

Hearing Date and Time: September 11, 2012 at 1:30 p.m. (Prevailing Eastern Time)
Objection Deadline: August 27, 2012 at 11:59 p.m. (Prevailing Eastern Time)
Reply and Objection Joinder Deadline: August 31, 2012 at 11:59 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)

DENIED
MOOT

Jan 29, 2013

Kathy A. Surratt - States

KATHY A. SURRETT-STATES
United States Bankruptcy Judge

**JOINDER OF CH2M HILL ENGINEERS, INC. TO THE DEBTORS'
MEMORANDUM OF LAW IN OPPOSITION TO (i) MOTION OF THE UNITED
MINE WORKERS OF AMERICA TO TRANSFER THE CASE TO THE
SOUTHERN DISTRICT OF WEST VIRGINIA, (ii) SURETIES' MOTION
TO TRANSFER JOINTLY ADMINISTERED CASES TO SOUTHERN
DISTRICT OF WEST VIRGINIA, AND (iii) MOTION OF THE UNITED STATES
TRUSTEE TO TRANSFER IN THE INTEREST OF JUSTICE**

CH2M HILL Engineers, Inc. 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]; (ii) the Sureties' Motion to Transfer Jointly Administered Cases to Southern District of West Virginia [Dkt. No. 287]; (iii) the United States Trustee's Motion to Transfer Venue of These Cases in the Interest of Justice [Dkt. Nos. 406, 407]; and (iv) two joinders and one notice of support for the transfer of these cases to the Southern District of West Virginia [Dkt. Nos. 178, 390, 392] (together, the "**Motions**"). In support of the Joinder, CH2M HILL Engineers, Inc. respectfully submit as follows:

1. CH2M HILL Engineers, Inc. is a party in interest in the above-captioned cases pursuant to its status as a critical vendor of the Debtors. CH2M HILL Engineers, Inc. is providing consulting, design, procurement, and construction services to Debtors in support of their environmental regulatory compliance efforts for the Debtor's mining operations.

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 motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia and the United States Trustee (the "**U.S. Trustee**") has filed a motion to transfer venue of these cases "to a district where venue is proper." CH2M HILL Engineers, Inc. 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, CH2M HILL Engineers, Inc. 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: Englewood, Colorado
August 28, 2012

By:



Catherine C. Lang

Corporate Counsel
CH2M HILL Engineers, Inc.
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Englewood, CO 80112
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CH2MHILL

CH2M HILL Engineers, Inc.
9191 S. Jamaica Street
Englewood, CO 80112



August 28, 2012

Re: Patriot Coal Corporation, et al. – Case 12-12900: Joinder to Debtors’ 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 [ECF No. 116, 127]; (ii) the Sureties’ Motion to Transfer Jointly Administered Cases to Southern District of West Virginia [ECF No. 287]; (iii) the United States Trustee’s Motion to Transfer Venue of These Cases in the Interest of Justice [ECF Nos. 406, 407]; and (iv) two joinders and one notice of support for the transfer of these cases to the Southern District of West Virginia [ECF Nos. 178, 390, 392]

United States Bankruptcy Court Clerk’s Office
One Bowling Green
New York, NY 10004

Dear Ms. Boyle,

Enclosed herewith please find (i) a hard copy and (ii) a CD ROM containing an electronic version of my clients’ joinder to the Debtors 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 [ECF Nos. 116, 127]; (ii) the Sureties’ Motion to Transfer Jointly Administered Cases to Southern District of West Virginia [ECF No. 287]; (iii) the United States Trustee’s Motion to Transfer Venue of These Cases in the Interest of Justice [ECF Nos. 406, 407]; and (iv) two joinders and one notice of support for the transfer of these cases to the Southern District of West Virginia [ECF Nos. 178, 390, 392].

I would be grateful if you could please file the enclosed joinder on my client’s behalf.

Dated: Englewood, Colorado
August 28, 2012

By: Catherine C. Lang
Catherine C. Lang, Corporate Counsel

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