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, Joseph G. Gibbons, move to be admitted *pro hac vice* to the
Bar of this Court for the purpose of representing ACE American Insurance Company, Indemnity
Insurance Company of North America, Pacific Employers Insurance Company, and Century
Indemnity Company, as successor to CCI Company, successor to Insurance Company of North
America in the instant matter. In support of this Motion, I submit the following information as
required by Rule 12.01(E):

- A. My name is Joseph G. Gibbons.
- B. My business address is 1650 Market Street, Suite 1800, Philadelphia, PA 19103. My phone number is 215-864-7000.
 - C. I am employed by the law firm of White and Williams LLP.
- D. I attended the Rutgers University School of Law Camden, and graduated in 1990.
 - E. I am a member of the Bars of the following state and federal courts:

<u>Court</u>	Admission Date	Bar Number
Commonwealth of Pennsylvania	1990	60378
State of New Jersey	1991	63660
District of New Jersey	1991	
Eastern District of Pennsylvania	1994	
Third Circuit Court of Appeals	2005	
Eastern District of Wisconsin	2005	
Western District of Pennsylvania	2007	

- F. I am a member in good standing of all the Bars of which I am a member. I am not under suspension or disbarment from any Bar.
- G. I do not reside in the Eastern District of Missouri, am not regularly employed in this district and am not regularly engaged in the practice of law in this district.

 Movant attests under penalty of purgery 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 10, 2013

Respectfully submitted,

Joseph G. Gibbons, Esquire WHITE AND WILLIAMS LLP 1650 Market Street, Suite 1800

One Liberty Place

Philadelphia, PA 19103-7395

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MISSOURI

)	
IN RE:)	
)	
PATRIOT COAL CORP., et. al.)	
) CASE NO. 12-515	502
Debtors,)	
) CHAPTER 11	
)	

CERTIFICATE OF SERVICE

I hereby certify that on this date, the foregoing Motion for Admission *Pro Hac Vice* of Joseph G. Gibbons, was served upon the following via first-class U.S. Mail:

Amelia T. R. Starr Brian M. Resnick Brian C. Walsh Davis Polk & Wardell LLP 450 Lexington Avenue New York, NY 10017

Adam C. Rogoff Cramer Levin Naftilus & Frankel 1177 Avenue of the Americas New York, NY 10036 Lenora S. Long Office of the U.S. Trustee 111 S. 10th Street Suite 6352 St. Louis, Missouri 63102

Dated: January 10, 2013

Joseph G. Gibbons, Esquire