

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

In re:	*	Case No. 15-35615
	*	
Raam Global Energy, Company, et al.	*	Chapter 11
	*	
Debtors	*	Jointly Administered
	*	
	*	Hearing Date: March 28, 2016
	*	Hearing Time: 1:30 PM (CDT)
	*	Party's Name: WesternGeco, L.L.C.
	*	Attorney's Name: Andrew A. Braun
	*	Attorney's Phone: 504-561-0400
	*	Nature of Proceeding: Motion to Vacate Order

WESTERNGECO, L.L.C.'S WITNESS AND EXHIBIT LIST

WesternGeco, L.L.C. ("WesternGeco") submits the following Witness and Exhibit List for the hearing scheduled on March 28, 2016 at 1:30 p.m. (CDT) in the above styled bankruptcy case (the "Bankruptcy Case") before the Honorable Marvin Isgur, United States Bankruptcy Judge, Courtroom 404, 515 Rusk Avenue, Houston, Texas, 77002.

WITNESSES

WesternGeco may call one or more of the following witnesses:

1. Jeremy Welch;
2. Rachelle Goldman;
3. Larry Galloway;
4. Don Dubose;
5. Sam Millis;
6. Alexander Shahade;

7. Linda Richey, Lewis Cadwallader, or other WesternGeco financial/accounting/treasury department representative;
8. Any witness listed, offered or called by any other party;
9. Any witness required for rebuttal or impeachment;
10. Any witnesses necessary to authenticate a document.

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted	Disposition
1	Master License Agreement For Multiclient Seismic Data effective 4/15/03 between WesternGeco and Century Exploration Company ("Century") and attachments				
2	Supplement 974280-3D-J0401175 dated 1/14/04 and related invoicing and correspondence.				
3	Supplement 974280-3D-J0603296 dated 3/17/06.				
4	Supplement 974280-3D-J0603297 dated 3/17/06.				
5	Supplement 974280-3D-J0710042 dated 10/8/07.				
6	Supplement 974280-3D-J0710046 dated 10/8/07.				
7	Supplement 974280-3D-J0710047 dated 10/8/07.				
8	Supplement 974280-3D-J0711091 dated 11/16/07.				
9	Supplement 974280-3D-J0711093 dated 11/16/07.				
10	Supplement 974280-3D-J0711094 dated 11/16/07.				
11	Supplement 974280-3D-J0711095 dated 11/16/07.				
12	Supplement 974280-3D-J0806320 dated 6/20/08.				
13	Supplement 974280-3D-J0806321 dated 6/20/08.				
14	Supplement 974280-3D-J0808059 dated 8/19/08.				

15	Supplement dated 8/19/08.	974280-3D-J0808060				
16	Supplement dated 8/19/08.	974280-3D-J0808061				
17	Supplement dated 8/19/08.	974280-3D-J0808062				
18	Supplement dated 8/19/08.	974280-3D-J0808063				
19	Supplement dated 8/19/08.	974280-3D-J0808064				
20	Supplement dated 8/19/08.	974280-3D-J0808065				
21	Supplement dated 8/19/08.	974280-3D-J0808066				
22	Supplement dated 8/19/08.	974280-3D-J0808067				
23	Supplement dated 8/19/08.	974280-3D-J0808068				
24	Supplement dated 8/19/08.	974280-3D-J0808069				
25	Supplement dated 8/19/08.	974280-3D-J0808070				
26	Supplement dated 8/19/08.	974280-3D-J0808071				
27	Supplement dated 8/19/08.	974280-3D-J0808072				
28	Supplement dated 8/19/08.	974280-3D-J0808073				
29	Supplement dated 2/24/10.	974280-3D-J1002128				
30	Supplement dated 2/24/10.	974280-3D-J1002129				
31	Supplement dated 4/23/10.	974280-3D-J1004087				
32	Supplement dated 4/23/10.	974280-3D-J1004088				
33	Email string including emails dated 4/22/15 from David Seay to shahade1@slb.com; dated 5/5/15 from David Seay to Rachelle Goldman; dated 5/6/15 from Rachelle Goldman to David Seay; dated 5/8/15 from David Seay to Rachelle Goldman; dated 5/11/15 from Rachelle Goldman to David Seay; dated 5/11/15 from David Seay to Rachelle Goldman.					

