

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**In re:** )  
)  
) **Chapter 11**  
)  
**PATRIOT COAL CORPORATION, et al.,** ) **Case No. 12-51502-659**  
)  
) **(Jointly Administered)**  
)  
**Debtors.** )  
)  
)  
)

**VERIFIED STATEMENT OF DOWD BENNETT LLP PURSUANT TO  
RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

James E. Crowe, III, on behalf of Dowd Bennett LLP (“Dowd Bennett”), in connection with the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby submits this Verified Statement Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Verified Statement”), and represents as follows:

1. Dowd Bennett is local counsel to the following parties (each a “Party” and collectively, the “Parties”) in the above-captioned bankruptcy cases (the “Chapter 11 Cases”):

United Mine Workers of America 1992 Benefit Plan  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America 1993 Benefit Plan  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America 1974 Pension Trust  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America 2012 Retiree Bonus Account Trust  
2121 K. Street N.W.  
Washington, DC 20037

United Mine Workers of America Combined Benefit Fund  
2121 K. Street N.W.  
Washington, DC 20037

2. Dowd Bennett represents the Parties in their capacity as health and retirement benefit plans to which certain of the Debtors have historically contributed.

3. Each of the Parties may hold claims against and/or interests in the Debtors arising out of statutory obligations, collective bargaining agreements, plan and trust documents, law or equity, pursuant to its respective relationship with the Debtors. The amounts of any such claims held by each of the Parties have not yet been determined.

4. I am not presently aware of any claims against or interest in the Debtors held by Dowd Bennett.

5. The following are the pertinent facts and circumstances in connection with Dowd Bennett's employment as counsel in these Chapter 11 Cases: Each Party separately requested that Dowd Bennett serve as its counsel in connection with the Debtors' Chapter 11 cases. Each party is aware of and has consented to Dowd Bennett's simultaneous representation of each other Party in this proceeding.

6. Dowd Bennett may undertake additional representations of other parties in interest in these Chapter 11 Cases, and Dowd Bennett reserves the right to supplement this Verified Statement as appropriate.

I, James E. Crowe, III, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge and belief.

/s/ James E. Crowe, III  
James E. Crowe, III

Dated: April 22, 2013

Respectfully submitted,

**DOWD BENNETT LLP**

By:       /s/ James E. Crowe, III        
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*Counsel for United Mine Workers of America 1992  
Benefit Plan, the United Mine Workers of America  
1974 Pension Trust, the United Mine Workers of  
America 1993 Benefit Plan, the United Mine  
Workers of America 2012 Retiree Bonus Account  
Trust and the United Mine Workers of America  
Combined Benefit Fund*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was filed on April 22, 2013 using the Court's CM/ECF system and that service will be accomplished by operation of that system upon all counsel of record, which includes counsel for all core parties.

/s/ James E. Crowe, III