SO ORDERED
Jan 17, 2013 Kathy a. Surratt - States
KALHY A. SURRATT-STATES United States Bankruptcy Judge

**RECEIVED & FILED** 

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI ST. LOUIS DIVISION JAN 16 2013

U.S. BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI

In re

PATRIOT COAL CORPORATION, et. al.

Debtor(s)

Case No. 12-51502 Chapter 11

## VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 12 of the local rules of the United States District Court for the Eastern District of Missouri, I, <u>Karen L. Gilman</u>, move to be admitted pro hac vice to the bar of this court for the purpose of representing <u>Lexon Insurance Company</u>, <u>Bond Safeguard Insurance</u> <u>Company</u>, <u>and Aspen American Insurance Company</u> in this 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: Karen L. Gilman
- (b) Address, telephone number and fax number of the movant-attorney: **1 Boland Drive, West Orange, New Jersey 07052 Phone: 973-530-2006; Fax: 973-530-2206**
- (c) Name of the firm or letterhead under which movant practices: Wolff & Samson PC
- (d) Name of the law school(s) movant attended and the date(s) of graduation therefrom: Suffolk University Law School, 1979
- (e) Bars, state and federal, of which the movant is a member, with dates of admission and registration numbers, if any:

State Court	Date of Admission	Bar No.
New Jersey	1987	2546
Massachusetts	1979	43780

Federal Court	Date of Admission
U.S. Supreme Court	1985
U.S. Court of Appeals, First Circuit	1981
U.S. Court of Appeals, Third Circuit	1989
U.S. Court of Appeals, Second Circuit	2009
U.S. District Court, District of Massachusetts	1980
U.S. District Court, Southern District of New York	2002
U.S. District Court, Eastern District of New York	2005
U.S. District Court, Western District of New York	2012

- (f) I, Karen L. Gilman, am a member in good standing of all bars of which I am a member, and I am not under suspension or disbarment from any bar. I have attached to this motion a certificate of good standing in the bar of the jurisdiction in which I reside or am regularly employed as an attorney.
- (g) I, Karen L. Gilman, 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.

I, Karen L. Gilman, attest under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully request that this motion be granted and that I be admitted pro hac vice to the bar of this Court to appear in the instant matter.

Dated: January 10, 2013

Laren F. Lilman KAREN L. GILMAN

Supreme Court of New Jersey



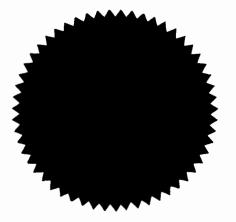
# Certificate of Good Standing

This is to certify that **KAREN L GILMAN** 

010811987 ) was constituted and appointed an Attorney at Law of New (No. June 11, 1987 Jersey on and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-*12*.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this day of December *, 20* 12

Clerk of the Supreme Court

#### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI

\_\_\_\_\_

In re:

Chapter 11

Case No. 12-51502

PATRIOT COAL CORPORATION, et al.

Judge Kathy A. Surratt-States

Debtors. : -----x

### **CERTIFICATE OF SERVICE**

I, BETH J. ROTENBERG, represent Lexon Insurance Company, Bond Safeguard Insurance Company, and Aspen American Insurance Company, secured creditors in the above-captioned matter.

On January 15, 2013, I caused an employee at my firm to send a copy of the Verified Motion for Admission *Pro Hac Vice* of Karen L. Gilman, Esq. to the parties listed in the annexed chart by causing true and correct copies to be enclosed securely in separate postage pre-paid envelopes and delivered via regular mail.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

BETH J. ROTENBERG

Dated: January 15, 2013

### In re: Patriot Coal Corporation, et al.

#### <u>Service List</u>

Patriot Coal Corporation Attn: Jacquelyn A. Jones, Esq. 12312 Olive Boulevard, Suite 400 St. Louis, MO 63141

GCG, Inc. Attn: Elizabeth Vrato, Esq. 190 S. LaSalle Street, Suite 1520 Chicago, IL 60603

Office of the United States Trustee Attn: Leonora S. Long, Esq. Trial Attorney 111 S. 10<sup>th</sup> Street, Suite 6.353 St. Louis, MO 63102-1125

Weil, Gotshal & Manges LLP Attn: Joseph H. Smolinsky, Esq. and Marcia Goldstein, Esq. 767 Fifth Avenue New York, NY 10153-0119

Curtis, Mallet-Prevost, Colt & Mosle LLP Proposed Conflicts Counsel to Debtors Attn: Steven J. Reisman, Esq. and Michael A. Cohen, Esq. 101 Park Avenue New York, NY 10178

Jackson Kelly PLLC Attn: Robert G. McLusky, Esq. 500 Lee St. E., Suite 1600 Charleston, WV 25301-3202

Reeder & Shuman Attn: Stephen K. Shuman, Esq. 256 High Street, P.O. Box 342 Morgantown, WV 26507-0842 (For the Creditor Committee Delta Electric Incorporated) David Polk & Wardwell LLP Attn: Marshall S. Huebner, Esq. and Brian M. Resnick, Esq. 450 Lexington Avenue New York, NY 10017

