Jan 25, 2013

Kathy A Surratt - States

KATHY A. SURRATT-STATES
United States Bankruptcy Judge

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

AUG 3 1 2012

U.S. RACKRUPTCY COURT

In re

PATRIOT COAL CORPORATION, et al.,

Debtors in Possession.

Case No. 12-12900 (SCC) Chapter 11 (Jointly Administered)

JOINDER OF LITTLE COAL LAND COMPANY
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,

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

(iii) MOTION OF THE UNITED STATES TRUSTEE TO
TRANSFER IN THE INTEREST OF JUSTICE

Little Coal Land Company 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]; (ii) the Sureties' Motion to Transfer

Jointly Administered Cases to Southern District of West Virginia [Dkt. No. 287]; (iii) the United

States Trustee's Motion to Transfer Venue of These Cases in the Interest of Justice [Dkt. Nos.

406, 407]; and (iv) three joinders and one notice of support for the transfer of these cases to the

Southern District of West Virginia [Dkt. Nos. 178, 390, 392, 423] (together, the "Motions"). In

support of the Joinder, Little Coal Land Company respectfully submits as follows:

- Little Coal Land Company, a West Virginia corporation, is a party in interest in the above-captioned cases pursuant to its status as a coal land lessor of one of the Debtors.
   Little Coal Land Company, as lessor, has a lease with Robin Land Company, as lessee.
- 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 motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia, and the United States Trustee (the "U.S. Trustee") has filed a motion to transfer venue of these cases "to a district where venue is Proper." Little Coal Land Company 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, Little Coal Land Company 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: August 30, 2012

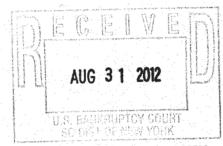
LITTLE COAL LAND COMPANY

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CHARLES I. JONES, JR., JD, MS

August 30, 2012

United States Bankruptcy Court Clerk's Office One Bowling Green New York, NY 10004

Subject: Patriot Coal Corporation, et al. - Case 12-12900: Joinder of Little Coal Land
Company to Debtors' 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 [ECF No. 116, 127]; (ii) the Sureties' Motion to
Transfer Jointly Administered Cases to Southern District of West Virginia [ECF
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the Interest of Justice [ECF Nos. 406, 407]; and (iv) three joinders and one notice of
support for the transfer of these cases to the Southern District of West Virginia
[ECF Nos. 178, 390, 392, 423]

Dear Ms. Boyle:

Enclosed herewith please find (i) a hard copy and (ii) a CD ROM containing an electronic version of Little Coal Land Company's joinder to the Debtors 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 [ECF Nos. 116, 127]; (ii) the Sureties' Motion to Transfer Jointly Administered Cases to Southern District of West Virginia [ECF No. 287]; (iii) the United States Trustee's Motion to Transfer Venue of These Cases in the Interest of Justice [ECF Nos. 406, 407]; and (iv) three joinders and one notice of support for the transfer of these cases to the Southern District of West Virginia [ECF Nos. 178, 390, 392, 423].

I would be grateful if you could please file the enclosed joinder on my client's

CAMPBELL WOODS, PLLC

Charles I. Jones, J

Counsel for Little Coal Land Company

CIJJr/ts

behalf.

Enclosures: original signed copy of joinder

CD ROM of signed copy of joinder