

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In Re:)	Chapter 11
)	
Patriot Coal Corporation, <i>et al.</i>)	Case No. 12-51502
)	
Debtors.)	

**FIRST SUPPLEMENTAL DECLARATION OF GREGORY D. WILLARD
AND SUPPLEMENTAL STATEMENT PURSUANT TO BANKRUPTCY RULE 2014**

I, Gregory D. Willard, hereby state and declare as follows:

1. I am an attorney at law admitted to practice law in the State of Missouri. I am a shareholder of the law firm of Carmody MacDonald P.C. (“**Carmody MacDonald**”). I am duly authorized to make this first supplemental declaration (“**First Supplemental Declaration**”) on behalf of Carmody MacDonald.

2. I submit this First Supplemental Declaration in supplement to Carmody MacDonald's prior retention application (the “**Carmody MacDonald Retention Application**”)¹ filed in the chapter 11 cases (the “**Chapter 11 Cases**”) of the above captioned debtors (the “**Debtors**”), and in furtherance of Carmody MacDonald’s ongoing disclosure obligations pursuant to the Court’s order authorizing the employment of Carmody MacDonald as local counsel for the Official Committee of Unsecured Creditors (the “**Committee**”).²

¹ *Application of the Official Committee of Unsecured Creditors of Patriot Coal Corporation, et al., for an Order Authorizing and Approving the Employment and Retention of Carmody MacDonald P.C. as Local Counsel, Nunc Pro Tunc to December 3, 2012* [ECF. No. 1848].

² *Order Authorizing and Approving the Retention and Employment of Carmody MacDonald P.C. as Local Counsel to the Official Committee of Unsecured Creditors of Patriot Coal Corporation, Et Al., Nunc Pro Tunc to December 3, 2012* [ECF. No. 2382].

3. This First Supplement Declaration supplements and incorporates by reference the disclosures provided in my prior declaration in support of the Carmody MacDonald Retention Application dated December 31, 2012 (“**Prior Declaration**”).³

4. Unless otherwise stated in this First Supplemental Declaration, I have personal knowledge of the facts set forth.

5. Lathrop & Gage LLP (“**Lathrop & Gage**”) has entered its appearance as counsel to the following creditors of the Debtors: Caterpillar Financial Services Corporation, Caterpillar Global Mining LLC, Caterpillar Global Mining America, LLC, Caterpillar Global Mining Virginia LLC, Caterpillar Global Mining Field Services LLC and Caterpillar Global Mining Highwall Miners LLC.

6. Carmody MacDonald currently represents Lathrop & Gage in a matter that is not related to the Debtors and these Chapter 11 Cases.

7. Except as set forth above and in the Prior Declaration, insofar as I have been able to ascertain after diligent inquiry, I do not believe that there is any other connection (as such term is used in Federal Rule of Bankruptcy Procedure 2014(a)) between Carmody MacDonald and the Debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed by the Office of the United States Trustee.

8. To the extent that any information disclosed herein requires subsequent amendment or modification upon Carmody MacDonald's completion of further analysis or if any new, material, relevant facts or relationships are discovered, a supplemental declaration on

³ *Exhibit A, Declaration of Gregory D. Willard and Statement Pursuant to Bankruptcy Rule 2014, to Application of the Official Committee of Unsecured Creditors of Patriot Coal Corporation, et al., for an Order Authorizing and Approving the Employment and Retention of Carmody MacDonald P.C. as Local Counsel, Nunc Pro Tunc to December 3, 2012* [ECF. No. 1848].

behalf of Carmody MacDonald will be submitted to the Court reflecting such amended or modified information.

9. I certify under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed on February 1, 2013.

/s/ Gregory D. Willard
Gregory D. Willard

CERTIFICATE OF SERVICE

A true and correct copy of this document was filed on February 1, 2013 using the Court's CM/ECF system which sent a copy to all parties receiving electronic notices in this case.

/s/ Gregory D. Willard
Gregory D. Willard