Kramer Levin Naftalis & Frankel LLP Attn: Adam C. Rogoff, Esq., P. Bradley O'Neill, Esq., Robert T. Schmidt, Esq. and Thomas Moers Mayer, Esq. 1177 Avenue of the Americas New York, NY 10036

Stahl Cowen Crowley Addis LLC Attn: Jon D. Cohen 55 West Monroe Street, Suite 1200 Chicago, IL 60603

Wilkie Farr & Gallagher LLP Attn: Ana M. Alfonso, Esq. and Margot B. Schonholtz, Esq. 787 Seventh Avenue New York, NY 10019-6099

Bryan Cave LLP Attn: Brian C. Walsh, Esq. Laura Uberti Hughes, Esq. and Lloyd A. Palans, Esq. 211 N. Broadway, Suite 3600 St. Louis, MO 63102

Carmody MacDonald P.C. Attn: Angela L. Schisler, Esq., Gregory D. Willard, Esq. and John D. McAnnar, Esq. 120 S. Central Avenue, Suite 1800 St. Louis, MO 63105

Cole Schotz Meisel Forman & Leonard PA Attn: Stuart Komrower, Esq. and Michael D. Warner, Esq. 900 Third Avenue, 16<sup>th</sup> Floor New York, NY 10022 United States Bankruptcy Court Eastern District of Missouri

In re: Patriot Coal Corporation Debtor Case No. 12-51502-kss Chapter 11

## **CERTIFICATE OF NOTICE**

District/off: 0865-4

User: pott Form ID: pdfol Page 1 of 3 Total Noticed: 1 Date Rcvd: Jan 21, 2013

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 22, 2013.

aty +Karen L Gilman, WOLFF & SAMSON PC, One Boland Drive, West Orange, NJ 07052-3687

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\* NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 22, 2013

Signature:

Joseph Spections

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 18, 2013 at the address(es) listed below:

Angela Ferrante on behalf of Other Professional GCG, Inc. angela.ferrante@gcginc.com,

pacerteam@gcginc.com;elizabeth.vrato@gcginc.com;kevin.grover@gcginc.com;alison.moodie@gcginc.com; jeffrey.demma@gcginc.com;ryan.nadick@gcginc.com

Angela L Schisler on behalf of Creditor Committee Official Committee of Unsecured Creditors als@carmodymacdonald.com,

tmayer@kramerlevin.com;arogoff@kramerlevin.com;boneill@kramerlevin.com;gplotko@kramerlevin.com;ay erramalli@kramerlevin.com;sblank@kramerlevin.com;abyowitz@kramerlevin.com;awong@kramerlevin.com;h vanaria@kramerlevin.com;jwagner@kramerlevin.com

Bradley P Schneider on behalf of Creditor CompassPoint Partners, L.P. schneider@stlouislaw.com Brian C. Walsh on behalf of Debtor Patriot Coal Corporation brian.walsh@bryancave.com, sgreiss@bryancave.com;erica.woods@bryancave.com

Catherine C Whittaker on behalf of Creditor Blue Eagle Land, LLC cwhittaker@shb.com Chrisandrea L. Turner on behalf of Creditor Argonaut Insurance Company clturner@stites.com Christopher N. Grant on behalf of Creditor United Mine Workers of America cng@schuchatcw.com, notices@schuchatcw.com;rm@schuchatcw.com

Daniel D. Doyle on behalf of Creditor Caterpillar Financial Services Corporation ddoyle@lathropgage.com, lschorr@lathropgage.com

David A. Warfield on behalf of Special Counsel Thompson Coburn LLP dwarfield@thompsoncoburn.com Desiree Wolford on behalf of Creditor Missouri Department of Revenue edmoecf@dor.mo.gov on behalf of Creditor Shonk Land Company LLC erc@stoneleyton.com, E. Rebecca Case ercecf@gmail.com

Edward L. Dowd on behalf of Creditor United Mine Workers of America 1974 Pension Trust edowd@dowdbennett.com

Frederick Perillo on behalf of Creditor United Mine Workers of America fp@previant.com Grant Crandall on behalf of Creditor United Mine Workers of America gcrandall@umwa.org Gregory D. Willard on behalf of Creditor Committee Official Committee of Unsecured Creditors gdw@carmodymacdonald.com

Howard S. Smotkin on behalf of Creditor Lawson Heirs Incorporated hss@stoneleyton.com, hssecf@qmail.com

James Gadsden on behalf of Creditor Phillip Machine Service, Inc. bankruptcy@clm.com James E. Crowe on behalf of Creditor United Mine Workers of America 1974 Pension Trust jcrowe@dowdbennett.com, tcampbell@dowdbennett.com

James I. Singer on behalf of Creditor United Mine Workers of America jis@schuchatcw.com, mw@schuchatcw.com

