THOMPSON & KNIGHT LLP 900 Third Avenue, 20th Floor New York, New York 10022 Tel: 212-751-3001 Fax: 212-751-3113 Ira L. Herman Jennifer A. Christian

Attorneys for Marjorie J. Wright

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PATRIOT COAL CORPORATION., et al.,

Debtors.

Chapter 11

Case No. 12-12900 (SCC)

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned cases on

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)

behalf of Marjorie J. Wright.¹

PLEASE TAKE FURTHER NOTICE that Pursuant to Rules 2002 and 9010(b) of the

Federal Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, Ms. Wright

requests that all notices given or required to be given and all pleadings and orders served upon

Ms. Wright be delivered to and served upon Ms. Wright's undersigned representatives at the

following addresses and telephone numbers:

¹ This Notice of Appearance does not affect or supercede the Amended Notice of Appearance, Request for Notice and Service of All Documents, Request for Matrix Entry and Reservation of Rights filed on August 2, 2012 by 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, Inc., 251].

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Ira L. Herman, Esq. Jennifer A. Christian, Esq. Thompson & Knight LLPq 900 Third Avenue, 20th Floor New York, New York 10022 Tel: 212-751-3001 Fax: 212-751-3113 E-mail: <u>Ira.Herman@tklaw.com</u> Jennifer.Christian@tklaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the abovementioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in these cases.

PLEASE TAKE FURTHER NOTICE that, this Notice of Appearance and any subsequent appearance, proof of claim, pleading, claim, or suit is not intended nor shall constitute a waiver of: (i) the right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; (iv) any right to object to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this notice; (v) an election of remedy; or (vi) other rights, claims, actions, defenses, setoffs or recoupments to which Ms. Wright is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved hereby.

Dated: New York, New York August 28, 2012

THOMPSON & KNIGHT LLP

By: <u>/s/ Ira L. Herman</u>

Ira L. Herman Jennifer A. Christian 900 Third Avenue, 20th Floor New York, New York 10022 Tel: 212-751-3001 Fax: 212-751-3113

Attorneys for Marjorie J. Wright

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Appearance has been served on this 28th day of August, 2012 upon the following via U.S. Mail.

Marshall S. Huebner Brian M. Resnick Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017

Steven J. Reisman Curtis, Mallet-Prevost, Colt & Mosle LLP 101 Park Avenue New York, NY 10178

Elisabetta Gasparini Office of the United States Trustee 33 Whitehall Street 21st Floor New York, NY 10004

Patriot Coal Corporation c/o GCG, Inc. 1985 Marcus Avenue Suite 200 Lake Success, NY 11042

> By: <u>/s/ Ira L. Herman</u> Ira L. Herman