## 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)

DENIED MOOT

Jan 25, 2013

KACHY A. SURRATT-STATES
United States Bankruptcy Judge

JOINDER OF RALEIGH MINE & INDUSTRIAL SUPPLY, INC., ET AL., 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 THE SOUTHERN DISTRICT OF WEST VIRGINIA

Raleigh Mine & Industrial Supply, Inc., et al., ("RMIS"), 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 the Southern District of West Virginia [Dkt. No. 287] (together, the "Motions"). In support of the Joinder, RMIS respectfully submits as follows:

- RMIS is a party in interest in the above-captioned cases pursuant to its status as a creditor and vendor of the Debtors. RMIS supplies MRO items and services including construction, electrical and temporary labor.
- 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. RMIS 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, RMIS 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 28, 2012

#### /s/ Mychal Sommer Schulz

Mychal Sommer Schulz (WVSB #6092)

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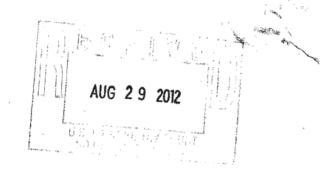
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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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Debtors.



Chapter 11

Case No. 12-12900 (SCC)

(Jointly Administered)

#### CERTIFICATE OF SERVICE

The undersigned counsel does hereby certify that on this \_\_\_\_\_ day of August, 2012, a true and correct copy of the foregoing JOINDER OF RALEIGH MINE & INDUSTRIAL SUPPLY, INC., ET AL., 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 THE SOUTHERN DISTRICT OF WEST VIRGINIA was served upon all counsel of record via LexisNexis File & Serve.

/s/ Mychal Sommer Schulz

Mychal Sommer Schulz (WVSB #6092)

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& INDUSTRIAL SUPPLY, INC., ET AL.

# Dinsmôre

### Legal Counsel.

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August 28, 2012

ATTN: Una Boyle or Gemma Philbert United States Bankruptcy Court Clerk's Office One Bowling Green New York, NY 10004

Patriot Coal Corporation, et al. – Case 12-12900: Joinder to Debtors' Objection to the Motion of the United Mine Workers of America Pursuant to 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc., to Transfer the Case to the Southern District of West Virginia [ECF No. 127]

Dear Ms. Boyle:

Re:

Enclosed herewith please find (i) a hard copy and (ii) a CD containing an electronic version of my clients' Joinder to the Debtors' Objection to the Motion of the United Mine Workers of American Pursuant to 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc., to Transfer the Case to the Southern District of West Virginia [ECF No. 127]. I would be grateful if you could please file the enclosed Joinder on my client's behalf.

Dated: Charleston, West Virginia

August 28, 2012

By:

Mycha Sommer Schuld (WV Dinsmore & Shohl LL/P

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MSS/tll Enclosure

cc: William Robinson, Esq. (Via E-Mail)