

**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.¹	§	(Jointly Administered)

**BGI GULF COAST, LLC & CHAMPION EXPLORATION, LLC’S MOTION
REQUESTING CANCELLATION OF HEARING**

BGI Gulf Coast, LLC (“BGI”) and Champion Exploration, LLC (“Champion”), creditors and parties in interest in the above captioned bankruptcy cases, file this motion (“Motion”) requesting that the Court cancel the hearing scheduled for March 7, 2016 as relates to BGI Gulf Coast, LLC & Champion Exploration, LLC’s Request for Payment of Administrative Expenses and respectfully represents as follows:

1. On January 13, 2016, BGI and Champion filed their Request for Payment of Administrative Expenses [ECF # 352] (“Administrative Expense Claim”). BGI and Champion also, on January 12, 2016, filed their Objection to Confirmation of the Debtors’ Second Amended Joint Plan of Liquidation [ECF # 333] (“Objection”). On January 19, 2016, the Court held a hearing (the “Confirmation Hearing”) to consider confirmation of the Debtors’ Second Amended Joint Plan of Liquidation (“Plan”). Prior to the Confirmation Hearing, BGI and Champion and the Debtors agreed to resolve BGI and Champion’s Objection and Administrative Expense Claim, which agreement was included in the Debtors’ proposed confirmation order.

2. On January 19, 2016, the Court entered its Order Confirming Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code (the “Confirmation

¹ The Debtors are RAAM Global Energy Company [2973], Century Exploration New Orleans, LLC [4948], Century Exploration Houston, LLC [9624], Century Exploration Resources, LLC [7252].

Order”). Paragraphs 26(d) – (j) address BGI and Champion’s treatment under the Plan and the agreed resolution of BGI and Champion’s Objection and Administrative Expense Claim.

3. On February 11, 2016, the Court entered its Order Setting Hearing setting a hearing on, among other matters, BGI and Champion’s Administrative Expense Claim. As such Administrative Expense Claim has been resolved pursuant to the Confirmation Order, BGI and Champion request that such hearing, as relates to BGI and Champion’s Administrative Expense Claim, be cancelled.

WHEREFORE, PREMISES CONSIDERED, Champion and BGI request that the Court enter an order cancelling the hearing scheduled for March 7, 2016 as relates to BGI Gulf Coast, LLC & Champion Exploration, LLC’s Request for Payment of Administrative Expenses and such other and further relief to which it is entitled.

Respectfully submitted this 18th day of February 2016.

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**COUNSEL FOR BGI GULF COAST, LLC
AND CHAMPION EXPLORATION, LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing pleading was served, upon filing, via the Court's CM/ECF system upon those parties subscribing thereto.

/s/ David L. Curry, Jr.

David L. Curry, Jr.