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

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In re:

RAAM GLOBAL ENERGY COMPANY, *ET AL.*,

Chapter 11

Case No. 15-35615 (MI)

(Jointly Administered)

Debtors.

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE AND SERVICE

Please take notice that the undersigned is counsel for Robert E. Ogle, Trustee of the RAAM Global Energy Company, *et al.*, Liquidating Trust (the "Liquidating Trustee") in certain litigation in the above-captioned, jointly administered cases, and hereby enters its appearance pursuant to Section 1109(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 9010(b) and requests copies of all notices and pleadings in this bankruptcy case pursuant to all applicable rules, including Federal Rules of Bankruptcy Procedure 2002(a), (b), and (f) and 3017(a). All such notices should be addressed as follows:

Timothy A. ("Tad") Davidson II J. Wiley George **ANDREWS KURTH LLP** 600 Travis, Suite 4200 Houston, Texas 77002 Telephone: (713) 220-4200 Facsimile: (713) 220-4285 taddavidson@andrewskurth.com wileygeorge@andrewskurth.com

Please take further notice that, pursuant to 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or

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conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings.

This Notice of Appearance and Request for Notice and Service shall not be deemed or construed to be a waiver of the rights of the Liquidating Trustee (i) to have final orders in noncore matters entered only after *de novo* review by a district judge, (ii) to trial by jury in any proceedings so triable in this case or in any case, controversy or proceeding related to this case, (iii) to have a district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) to contest service of process, or (v) to any other rights, claims, actions, setoffs or recoupments to which the Liquidating Trustee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: July 27, 2016

Respectfully submitted,

ANDREWS KURTH LLP

/s/ Timothy A. ("Tad") Davidson II Timothy A. ("Tad") Davidson II Texas Bar No. 24012503 J. Wiley George Texas Bar No. 07805445 600 Travis, Suite 4200 Houston, Texas 77002 Telephone: (713) 220-4200 Facsimile: (713) 220-4285 taddavidson@andrewskurth.com wileygeorge@andrewskurth.com

Counsel for Robert E. Ogle, Trustee of the RAAM Global Energy Company, et al., Liquidating Trust

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 27, 2016, a true and correct copy of the foregoing document was served via the Court's CM/ECF notification system on the parties registered to receive electronic notices in this case.

By: <u>/s/ Timothy A. ("Tad") Davidson II</u> Timothy A. ("Tad") Davidson II