

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

<b>IN RE:</b>	§	
	§	
<b>RAAM GLOBAL ENERGY COMPANY, <i>et al.</i></b>	§	<b>CASE NO. 15-35615</b>
	§	
	§	<b>(Chapter 11)</b>
	§	
<b>DEBTORS.</b>	§	<b>JOINTLY ADMINISTERED</b>

**NOTICE OF ADMINISTRATIVE AND PRIORITY CLAIMS BAR DATE**

**PLEASE TAKE NOTICE** that, on December \_\_\_, 2015, the Bankruptcy Court for the Southern District of Texas, Houston Division (the “Bankruptcy Court”) entered its *Order Setting Administrative and Priority Claims Bar Date* [Docket No. \_\_\_] (the “Administrative and Priority Claims Bar Date Order”).<sup>1</sup>

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Administrative and Priority Claims Bar Date Order, any request for payment of an Administrative Expense Claim<sup>2</sup> incurred during the period between the Petition Date and January 13, 2016 that is not related to the Assets (each an “Administrative Expense Claim Request”) must be filed on the docket of the Cases on or before January 13, 2016 (the “Administrative and Priority Claims Bar Date”) or forever be barred from doing so.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Administrative and Priority Claims Bar Date Order, any holder of a Priority Claim that is not related to the Assets must submit a proof of claim with BMC Group, Inc., the Debtors’ claims and noticing agent, on or before the Administrative and Priority Claims Bar Date.

**PLEASE TAKE FURTHER NOTICE** that the Administrative and Priority Claims Bar Date will cover all Administrative Expense Claims and Priority Claims incurred during the period between the Petition Date and the Administrative and Priority Claims Bar Date; *provided, however*, the Administrative and Priority Claims Bar Date will not apply to: (a) Administrative

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<sup>1</sup> Capitalized terms used but not defined herein have the meaning set forth in the *Expedited Motion to Establish Administrative and Priority Claims Bar Date* [Docket No. \_\_\_].

<sup>2</sup> Administrative Expense Claims and Priority Claims include any asserted expense or claim seeking a higher or superior priority than that of a general unsecured creditor pursuant to Bankruptcy Code § 503(b) or otherwise. For the avoidance of doubt, except to the extent provided otherwise in the Administrative and Priority Claims Bar Date Order, the Administrative Expense Claims and Priority Claims subject to the Administrative and Priority Claims Bar Date include (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured, and (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

Expense Claims incurred and paid by any Debtor or the Liquidating Trustee (as such term is defined in the Plan) in the ordinary course on and after the Petition Date and Administrative Expense Claims related to the Assets, and in accordance with the Purchase Agreement, as such claims shall be deemed Allowed Claims (as such term is defined in the Plan); (b) fees payable by the Debtors pursuant to 28 U.S.C. § 1930 or any interest accruing thereto; (c) professional advisors (e.g., attorneys, financial advisors, and accountants) retained by the Debtors and the Committee whose Administrative Expense Claims are for services rendered and reimbursement of expenses in the Cases;<sup>3</sup> (d) claims that are entitled to priority pursuant to Bankruptcy Code § 507(a)(8); and (e) governmental units holding Priority Claims, as such claims are governed by the bar date set forth in the *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. 42].

**PLEASE TAKE FURTHER NOTICE** that to be considered properly asserted and filed, each Administrative Expense Claim Request must: (a) be filed as a separate motion or application; (b) specify the full name of the Debtor against which the claimant asserts the Administrative Expense Claim; (c) set forth with specificity the legal and factual basis for the Administrative Expense Claim; and (d) have attached to it supporting documentation upon which the claimant will rely to support the Administrative Expense Claim Request.

**PLEASE TAKE FURTHER NOTICE** that if a request for an Administrative Expense Claim was previously made by proof of claim, or otherwise not in accordance with the procedures set forth in the Administrative and Priority Claims Bar Date Order, such claimants must file a separate Administrative Expense Claim Request in accordance with the Administrative and Priority Claims Bar Date Order.

**PLEASE TAKE FURTHER NOTICE** that the Debtors expressly reserve the right object to all claims filed, or to be filed, against the Debtors' estates on any and all grounds.

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<sup>3</sup> Pursuant to the Plan, professionals asserting a Professional Fee Claim (as such term is defined in the Plan) shall be required to file with the Court a final fee application on or before the Professional Fee Bar Date (as such term is defined in the Plan).

Dated: December \_\_\_, 2015

Respectfully submitted,

**VINSON & ELKINS LLP**

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**ATTORNEYS FOR THE DEBTORS**