

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
ST LOUIS DIVISION

In re)
) Chapter 11
)
Patriot Coal Corporation, et al.)
) Case No. 12-51502
)
Debtors.

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(E) of the local rules of the United States District Court for the Eastern District of Missouri, I, W. Blaine Early III, move to be admitted pro hac vice to the bar of this Court for the purpose of representing Argonaut Insurance Company, Indemnity National Insurance Company, US Specialty Insurance, and Westchester Fire Insurance Company in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(E):

a. *Full name of the movant-attorney;*

W. Blaine Early III

b. *Address and telephone number of the movant-attorney;*

250 West Main Street
Suite 2300
Lexington, Ky 40507
Phone: (859) 226-2300
Fax: (859) 253-9144

c. *Name of the firm or letterhead under which the movant practices;*

Stites & Harbison, PLLC

d. *Name of the law school(s) movant attended and the date(s) of graduation therefrom;*

University of Kentucky College of Law - 1996

e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any;*

Kentucky -1996, Bar #86380;

United States District Court, Eastern and Western Districts of Kentucky 1999
United States Bankruptcy Court, Eastern and Western Districts of Kentucky 1999

f. The movant is a member in good standing of all bars of which movant is a member; the movant is not under suspension or disbarment from any bar.

g. The movant does not reside in the Eastern District of Missouri, is not regularly employed in this district and is not engaged in the practice of law in this district.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted pro hac vice to the bar of this Court and be allowed to appear in the instant matter.

Dated: January 11, 2013

STITES & HARBISON, PLLC

By: /s/ W. Blaine Early III
W. Blaine Early III
Stites & Harbison, PLLC
250 West Main St., Ste 2300
Lexington, KY 40507
E-mail address: bearly@stites.com
Telephone number: (859) 226-2300

Proposed Counsel for US Specialty
Insurance, Argonaut Insurance
Company, Westchester Fire
Insurance Company, and Indemnity
National Insurance Company