

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: § CASE NO. 15-35615
RAAM GLOBAL ENERGY COMPANY, §
ET AL. § (CHAPTER 11)
DEBTORS § JOINTLY ADMINISTERED

NOTICE OF PERFECTION OF LIEN PURSUANT TO 11 U.S.C. §546(b)

Acock Consulting, L.L.C. (“ACLLC”) hereby gives notice pursuant to 11 U.S.C. § 546(b) of the perfection of a lien upon mineral property pursuant to the laws of the State of Texas. In support ACLLC would show the Court as follows:

ACLLC’s Lien Claims

1. Overview. ACLLC performed labor and/or furnished material, machinery and supplies pursuant to a contract with Debtor, Century Exploration Houston, LLC, for which ACLLC has not been paid. ACLLC has certain lien rights under applicable state law which provide for statutory mineral liens. *See* Tex. Prop. Code § 56.001, *et. seq.* ACLLC is within the statutory period for exercising its lien rights under applicable law, including the right to perfect such liens post-petition. The principal indebtedness in connection with the unpaid amounts due and owing from the goods, material, supplies, machinery, equipment and labor furnished by ACLLC is approximately \$46,249.02 as related to the Akula, Phineas, Jacques, Flipper, Sebastian and Blacktip Prospects and related leases. ACLLC’s claim is secured by statutory mineral liens, including the liens described on Exhibit “A” and further lien rights related to pre-petition materials and/or services furnished by ACLLC, which liens may be perfected post-petition as allowed by 11 U.S.C. §§ 362(b)(3) and 546(b), including the liens described on Exhibit “A”.

2. Lien Inception. Once filed and perfected, ACLLC’s mineral lien incept and relate

back to the date ACLLC commenced furnishing labor and/or materials on the subject leases and/or units. *Youngstown Sheet and Tube Co. V. Lucey Products Co.*, 403 F.2d 135 (5th Cir. 1968); *In re Meg Petroleum Corp.*, 61 B.R. 14, 20 (Bankr. N.D. Tex. 1986); *Bandera Drilling Co. V. Lavino*, 824 S.W.2d 782, 784 (Tex. App. - Eastland 1992, no writ); *Trevor Rees-Jones, Trustee for Atkins Petroleum Corp. v. Trevor Rees-Jones, Trustee for Apache Services, Inc.*, 799 S.W. 2d 463 (Tex. App.-El Paso 1990, writ denied).

3. Mineral Lien Claims. ACLLC hereby gives notice of the filing and perfection of the statements and affidavits in support of lien on mineral property as to the oil and gas wells, leaseholds and associated rights and property described in Exhibit "A".

4. Notice under §546(b). Under applicable non-bankruptcy law, ACLLC has the right to commence a lien foreclosure action and have a receiver appointed to seize and preserve the proceeds of production from the Subject Property pending a judicial foreclosure. *See* Tex. Prop. Code §§ 56.041, 53.154; Tex. Civ. Prac. & Rem. Code § 64.001 *et seq.*; *Abella v. Knight Oil Tools*, 945 S.W.2d 847 (Tex. App.-Houston [1st Dist.] 1997, no writ). Further, ACLLC is required to file suit to enforce its mineral liens within two years after the last day in which the lien affidavit may be filed. *See* Tex. Prop. Code §§ 56.041, 53.158. Pursuant to 11 U.S.C. § 546(b), ACLLC hereby gives notice in lieu of commencement of such an action to perfect, maintain or continue perfection of ACLLC's interest in the Subject Property.

5. Further Information Available Upon Request. Any party in interest may obtain a copy of the Subject Mineral Liens and Mineral Subcontractor Lien Notices by contacting:

Acock Consulting, L.L.C.
c/o Elizabeth G. Smith
Law Offices of Elizabeth G. Smith
6655 First Park Ten, Suite 240

San Antonio, TX 78213

6. Reservation of Rights. ACLLC reserves the right to supplement and/or amend this Notice. ACLLC further reserves all rights under applicable law.

Respectfully Submitted,

Law Offices of Elizabeth G. Smith
6655 First Park Ten, Suite 240
San Antonio, Texas 78213
P: 210-731-9177 F: 210-731-9130
beth@egsmithlaw.com

by: /s/ Elizabeth G. Smith

Elizabeth G. Smith

State Bar No. 18577200

Attorney for Acock Consulting, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2015, a true and correct copy of the above and foregoing Notice of Perfection of Lien Pursuant to 11 U.S.C. § 546(b) was served by the method and to the following parties as indicated below:

/s/ Elizabeth G. Smith

Elizabeth G. Smith

Via Email Mail Only

Attorney for Debtors: bfoxman@velaw.com; hperrin@velaw.com

Bradley R. Foxman

Harry A. Perrin

Trammell Crow Center

2001 Ross Avenue, Suite 3700

Dallas, TX 75201

U.S. Trustee USTPRegion07.HU.ECF@USDOJ.GOV

and by email to all the parties listed in the Mailing Information List for Case #15-35615 attached hereto who are on said list to receive email notice/service for this case;

and, to the following by 1st Class Mail only:

Andrew B. Zollinger

DLA Piper LLP

1717 Main St., Ste. 4600

Dallas, TX 75201

Mailing Information for Case 15-35615

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- Jeffrey D. Carruth jcarruth@wkpz.com, jcarruth@aol.com; ATTY_CARRUTH@trustesolutions.com
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- Karl J Zimmermann karlz@bhbmllaw.com, troper@bhbmllaw.com; cunningham@bhbmllaw.com

Manual Notice List

The following is the list of **parties** who are **not** on the list to receive email notice/service for this case (who therefore require manual noticing/service). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Andrew B Zollinger
 DLA Piper LLP
 1717 Main St
 Ste 4600
 Dallas, TX 75201
 andrew.zollinger@dlapiper.com, eli.burris@dlapiper.com; arthur.burke@davispolk.com

Creditor List

Click the link above to produce a complete list of **creditors** only.

List of Creditors

Click on the link above to produce a list of **all** creditors and **all** parties in the case. User may sort in **all** columns or raw data format.