Jason P. Alter on behalf of Creditor Broun Properties, LLC jalter@mcguirewoods.com John D. McAnnar on behalf of Creditor Committee Official Committee of Unsecured Creditors

jdm@carmodymacdonald.com, cjz@carmodymacdonald.com;gdw@carmodymacdonald.com John J. Hall on behalf of Intervenor-Defendant Arch Coal, Inc. jhall@lewisrice.com Joseph G. Bunn on behalf of Defendant STB Ventures, Inc. jgbunn@efjones.com, jgbunn@gmail.com Joseph G. Gibbons on behalf of Creditor Century Indemnity Company gibbonsj@whiteandwilliams.com Kristi A. Davidson on behalf of Creditor Caterpillar Financial Services Corporation kristi.davidson@bipc.com

Laura Uberti Hughes on behalf of Debtor Patriot Coal Corporation laura.hughes@bryancave.com Leonora S. Long on behalf of U.S. Trustee Office of U.S. Trustee leonora.long@usdoj.gov Lloyd A. Palans on behalf of Debtor Patriot Coal Corporation lpalans@bryancave.com, lwilson@bryancave.com

Mark Moedritzer on behalf of Creditor Blue Eagle Land, LLC mmoedritzer@shb.com Mark V. Bossi on behalf of Special Counsel Thompson Coburn LLP mbossi@thompsoncoburn.com, lmckinnon@thompsoncoburn.com

Marshall C. Turner on behalf of Creditor Citibank, N.A. marshall.turner@huschblackwell.com Mary Louise Fullington on behalf of Creditor County of Henderson, Kentucky Lexbankruptcy@wyattfirm.com

Matthew J. Gartner on behalf of Creditor Citibank, N.A. matthew.gartner@huschblackwell.com Meredith Thomas Persinger on behalf of Creditor Southern Land Company Limited Partnership, et al mtplaw@frontier.com

on behalf of Creditor Alice Ann Wright, Wright Holdings, LLC Michael J. Roeschenthaler mroeschenthaler@mcguirewoods.com

Michael R Carney on behalf of Creditor Interested Shareholders mcarney@mckoolsmith.com Michelle M. McGreal on behalf of Debtor Patriot Coal Corporation

bankruptcy.routing@davispolk.com

Norah J. Ryan on behalf of Creditor American Electric Power norah.ryan@att.net

Office of U.S. Trustee USTPRegion13.SL.ECF@USDOJ.gov Paul A. Green on behalf of Creditor United Mine Workers of America 1974 Pension Plan and Trust pgreen@mooneygreen.com

Paul A. Randolph on behalf of U.S. Trustee Office of U.S. Trustee paul.a.randolph@usdoj.gov Peter Russ on behalf of Creditor Caterpillar Financial Services Corporation peter.russ@bipc.com

Peter D. Kerth on behalf of Creditor Kanawha River Terminals, LLC pkerth@jenkinskling.com, mdarner@jenkinskling.com

Randall F. Scherck on behalf of Creditor Bank of America, N.A. rscherck@lathropgage.com Richard J. Parks on behalf of Creditor Continental Crushing & Conveying, Inc ,

kas2@pietragallo.com;ms@pietragallo.com

Robert E. Eggmann on behalf of Creditor Harold Racer reggmann@demlawllc.com,

triske@demlawllc.com;whickey@demlawllc.com;nneske@demlawllc.com Sarah Jean Geenen on behalf of Creditor United Mine Workers of America sjg@previant.com Scott N. Schreiber on behalf of Creditor Harold Racer sschreiber@stahlcowen.com Shawn M. Christianson on behalf of Creditor Oracle America, Inc. schristianson@buchalter.com,

cmcintire@buchalter.com

District/off: 0865-4

User: pott Form ID: pdfol Page 3 of 3 Total Noticed: 1 Date Rcvd: Jan 21, 2013

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Sherry K. Dreisewerd on behalf of Creditor J.H. Fletcher & Co. sdreisewerd@polsinelli.com, robrien@polsinelli.com;sdenison@polsinelli.com;stldocketing@polsinelli.com

Stephen L. Thompson on behalf of Creditor Central Contracting, Inc.

sthompson@barth-thompson.com

Stoompsonebarin-chompson.com Steven L Thomas on behalf of Creditor Hughes Supply Company sthomas@kaycasto.com Steven N. Cousins on behalf of Creditor Peabody Energy Corporation scousins@armstrongteasdale.com, srice@armstrongteasdale.com Tanya D. Bosi on behalf of Creditor Caterpillar Financial Services Corporation

tanya.bosi@bipc.com

Thomas H. Riske on behalf of Creditor Harold Racer triske@demlawllc.com,

whickey@demlawllc.com;nneske@demlawllc.com

Todd W. Ruskamp on behalf of Creditor Blue Eagle Land, LLC truskamp@shb.com, dnunn@shb.com;cwhittaker@shb.com;mmoedritzer@shb.com

TOTAL: 56