

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

In re:

PATRIOT COAL CORPORATION, et al,

Debtors.

Chapter 11

Case No. 12-12900 (SCC)

(Jointly Administered)


**JOINDER OF AMERICAN FREEDOM INNOVATIONS, LLC TO THE DEBTORS' MEMORANDUM OF LAW IN
OPPOSITION TO (i) MOTION OF THE UNITED MINE WORKERS OF AMERICA TO TRANSFER THE CASE TO
THE SOUTHERN DISTRICT OF WEST VIRGINIA, (ii) SURETIES' MOTION TO TRANSFER JOINTLY
ADMINISTERED CASES TO SOUTHERN DISTRICT OF WEST VIRGINIA, AND (iii) MOTION OF THE
UNITED STATES TRUSTEE TO TRANSFER IN THE INTEREST OF JUSTICE**

American Freedom Innovations, LLC through its undersigned counsel hereby submits this Joinder to the Debtors' Objection (the "**Objection**") to: (i) the Motion of the United Mine Workers of America Pursuant to 28 U.S.C. §1412 and Rule 1014 to Transfer the Case to the Southern District of West Virginia (Dkt. Nos. 116, 127); (ii) the Sureties' Motion to Transfer Jointly Administered Cases to Southern District of West Virginia (Dkt. No. 287); (iii) the United States Trustee's Motion to Transfer Venue of These Cases in the Interest of Justice (Dkt. Nos. 406, 407); and (iv) two joinders and one notice of support for the transfer of these cases to the Southern District of West Virginia (Dkt. Nos. 178, 390,392) (together, the "**Motions**"). In support of the Joinder, American Freedom Innovations, LLC respectfully submit as follows:

1. American Freedom Innovations, LLC is a party in interest in the above-captioned cases pursuant to its status as an unsecured Creditor of the Debtors. American Freedom Innovations, LLC has served as a Consultant to Debtors since November 2009.
2. As set forth in detail in the Objection, United Mine Workers of America (the "**Union**") and Argonaut Insurance Company, Indemnity National Insurance Company, US Specialty Insurance and Westchester Fire Insurance Company (together, the "**Sureties**") have filed motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia and the United States Trustee (the "**U.S. Trustee**") has filed a motion to transfer venue of these cases "to a district where venue is proper". American Freedom Innovations, LLC hereby objects to the Motions on the grounds raised and asserted in the Objection, and supports venue of these cases in the Southern District of New York.

WHEREFORE, American Freedom Innovations, LLC respectfully requests that the Court enter an order (i) denying the Motions and (ii) granting such other and further relief as this court deems just and proper.

Dated: August 27, 2012

BY: 

Daniel S. Hermann, President
American Freedom Innovations, LLC