

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 FIRST SURETY CORPORATION**

Joseph G. Bunn, Esq. of Jones & Associates, ("Bunn"), counsel for First Surety Corporation, a West Virginia corporation, ("FSC"), respectfully moves this Court, pursuant to Local Rule 2091, to allow him to withdraw as counsel for FSC (the "Motion to Withdraw") for the foregoing reasons:

1. Bunn is lead counsel representing the interests of FSC 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 FSC.
3. Upon this Court's approval of Bunn's withdrawal as counsel for FSC, Moedritzer, Whittaker, and Ruskamp shall continue to represent FSC'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 First Surety Corporation, 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

Joseph G. Bunn, Esq.

JONES & ASSOCIATES

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EXHIBIT A

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**ORDER GRANTING JOSEPH G. BUNN'S MOTION
TO WITHDRAWAL AS COUNSEL FOR FIRST SURETY CORPORATION**

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 First Surety Corporation, a West Virginia corporation, ("FSC"); 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 FSC 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

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