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

)	
In re:)	Chapter 11
)	
PATRIOT COAL CORPORATION, et al.,)	Case No. 12-12900 (SCC)
)	
Debtors.)	(Jointly Administered)
)	
)	

**JOINDER OF WEST VIRGINIA ATTORNEY GENERAL
TO THE MOTION OF THE UNITED MINE WORKERS OF AMERICA
PURSUANT TO 28 U.S.C. § 1412 AND RULE 1014, FED. R. BANKR. PROC.,
TO TRANSFER THE CASE TO THE SOUTHERN DISTRICT OF WEST VIRGINIA**

The West Virginia Attorney General, by counsel, hereby joins in the *Motion of the United Mine Workers of America Pursuant to 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc., to Transfer the Case to the Southern District of West Virginia*, and sets forth the following:

Facts Concerning the Attorney General's Office

1. The Joinder, Darrell V. McGraw, Jr., is the duly elected Attorney General of West Virginia.

2. The Attorney General of West Virginia is constitutionally the chief legal officer of the State of West Virginia. *See State ex rel. McGraw v. Burton*, 569 S.E.2d 99 (W. Va. 2002).

3. Pursuant to West Virginia Code § 5-3-2, the Attorney General provides representation on behalf of the State in any court in which the State has an interest.

4. The Debtors comprise a significant portion of West Virginia's coal mining industry, which is the primary economic engine in the State. The State oversees the industry through a regulatory framework that promotes extraction of an economically important resource in a responsible manner that safeguards the environment, worker safety and public health. Many of the issues in these cases will be resolved by reference to West Virginia law, and the many citizens of West Virginia who are interested parties in the case--including the Debtors' active and retired miners and other creditors--deserve a level of accessibility to these proceedings that is not available to them in the Southern District of New York.

5. Patriot employes over 1,500 West Virginia UMWA members. It provides health care benefits to over 4,020 West Virginia retirees. The loss of health care benefits to citizens of the State of West Virginia would have adverse economic repercussions for the State of West Virginia.

6. The State of West Virginia and her citizens have a significant interest in the resolution of the matters that will arise in these consolidated cases, and I therefore respectfully request that they be decided within her borders.

Relief Requested

7. The Joinder Attorney General adopts and incorporates by reference herein the *Relief Requested* section set forth in the Motion.

Background Information

8. The Joinder Attorney General adopts and incorporates by reference herein the *Background Information* section set forth in the Motion.

Argument

9. The Joinder Attorney General adopts and incorporates by reference herein the *Argument* sections set forth in the Motion.

WHEREFORE, the Joinder Attorney General respectfully requests that this Court enter an order:

1. Granting the relief requested in the Motion; and
2. Providing such other and further relief as the Court deems just and appropriate.

Dated: August 20, 2012

New York, New York

/s/ *Darrell V. McGraw, Jr.*

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/s/ *Frances A. Hughes*

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*Counsel for West Virginia Attorney
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CERTIFICATE OF SERVICE

I, Frances A. Hughes, hereby certify that on August 20, 2012, I caused a true and correct copy of the *Joinder of the West Virginia Attorney General's Office to the Motion of the United Mine Workers of America Pursuant to 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc., to Transfer the Case to the Southern District of West Virginia* to be sent via the Court's ECF System, which will send notification to all ECF participants. I also certify that I have caused a true and correct copy to be mailed by United States mail, first-class postage prepaid, on the parties listed below:

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