

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

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

**SECOND AMENDMENT TO PLAN SUPPLEMENT FOR DEBTORS’
SECOND AMENDED JOINT PLAN OF LIQUIDATION
PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

The above-referenced debtors and debtors in possession (the “Debtors”) hereby file this *Second Amendment to Plan Supplement for Debtors’ Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code* (the “Second Amendment to Plan Supplement”) pursuant to Section 14.13 of the *Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code* (as amended, modified, and supplemented, the “Plan”).¹ This Second Amendment to Plan Supplement supplements the form of Liquidating Trust Agreement, attached as **Exhibit C** to the *Plan Supplement for Debtors’ Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 299] (the “Plan Supplement”) by replacing such form of Liquidating Trust Agreement with the Liquidating Trust Agreement attached as **Exhibit 1** thereto. A redline showing changes to the Liquidating Trust Agreement is attached hereto as **Exhibit 2**. This Second Amendment to Plan Supplement further provides notice that the initial members of the Liquidating Trust Committee are Greg White, Jeff Fitts,

¹ Capitalized terms that are not defined herein have the meaning set forth in the Plan or the Liquidating Trust Agreement, as applicable.

and Monty Kehl and the initial members of the Litigation Committee are Greg White and Jeff Fitts.

The Debtors reserve all rights to further amend, modify, or supplement the Plan Supplement and any of the documents contained therein, in accordance with the terms of the Plan.

Dated: January 15, 2016

Respectfully submitted,

VINSON & ELKINS LLP

By: /s/ Reese A. O'Connor
Harry A. Perrin, SBT # 1579800
John E. West, SBT # 21202500
Reese A. O'Connor, SBT # 24092910
First City Tower
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: 713.758.2222
Fax: 713.758.2346
hperrin@velaw.com; jwest@velaw.com
roconnor@velaw.com

and

William L. Wallander, SBT # 20780750
Bradley R. Foxman, SBT # 24065243
Trammell Crow Center
2001 Ross Avenue, Suite 3700
Dallas, TX 75201
Tel: 214.220.7700
Fax: 214.999.7787
bwallander@velaw.com; bfoxman@velaw.com

ATTORNEYS FOR THE DEBTORS