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 29, 2012 at 4:00 p.m. (Prevailing Eastern Time)

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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PATRIOT COAL CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 12-12900 (SCC)

(Jointly Administered)

JOINDER OF CONVEYING SOLUTIONS, 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

Conveying Solutions, LLC (hereinafter "CS"), 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, CS respectfully submit as follows:

1. CS is a party in interest in the above-captioned cases pursuant to its status as a creditor of the Debtors. CS has a vendor of the Debtors and believes that the Debtors best chance of successfully reorganizing is premised, in large part, on the Court denying the Motions.

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2. As set forth in detail in the Objection, the United Mine Workers of America (the "Union") and Argonaut Insurance Company, Indemnity National Insurance 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. CS 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, CS 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.

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By:<u>//</u>

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## 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)

## **CERTIFICATE OF SERVICE**

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