

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

In re:	)	
	)	Chapter 11
PATRIOT COAL CORPORATION, <i>et al.</i> ,	)	Case No. 12-51502
	)	
Debtors.	)	(Jointly Administered)
	)	

**VERIFIED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri and Rule 12.01(E) of the local rules of the United States District Court for the Eastern District of Missouri, I, Michael R. Carney (the "Movant"), move to be admitted pro hac vice to the bar of this Court for the purpose of representing CompassPoint Partners, L.P.; Ron Bew; Andy Gregor; Reserve Capital, Inc.; Frank Williams; and Eric Wagoner (collectively, the "Interested Shareholders")<sup>1</sup> in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(E):

- a. *Full name of the Movant-attorney:*  
**Michael Robert Carney**
  
- b. *Address and telephone number of the Movant-attorney:*  
**McKool Smith, P.C.  
One Bryant Park, 47<sup>th</sup> Floor  
New York, New York 10036  
Telephone: (212) 902-9400**
  
- c. *Name of the firm or letterhead under which the Movant practices:*  
**McKool Smith, P.C.**
  
- d. *Name of the law school(s) Movant attended and the date(s) of graduation therefrom:*

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<sup>1</sup> The Interested Shareholders have no intention of forming an *ad hoc* committee at this time.

**Boston College Law School (2004)**

- e. *State and federal bars of which the Movant is a member, with dates of admission and registration numbers, if any:*  
**New York State (2005), Bar No. 4332607;**  
**U.S. District Court, S.D. New York (2005), Bar No. MC-1977;**  
**U.S. Bankruptcy Court, S.D. New York (2005), Bar No. MC-1977;**  
**U.S. Bankruptcy Court, E.D. New York (2012); Bar No. MC-1847; and**  
**U.S. Court of Appeals, Second Circuit (2006); Bar No. N/A**
- f. Movant is a member in good standing of all bars of which Movant is a member, and Movant is not under suspension or disbarment from any bar.
- g. Movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that Movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: January 4, 2013  
New York, New York

Respectfully submitted,

**MCKOOL SMITH, P.C.**

By: /s/ Michael R. Carney  
Michael Robert Carney  
One Bryant Park, 47<sup>th</sup> Floor  
New York, New York 10036  
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E-mail: mcarney@mckoolsmith.com

*Counsel for the Interested Shareholders*

**EXHIBIT A**

**Proposed Order**

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

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In re:	)	Chapter 11
	)	
PATRIOT COAL CORPORATION, <i>et al.</i> ,	)	Case No. 12-51502
	)	
Debtors.	)	(Jointly Administered)
-----	)	

**ORDER GRANTING VERIFIED MOTION FOR ADMISSION *PRO HAC VICE***

Upon the *Verified Motion for Admission for Admission Pro Hac Vice* of Michael Robert Carney for admission to practice and appear in the above-captioned bankruptcy cases; it is hereby

ORDERED that Michael Robert Carney is admitted to practice *pro hac vice* in the above-captioned bankruptcy cases, subject to the payment of the filing fee.

Dated: \_\_\_\_\_, 2013  
St. Louis, Missouri

\_\_\_\_\_  
The Honorable Kathy Surratt-States  
United States Bankruptcy Judge