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

IN RE:	§ CASE NO. 15-35615
	§
RAAM Global Energy Company,	§ (Chapter 11)
et al.	§
	§ JOINTLY ADMINISTERED
DEBTORS.	§

## SUPPLEMENTAL DECLARATION OF HARRY A. PERRIN ON BEHALF OF VINSON & ELKINS LLP AND BANKRUPTCY RULE 2014 AND 2016 DISCLOSURE

## [RELATED TO DOCKET NO. 115]

- I, Harry A. Perrin, declare as follows:
- I am duly authorized to make and submit this declaration (the "Supplemental Declaration") in support of the Application to Employ Vinson & Elkins LLP as Counsel for the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 115] (the "Application") filed on November 13, 2015.<sup>1</sup>
- This supplements my previous declaration [Docket No. 115-1] (the "Original Declaration") that was submitted in connection with the Application. If any information disclosed in this Supplemental Declaration requires amendment or modification due to further analysis, changed circumstances, or the availability of additional information, Vinson & Elkins L.L.P. ("V&E") will supplement this Supplemental Declaration.
- 3. To supplement the Original Declaration, two attorneys who formerly worked as associates for Kirkland & Ellis LLP ("Kirkland") joined V&E in late November 2015. While working at Kirkland, one of these attorneys played a role in Kirkland's representation of a This attorney will not work on the Cases in any capacity, and creditor in the Cases. consents/waivers have been received from the Debtors and the creditor which Kirkland represents in the Cases. In addition, to prevent inadvertent disclosure of that creditor's and the Debtors' confidential information, V&E has taken appropriate internal measures, including setting up ethical walls, to prevent this attorney from having access to any information (including electronic records and files) regarding V&E's representation of the Debtors related to the Cases. V&E also has prohibited V&E attorneys from communicating with this attorney regarding the Cases and any related matters. These steps are designed to prevent access by V&E attorneys involved in the representation of the Debtors to any confidential information about the creditor that such attorney might know.

<sup>&</sup>lt;sup>1</sup> Capitalized terms not defined in this Supplemental Declaration have the meaning set forth in the Application.

4. To further supplement the Original Declaration, a former V&E partner who retired on December 31, 1995 is a royalty interest creditor in certain of the Debtors' wells.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2015.

/s/ <u>Harry A. Perrin</u> Harry A. Perrin