



ENTERED
12/22/2015

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

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

ORDER SETTING ADMINISTRATIVE AND PRIORITY CLAIMS BAR DATE

On December 22, 2015, the Court considered the *Expedited Motion to Establish Administrative and Priority Claims Bar Date* [Docket No. 257] (the “Motion”)¹ filed by the above-referenced debtors and debtors in possession (collectively, the “Debtors”).² The Court finds that: (a) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334(b); (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (c) the relief requested in the Motion is in the best interests of the Debtors and their respective estates, creditors, and equity security holders; (d) pursuant to Bankruptcy Rule 6004(a), proper and adequate notice of the Motion and hearing thereon has been given and that no other or further notice is necessary; and (e) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion. Therefore, it is

ORDERED that any request for payment of an Administrative Expense Claim³ incurred

¹ Capitalized terms not otherwise defined herein have the meaning set forth in the Motion.

² The Debtors are RAAM Global Energy Company [2973], Century Exploration New Orleans, LLC [4948], Century Exploration Houston, LLC [9624], and Century Exploration Resources, LLC [7252].

³ Administrative Expense Claims, for purposes of this Order, shall 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 this Order, the Administrative Expense Claims and Priority Claims subject to the Administrative and Priority Claims Bar Date include (a) any right

any time between the Petition Date and January 13, 2016 that is not related to the Assets (each an “Administrative Expense Claim Request”) shall be filed with the Court by such holder on or before January 13, 2016 (the “Administrative and Priority Claims Bar Date”), and any holder of a Priority Claim that is not related to the Assets shall submit a proof of claim (“Priority Proof of Claim”) with BMC Group, Inc. (“BMC”), the Debtors’ claims and noticing agent, on or before the Administrative and Priority Claims Bar Date. Notwithstanding the preceding sentence, the Administrative and Priority Claims Bar Date shall not apply to: (a) Administrative 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;⁴ (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]. It is further

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.

⁴ 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).

ORDERED that to be considered properly asserted and filed, each Administrative Expense Claim Request: (a) must 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. It is further

ORDERED 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 herein, such claimants must file a separate Administrative Expense Claim Request in accordance with this Order. It is further

ORDERED that the Bar Date Notice, in a form substantially the same as **Exhibit A** attached hereto, shall be mailed by the Debtors or BMC to (a) all known and reasonably ascertainable creditors of the Debtors' and their estates, (b) all parties who have requested notice in the Cases, (c) all co-interest holders in any oil and gas property, (d) any predecessor-in-interest that may be liable for any plugging and abandonment or safety related expense, and (e) all other parties in interest no later than five (5) business days after entry of this Order. It is further

ORDERED that the Mil-Vid entities and their affiliates who are scheduled on Exhibit "1" admitted into evidence on December 22, 2015 are not required to file an administrative claim as to distributions that are set forth on Exhibit "1". It is further

ORDERED that any holder of an Administrative Expense Claim or Priority Claim who receives notice of this order and that is required to file but fails to file an Administrative Expense Claim Request or Priority Proof of Claim in accordance with this Order on or before

Administrative and Priority Claims Bar Date shall be forever barred, estopped, and enjoined from asserting such Administrative Expense Claim or Priority Claim against the Debtors and their estates, and the Debtors and their estates shall be forever discharged from any and all indebtedness or liability with respect to such Administrative Expense Claim or Priority Claim. It is further

ORDERED that this Order is without prejudice to the Debtors' right to object to all claims filed, or to be filed, against the Debtors' estates on any and all grounds. It is further

ORDERED that the Debtors are authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order. It is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order. It is further

ORDERED that this Court hereby retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: December 22, 2015


UNITED STATES BANKRUPTCY JUDGE

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

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

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”).¹

PLEASE TAKE FURTHER NOTICE that, pursuant to the Administrative and Priority Claims Bar Date Order, any request for payment of an Administrative Expense Claim² 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

¹ 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. __].

² 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;³ (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.

³ 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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