#### 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 OCTOBER 28, 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 October 28, 2015 at 3:00 p.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. Jared Dermont, Managing Director at Moelis & Company;
- 3. Brian Lastrapes, Managing Director at Moelis & Company;
- 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.	List of Bank Accounts					
C.	Stop Payment Letter					
D.	Diagram of Cash Management System					
E.	List of Utilities					
F.	Proposed Budget (13-Week)					
G.	Attorney Checklist Concerning Motion and Order Pertaining to Use of Cash Collateral					
H.	Notice of Commencement of the Debtors' Chapter 11 Cases					
I.	List of Insurance Policies					
J.	List of Bonding Obligations					
K.	List of Critical Vendors					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
L.	Notice of Intent to Purchase, Acquire, or Otherwise Obtain Tax Ownership of Stock					
M.	Notice of Intent to Sell, Exchange, or Otherwise Dispose of Tax Ownership of Stock					
N.	Notice of Interim Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in Debtors' Estates					
О.	Publication Notice					
Р.	Any pleadings or other documents filed in these cases or any related cases					
Q.	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: October 27, 2015

Respectfully submitted,

## VINSON & ELKINS LLP

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# 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