

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
ST. LOUIS DIVISION

In re:  
PATRIOT COAL CORPORATION, et al.,  
Debtors.

Chapter 11  
Case No.: 12-51502-659 (KSS)  
Jointly Administered

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Thomas Persinger, 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) 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 “subject 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 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  
THOMAS PERSINGER PLLC  
P. O. Box 2828  
Charleston, WV 25330-2828  
Telephone number: (304) 343-0850  
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E: [mtplaw@frontier.com](mailto:mtplaw@frontier.com)

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code Section 1109(b), 11 U.S.C. § 1109(b), the foregoing request 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 cases and 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 subject Clients, supra, with respect to (1) the entry of final orders in noncore matters only after de novo 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: January 18, 2013  
Charleston, West Virginia

Respectfully submitted,

/s/ Thomas Persinger

Thomas Persinger

WVSB No. 2874

Admission pro hac vice

THOMAS PERSINGER PLLC

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Counsel for Southern Land Company

Limited Partnership, Dickinson Properties

Limited Partnership, Chesapeake Mining

Company, The Imperial Coal Company,

Quincy Coal Company, Branch Banking &

Trust Company, Nelle Ratrie Chilton, and

Charles C. Dickinson, III, as Successor

Trustees of the C. C. Dickinson

Testamentary Trust, Horse Creek Land &

Mining Company, and Payne-Gallatin

Company

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2013, a true and correct copy of the Notice of Appearance and Request for Service of Papers was served by (i) the Electronic Case Filing system for the United States Bankruptcy Court for the Eastern District of Missouri, St. Louis Division, on those parties that have consented to such service in these cases, and (ii) United States mail, first class postage prepaid, on the parties and or counsel listed below:

(a) Counsel to the Debtors:

- (i) Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017  
Attn: Marshall S. Huebner and Brian M. Resnick,
- (ii) Bryan Cave LLP  
211 North Broadway  
St. Louis, MO 63102  
Attn: Laura Uberti Hughes

(b) Conflicts counsel to the Debtors:

Curtis, Mallet-Prevost, Colt & Mosle LLP  
101 Park Avenue  
New York, NY 10178  
Attn: Steven J. Reisman and Michael A. Cohen

- (c) Office of the United States Trustee  
USBC Eastern District of Missouri  
Thomas F. Eagleton US Courthouse  
111 S. 10<sup>th</sup> Street, Suite 6-353  
St. Louis, MO 63102  
Attn: Leonora S. Long

(d) Counsel for the Official Committee of Unsecured Creditors:

- (i) Kramer Levin Naftalis & Frankel LLC  
1177 Avenue of the Americas,  
New York, NY 10036  
Attn: Adam C. Rogoff
- (ii) Gregory D. Willard  
Carmody MacDonald P.C.  
120 South Central, Suite 1800  
St. Louis, MO 63105-1705

- (e) The Debtors' authorized claims and noticing agent:
- Patriot Coal Corporation  
c/o GCG, Inc.  
P.O. Box 9898  
Dublin, OH 43017-5798
- (f) Counsel for the administrative agents for the Debtors' proposed postpetition lenders:
- (i) Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153  
Attn: Marcia Goldstein and Joseph Smolinsky
- (ii) Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019,  
Attn: Margot B. Schonholtz and Ana Alfonso
- (g) Counsel to the United Mine Workers of America:
- Kennedy, Jennik & Murray, P.C.  
113 University Place, 7th Floor  
New York, NY 10003  
Attn: Susan M. Jennik
- (h) Counsel to the Argonaut Insurance Company, Indemnity National Insurance Company, US Specialty Insurance, and Westchester Fire Insurance Company:
- Stites & Harbison, PLLC  
250 West Main Street, Suite 2300  
Lexington, KY 40507  
Attn: Chrisandrea L. Turner

/s/ Thomas Persinger

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Admission pro hac vice

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