

**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.,*¹ § **(Chapter 11)**
§
§ **(JOINTLY ADMINISTERED)**
§
DEBTORS. §

**UPSTREAM EXPLORATION LLC'S
WITNESS AND EXHIBIT LIST FOR MARCH 28, 2016 HEARING**

Upstream Exploration LLC files its Witness and Exhibit List for the hearing to be held on March 28, 2016, at 1:30 p.m. (prevailing Central Time) (the "**Hearing**") as follows:

WITNESSES

Upstream Exploration LLC may call the following witnesses at the Hearing, whether in person or by proffer:

1. Mark Wojna, Vice President for Exploration, Upstream Exploration LLC, as a fact witness.
2. Michael Willis, President, Upstream Exploration LLC, as a fact witness.
3. Any witness necessary to authenticate a document.
4. Any witness listed by any other party.
5. Rebuttal witnesses as necessary.
6. Upstream Exploration LLC reserves the right to cross-examine any witness called by any other party.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number were RAAM Global Energy Company [2973], Century Exploration New Orleans, LLC [4948], Century Exploration Houston, LLC [9624], and Century Exploration Resources, LLC [7252].

EXHIBITS

| No. | Description | Mark | Offer | Object | Admit | W/D | Disposition After Trial |
|-----|--|------|-------|--------|-------|-----|-------------------------|
| 1. | [Redacted] Declaration of Mark Wojna in Support of Upstream Exploration LLC's Response [Docket No. 452] | | | | | | |
| 2. | February 16, 2007, Schlumberger Limited Form 10-K | | | | | | |
| 3. | WesternGeco Invoice to Century Exploration New Orleans, dated September 29, 2008 | | | | | | |
| 4. | February 1, 2012, Schlumberger Limited Form 10-K | | | | | | |
| 5. | Email Chain Between David Seay and K. Rachelle Goldman, dated April 22, 2015 - May 11, 2015 [Docket No. 452, Ex. A] | | | | | | |
| 6. | November 6, 2015, Certificate of Service for Notice of Commencement of Cases [Docket No. 89] | | | | | | |
| 7. | Email Chain Between Larry Galloway and Mark Wojna, dated November 30, 2015 - December 2, 2015 [Docket No. 452, Ex. B] | | | | | | |
| 8. | December 3, 2015, Certificate of Service for Notice of Filing of Motion to Approve Disclosure Statement and Notice of Hearing Thereon [Docket No. 187] | | | | | | |
| 9. | December 4, 2015, Notice of Transaction [Docket No. 190] | | | | | | |
| 10. | December 8, 2015, Certificate of Service for Notice of Transaction [Docket No. 212] | | | | | | |
| 11. | Email From Larry Galloway to Mark Wojna, dated December 11, 2015 [Docket No. 452, Ex. C] | | | | | | |
| 12. | [Redacted] Email from Larry Galloway to Michael Willis, dated December 23, 2015 [Docket No. 452, Ex. D] | | | | | | |

| No. | Description | Mark | Offer | Object | Admit | W/D | Disposition After Trial |
|-----|--|------|-------|--------|-------|-----|-------------------------|
| 13. | Attachment (Map) to Email from Larry Galloway to Michael Willis, dated December 23, 2015 [Docket No. 452, Ex. E] | | | | | | |
| 14. | January 6, 2016, Certificate of Service for Notice of Confirmation Hearing and Notice of Administrative and Priority Claims Bar Date [Docket No. 302] | | | | | | |
| 15. | Email from Don DuBose to Mark Wojna, dated January 8, 2016 [Docket No. 452, Ex. H] | | | | | | |
| 16. | Mark Wojna Calendar for January 15, 2016 [Docket No. 452, Ex. F] | | | | | | |
| 17. | Email Chain Between Larry Galloway and Michael Willis, dated January 18, 2016 - February 1, 2016 [Docket No. 452, Ex. G] | | | | | | |
| 18. | January 22, 2016, Supplemental Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 391] | | | | | | |
| 19. | January 26, 2016, Certificate of Service for Supplemental Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 396] | | | | | | |
| 20. | February 2, 2016, Notice of Entry of Confirmation Order and Occurrence of Effective Date Under Second Amended Joint Plan of Liquidating Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 410] | | | | | | |
| 21. | Any exhibit introduced by any other party | | | | | | |
| 22. | Rebuttal exhibits as necessary | | | | | | |
| 23. | Any pleadings or other documents filed in these cases | | | | | | |

Upstream Exploration LLC reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing.

Dated: March 24, 2016

Respectfully Submitted,

/s/ Zack A. Clement

Zack A. Clement (TX Bar No. 04361550)

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Counsel to Upstream Exploration LLC

Certificate of Service

I certify that on March 24, 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.

/s/ Zack A. Clement

Zack A. Clement