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

In re:

PATRIOT COAL CORPORATION, *et al.*, Debtors.

) Chapter 11
) Case No. 12-51502-659
) Jointly Administered
) Honorable Kathy Surratt-States
)

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

)

Pursuant to L.B.R. 2090-1 B.1 of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, Bonnie L. Clair and the firm of Summers Compton Wells PC hereby move that Mark E. Freedlander be admitted pro hac vice to the bar of this Court for the purpose of representing The Ohio Valley Coal Company in this case and any pending or subsequently filed adversary proceeding. In support of this Motion, the following information as required by Rule 12.01(F) is submitted:

1. Mark E. Freedlander is a partner in the law firm of McGuireWoods LLP located at 625 Liberty Avenue, 23rd Floor, Pittsburgh, PA 15222-3142, as well as other locations, with a telephone number of (412) 667-7928. His e-mail address is mfreedlander@mcguirewoods.com.

2. Mr. Freedlander is a 1993 graduate of Capital University Law School.

3. Mr. Freedlander was admitted to the Bar of the Commonwealth of Pennsylvania in 1994 (Bar No. 70593). In addition, Mr. Freedlander has been admitted to practice before various federal courts, including:

a. United States District Court for the Eastern District of Michigan;

b. United States District Court for the Western District of Pennsylvania; and

c. United States Court of Appeals for the Third Circuit;

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4. Mr. Freedlander affirms that he is a member in good standing of all of the bars set forth above and is not currently under suspension or disbarment from any bar.

5. Mr. Freedlander affirms that he does not reside in the Eastern District of Missouri and is not regularly employed by this District and is not regularly engaged in the practice of law in this District.

Mr. Freedlander does hereby attest under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that he be admitted pro hac vice to the bar of this Court and be allowed to appear in the instant matter.

Date: March 21, 2013

/s/ Mark E. Freedlander Mark E. Freedlander

Respectfully Submitted, SUMMERS COMPTON WELLS PC

Date: March 21, 2013

/s/ Bonnie L. Clair BONNIE L. CLAIR (#41696MO) 8909 Ladue Road St. Louis, MO 63124 (314) 991-4999/(314) 991-2413 Fax Email: blcattymo@summerscomptonwells.com

CERTIFICATE OF SERVICE

I, Bonnie L. Clair, hereby certify that on the 21st day of March, 2013, copies of the documents described below were served via electronic filing in the CM/ECF system for the United States Bankruptcy Court for the Eastern District of Missouri. I also certify that copies of these documents also were served via US Mail, first class postage paid, on March 21, 2013 to the Core Parties listed on below.

Curtis Mallet Prevost Colt & Mosle LLC	Davis Polk & Wardwell LLP
S. Reisman and	Brian M. Resnick
Michael Cohen	Marshall S. Huebner
101 Park Avenue	450 Lexington Avenue
New York, NY 10178	New York, NY 10017
GCG, Inc.	Kramer Levin Naftalis & Frankel LLP
Attn: Elizabeth Vrato	Adam C. Rogoff, Thomas Moers Mayer
190 S. LaSalle Street	P. Bradley O'Neill, Robert T. Schmidt
Suite 1520	1177 Avenue of the Americas
Chicago, IL 60603	New York, NY 10036
Weil Gotshal & Manges LLP	Willkie Farr & Gallagher LLP
Joseph H. Smolinsky	Ana M. Alphonso
Marcia Goldstein	Morgot B. Schonholtz
767 Fifth Avenue	787 Seventh Avenue
New York, NY 10153	New York, NY 10019

/s/ Christina Hauck