

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

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

**MOTION TO EXTEND DEADLINE TO FILE  
OBJECTIONS TO CLAIMS BY SIXTY DAYS**

**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Robert E. Ogle, Trustee of the RAAM Global Energy Company et al Liquidating Trust (the “Trustee”), and files this his Motion to Extend Deadline to File Objections to Claims by Sixty Days (the “Motion to Extend”),<sup>1</sup> and respectfully states as follows:

**JURISDICTION**

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

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<sup>1</sup> Unless defined differently herein, capitalized terms shall have the same use and meaning as in the Confirmation Order and Plan.

**BACKGROUND AND REQUEST FOR RELIEF**

3. On October 26, 2015 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Bankruptcy Court”).

4. On January 19, 2016, the Court entered an order (the “Confirmation Order”) confirming the Debtors’ *Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 376] (as may be amended, supplemented, or otherwise modified from time to time, the “Plan”). The Effective Date of the Plan occurred on February 1, 2016 [Dkt. No. 410].

5. Pursuant to the Plan, a the RAAM Global Energy Company *et al.* Liquidating Trust was created (the “Liquidating Trust”). The Liquidating Trust is governed by the Plan, the Confirmation Order, and the Liquidating Trust Agreement. Pursuant to the Confirmation Order, Douglas J. Brickley was appointed as the initial trustee of the Liquidating Trust. *See* Confirmation Order at ¶ 10, page 24. Mr. Brickley has served as the Liquidating Trustee since February 1, 2016. Effective June 30, 2016, Mr. Brickely was replaced as the Liquidating Trustee by the Trustee. *See* Docket No. 491, Order Appointing Successor Trustee.

6. Pursuant to the Plan and the Confirmation Order, the deadline to file objections to proofs of claim and scheduled claims is August 1, 2016. *See* Docket No. 376, Plan at Section 1.02(30) (“‘Claims Objection Deadline’ means the first Business Day which is at least one hundred eighty (180) days after the Effective Date, or such other date as May be established or extended by the Bankruptcy Court in accordance with Section 7.01( b) of the Plan”). Section

7.01(b) of the Plan allows the Trustee to extend the deadline to file objections upon motion to the Court. *See* Plan at Section 7.01(b).

7. Under the circumstances, given the transition from Mr. Brickley to the Trustee, the Trustee requests another 60 days, until September 29, 2016, to file objections to claims. The requested extension will allow the Trustee to complete the review that was in progress under Mr. Brickley without the looming restriction of the existing deadline. While the transition from Mr. Brickley to the Trustee has been orderly, there has necessarily been some delay in completing tasks. Additionally, the claims objection process is not the only matter occupying the Trustee's attention. There remain ongoing state and federal regulatory requirements relating to the assets that were not sold by Upsteam and remain in the Reorganized Debtors to which the Trustee and his counsel must supervise and attend. These regulatory matters have occupied more time than expected and have delayed the completion of the claims review process. The requested sixty-day extension will allow the Trustee and his counsel to attend to the regulatory issues without being confined by the existing deadline.

8. Based upon the foregoing cause, the Trustee respectfully requests a sixty-day extension to file objections to scheduled and filed claims.

WHEREFORE, PREMISES CONSIDERED, Robert E. Ogle, as Trustee for the Liquidating Trust respectfully requests that the Court approve this Motion, extend the Claims Objection Deadline to September 29, 2016, and grant such other and further relief to which the Liquidating Trust may be justly entitled.

Dated: July 10, 2016

Respectfully Submitted,

KELL C. MERCER, P.C.  
1602 E. Cesar Chavez Street  
Austin, Texas 78702  
(512) 627-3512  
(512) 597-0767 (fax)  
kell.mercer@mercerc-law-pc.com

By: /s/ Kell C. Mercer  
Kell C. Mercer  
Texas State Bar No. 24007668

ATTORNEY FOR ROBERT E. OGLE,  
TRUSTEE OF THE LIQUIDATING TRUST

**CERTIFICATE OF SERVICE**

This will certify that on July 10, 2016, a true and correct copy of the foregoing pleading was forwarded via this Court's CM/ECF notification system to the parties registered for such service. A supplemental certificate of service will be filed upon completion by the Trustee of service to all beneficiaries of the Liquidating Trust via first class United States Mail.

/s/ Kell C. Mercer  
Kell C. Mercer