

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

IN RE:	§	
	§	
RAAM GLOBAL ENERGY COMPANY, <i>et al.</i>	§	CASE NO. 15-35615
	§	
	§	(Chapter 11)
	§	(Joint Administration Requested)
DEBTORS.	§	(Emergency Hearing Requested)

**NOTICE OF FILING OF FIRST DAY MOTIONS
AND EMERGENCY HEARING THEREON**

PLEASE TAKE NOTICE that on October 26, 2015, the above-captioned debtors and debtors in possession (collectively, the “Debtors”)¹ filed, and seek relief from the Court on an emergency basis, the following motions (collectively, the “First Day Motions”):

1. Emergency Motion for Order Directing Joint Administration of the Debtors’ Chapter 11 Cases [Docket No. 6];
2. Emergency Motion (a) for Authority to File a Consolidated List of Creditors; (b) for Authority to File a Consolidated List of 50 Largest Unsecured Creditors; (c) Setting of Bar Dates; and (d) for Approval of the Form and Manner of Notifying Creditors of the Commencement of the Cases and Other Information [Docket No. 8];
3. Emergency Motion Seeking Extension of Time to File Schedules of Assets and Liabilities, Current Income and Expenditures, Executory Contracts and Unexpired Leases, and Statements of Financial Affairs [Docket No. 9];
4. Emergency Motion to (i) Approve Maintenance of Certain Pre-Petition Bank Accounts and Cash Management System and (ii) Continue Use of Existing Checks and Business Forms [Docket No. 10];
5. Emergency Motion for Approval of Interim and Final Use of Cash Collateral and Granting Adequate Protection [Docket No. 11];
6. Emergency Motion (a) Authorizing Debtors to (i) Pay Pre-Petition Wages and Salaries to Employees and Independent Contractors and (ii) Pay Pre-Petition

¹ The Debtors are RAAM Global Energy Company [2973], Century Exploration New Orleans, LLC [4948], Century Exploration Houston, LLC [9624], Century Exploration Resources, LLC [7252].

Benefits and to Continue Benefit Programs in the Ordinary Course and (b) Directing Banks to Honor Pre-Petition Checks for Payment of Pre-Petition Obligations [Docket No. 12];

7. Emergency Motion for Interim and Final Orders Providing Adequate Assurance of Utility Payments [Docket No. 13];
8. Emergency Motion for Authority to Pay or Honor Pre-Petition Obligations to Certain Critical Vendors [Docket No. 14];
9. Emergency Motion for Order Authorizing Debtors to Continue Insurance Policies and Bonding Program [Docket No. 15];
10. Emergency Motion for Authority to Pay Royalty and Working Interest Obligations, Lease Operating Expenses, JIBs, and Trade, and Potential Holders of Statutory Liens [Docket No. 16];
11. Emergency Motion for Authority to Pay (a) Pre-Petition Use and Other Taxes and (b) Licensing and Permit Fees in the Ordinary Course [Docket No. 17]; and
12. Emergency Motion to Establish Notification Procedures and Approve Restrictions of Certain Transfers of Interest in the Debtors' Estates [Docket No. 18].

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing on the First Day Motions at 3:00 p.m., prevailing Central time, on October 28, 2015 before the Honorable Marvin J. Isgur, United States Bankruptcy Judge for the Southern District of Texas, Houston Division, at the United States Courthouse, Room 404, 515 Rusk Avenue, Houston, Texas 77002.

PLEASE TAKE FURTHER NOTICE that copies of all First Day Motions can be found on the docket of Case No. 15-35615 in the Bankruptcy Court for the Southern District of Texas and can also be downloaded from the website of the Debtors' Claims, Balloting, and Noticing Agent, BMC Group, Inc., found at www.bmcgroup.com/RAAMglobal.

Dated: October 26, 2015

Respectfully submitted,

VINSON & ELKINS LLP

By: /s/ Reese A. O'Connor

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**PROPOSED ATTORNEYS FOR THE
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