IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	CASE NO. 15-35615
RAAM GLOBAL ENERGY COMPANY,	§	
et al.	§	(Chapter 11)
	§	_
	§	JOINTLY ADMINISTERED
DEBTORS.	§	

DEBTORS' WITNESS AND EXHIBIT LIST FOR DECEMBER 2, 2015 HEARING

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>"), file this Witness and Exhibit List for the hearing scheduled for Wednesday, December 2, 2015 at 10:00 a.m., Central Time (or as such hearing may be continued or rescheduled, the "<u>Hearing</u>").

WITNESSES

The Debtors may call any of the following witnesses at the Hearing, whether in person or

by proffer:

- 1. James R. Latimer, III, Chief Restructuring Officer of the Debtors;
- 2. Michael Willis, President of the Debtors;
- 3. Thomas Hensley, Jr., Member of Parkman Whaling LLC
- 4. Any witness necessary to authenticate a document;
- 5. Any witnesses called or designated by any other party; and
- 6. Any witnesses necessary to rebut the evidence or testimony of any witness offered or designated by any other party.

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EXHIBITS

The Debtors may offer into evidence any one or more of the following exhibits at the

Hearing:

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
A.	Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20]					
B.	Proposed Budget (13-Week)					
C.	Attorney Checklist Concerning Motion and Order Pertaining to Use of Cash Collateral					
D.	List of Critical Vendors					
E.	Escrow Agreement					
F.	Funds Disbursing Agreement					
G.	Stalking Horse Asset Purchase Agreement					
H.	Bid Procedures					
I.	Notice of Transaction					
J.	Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
ŀ	Any pleadings or other documents filed in these cases or any related cases					
Ι	Any exhibits designated by any other party					

The Debtors reserve the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing.

Dated: November 25, 2015

Respectfully submitted,

VINSON & ELKINS LLP

By: <u>/s/ Reese A. O'Connor</u> Harry A. Perrin, SBT # 1579800 John E. West, SBT # 21202500 Reese A. O'Connor, SBT # 24092910 First City Tower 1001 Fannin Street, Suite 2500 Houston, TX 77002-6760 Tel: 713.758.2222 Fax: 713.758.2346 <u>hperrin@velaw.com; jwest@velaw.com</u> roconnor@velaw.com

and

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PROPOSED ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

I certify that on November 25, 2015, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas which gives notice to all counsel of record.

/s/ Reese A. O'Connor One of Counsel