# 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.	§	(Emergency Hearing Requested)

#### NOTICE OF AGENDA FOR HEARING ON OCTOBER 28, 2015 AT 3:00 P.M.

Please take notice of the status and proposed disposition of the following matters set for hearing on the Court's Docket for October 28, 2015 at 3:00 p.m., Central Time:

1. Emergency Motion for Order Directing Joint Administration of the Debtors' Chapter 11 Cases [Docket No. 6 - filed October 26, 2015];

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Order Granting Emergency Motion for Order Directing Joint Administration of the Debtors' Chapter 11 Cases [Docket No. 6-1 - filed October 26, 2015]

Status: Granted [Docket No. 22 – entered October 27, 2015].

2. Notice of Designation as Complex Chapter 11 Cases [Docket No. 7 – filed October 26, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

\_

<sup>&</sup>lt;sup>1</sup> Original order entered in Case No. 15-35614.

b. Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 7-1 - filed October 26, 2015]

Status: Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

3. 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. 8-1 – filed October 26, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Order (a) Granting Authority to File a Consolidated List of Creditors; (b) Granting Authority to File a Consolidated List of 50 Largest Unsecured Creditors;
(c) Setting Bar Dates; and (d) Approving the Form and Manner of Notifying Creditors of the Commencement of the Cases and Other Information [Docket No. 8-2 - filed October 26, 2015]

Status: Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

4. 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 – filed October 26, 2015]

#### **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Order Extending the Time to File Schedules of Assets and Liabilities, Current Income and Expenditures, Executory Contracts and Unexpired Leases, and Statements of Financial Affairs [Docket No. 9-1 - filed October 26, 2015]

**Status:** Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

5. 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 – filed October 26, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Interim Order Granting 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. 10-4 - filed October 26, 2015]

**Status:** Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

6. Emergency Motion for Approval of Interim and Final Use of Cash Collateral and Granting Adequate Protection [Docket No. 11 – filed October 26, 2015]

## **Related Documents:**

- a. Attorney Checklist Concerning Motion and Order Pertaining to Use of Cash Collateral [Docket No. 11-3 filed October 26, 2015]
- b. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 filed October 27, 2015]

## **Proposed Form of Order:**

c. Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 507, Bankruptcy Rules 2002, 4001 and 9014 and Local Bankruptcy Rules 4001-2 (I) Authorizing Debtors' Limited Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Modifying the Automatic Stay and (IV) Scheduling a Final Hearing [Docket No. 11-2 - filed October 26, 2015]

**Status:** Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

7. Emergency Motion (a) Authorizing Debtors to (i) Pay Pre-Petition Wages and Salaries to Employees and Independent Contractors and (ii) Pay Pre-Petition 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 – filed October 26, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Interim Order (a) Authorizing Debtors to (i) Pay Pre-Petition Wages and Salaries to Employees and Independent Contractors and (ii) Pay Pre-Petition 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. 12-1 - filed October 26, 2015]

**Status:** Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

8. Emergency Motion for Interim and Final Orders Providing Adequate Assurance of Utility Payments [Docket No. 13 – filed October 26, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Interim Order (a) Authorizing Debtors to Pay Adequate Assurance Payments to Utilities and (b) Prohibiting Utilities from Altering, Refusing, or Discontinuing Services [Docket No. 13-2 - filed October 26, 2015]

**Status:** Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

9. Emergency Motion for Authority to Pay or Honor Pre-Petition Obligations to Certain Critical Vendors [Docket No. 14 – filed October 26, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Interim Order Granting Emergency Motion for Authority to Pay or Honor Pre-Petition Obligations to Certain Critical Vendors [Docket No. 14-1 - filed October 26, 2015] Status: Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

10. Emergency Motion for Order Authorizing Debtors to Continue Insurance Policies and Bonding Program [Docket No. 15 – filed October 27, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Interim Order Granting Emergency Motion to Authorize Debtors to Continue Insurance Policies and Bonding Program [Docket No. 15-3 - filed October 27, 2015]

Status: Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

11. 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 – filed October 27, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

## **Proposed Form of Order:**

b. Interim Order Authorizing Payment of Royalty and Working Interest Obligations, Lease Operating Expenses, JIBs, and Trade, and Potential Holders of Statutory Liens [Docket No. 16-1 - filed October 27, 2015]

**Status:** Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

12. 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 – filed October 27, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

# **Proposed Form of Order:**

b. Interim Order Authorizing Debtors to Pay Sales, Use, Property, Production, and Other Taxes and Related Obligations [Docket No. 17-1 - filed October 27, 2015]

Status: Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

13. Emergency Motion to Establish Notification Procedures and Approve Restrictions of Certain Transfers of Interest in the Debtors' Estates [Docket No. 18 – filed October 27, 2015]

## **Related Documents:**

a. Declaration of James R. Latimer, III in Support of First Day Pleadings [Docket No. 20 - filed October 27, 2015]

# **Proposed Form of Order:**

b. Interim Order Granting Emergency Motion to Establish Notification Procedures and Approve Restrictions on Certain Transfers of Interests in the Debtors' Estates [Docket No. 18-3 - filed October 27, 2015]

Status: Going forward on Wednesday, October 28, 2015 at 3:00 p.m.

Dated: October 27, 2015

Respectfully submitted,

## VINSON & ELKINS LLP

By: /s/ Reese A. O'Connor

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

hperrin@velaw.com; jwest@velaw.com

roconnor@velaw.com

and

William L. Wallander, SBT # 20780750 Bradley R. Foxman, SBT # 24065243 Trammell Crow Center 2001 Ross Avenue, Suite 3700 Dallas, Texas 75201

Tel: 214.220.7700 Fax: 214.999.7787

<u>bwallander@velaw.com</u>; <u>bfoxman@velaw.com</u>

# PROPOSED ATTORNEYS FOR THE DEBTORS

## **CERTIFICATE OF SERVICE**

I certify that on October 27, 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