UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI ST LOUIS DIVISION

| In re |) | |
|----------------------------------|---|-------------------|
| Patriot Coal Corporation, et al. |) | Chapter 11 |
| |) | |
| |) | |
| |) | Case No. 12-51502 |
| Debtors | | |

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, Madison L. Martin, move to be admitted pro hac vice to the bar of this Court for the purpose of representing Bridgestone Americas Tire Operations, LLC 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;

Madison L. Martin

b. Address and telephone number of the movant-attorney;

401 Commerce Street, Suite 800

Nashville, TN 37219

Phone: (615) 782-2200 Fax: (615) 313-3988

c. Name of the firm or letterhead under which the movant practices;

Stites & Harbison, PLLC

d. Name of the law school(s) movant attended and the date(s) of graduation therefrom;

The University of Michigan Law School, 1999

e. State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any;

State of Illinois, 1999 (Bar # 6270108)

State of Delaware, 2001 (Bar # 4079)

State of Tennessee, 2005 (Bar # 24027)

- U.S. District Court for the Northern District of Illinois, 1999
- U.S. District Court for the District of Delaware, 2001
- U.S. District Court for the Eastern District of Tennessee, 2005
- U.S. District Court for the Western District of Tennessee, 2005
- U.S. District Court for the Middle District of Tennessee, 2005
- U.S. Court of Appeals for the Third Circuit, 2004
- U.S. Court of Appeals for the Eleventh Circuit, 2006
- U.S. Court of Appeals for the Sixth Circuit, 2007

United States Supreme Court, 2008

- f. The movant is a member in good standing of all bars of which movant is a member; the movant is not under suspension or disbarment from any bar.
- g. The movant does not reside in the Eastern District of Missouri, is not regularly employed in this district and is not 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 9, 2013 STITES & HARBISON, PLLC

By: /s/ Martin Madison
Madison L. Martin
Tennessee Bar No. 24027
401 Commerce Street, Suite 800
Nashville, TN 37219

E-mail address: <u>mmartin@stites.com</u> Telephone number: (615) 782-2200

Proposed Counsel for Bridgestone Americas Tire Operations, LLC