Hearing Date and Time: September 11, 2012 at 1:30 p.m. (Prevailing Eastern Time)
Objection Deadline: August 24, 2012 at 4:00 p.m. (Prevailing Eastern Time)
Reply and Objection Joinder Deadline: August 31, 2012 at 4:00 p.m. (Prevailing Eastern Time)

## 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)

JOINDER OF UNITED CENTRAL INDUSTRIAL SUPPLY CO., LLC TO THE DEBTORS' OBJECTION TO (i) MOTION OF THE UNITED MINE WORKERS OF AMERICA TO TRANSFER

THE CASE TO THE SOUTHERN DISTRICT OF WEST VIRGINIA AND (ii) SURETIES' MOTION TO TRANSFER JOINTLY ADMINISTERED CASES TO SOUTHERN DISTRICT OF WEST VIRGINIA

United Central Industrial Supply Co., LLC ("United Central") through its undersigned counsel hereby submits this Joinder to the Debtors' Objection (the "Objection") to: (i) the Motion of the United Mine Workers of America Pursuant to 28 U.S.C. § 1412 and Rule 1014 to Transfer the Case to the Southern District of West Virginia [Dkt. Nos. 116, 127]; and (ii) the Sureties' Motion to Transfer Jointly Administered Cases to Southern District of West Virginia [Dkt. No. 287] (together, the "Motions"). In support of the Joinder, United Central respectfully submit as follows:

- 1. United Central is a party in interest in the above-captioned cases pursuant to its status as a creditor and vendor of the Debtors. Attached as Exhibit 1 is a listing of the pre-petition claims asserted by United Central against the Patriot Debtor entities.
- As set forth in detail in the Objection, the United Mine Workers of America (the "Union") and Argonaut Insurance Company, Indemnity National Insurance

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Company, US Specialty Insurance, and Westchester Fire Insurance Company (together, the "Sureties") have filed the Motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia. United Central hereby objects to the Motions on the grounds raised and asserted in the Objection, and supports venue of these cases in the Southern District of New York.

WHEREFORE, United Central respectfully requests that the Court enter an order (i) denying the Motions and (ii) granting such other and further relief as this Court deems just and proper.

Dated: New York, New York

August 31, 2012

KAYE SCHOLER LLP 425 Park Avenue New York, NY 10022 Telephone: (212) 836-8000 Facsimile: (212) 836-8698

By: /s/Benjamin Mintz

Benjamin Mintz

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Attorneys for United Central Industrial Supply Co., LLC

## **EXHIBIT 1**

## PATRIOT COAL CORPORATION ENTITIES AND CLAIM AMOUNTS

<u>Entity</u>	<u>Claim Amount</u>
Apogee Coal Company, LLC	47,529.18
Appalachian Mine Services, LLC	2,605.25
Black Stallion Coal Company, LLC	810,926.05
Catenary Coal company, LLC	33,261.27
Coal Clean LLC	20,409.46
Dodge Hill Mining Company, LLC	209,508.71
Eastern Associated Coal LLC	1,070,335.64
Gateway Eagle Coal Company LLc	31,623.33
Grand Eagle Mining, LLC	17,508.14
Heritage Coal Company, LLC	20,764.49
Highland Mining Company, LLc	659,546.98
Hillside Mining Company	76,521.89
Hobet Mining LLC	38,392.36
Kanawha Eagle Coal, LLC	431,247.90
Midland Trail Energy, LLC	123,499.76
Ohio County Coal Company, LLC	8,052.93
Pine Ridge Coal Company, LLC	1,786.34
Remington, LLC	171,156.85
Speed Mining, LLC	558,169.69
Total	4,332.846.22

EXHIBIT

Seption 1