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.	8	

NOTICE OF FILING OF CERTAIN PROPOSED ORDERS FOR HEARING ON DECEMBER 2, 2015

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") hereby submit the following:

- (a) proposed Final Order Pursuant to 11 U.S.C. §§ 105, 361, 362 and 507, Bankruptcy Rules 2002, 4001 and 9014 and Local Bankruptcy Rule 4001-2 (I) Authorizing Debtors' Limited Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, and (III) Modifying the Automatic Stay (the "Proposed Final Cash Collateral Order"), attached hereto as Exhibit A, with a redline thereof to the version attached to the applicable motion attached hereto as Exhibit B;
- (b) proposed *Order Authorizing and Approving (a) Stalking Horse Purchase Agreement, (b) Bidding Procedures, (c) Procedures for Determining Cure Amounts for Executory Contracts and Unexpired Leases, and (d) Related Relief (the "Proposed Bid Procedures Order"), attached hereto as Exhibit C, with a redline thereof to the version attached to the applicable motion attached hereto as Exhibit D;* and
- (c) proposed *Bid Procedures* (the "<u>Proposed Bid Procedures</u>"), attached hereto as **Exhibit E**, with a redline thereof to the version attached to the applicable motion attached hereto as **Exhibit F**.

PLEASE TAKE FURTHER NOTICE that the Proposed Final Cash Collateral Order, the Proposed Bid Procedures Order, and the Proposed Bid Procedures are subject to change and certain provisions are still being negotiated.

Dated: December 1, 2015

Respectfully submitted,

VINSON & ELKINS LLP

By: <u>/s/ Bradley R. Foxman</u>

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