

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

Apr 23, 2013

*Kathy A. Surratt - States*

**KATHY A. SURRATT-STATES**  
Chief United States Bankruptcy Judge

**In re:**

**PATRIOT COAL CORPORATION, *et al.*,**  
  
**Debtors.**

**Chapter 11**

**Case No. 12-51502-659**

**(Jointly Administered)**

**PATRIOT COAL CORPORATION and  
HERITAGE COAL COMPANY,**

**Plaintiffs,**

**v.**

**PEABODY HOLDING COMPANY, LLC and  
PEABODY ENERGY CORPORATION,**

**Defendants.**

**Adversary Proceeding  
No. 13-04067-659**

**VERIFIED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to the Local Rule 2090(B)(1) of the United States Bankruptcy Court for the Eastern District of Missouri, and Local Rule 12.01(F) of the United States District Court for the Eastern District of Missouri, Steven N. Cousins and the firm of Armstrong Teasdale LLP hereby move that Brad B. Erens be admitted *pro hac vice* to the bar of this Court for the purpose of representing Peabody Energy Corporation and Peabody Holding Company, LLC, in the above-referenced matter. In support of this motion, movant sets forth the following information, as required by Local Rule 12.01(F):

1. Brad B. Erens is partner at the law firm of Jones Day located at 77 West Wacker, Chicago, Illinois 60601. His telephone number is 312-269-4050 and; his email address is bberens@jonesday.com.

2. Mr. Erens is a 1991 graduate of The University of Chicago Law School.

3. Mr. Erens was admitted to the Bar of the State of Illinois in 1991 (Bar No. 6206864). In addition, Mr. Erens has been admitted to practice before the United States District Court for the Northern District of Illinois (12/13/91).

4. Mr. Erens affirms that he is a member in good standing of all the bars set forth above and is not currently under suspension or disbarment from any bar.

5. Mr. Erens affirms that he does not reside in the Eastern District of Missouri, is not regularly employed by this District, and is not regularly engaged in the practice of law in this District.

6. Mr. Erens has filed for *pro hac vice* admission to the bankruptcy case of Patriot Coal Corp., et al., (Case No. 12-51502-659) on April 22, 2013, which motion is currently pending.

Mr. Erens does hereby attest under penalty of perjury to the truth and accuracy of the foregoing facts. Movant respectfully requests that this motion be granted and that Mr. Erens be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the referenced matter.

Dated: April 22, 2013

/s/ Brad B. Erens  
Brad B. Erens

Respectfully submitted,

ARMSTRONG TEASDALE LLP

/s/ Steven N. Cousins

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Attorneys for Peabody Energy Corporation and  
Peabody Holding Company, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of April, 2013, a true and correct copy of the above and foregoing has been served on counsel of record receiving notice via the Court's CM/ECF filing system where available, and first class U.S. Mail, postage prepaid on the individuals and entities identified on the Core Party/Non-ECF Service List (Per Case Management Order) as follows:

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