34	Chapter 11 Voluntary Petition [Dkt. No. 1] filed 10/26/15 by Raam Global Energy Company (“Raam”).				
35	Order dated 10/27/15 [Dkt No. 22] Granting Emergency Motion for Order Directing Joint Administration.				
36	Certificate of Service re Various Motions filed 10/29/15 [Dkt. No. 50]				
37	Notice of Filing of Master Service List and attached Master Service List dated 10/29/15 [Dkt. No. 53].				
38	Certificate of Service re Various Motions filed 11/3/15 [Dkt. No. 70]				
39	Certificate of Service re Various Motions filed 11/3/15 [Dkt. No. 71]				
40	Notice of Commencement of Cases Under Chapter 11 [Dkt. No. 79].				
41	Certificate of Supplemental Service re Various Motions filed 11/4/15 [Dkt. No. 80]				
42	Notice of Filing of Debtor’s Revised Master Service List dated 11/6/15 and attached Master Service List of 11/6/15 [Dkt. No. 88].				
43	Certificate of Service re Notice of Commencement of Cases Under Chapter 11 and Proof of Claim Form dated 11/6/15 [Dkt. No. 89].				
44	Motion to Sell Motion to Authorize and Approve (a) Stalking Horse Purchase Agreement, (b) Sale of Substantially all Assets Free and Clear of Claims, Liens, Encumbrances and Other Interests, (c) Assumption and Assignment of Executory Contracts and Unexpired Leases, (d) Bidding Procedures, (e) Procedures for Determining Cure Amounts for Executory Contracts and Unexpired Leases, and (f) Related Relief Free and Clear of Liens as Described in Section 363(f) dated 11/6/15 [Dkt. No. 90].				
45	Assert Purchase and Sale Agreement dated 11/6/15 [Dkt. No. 90-1]				
46	Certificate of Service re Dkt. No. 90 dated 11/9/15 [Dkt. No. 91].				

47	Notice of Filing of Debtors' Revised Master Service List dated 11/13/15 and Master Service List dated 11/13/15 [Dkt. Nos. 109 and 110].				
48	Notice of Filing of Debtors' Revised Master Service List dated 11/20/15 and Master Service List dated 11/20/15 [Dkt No. 134].				
49	Order Granting Motion To Sell dated 12/2/15 [Dkt. No. 180].				
50	Certificate of Service re Dkt. Nos. 169 and 170 dated 12/3/15 [Dkt. No. 187].				
51	Notice of Transaction dated 12/4/15 [Dkt. No. 190].				
52	Certificate of Service of Notice of Transaction dated 12/8/15 [Dkt. No. 212].				
53	Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases dated 12/7/15 [Dkt. No. 205].				
54	Notice of Filing of Debtors' Revised Master Service List dated 11/20/15 and Master Service List dated 12/11/15 [Dkt No. 229].				
55	Certificate of Service re: Solicitation Package dated 1/6/16 [Dkt. No. 302].				
56	Notice of Filing of Debtors' Revised Master Service List dated 1/11/16 and Master Service List [Dkt. No. 316].				
57	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 dated 1/19/16 [Dkt. No. 377].				
58	Supplemental Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases dated 1/22/16 [Dkt. No. 391].				
59	Certificate of Service re Dkt. 391 dated 1/26/16 [Dkt. No. 396].				

60	Schlumberger Technology Corporation Treasury Department letter of 9/25/14 to JP MorganChase closing account 323181252.				
61	WesternGeco checking account no. 323181252 statement for June 30, 2012 to July 31, 2012 from JP MorganChase.				
62	Any pleadings, exhibits thereto, or documents filed into the record of this proceeding, whether by the parties hereto or any other person or entity.				
63	Any exhibits listed, designated, offered or used by any other party.				
64	Any exhibits necessary for rebuttal.				

WesternGeco reserves the right to modify, amend or supplement this Witness and Exhibit List at any time prior to the hearing in this matter. WesternGeco further reserves the right to ask the Court to take judicial notice of pleadings, transcripts and/or other documents filed in connection with this Bankruptcy Case, and to offer rebuttal exhibits and demonstrative exhibits as appropriate.

Dated: March 24, 2016.

Respectfully submitted:

/s/ Andrew A. Braun
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via electronic mail on the 24th day of March, 2016, to all parties in interest listed on the ECF service list requesting notice.

/s/ Andrew A. Braun