

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:

PATRIOT COAL CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 12-51502

(Joint Administered)

Hon. Judge Kathy A. Surratt-States

**JOSEPH G. BUNN'S MOTION  
TO WITHDRAW AS COUNSEL FOR BLUE EAGLE LAND, LLC**

Joseph G. Bunn, Esq. of Jones & Associates, ("Bunn"), counsel for Blue Eagle Land, LLC, a West Virginia limited liability company, ("BEL"), respectfully moves this Court, pursuant to Local Rule 2091, to allow him to withdraw as counsel for BEL (the "Motion to Withdraw") for the foregoing reasons:

1. Bunn is lead counsel representing the interests of BEL in the above-captioned matter.
2. Mark Moedritzer ("Moedritzer"), Kay C. Whittaker ("Whittaker"), and Todd W. Ruskamp ("Ruskamp") of Shook, Hardy & Bacon, L.L.P. currently assist Bunn in his representation of BEL.
3. Upon this Court's approval of Bunn's withdrawal as counsel for BEL, Moedritzer, Whittaker, and Ruskamp shall continue to represent BEL's interests in the above-captioned litigation.

**WHEREFORE**, for the foregoing reasons, Bunn respectfully requests that this Court:

- (a) grant his Motion to Withdraw by executing the proposed Order Granting Joseph G. Bunn's Motion to Withdraw as Counsel for Blue Eagle Land, LLC, attached hereto as Exhibit A;

(b) direct the Clerk to remove Bunn from receiving all notices in the above-captioned matter;

(c) grant such other relief as this Court deems is just or appropriate under the given circumstances.

Dated: May 10, 2013

Respectfully submitted,

*/s/ Joseph G. Bunn*

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Joseph G. Bunn, Esq.

**JONES & ASSOCIATES**

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# EXHIBIT A

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**Hon. Judge Kathy A. Surratt-States**

**ORDER GRANTING JOSEPH G. BUNN'S MOTION  
TO WITHDRAWAL AS COUNSEL FOR BLUE EAGLE LAND, LLC.**

Upon the motion (the "Motion") of Joseph G. Bunn, Esq. ("Bunn") for entry of an order, pursuant to Local Rule 2091, authorizing his withdrawal as counsel for Blue Eagle Land, LLC, a West Virginia limited liability company, ("BEL"); and the Court having reviewed the Motion; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that Bunn may withdraw as counsel for BEL upon entry of this Order; and it is further

ORDERED that the Clerk shall no longer direct delivery of any notices involved in the above-captioned case to Bunn.

Dated: \_\_\_\_\_, 2013  
St. Louis, Missouri

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Hon. Kathy A. Surratt-States  
United States Bankruptcy Judge