



**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 RALEIGH MINE & INDUSTRIAL SUPPLY, INC., ET AL.,  
TO THE DEBTORS' OBJECTION TO (i) MOTION OF THE UNITED  
MINE WORKERS OF AMERICA TO TRANSFER THE CASE TO  
THE SOUTHERN DISTRICT OF WEST VIRGINIA AND (ii) SURETIES'  
MOTION TO TRANSFER JOINTLY ADMINISTERED CASES TO  
THE SOUTHERN DISTRICT OF WEST VIRGINIA**

Raleigh Mine & Industrial Supply, Inc., et al., ("RMIS"), 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]; and (ii) the Sureties' Motion to Transfer Jointly Administered Cases to the Southern District of West Virginia [Dkt. No. 287] (together, the "**Motions**"). In support of the Joinder, RMIS respectfully submits as follows:

1. RMIS is a party in interest in the above-captioned cases pursuant to its status as a creditor and vendor of the Debtors. RMIS supplies MRO items and services including construction, electrical and temporary labor.
2. As set forth in detail in the Objection, the 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 the Motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia. RMIS 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, RMIS 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 28, 2012

/s/ Mychal Sommer Schulz

Mychal Sommer Schulz (WVSB #6092)  
DINSMORE & SHOHL, LLP  
Huntington Square, Suite 600  
Post Office Box 11887  
Charleston, West Virginia 25339-1887  
Telephone: (304) 357-0900  
Direct Dial: (304) 357-0906  
Facsimile: (304) 357-0919  
**COUNSEL FOR RALEIGH MINE  
& INDUSTRIAL SUPPLY, INC, et al.**

**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)**

**CERTIFICATE OF SERVICE**

The undersigned counsel does hereby certify that on this \_\_\_\_ day of August, 2012, a true and correct copy of the foregoing **JOINDER OF RALEIGH MINE & INDUSTRIAL SUPPLY, INC., ET AL., TO THE DEBTORS' OBJECTION TO (i) MOTION OF THE UNITED MINE WORKERS OF AMERICA TO TRANSFER THE CASE TO THE SOUTHERN DISTRICT OF WEST VIRGINIA AND (ii) SURETIES' MOTION TO TRANSFER JOINTLY ADMINISTERED CASES TO THE SOUTHERN DISTRICT OF WEST VIRGINIA** was served upon all counsel of record via LexisNexis File & Serve.

**/s/ Mychal Sommer Schulz**

Mychal Sommer Schulz (WVSB #6092)

DINSMORE & SHOHL, LLP

Huntington Square, Suite 600

Post Office Box 11887

Charleston, West Virginia 25339-1887

Telephone: (304) 357-0900

Direct Dial: (304) 357-0906

Facsimile: (304) 357-0919

**COUNSEL FOR RALEIGH MINE  
& INDUSTRIAL SUPPLY, INC., ET AL.**

# Dinsmore

DINSMORE & SHOHL LLP  
Huntington Square  
900 Lee Street ^ Suite 600 ^ Charleston, WV 25301  
www.dinsmore.com  
P.O. Box 11887, Charleston, WV 25339-1887  
Mychal Sommer Schulz  
(304) 357-0906 (direct) ^ (304) 357-0919 (fax)  
mychal.schulz@dinsmore.com

August 28, 2012

**ATTN: Una Boyle or Gemma Philbert**  
United States Bankruptcy Court Clerk's Office  
One Bowling Green  
New York, NY 10004

**Re: Patriot Coal Corporation, et al. – Case 12-12900: Joinder to Debtors'  
Objection to the Motion of the United Mine Workers of America Pursuant to  
28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc., to Transfer the Case to  
the Southern District of West Virginia [ECF No. 127]**

Dear Ms. Boyle:

Enclosed herewith please find (i) a hard copy and (ii) a CD containing an electronic version of my clients' Joinder to the Debtors' Objection to the Motion of the United Mine Workers of American Pursuant to 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc., to Transfer the Case to the Southern District of West Virginia [ECF No. 127]. I would be grateful if you could please file the enclosed Joinder on my client's behalf.

Dated: Charleston, West Virginia  
August 28, 2012



By: \_\_\_\_\_

*(Handwritten signature)*  
Mychal Sommer Schulz (WVSB #6092)  
Dinsmore & Shohl LLP  
Post Office Box 11887  
Charleston, WV 25339-1887  
Telephone: (304) 357-0900  
Facsimile: (304) 357-0919  
**COUNSEL FOR RALEIGH MINE  
& INDUSTRIAL SUPPLY, INC., et al.**

MSS/tll  
Enclosure  
cc: William Robinson, Esq. (Via E-Mail)