Hearing Date and Time: September 11, 2012 at 1:30 p.m. (Prevailing Eastern Time)
Objection Deadline: August 24, 2012 at 4:00 p.m. (Prevailing Eastern Time)
Reply and Objection Joinder Deadline: August 29, 2012 at 4:00 p.m. (Prevailing Eastern Time)

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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PATRIOT COAL CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 12-12900 (SCC)

(Jointly Administered)

JOINDER OF INDUSTRIAL SUPPLY SOLUTIONS, INC. 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 AND (ii) SURETIES' MOTION TO TRANSFER JOINTLY ADMINISTERED CASES TO SOUTHERN DISTRICT OF WEST VIRGINIA

Industrial Supply Solutions, Inc. (hereinafter "ISSI"), 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]; and (ii) the Sureties' Motion to Transfer Jointly Administered Cases to Southern District of West Virginia [Dkt. No. 287] (together, the "Motions"). In support of the Joinder, ISSI respectfully submit as follows:

1. ISSI is a party in interest in the above-captioned cases pursuant to its status as a creditor of the Debtors. ISSI has a significant pre-petition claim and believes that the Debtors best chance of successfully reorganizing is premised, in large part, on the Court denying the Motions.

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2. 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 the Motions seeking to transfer venue of these cases from the Southern District of New York to the Southern District of West Virginia. ISSI hereby objects to the Motions on the grounds raised and asserted in the Objection, and supports

WHEREFORE, ISSI 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.

HUTCHENS, SENTER, KELLAM & PETTIT, P.A. Attorneys for Industrial Supply Solutions, Inc.

Bv:

venue of these cases in the Southern District of New York.

William Walt Pettit N.C. Bar No. 9407 P.O. Box 12497

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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PATRIOT COAL CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 12-12900 (SCC)

(Jointly Administered)

## **CERTIFICATE OF SERVICE**

I, William Walt Pettit as attorney of record for Industrial Supply Solutions, Inc., hereby certify that on the 30<sup>TH</sup> day of August, 2012, I served a copy of the Joinder of Industrial Solutions, Inc. 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 and (ii) Sureties' Motion to Transfer Jointly Administered Cases to Southern District of West Virginia by either electronic notice in accordance with the local rules or by depositing the same, enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United states Postal Service, said envelope being addressed as follows:

Patriot Coal Corporation 12312 Olive Boulevard, Suite 400 Saint Louis, MO 63141 Debtor

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Michael D. Warner Cole Schotz Meisel Forman & Leonard, PA 301 Commerce Street, Suite 1700 Fort Worth, TX 76102 Attorney for the Creditor Committee

Susan M. Jennik Kennedy, Jennik & Murray, PC 113 University Place, 7<sup>th</sup> Floor New York, NY 10003 Attorney for the United Mine Workers of America

Chrisandrea L. Turner Stites & Harbison, PLLC 250 West Main Street, Suite 2300 Lexington, KY 40507 Attorney for the Argonaut Insurance Company, Indemnity National Insurance Company, US Specialty Insurance and Westchester Fire Insurance Company

HUTCHENS, SENTER, KELLAM & PETTIT, P.A. Attorneys for Industrial Supply Solutions, Inc.

By:

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