

Hearing Date and Time: August 2, 2012 at 2:00 p.m.
Objection Deadline: July 26, 2012 at 4:00 p.m.

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Monongahela Power Company and
Hope Gas, Inc. d/b/a Dominion Hope*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
) Chapter 11
)
PATRIOT COAL CORPORATION, *et al.*,) Case No. 12-12900 (SCC)
)
Debtors.) (Jointly Administered)
)
_____)

**DENIED
MOOT**

Jan 25, 2013

Kathy A. Surratt - States

KATHY A. SURRATT-STATES
United States Bankruptcy Judge

**JOINDER OF AMERICAN ELECTRIC POWER,
MONONGAHELA POWER COMPANY AND HOPE GAS, INC. d/b/a DOMINION
HOPE TO THE CORRECTED MOTION OF THE UNITED MINE WORKERS OF
AMERICA PURSUANT TO 28 U.S.C. § 1412 AND RULE 1014, FED. R. BANK. PROC.
TO TRANSFER THE CASE TO THE SOUTHERN DISTRICT OF WEST VIRGINIA**

American Electric Power, Monongahela Power Company and Hope Gas, Inc., d/b/a Dominion Hope (collectively, the “ Joinder Utilities”), by counsel, hereby join in the *Corrected 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* (the “Motion”) (Docket No. 127), and set forth the following:

Facts Concerning the Joinder Utilities

1. The Joinder Utilities provide utility goods/services to the Debtors at locations in the State of West Virginia.

2. The provision of utility goods/services by the Joinder Utilities to the Debtors is regulated by the Public Service Commission of West Virginia, and governed by applicable West Virginia state laws, regulations and/or tariffs.

3. As reflected by the *Notice of Filing of Revised List of Creditors Holding 50 Largest Unsecured Claims* (Docket No. 98), American Electric Power (“AEP”) and Monongahela Power Company (f/k/a Allegheny Power) (“Monongahela Power”) are two of the top 50 creditors holding unsecured claims against the Debtors. AEP estimates that the debt owed by the Debtors to AEP is approximately \$3.8 million. Monongahela Power estimates that the debt owed by the Debtors to Monongahela Power is approximately \$1,139,307.

Relief Requested

4. The Joinder Utilities adopt and incorporate by reference herein the *Relief Requested* section set forth in the Motion.

Background Information

5. The Joinder Utilities adopt and incorporate by reference herein the *Background*

Information section set forth in the Motion.

Argument

6. The Joinder Utilities adopt and incorporate by reference herein the *Argument* sections set forth in the Motion.

WHEREFORE, the Joinder Utilities respectfully request that this Court enter an order:

1. Granting the relief requested in the Motion; and
3. Providing such other and further relief as the Court deems just and appropriate.

**Dated: Garden City, New York
July 25, 2012**

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

**By: /s/ Jessica Berman
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