

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:

PATRIOT COAL CORPORATION, et al.,

Debtors.

Chapter 11

Case No.: 12-51502-659 (KSS)

Jointly Administered

VERIFIED STATEMENT OF THOMAS PERSINGER PLLC  
PURSUANT TO RULE 2019  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Thomas Persinger, of THOMAS PERSINGER PLLC, a West Virginia professional limited liability company (the “Firm”), respectfully files this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Verified Statement”) on behalf of the Firm, and represents as follows:

1. I am the sole member of the Firm.
2. The Firm is counsel to the following parties (each a “Party” and collectively, the “Parties”) in these Chapter 11 cases:

- (i) Southern Land Company Limited Partnership  
300 Capitol Street, Suite 1401  
Charleston, WV 25301
- (ii) Dickinson Properties Limited Partnership  
300 Capitol Street, Suite 1401  
Charleston, WV 25301
- (iii) Chesapeake Mining Company  
300 Capitol Street, Suite 1401  
Charleston, WV 25301

- (iv) The Imperial Coal Company  
300 Capitol Street, Suite 1401  
Charleston, WV 25301
- (v) Quincy Center, a partnership  
300 Capitol Street, Suite 1401  
Charleston, WV 25301
- (vi) Quincy Coal Company  
300 Capitol Street, Suite 1401  
Charleston, WV 25301
- (vii) Branch Banking & Trust Company  
Successor Trustee of the  
C. C. Dickinson Testamentary Trust  
Attn: Joseph A. Freedman  
Senior Vice President  
300 Summers Street  
Charleston, WV 25301,  
and  
Nelle Ratrie Chilton  
Successor Trustee of the  
C. C. Dickinson Testamentary Trust  
P. O. Box 311  
Charleston, WV 25321-0311,  
and  
Charles C. Dickinson, III,  
Successor Trustee of the  
C. C. Dickinson Testamentary Trust  
P. O. Box 311  
Charleston, WV 25321-0311
- (viii) Horse Creek Land & Mining Company  
300 Capitol Street, Suite 1503  
Charleston, WV 25301
- (ix) Payne-Gallatin Company  
300 Capitol Street, Suite 1503  
Charleston, WV 25301

3. The Parties represented by the Firm are lessors of nonresidential real property to certain of the Debtors as lessees.

4. Each of the leases between the Parties and the respective Debtors has been assumed, with the exception of the lease between Payne-Gallatin Company (“PG”), as lessor, and Debtor Panther LLC, as lessee, dated October 15, 1976 (the “Lease”). PG’s objection [ECF 2056] to Debtor Panther LLC’s motion to assume the Lease [ECF 1995] is pending before the Court, and a hearing thereon is scheduled before the Honorable Kathy Surratt-States, Judge of the United States Bankruptcy Court, Eastern District of Missouri, Eastern Division, on Tuesday, May 21, 2013 at 10:00 a.m. (Prevailing Central Time).

5. I am not presently aware of any claims against or interest in the Debtors held by the Firm.

6. The pertinent facts and circumstances in connection with the Firm’s employment as counsel in these Chapter 11 Cases are that each Party separately requested the Firm to serve as its counsel in connection with these Chapter 11 cases. Each Party is aware of and has consented to the Firm’s simultaneous representation of each other Party in these Chapter 11 Cases.

7. The Firm may undertake additional representation of other parties in interest in these Chapter 11 cases, and the Firm respectfully reserves the right to supplement this Verified Statement as appropriate.

I, Thomas Persinger, 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/ Thomas Persinger  
Thomas Persinger  
THOMAS PERSINGER PLLC  
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WVSB No. 2874  
Admission pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2013, a true and correct copy of the foregoing Verified Statement of Thomas Persinger PLLC Pursuant To Rule 2019 Of The Federal Rules Of Bankruptcy Procedure was served by (i) the Electronic Case Filing system for the United States Bankruptcy Court for the Eastern District of Missouri, St. Louis Division, on those parties consenting to such service in these cases, and (ii) by United States mail, first class postage prepaid, on the counsel and/or parties listed below:

- (a) Davis Polk & Wardwell LLP Counsel to the Debtors  
Attn: Marshall S. Huebner  
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- Bryan Cave LLP  
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St. Louis, MO 63102
- (b) Curtis, Mallet-Prevost, Colt & Mosle LLP Conflicts counsel to the Debtors  
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- (c) Office of the United States Trustee Office of the United States Trustee  
USBC Eastern District of Missouri  
Attn: Paul A. Randolph  
Leonora S. Long  
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(d) Kramer Levin Naftalis & Frankel LLC  
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Counsel for the Official Committee  
of Unsecured Creditors

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St. Louis, MO 63105-1705

(e) Patriot Coal Corporation  
c/o GCG, Inc.  
P.O. Box 9898  
Dublin, OH 43017-5798

Debtors' authorized claims and  
noticing agent

/s/ Thomas Persinger  
Thomas Persinger