#### 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.	§	

### DEBTORS' WITNESS AND EXHIBIT LIST FOR JANUARY 20, 2016 HEARING

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>"), file this Witness and Exhibit List for the hearing scheduled for Wednesday, January 20, 2016 at 1:30 p.m., Central Time (or as such hearing may be continued or rescheduled, the "<u>Hearing</u>").

### WITNESSES

The Debtors may call any of the following witnesses at the Hearing, whether in person or

by proffer:

- 1. James R. Latimer, III, Chief Restructuring Officer of the Debtors;
- 2. Michael Willis, President of the Debtors;
- 3. Stephen J. Allen, Principal, Ryan, LLC;
- 4. Any witness necessary to authenticate a document;
- 5. Any witnesses called or designated by any other party; and
- 6. Any witnesses necessary to rebut the evidence or testimony of any witness offered or designated by any other party.

# **EXHIBITS**

The Debtors may offer into evidence any one or more of the following exhibits at the

Hearing:

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
А.	Century Exploration New Orleans, LLC – Forms 1042, 1042-T, and 1042-S for 2014					
B.	RAAM Global Energy Company – 2014 Tax Returns					
C.	RAAM Global Energy Company – Form 941, Employer's Quarterly Federal Tax Return for Q1, Q2, and Q3 2015					
D.	Century Exploration New Orleans, LLC – Form 941, Employer's Quarterly Federal Tax Return for Q1, Q2, and Q3 2015					
E.	Century Exploration Houston, LLC – Form 941, Employer's Quarterly Federal Tax Return for Q1, Q2, and Q3 2015					
F.	Century Exploration Resources, LLC – Form 941, Employer's Quarterly Federal Tax Return Q1, Q2, and Q3 2015					
G.	RAAM Global Energy Company – ADP Statement of Deposits and Filings for Q1, Q2, and Q3 2015					

EXHIBIT		DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
	H.	RAAM Global Energy Company – ADP Invoice Showing Taxes Paid for Q4 2015					
	I.	Record of ADP Deposits with U.S. Treasury for Q4 2015					
	J.	Any pleadings or other documents filed in these cases or any related cases					
	K.	Any exhibits designated by any other party					

The Debtors reserve the right to supplement or amend this Witness and Exhibit List at

any time prior to the Hearing.

Dated: January 17, 2016

Respectfully submitted,

## VINSON & ELKINS LLP

By: <u>/s/ Reese A. O'Connor</u> 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 <u>hperrin@velaw.com; jwest@velaw.com</u> 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**

### **CERTIFICATE OF SERVICE**

I certify that on January 17, 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