

**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.** §

**NOTICE OF AGENDA  
FOR HEARING ON JANUARY 19, 2016 AT 9:00 A.M.**

Please take notice of the status and proposed disposition of the following matters set for hearing on the Court's Docket for January 19, 2016 at 9:00 a.m., Central Time:

1. 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]

**Related Documents:**

- a. Asset Purchase and Sale Agreement dated November 6, 2015 [Docket No. 90-1]
- b. The State of Louisiana's Objection to Motion of Chapter 11 Debtors to Authorize and Approve the (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. 114]
- c. Notice of Filing of Amendment to Asset Purchase Agreement [Docket No. 181]
- d. Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 205]
- e. Notice of Filing of Amendment to Asset Purchase Agreement [Docket No. 303]
- f. Notice Regarding Auction [Docket No. 309]

**NOTICE OF AGENDA FOR HEARING  
ON JANUARY 19, 2016 AT 9:00 A.M.**

- g. Oracle's Rights Reservation and Rights Notice Regarding (1) 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; and (2) Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases ("Rights Reservation") [Docket No. 317]
- h. TechXplore Participation I, LTD.'s and TechXplore, LP's Objection and Rights Notice [Docket No. 319]
- i. Business Property Lending, Inc.'s Objection to Confirmation of Plan and Limited Objection to Transaction or Alternative Transaction [Docket No. 322]
- j. BGI Gulf Coast, LLC & Champion Exploration, LLC's Limited Objection to the Debtors' 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. 324]
- k. Notice of Receipt of Offer to Purchase [Docket No. 327]
- l. Objection to 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. 331]
- m. City National Bank's (I) Limited Objection to 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; and (II) Reservation of Rights Pertaining to Notice of Receipt of Offer to Purchase [Docket No. 354]
- n. Supplemental Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 355]
- o. Notice of Deletion of Executory Contracts and Unexpired Leases from Desired 365 Contract Notice [Docket No. 356]

**Proposed Form of Order:**

- p. Order (a) Approving Offer to Purchase, (b) Authorizing the Debtors to Sell Oil and Gas Properties in California Free and Clear of All Rights, Liens, Claims, Interests, and Encumbrances, and (c) Granting Related Relief.

**Status:** Contested. Going forward on Tuesday, January 19, 2016 at 9:00 a.m., with any additional hearings on this matter to be heard on Wednesday, January 20, 2016 at 1:30 p.m.

2. Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 286-2]

**Related Documents:**

- a. Notice of Additional Information Regarding Certain Oil and Gas Properties in California [Docket No. 298]
- b. Plan Supplement for Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 299]
- c. Statement of Ad Hoc Group of Senior Secured Noteholders in Connection with Debtors' Second Amended Joint Plan of Liquidation [Docket No. 318]
- d. Business Property Lending, Inc.'s Objection to Confirmation of Plan and Limited Objection to Transaction or Alternative Transaction [Docket No. 321]
- e. Business Property Lending, Inc.'s Objection to Confirmation of Plan and Limited Objection to Transaction or Alternative Transaction [Docket No. 322]
- f. Limited Objection of Harris County, Jasper County, Montgomery County, and Orange County to Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 325]
- g. Objection to Confirmation of Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 330]
- h. City National Bank's Objection to Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 332]
- i. BGI Gulf Coast, LLC & Champion Exploration, LLC's Objection to Confirmation of the Debtors' Second Amended Joint Plan of Liquidation [Docket No. 333]
- j. Notice of Abandonment [Docket No. 357]

- k. Notice of Amendment to Plan Supplement for Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 358]

**Proposed Form of Order:**

- l. Order Confirming Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code

**Status:** Contested. Going forward on Tuesday, January 19, 2016 at 9:00 a.m., with any additional hearings on this matter to be heard on Wednesday, January 20, 2016 at 1:30 p.m.

Dated: January 15, 2016

Respectfully submitted,

**VINSON & ELKINS LLP**

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**ATTORNEYS FOR THE DEBTORS**

**CERTIFICATE OF SERVICE**

I certify that on January 15, 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 which gives notice to all counsel of record.

/s/ Reese A. O'Connor  
One of Counsel