DRINKER BIDDLE & REATH LLP

Andrew C. Kassner (AK-9067) One Logan Square, Ste. 2000

Philadelphia, PA 19103

Telephone: (215) 988-2700

Facsimile: (215) 988-2757

-and-

1177 Avenue of the Americas, 41st Floor

New York, NY 10036-2714 Telephone: (212) 248-3140 Facsimile: (212) 248-3141

Counsel for Quaker Chemical Corporation



DENIED

Jan 25, 2013

Hearing Date and Time: September 11, 2012 at 1:30 p.m. (Prevailing Eastern Time)
Objection Deadline: August 28, 2012 at 4:00 p.m. (Prevailing Eastern Time)
Reply and Objection Joinder Deadline: August 31, 2012 at 4:00 p.m. (Prevailing Eastern Time)

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PATRIOT COAL CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 12-12900 (SCC)

(Jointly Administered)

JOINDER OF QUAKER CHEMICAL CORPORATION TO THE DEBTORS' OBJECTION TO (i) MOTION OF THE UNITED MINE WORKERS OF AMERICA TO TRANSFER THE CASE TO THE SOUTHERN DISTRICT OF WEST VIRGINIA AND (ii) SURETIES' MOTION TO TRANSFER JOINTLY ADMINISTERED CASES TO SOUTHERN DISTRICT OF WEST VIRGINIA

Quaker Chemical Corporation ("Quaker"), through its undersigned counsel hereby submits this Joinder to the Debtors' Objection (the "Objection") to: (i) the Motion of the United Mine Workers of America Pursuant to 28 U.S.C. § 1412 and Rule 1014 to Transfer the Case to the Southern District of West Virginia [Dkt. Nos. 116, 127]; and (ii) the Sureties' Motion to Transfer Jointly Administered Cases to Southern District

of West Virginia [Dkt. No. 287] (together, the "Motions"). In support of the Joinder, Quaker respectfully submits as follows:

- 1. Quaker is a party in interest in the above-captioned cases pursuant to its status as a creditor of the Debtors. Pursuant to various purchase orders, Quaker has supplied goods and services to several of the Debtors. The Debtors have listed Quaker on their List of Creditors Holding 50 Largest Unsecured Claims filed in the case. See List of Creditors Holding 50 Largest Unsecured Claims at 6, July 17, 2012 [D.I. No. 98].
- 2. As set forth in detail in the Objection, the United Mine Workers of America (the "Union") and Argonaut Insurance Company, Indemnity National Insurance Company, US Specialty Insurance, and Westchester Fire Insurance Company (together, the "Sureties") have filed the Motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia. Quaker hereby objects to the Motions on the grounds raised and asserted in the Objection, and supports venue of these cases in the Southern District of New York.

WHEREFORE, Quaker respectfully requests that the Court enter an order (i) denying the Motions and (ii) granting such other and further relief as this Court deems just and proper.

Dated: August 30, 2012

DRINKER BIDDLE & REATH LLP

By: /s/ Andrew C. Kassner
Andrew C. Kassner (AK-9067)

Counsel for Quaker Chemical Corporation