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-and-

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*Counsel to Bridgestone Americas Tire Operations, LLC*

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

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IN RE:	:	Chapter 11
	:	
PATRIOT COAL CORPORATION, <i>et al.</i> ,	:	Case No. 12-12900 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**SUPPLEMENTAL VERIFIED STATEMENT  
PURSUANT TO RULE 2019 OF THE FEDERAL  
RULES OF BANKRUPTCY PROCEDURE**

Pursuant to the provisions of Rule 2019 of the Federal Rules of Bankruptcy Procedure, Chrisandrea L. Turner, of the law firm of Stites & Harbison, PLLC, files this Verified Statement of her firm's (the "Firm") multiple representations in connection with the above-captioned bankruptcy cases of the following surety companies (the "Sureties"), trade creditor Bridgestone

Americas Tire Operations, LLC (“BATO”), and R.J. Corman Railroad Construction Company  
(the “Lien Creditor”).

1. The name and address of the Sureties represented by the Firm are as follows:

- a) U.S. Specialty Insurance Company  
ATTN: Mr. Brian J. Steele  
601 S. Figueroa St., Suite 1600  
Los Angeles, CA 90017
- b) ARGONAUT INSURANCE COMPANY  
ATTN: Mr. Vincent C. Miseo  
P.O. Box 469012  
San Antonio, TX 78246
- c) Westchester Fire Insurance Company  
ATTN: Mr. John Mangan  
c/o ACE USA Claims  
436 Walnut St., WA10A  
Philadelphia, PA 19106
- d) Indemnity National Insurance Company  
ATTN: Mr. Tracy Tucker  
c/o Willis of Tennessee, Inc.  
6322 Deane Hill Dr.  
Knoxville, TN 37919

2. The name and address of the trade creditor(s) represented by the Firm are as  
follows:

Bridgestone Americas Tire Operations, LLC  
ATTN: Elizabeth Widman  
N. Sue Van Sant Palmer  
535 Marriott Drive  
Nashville, TN 37214-0991

3. The name and address of the Lien Creditor represented by the Firm is as follows:

- a) R. J. Corman Railroad Construction, LLC  
ATTN: Jeremy J. Sylvester, Esquire  
Moynahan, Irvin & Mooney, PSC  
110 N. Main Street  
Nicholasville, KY 40356

4. Each of the Sureties has issued reclamation or other surety bonds to secure Debtors' obligations under a variety of federal, state, and local laws. The Sureties hold collateral and contracts of indemnity to reimburse them in the event they suffer losses due to Debtors' failure to perform their bonded obligations. The Sureties may hold claims against and/or interests in the debtors and debtors in possession (the "Debtors") arising out of the bonded obligations, common law and contractual indemnity, subrogation, or other claims. The amount of claims (interests) of the Sureties have not yet been determined.

5. BATO is a trade creditor that supplies mining tires and related equipment to certain of the Debtors. BATO holds a \$ 195,609.50 reclamation and 11 U.S.C. § 503(b)(9) claim and may hold other claims against and/or security interests in certain of the Debtors arising out of its supply arrangements with Debtors. The amount of the non-reclamation and 20-day claims (interests) of BATO have not yet been determined.

6. Lien Creditor is a creditor who contracted with Debtor, TC Sales Company, LLC pursuant to a Track Maintenance Agreement and holds a mechanic's lien in TC Sales Company, LLC's interest in real estate located in Kanawha County, West Virginia. The mechanic's lien is to secure payment to Lien Creditor in the amount of \$97,015.06.

7. I am not presently aware of any claims against or interest in the Debtors held by Stites & Harbison, PLLC.

8. Each Surety, BATO and Lien Creditor separately requested that the Firm serve as its counsel in connection with the Debtors' Chapter 11 cases. Each Surety, BATO and Lien Creditor is aware of and has consented to the Firm's simultaneous representation of said parties in this proceeding. The circumstances and terms and conditions of employment of the Firm by

the Sureties, BATO and Lien Creditor are protected by the attorney-client privilege and attorney work product doctrine.

9. The Firm may undertake additional representations of other parties in interest in these Chapter 11 Cases and reserves the right to revise and supplement this Verified Statement as appropriate.

I, Chrisandrea L. Turner, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge and belief.

Respectfully Submitted,

/s/Chrisandrea L. Turner  
Chrisandrea L. Turner  
Bar No. 87520  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of September, 2012, a true and correct copy of the foregoing was filed electronically with the Clerk's office by using the CM/ECF system, served electronically on those parties accepting electronic service through the CM/ECF system, and served upon all parties shown below via First Class U.S. Mail.

**Patriot Coal Corporation**

Attn: Marguerite A. O'Connell  
12312 Olive Boulevard, Suite 400  
St. Louis, Missouri, 63141

**Office of the United States Trustee**

Attn: Elisabetta Gasparini, Esq.  
33 Whitehall Street, 21st Floor  
New York, NY 10004

**Davis Polk & Wardwell LLP**

Attn: Brian Resnick, Esq. and  
Michelle M. McGreal, Esq.  
450 Lexington Avenue  
New York, NY 10017

**Patriot Coal Corporation**

c/o GCG, Inc.  
P.O. Box 9898  
Dublin, Ohio, 43017

/s/Chrisandrea L. Turner  
Chrisandrea L. Turner