

telephone or otherwise filed with regard to the above-styled jointly administered case and

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proceedings.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance And Request For Service Of Papers, nor any later appearance, pleading, claim or suit, shall waive the rights of the Clients, <u>supra</u>, with respect to (1) the entry of final orders in noncore matters only after <u>de novo</u> review by the District Court Judge, (2) trial by jury in a proceeding so triable in these jointly administered cases, or any controversy or proceeding related to same, (3) the District Court withdrawal of the reference in any matter subject to mandatory or discretionary withdrawal, (4) any rights, actions or defenses relating to the jurisdiction of the Bankruptcy Court, or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Clients are or may be entitled under agreements, in law, in equity or otherwise; all of which rights, claims, actions, defenses, setoffs, and recoupments are reserved on behalf of the Clients.

Dated: July 17, 2012

Charleston, West Virginia

Respectfully submitted,

/s/ Thomas Persinger

Thomas Persinger, Esq.
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Counsel for Southern Land Company Limited Partnership, et al. 12-12900-scc Doc 101 Filed 07/17/12 Entered 07/17/12 12:59:13 Main Document Pg 4 of 4

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all registered ECF participants through the Court's ECF system at the email addresses registered with the Court on the 17th day of July, 2012.

/s/ Thomas Persinger
Thomas Persinger, Esq.