

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:) Case No. 12-12900 (SCC)
)
PATRIOT COAL CORPORATION, *et al.*,) Chapter 11
)
Debtors.) Jointly Administered
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**VERIFIED STATEMENT PURSUANT TO
BANKRUPTCY RULE 2019 OF MCKOOL SMITH, P.C.**

PETER S. GOODMAN certifies as follows:

1. I am an attorney at law and a principal with the law firm of McKool Smith, P.C. (“McKool Smith”). I am admitted to practice before the courts of the State of New York, the United States District Court for the Southern District of New York, and the United States Bankruptcy Court for the Southern District of New York, among others. On behalf of McKool Smith, I hereby provide this verified statement (the “Statement”), as required by Bankruptcy Rule 2019, in connection with McKool Smith’s representation in these Chapter 11 cases of CompassPoint Partners, L.P.; Ron Bew; Andy Gregor; Reserve Capital, Inc.; Frank Williams; and Eric Wagoner (collectively, the “Interested Shareholders”),¹ which members hold a significant amount of the issued and outstanding common stock of Patriot Coal Corporation (“Patriot Coal”), one of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”). The purpose of the Statement is to set forth certain facts and to provide information pursuant to Bankruptcy Rule 2019.

2. As of the date hereof, Interested Shareholders hold 388,000 shares of common stock of Patriot Coal in the aggregate.

3. In accordance with Bankruptcy Rule 2019, to the best of my knowledge, the names, addresses, and “the nature and amount of all disclosable economic interests” held by each of the Interested Shareholders in relation to the Debtors as of the date of this Statement are as follows:

<u>Patriot Coal Equity Holder</u>	<u>Address</u>	<u>Disclosable Economic Interest in the Debtors</u>
CompassPoint Partners, L.P.	29 Cliff Ave. Darien, CT 06820	<ul style="list-style-type: none"> • 30,000 shares of common stock • 55 3.25% Convertible Notes Due 2013
Ron Bew	2300 Lastingham Dr. Midlothian, VA 23113	<ul style="list-style-type: none"> • 15,000 shares of common stock
Andy Gregor	94 River St. Old Saybrook, CT 06475	<ul style="list-style-type: none"> • 10,000 shares of common stock • 100 3.25% Convertible Notes Due 2013
Reserve Capital, Inc.	29 Cliff Ave. Darien, CT 06280	<ul style="list-style-type: none"> • 130,000 shares of common stock
Eric Wagoner	29 Cliff Ave. Darien, CT 06280	<ul style="list-style-type: none"> • 55,000 shares of common stock
Frank Williams	P.O. Box 4004 Merrifield, VA 22166	<ul style="list-style-type: none"> • 148,000 shares of common stock • 200 3.25% Convertible Notes Due 2013

4. Each of the Interested Shareholders has asked McKool Smith to represent their interests. In addition, the each of the Interested Shareholders does not represent or purport to represent any other entities in connection with these Chapter 11 cases.

5. To the best of my knowledge, McKool Smith holds no “disclosable economic interests” in Patriot Coal.

¹ The Interested Shareholders have no intention of forming an *ad hoc* committee at this time.

6. To the best of my knowledge, neither McKool Smith, nor any attorney or other personnel thereof, has at any time during this representation owed any claim against or any interest in the Debtors, except to the extent that McKool Smith or its clients may at some future time seek to have McKool Smith's fees and disbursements paid by the Debtors' estates pursuant to applicable provisions of the Bankruptcy Code.

7. Nothing contained in this Statement should be construed as a limitation upon, or waiver of, any of the Interested Shareholders' rights to assert, file, and/or amend its proofs of interest or proofs of claim, if applicable, in accordance with applicable law and any orders entered in these Chapter 11 Cases.

8. The undersigned hereby verifies under oath that this Statement is true and accurate, to the best of the undersigned's knowledge and belief. McKool Smith reserves the right to revise and supplement this Statement.

Dated: September 6, 2012
New York, New York

MCKOOL SMITH, P.C.

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