

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

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

EMERGENCY MOTION TO CONTINUE HEARING

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “Debtors”)¹ file this *Emergency Motion to Continue Hearing* (the “Motion”) and in support respectfully state as follows:

1. The Debtors request that the Court continue the January 14, 2016 hearing on the following matters (the “Hearing”) as set forth below:

- a. *Motion to Authorize and Approve (a) Stalking Horse Purchase Agreement, (b) Sale of Substantially All Assets Free and Clear of Claims, Liens, Encumbrances and Other Interests, (c) Assumption and Assignment of Executory Contracts and Unexpired Leases, (d) Bidding Procedures, (e) Procedures for Determining Cure Amounts for Executory Contracts and Unexpired Leases, and (f) Related Relief [Docket No. 90] (the “Sale Motion”) to be continued to January 19, 2016 at 9:00 a.m., with any additional hearings needed on the Sale Motion to be set for January 20, 2016 at 1:30 p.m.*
- b. *Debtors’ First Emergency Motion for Estimation of General Administrative, Priority Tax, & Other Priority Claims [Docket No. 312] (the “Estimation Motion”) to be continued to January 20, 2016 at 1:30 p.m.*
- c. *Debtors’ Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 286-2] (“the Plan”) to be*

¹ 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].

continued to January 19, 2016 at 9:00 a.m., with any additional hearings needed on the Plan to be heard on January 20, 2016 at 1:30 p.m.

2. The Debtors received a number of objections to the Sale Motion and to confirmation of the Plan. The Debtors submit that continuing the Hearing will allow the Debtors to (a) resolve many of the objections by agreement and (b) brief the Court on any unsettled issues for which the Debtors will need to seek a ruling from the Court. Additionally, the deadline for parties to file applications for allowance of certain administrative claims is on January 13, 2016, and the continuance will enable the Debtors to adequately respond to any administrative claims asserted.

3. Additionally, the Debtors believe that additional notice of the Estimation Motion is appropriate and the continuance of the Estimation Motion would provide the applicable creditors additional time to respond to the Estimation Motion.

4. The Debtors have conferred with counsel to the official committee of unsecured creditors and their senior secured lender regarding the relief requested herein, and if the relief herein is granted, the Debtors will reach out to counsel to the objecting parties to advise them of the new setting.

PRAYER

The Debtors respectfully request that this Court enter an Order continuing the Hearing as set forth hereinabove.

Dated: January 13, 2016

Respectfully submitted,

VINSON & ELKINS LLP

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ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

I certify that on January 13, 2016, 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.

Bradley R. Foxman
One of Counsel