

Hearing Date and Time: September 11, 2012 at 1:30 p.m. (Prevailing Eastern Time)

**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 FLOMIN COAL, INC. 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 SOUTHERN DISTRICT OF WEST VIRGINIA**

Flomin Coal, Inc. ("Flomin") through its undersigned counsel hereby submits this Joinder to the Debtors' Objection (the "**Objection**") [Dkt. No. 425] 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 Southern District of West Virginia [Dkt. No. 287] (together, the "**Motions**"). In support of the Joinder, Flomin respectfully submits as follows:

1. Flomin is a party in interest in the above-captioned cases pursuant to its status as a vendor of the Debtors. Flomin is a Delaware corporation with offices in the States of Georgia and Kentucky. Flomin is a distributor of chemicals for use in the mining industry and is included in the Debtor's list of creditors holding the 50 largest unsecured claims [Dkt. No. 1].

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. Flomin 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, Flomin Coal, Inc. 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: New York, New York
August 31, 2012

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