

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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In re:	)	Chapter 11
	)	
PATRIOT COAL CORPORATION, <i>et al.</i> ,	)	Case No. 12-51502
	)	
Debtors.	)	(Jointly Administered)
-----	)	

**VERIFIED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri and Rule 12.01(E) of the local rules of the United States District Court for the Eastern District of Missouri, I, Hugh M. Ray, III (the "Movant"), move to be admitted pro hac vice to the bar of this Court for the purpose of representing CompassPoint Partners, L.P.; Ron Bew; Andy Gregor; Reserve Capital, Inc.; Frank Williams; and Eric Wagoner (collectively, the "Interested Shareholders")<sup>1</sup> in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(E):

- a. *Full name of the Movant-attorney:*  
**Hugh M. Ray, III**
  
- b. *Address and telephone number of the Movant-attorney:*  
**McKool Smith, P.C.  
600 Travis Street, Suite 7000  
Houston, Texas 77002  
Telephone: (713) 485-7300**
  
- c. *Name of the firm or letterhead under which the Movant practices:*  
**McKool Smith, P.C.**
  
- d. *Name of the law school(s) Movant attended and the date(s) of graduation therefrom:*  
**Vanderbilt Law School (1996)**

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<sup>1</sup> The Interested Shareholders have no intention of forming an *ad hoc* committee at this time.

- e. *State and federal bars of which the Movant is a member, with dates of admission and registration numbers, if any:*  
**Texas State (1998), Bar No. 24004246**  
**U.S. District Court, Northern District of Texas (1998), Bar No. N/A**  
**U.S. District Court, Southern District of Texas (1998), Bar No. 22090**  
**U.S. District Court, Eastern District of Texas (1998), Bar No. N/A**  
**U.S. District Court, Western District of Texas (2005). Bar No. N/A**  
**U.S. District Court, District of Colorado (2000), Bar No. N/A**  
**U.S. Tax Court (2005), Bar No. RH0371**  
**U.S. Court of Appeals, Fifth Circuit (2001), Bar No. N/A**  
**U.S. Court of Appeals, Eleventh Circuit (2001), Bar No. N/A**  
**U.S. Supreme Court (2001), Bar No. N/A**
- f. Movant is a member in good standing of all bars of which Movant is a member, and Movant is not under suspension or disbarment from any bar.
- g. Movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that Movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: January 4, 2013  
Houston, Texas

Respectfully submitted,

**MCKOOL SMITH, P.C.**

By: /s/ Hugh M. Ray III

Hugh M. Ray III  
Texas Bar No. 24004246  
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*Counsel for the Interested Shareholders*

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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In re:	)	Chapter 11
	)	
PATRIOT COAL CORPORATION, <i>et al.</i> ,	)	Case No. 12-51502
	)	
Debtors.	)	(Jointly Administered)
-----	)	

**ORDER GRANTING VERIFIED MOTION FOR ADMISSION *PRO HAC VICE***

Upon the *Verified Motion for Admission for Admission Pro Hac Vice* of Hugh M. Ray, III for admission to practice and appear in the above-captioned bankruptcy cases, it is hereby

ORDERED that Hugh M. Ray, III is admitted to practice *pro hac vice* in the above-captioned bankruptcy cases, subject to the payment of the filing fee.

Dated: \_\_\_\_\_, 2013  
St. Louis, Missouri

\_\_\_\_\_  
The Honorable Kathy Surratt-States  
United States Bankruptcy Judge