

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

IN RE: § **CHAPTER 11**
§
RAAM GLOBAL ENERGY § **CASE NO. 15-35615**
COMPANY, ET AL., § **(JOINTLY ADMINISTERED)**
§
DEBTORS. §

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE
AND SERVICE OF ALL PAPERS
BY KELL C. MERCER, COUNSEL FOR
DOUGLAS J. BRICKELY, TRUSTEE OF THE LIQUIDATING TRUST**

PLEASE TAKE NOTICE that the undersigned counsel hereby enters an appearance on behalf of Douglas J. Brickley, Trustee of the Liquidating Trust in the above-referenced chapter 11 bankruptcy case (the "Bankruptcy Case") pursuant to the United States bankruptcy code and federal rule of bankruptcy procedure 9010.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007, and 9010, undersigned counsel hereby requests that all notices given or required to be given in the Bankruptcy Case including, but not limited to, all papers filed and served in all adversary proceedings relating to the Bankruptcy Case, and all notices mailed only to statutory committees or their authorized agents or to creditors and equity security holders who file with the court a request that all notices be mailed to them, be given to and served at the following address, telephone and fax number:

Kell C. Mercer
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KELL C. MERCER, P.C.
1602 E. Cesar Chavez Street
Austin, Texas 78702
(512) 627-3512
(512) 597-0767 (fax)

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Federal Rule of Bankruptcy Procedure 2002, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand-delivery, telephone, fax transmission, or otherwise filed in or made with regard to this case and any proceeding commenced herein.

PLEASE TAKE FURTHER NOTICE that the foregoing constitutes only a demand and request for service of papers and does not constitute a consent to the jurisdiction of the Bankruptcy Court or a waiver of the right to a jury trial. Further, this request for notice does not waive any:

- a) Right to have any and all final orders for any and all non-core matters entered only after a *de novo* review by a United States District Court;
- b) Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation of such matters as “core proceedings” pursuant to 28 U.S.C. § 157 and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) Right to have the reference of any matter withdrawn by the United States District Court in any manner or proceeding subject to mandatory or discretionary withdrawal; and
- d) Other rights, claims, actions, setoffs, recoupments, or other matters under any agreements or at law or in equity or under the United States Constitution.

All of the above-rights are expressly reserved and preserved without exception and shall not be waived, confessed, or conceded by filing this notice or by any other participation in this matter.

Dated: February 4, 2016

Respectfully Submitted,

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By: /s/ Kell C. Mercer
Kell C. Mercer
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ATTORNEY FOR DOUGLAS J. BRICKLEY,
TRUSTEE OF THE LIQUIDATING TRUST

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing pleading was forwarded via this Courts CM/ECF notification system to the parties registered for such service on February 4, 2016.

/s/ Kell C. Mercer
Kell C. Mercer