#### 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 DECEMBER 22, 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 Tuesday, December 22, 2015 at 1:30 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. Michael Willis, President of the Debtors;
- 3. Any witness necessary to authenticate a document;
- 4. Any witnesses called or designated by any other party; and
- 5. 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					
B.	Notice of Unimpaired Status					
C.	Notice of Fully Impaired Status and Scheduling of Confirmation Hearing					
D.	Notice of Confirmation Hearing					
E.	Ballot Forms					
F.	Royalty Chart					
G.	Any pleadings or other documents filed in these cases or any related cases					
H.	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: December 16, 2015

Respectfully submitted,

## VINSON & ELKINS LLP

By: <u>/s/ Reese A. O'Connor</u> 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 <u>hperrin@velaw.com; jwest@velaw.com</u> roconnor@velaw.com

and

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### **ATTORNEYS FOR THE DEBTORS**

### **CERTIFICATE OF SERVICE**

I certify that on December 16, 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