## UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

## **WOLFF & SAMSON PC**

Karen L. Gilman (KG-5161)

One Boland Drive

West Orange, New Jersey 07052

Telephone: (973) 530-2006 Facsimile: (973) 530-2206

E-Mail: kgilman@wolffsamson.com

Attorneys for Aspen American Insurance Company, as a

creditor

In re: CHAPTER 11

PATRIOT COAL CORPORATION, et al., CASE NO.: 12-12900 (SCC)

Debtors, (JOINTLY ADMINISTERED)

## NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, Aspen American Insurance Company, as a creditor, through its attorneys, Wolff & Samson PC, appears in the above-captioned case and requests that all notices given or required to be given, and all papers served or required to be served in this case, be given to and served upon the following:

WOLFF & SAMSON PC
One Boland Drive
West Orange, New Jersey 07052
Attn: Karen L. Gilman, Esq.
Tel: (973) 530-2006
Fax: (973) 530-2206

E-Mail: kgilman@wolffsamson.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes notices and papers referred to in Rule 2002 of the Federal Rules of Bankruptcy Procedure and pursuant to Section 1109(b) of the Bankruptcy Code also includes, without limitation, any notice of any

12-12900-scc Doc 149 Filed 07/20/12 Entered 07/20/12 15:40:58 Main Document

Pg 2 of 2

orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions,

answering or reply papers, memoranda and briefs in support of any of the foregoing, whether

formal or informal, whether written or oral and whether transmitted or conveyed by mail,

delivery, telephone, telegraph, telecopier or otherwise, which affects or seeks to affect in any

way any rights or interests of any creditor, equity security holder, party in interest, and/or other

person or entity.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is expressly

without prejudice to any objection that may be made to the subject matter jurisdiction of the

Court and shall not be deemed or construed to be a waiver of any objection thereto nor shall it be

deemed or construed to submit Aspen American Insurance Company to the jurisdiction of the

Court and it is without prejudice to its rights, remedies and claims against other entities. This

Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to

be a waiver of the right: (1) to have final orders in non-core matters entered only after de novo

review by a District Court judge; (2) to trial by jury in any proceeding so triable in this case or

any case, controversy, or proceeding related to this case; or (3) to have the District Court

withdraw the reference in any subject to mandatory or discretionary withdrawal. All rights,

remedies, claims, actions, setoffs or recoupments to which Aspen American Insurance Company,

is or may be entitled are hereby expressly reserved.

Dated: July 20, 2012

Wolff & Samson, P.C.

By: /s/Karen L. Gilman

KAREN L. GILMAN, ESQ. (KLG-5161)

kgilman@wolffsamson.com

3381143.1 2