

### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI ST. LOUIS DIVISION

~		
- 1	12	140
- 1		16

PATRIOT COAL CORPORATION, et. al.	. )	
	)	Case No. 12-51502
	)	Chapter 11
Debtor(s)	)	

#### 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, Beth J. Rotenberg, move to be admitted pro hac vice to the bar of this court for the purpose of representing Lexon Insurance Company, Bond Safeguard Insurance Company, and Aspen American Insurance Company 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: Beth J. Rotenberg
- (b) Address, telephone number and fax number of the movant-attorney: 1 Boland Drive, West Orange, New Jersey 07052 Phone: 973-530-2118; Fax: 973-530-2318
- (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: Benjamin N. Cardozo School of Law, Yeshiva University, 2005
- (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	2006	023712005
New York	2006	4427332
Florida	2006	0024275

Federal Court	Date of Admission	
U.S. District Court, District of New Jersey	2006	
U.S. District Court, Eastern District of New York	2006	
U.S. District Court, Southern District of New York	2006	
U.S. District Court, Northern District of New York	2011	

## Case 12-51502 Doc 2906 Filed 02/27/13 Entered 02/27/13 09:00:36 Main Document Pg 2 of 5

- (f) I, **Beth J. Rotenberg**, 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, Beth J. Rotenberg, 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, **Beth J. Rotenberg**, 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: February 2 2013

2

# Supreme Court of New Jersey



# Certificate of Good Standing

This is to certify that BETH JESSICA ROTENBERG

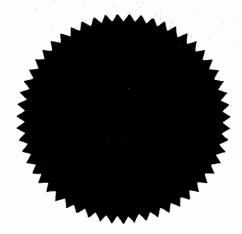
(No. 023712005) was constituted and appointed an Attorney at Law of New

Jersey on January 06, 2006 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 18TH day of January , 20 13.

Clerk of the Supreme Court

-453a-

Case 12-51502 Doc 2906 Filed 02/27/13 Entered 02/27/13 09:06:36 Main Document Pg 4 of 5

RECEIVED + FILED

#### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI 2013 FEB 21 AM 11:59

CLERK, US BANKRUPTCY COURT EASTERN DISTRICT ST. LOUIS, MISSOURI-MR

Chapter 11

In re:

Case No. 12-51502

PATRIOT COAL CORPORATION,

Judge Kathy A. Surratt-States

et al.

Debtors.

### **CERTIFICATE OF SERVICE**

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

On February 20, 2013, I caused an employee at my firm to send a copy of the Verified Motion for Admission Pro Hac Vice for Jonathan Bondy, Esq. and a copy of the Verified Motion for Admission Pro Hac Vice for Beth J. Rotenberg, Esq. to the parties on the annexed list 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.

Dated: February 20, 2013

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

### Service List

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