

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

<b>In re:</b>	)	
	)	
	)	<b>Chapter 11</b>
	)	
<b>PATRIOT COAL CORPORATION, et al.,</b>	)	<b>Case No. 12-51502-659</b>
	)	
	)	<b>(Jointly Administered)</b>
	)	
<b>Debtors.</b>	)	
	)	
	)	

**VERIFIED SUPPLEMENTAL STATEMENT OF MORGAN, LEWIS & BOCKIUS LLP  
PURSUANT TO RULE 2019 OF  
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

John C. Goodchild, III, on behalf of Morgan, Lewis & Bockius LLP (“Morgan Lewis”), in connection with the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby submits this Supplemental Verified Statement Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Verified Supplemental Statement”), and represents as follows:

1. Morgan Lewis is counsel to the following parties (each a “Party” and collectively, the “Parties”) in the above-captioned bankruptcy cases (the “Chapter 11 Cases”):

United Mine Workers of America 1992 Benefit Plan  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America 1993 Benefit Plan  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America 1974 Pension Trust  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America 2012 Retiree Bonus Account Trust  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America Combined Benefit Fund  
2121 K. Street N.W.  
Washington, DC 20037

2. Morgan Lewis represents the Parties in their capacity as health and retirement benefit plans to which certain of the Debtors have historically contributed.

3. Each of the Parties may hold claims against and/or interests in the Debtors arising out of statutory obligations, collective bargaining agreements, plan and trust documents, law or equity, pursuant to its respective relationship with the Debtors. The amounts of any such claims held by each of the Parties have not yet been determined.

4. I am not presently aware of any claims against or interest in the Debtors held by Morgan Lewis.

5. The following are the pertinent facts and circumstances in connection with Morgan Lewis's employment as counsel in these Chapter 11 Cases: Each Party separately requested that Morgan Lewis serve as its counsel in connection with the Debtors' Chapter 11 cases. Each party is aware of and has consented to Morgan Lewis's simultaneous representation of each other Party in this proceeding.

6. Morgan Lewis may undertake additional representations of other parties in interest in these Chapter 11 Cases, and Morgan Lewis reserves the right to further supplement this Verified Supplemental Statement as appropriate.

7. The only material change in the facts required to be disclosed by 2019(c) of the Federal Rules of Bankruptcy Procedure since the time Verified Statement of Morgan, Lewis & Bockius LLP Pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure [ECF No. 119 (the "Original Verified Statement")]) was filed in the United States Bankruptcy Court for the Southern District of New York on July 18, 2012, is that on April 12, 2013, the United Mine

Workers of America 2012 Retiree Bonus Account Trust took a position before the Court [ECF No. 3624]. Accordingly, the Original Verified Statement is being supplemented only insofar as the United Mine Workers of America 2012 Retiree Bonus Account Trust is added as a Party.

8. This Verified Supplemental Statement supersedes the Original Verified Statement.

I, John C. Goodchild, III, 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/ John C. Goodchild, III  
John C. Goodchild, III

Dated: April 22, 2013

Respectfully submitted,

**DOWD BENNETT LLP**

By: /s/ James E. Crowe, III  
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*Counsel for United Mine Workers of America 1992 Benefit Plan, the United Mine Workers of America 1974 Pension Trust, the United Mine Workers of America 1993 Benefit Plan, the United Mine Workers of America 2012 Retiree Bonus Account Trust and the United Mine Workers of America Combined Benefit Fund*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was filed on April 22, 2013 using the Court's CM/ECF system and that service will be accomplished by operation of that system upon all counsel of record, which includes counsel for all core parties.

/s/ James E. Crowe, III