12-12900-scc Doc 251 Filed 08/02/12 Entered 08/02/12 12:22:18 Main Document Pg 1 of 3

McGUIREWOODS LLP

Michael J. Roeschenthaler Jason P. Alter Shawn R. Fox 1345 Avenue of the Americas Seventh Floor New York, NY 10105 Telephone: (212) 548-2100 Facsimile: (212) 548-2150

And

Law Offices of Larry W. George, PLLC

Larry W. George One Bridge Place, Suite 205 10 Hale Street Charleston, WV 25301 Telephone: (304) 556-4830 Facsimile: (304) 556-4852

Counsel to Broun Properties, LLC, LML Properties, LLC, Riverside Park, Inc., LaFollette Holdings, Ltd., Alice Ann Wright, Wright Holdings, LLC, The Robert B. LaFollette Trust for the benefit of Marjorie J. Wright, The Robert B. LaFollette Trust for the benefit of Alice A. Wright, The Latelle M. Lafollette Trust for the benefit of Marjorie J. Wright, and The Latelle M. LaFollette Trust for the benefit of Alice A. Wright

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	Х	
In re	:	Chapter 11
in le	:	Chapter 11
PATRIOT COAL CORPORATION, et al.	:	Case No. 12-12900 (SCC)
Debtors.	: : :	(Jointly Administered)
	х	

AMENDED NOTICE OF APPEARANCE, REQUEST FOR NOTICE AND SERVICE OF ALL DOCUMENTS, REQUEST FOR MATRIX ENTRY <u>AND RESERVATION OF RIGHTS</u>

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 9010(b) and section 1109(b) of Title 11 (the "<u>Bankruptcy Code</u>") of the United States Code, the undersigned hereby appears as counsel of record for Counsel to Broun Properties, LLC, LML Properties, LLC, Riverside Park, Inc., LaFollette Holdings, Ltd., Alice Ann Wright, Wright Holdings, LLC, The Robert B. LaFollette Trust for the benefit of Marjorie J. Wright, The Robert B. LaFollette Trust for the benefit of Alice A. Wright, The Latelle M. Lafollette Trust for the

12-12900-scc Doc 251 Filed 08/02/12 Entered 08/02/12 12:22:18 Main Document Pg 2 of 3

benefit of Marjorie J. Wright, and The Latelle M. LaFollette Trust for the benefit of Alice A. Wright (the "LRPB entities") in the above captioned bankruptcy case (the "<u>Bankruptcy Case</u>").

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 4001, 9001 and 9010 and sections 342 and 1109(b) of the Bankruptcy Code, the LRPB entities hereby requests that all documents filed with the Bankruptcy Court, all notices given or required to be given in the Bankruptcy Case be given and served upon the following, and that appropriate entry thereof be made on the Clerk's Matrix in the Bankruptcy Case:

McGUIREWOODS LLP

Attn: Shawn R. Fox 1345 Avenue of the Americas Seventh Floor New York, NY 10105 Telephone: (212) 548-2100 Facsimile: (212) 548-2150 E-mail: sfox@mcguirewoods.com Law Offices of Larry W. George, PLLC

Larry W. George One Bridge Place, Suite 205 10 Hale Street Charleston, WV 25301 Telephone: (304) 556-4830 Facsimile: (304) 556-4852 Igeorge@larrygeorgelaw.com

and

McGUIREWOODS LLP

Attn: Michael J. Roeschenthaler EQT plaza 625 Liberty Avenue, 23rd Floor Pittsburgh, PA 15222 Telephone: (412) 667-6000 Facsimile: (412) 667-6050 E-Mail: <u>mroeschenthaler@mcguirewoods.com</u> jalter@mcguirewoods.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure and Bankruptcy Code provisions specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, telegraph, telex, facsimile transmission, electronic mail or otherwise that: (a) affect or seek to affect in any way any rights or interests of any creditor or party in interest in this case, including the LRPB entities, with respect to, without limitation, (i) the Debtor, (ii) property of the estate or proceeds thereof, in which the Debtor may claim an interest, or (iii) property or proceeds thereof, in the possession, custody or control of others, that the Debtor may seek to use; or (b) require or seek to require any act, delivery or any property, payment or other conduct by the LRPB entities.

PLEASE TAKE FURTHER NOTICE that the LRPB entities intend that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (a) the right of the LRPB entities to have final orders and non-core matters entered only after <u>de novo</u> review by a District Court Judge; (b) the right of the LRPB entities to trial by jury in any proceedings so triable in this case or any case, controversy or proceeding related to this case; (c) the right of the LRPB entities to have the District Court withdraw the reference in any matter subject to

mandatory or discretionary withdrawal; or (d) any other rights, claims, actions, defenses, set-offs or recoupments to which the LRPB entities are or may be entitled.

Dated: August 2, 2012

McGUIREWOODS LLP

/s/ Michael J. Roeschenthaler Michael J. Roeschenthaler Jason P. Alter Shawn R. Fox 1345 Avenue of the Americas Seventh Floor New York, NY 10105 Telephone: (212) 548-2100 Facsimile: (212) 548-2150 mroeschenthaler@mcguirewoods.com sfox@mcguirewoods.com jalter@mcguirewoods.com

And

Law Offices of Larry W. George, PLLC Larry W. George One Bridge Place, Suite 205 10 Hale Street Charleston, WV 25301 Telephone: (304) 556-4830 Facsimile: (304) 556-4852 Igeorge@larrygeorgelaw.com

Counsel to Broun Properties, LLC, LML Properties, LLC, Riverside Park, Inc., LaFollette Holdings, Ltd., Alice Ann Wright, Wright Holdings, LLC, The Robert B. LaFollette Trust for the benefit of Marjorie J. Wright, The Robert B. LaFollette Trust for the benefit of Alice A. Wright, The Latelle M. Lafollette Trust for the benefit of Marjorie J. Wright, and The Latelle M. LaFollette Trust for the benefit of Alice A. Wright

\40975190.2