

STITES & HARBISON, LLP
250 West Main Street, Suite 2300
Lexington, KY 40507
Telephone: (859) 226-2300
Facsimile: (859) 253-9144
Chrisandrea L. Turner
William T. Gorton, III
W. Blaine Early, III
Gregory P. Parsons
*Counsel to Argo Surety, Indemnity National Insurance Company,
US Specialty Insurance, Westchester Fire Insurance Company*
-and-
Madison L. Martin (TN 24027)
401 Commerce Street, Suite 800
Nashville, TN 37219
Tel: (615) 244-5200
Facsimile: (615) 782-2371
Madison.Martin@stites.com
Counsel to Bridgestone Americas Tire Operations, LLC

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

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IN RE: : Chapter 11
: :
PATRIOT COAL CORPORATION, *et al.*, : Case No. 12-12900 (SCC)
: :
Debtors. : (Jointly Administered)
: :
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**SUPPLEMENTAL VERIFIED STATEMENT
PURSUANT TO RULE 2019 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Pursuant to the provisions of Rule 2019 of the Federal Rules of Bankruptcy Procedure, Chrisandrea L. Turner, of the law firm of Stites & Harbison, PLLC, files this Verified Statement of her firm’s (the “Firm”) multiple representations in connection with the above-captioned bankruptcy cases of the following surety companies (the “Sureties”) and trade creditor Bridgestone Americas Tire Operations, LLC (“BATO”).

1. The name and address of the Sureties represented by the Firm are as follows:

- a) U.S. Specialty Insurance Company
ATTN: Mr. Brian J. Steele
601 S. Figueroa St., Suite 1600
Los Angeles, CA 90017
- b) Argo Surety
ATTN: Mr. Vincent C. Miseo
P.O. Box 469012
San Antonio, TX 78246
- c) Westchester Fire Insurance Company
ATTN: Mr. John Mangan
c/o ACE USA Claims
436 Walnut St., WA10A
Philadelphia, PA 19106
- d) Indemnity National Insurance Company
ATTN: Mr. Tracy Tucker
c/o Willis of Tennessee, Inc.
6322 Deane Hill Dr.
Knoxville, TN 37919

2. The name and address of the trade creditor(s) represented by the Firm are as follows:

- a) Bridgestone Americas Tire Operations, LLC
ATTN: Elizabeth Widman
N. Sue Van Sant Palmer
535 Marriott Drive
Nashville, TN 37214-0991

3. Each of the Sureties has issued reclamation or other surety bonds to secure Debtors' obligations under a variety of federal, state, and local laws. The Sureties hold collateral and contracts of indemnity to reimburse them in the event they suffer losses due to Debtors' failure to perform their bonded obligations. The Sureties may hold claims against and/or interests in the debtors and debtors in possession (the "Debtors") arising out of the bonded obligations, common law and contractual indemnity, subrogation, or other claims. The amount of claims (interests) of the Sureties have not yet been determined.

4. BATO is a trade creditor that supplies mining tires and related equipment to certain of the Debtors. BATO holds a \$ 195,609.50 reclamation and 11 U.S.C. § 503(b)(9) claim and may hold other claims against and/or security interests in certain of the Debtors arising out of its supply arrangements with Debtors. The amount of the non-reclamation and 20-day claims (interests) of BATO have not yet been determined.

5. I am not presently aware of any claims against or interest in the Debtors held by Stites & Harbison, PLLC.

6. Each Surety and BATO separately requested that the law firm of Stites & Harbison, PLLC serve as its counsel in connection with the Debtors' Chapter 11 cases. Each Surety and BATO is aware of and has consented to Stites & Harbison, PLLC's simultaneous representation of each Surety and of BATO in this proceeding. The circumstances and terms and conditions of employment of the Firm by the Sureties and BATO is protected by the attorney-client privilege and attorney work product doctrine.

7. Stites & Harbison, PLLC may undertake additional representations of other parties in interest in these Chapter 11 Cases, and Stites & Harbison, PLLC reserves the right to revise and supplement this Verified Statement as appropriate.

I, Madison L. Martin, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge and belief.

/s/Madison L. Martin
Madison L. Martin (TN No. 24027)
STITES & HARBISON, PLLC
401 Commerce Street, Suite 800
Nashville, TN 37219
Phone:(615)782-2243; Fax:(615)313-3988
Email: mmartin@stites.com

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August, 2012, a true and correct copy of the foregoing was filed electronically with the Clerk's office by using the CM/ECF system, served electronically on those parties accepting electronic service through the CM/ECF system, and served upon all parties shown below via First Class U.S. Mail.

Patriot Coal Corporation

Attn: Marguerite A. O'Connell
12312 Olive Boulevard, Suite 400
St. Louis, Missouri, 63141

Office of the United States Trustee

Attn: Elisabetta Gasparini, Esq.
33 Whitehall Street, 21st Floor
New York, NY 10004

Davis Polk & Wardwell LLP

Attn: Brian Resnick, Esq. and
Michelle M. McGreal, Esq.
450 Lexington Avenue
New York, NY 10017

Patriot Coal Corporation

c/o GCG, Inc.
P.O. Box 9898
Dublin, Ohio, 43017

/s/Madison L. Martin

Madison L. Martin