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 FILING OF PROPOSED ORDERS FOR HEARING ON JANUARY 19, 2016

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") hereby submit the following:

- (a) proposed 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, attached hereto as **Exhibit A**;
- (b) proposed Order (i) Authorizing and Approving the Debtors to Sell Substantially All of Their Property Free and Clear of All Rights, Liens, Claims, Interests, and Encumbrances, (ii) Authorizing the Debtors to Assume and Assign Certain Executory Contracts and Unexpired Leases, and (iii) Granting Related Relief, attached hereto as Exhibit B, with a redline thereof to the version attached to the applicable motion attached hereto as Exhibit C; and
- (c) proposed Order Confirming Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code, attached hereto as **Exhibit D**.

PLEASE TAKE FURTHER NOTICE that the proposed orders set forth above are subject to change and certain provisions are still being negotiated.

Dated: January 18, 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, Texas 75201

Tel: 214.220.7700 Fax: 214.999.7787

<u>bwallander@velaw.com</u>; <u>bfoxman@velaw.com</u>

ATTORNEYS FOR THE DEBTORS