

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

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

**SECOND AND FINAL MOTION TO EXTEND DEADLINE TO FILE
OBJECTIONS TO CLAIMS UNTIL OCTOBER 31, 2016**

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 Second and Final Motion to Extend Deadline to File Objections to Claims Until October 31, 2016 (the “Motion to Extend”),¹ 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.

¹ 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 Plan, the Confirmation Order, and the Liquidating Trust Agreement govern the Liquidating Trust. 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 served as the Liquidating Trustee from February 1, 2016 until June 30, 2016. Effective June 30, 2016, Mr. Brickley was replaced as the Liquidating Trustee by Robert E. Ogle. *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 was originally set for August 1, 2016. *See* Docket No. 376, Plan at Section 1.02(30). 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). The Trustee

has previously requested and was granted a 60-day extension to September 29, 2016. *See* Docket No. 499.

7. The Trustee requests a second and final extension, until Monday, October 31, 2016, to file objections to claims. The requested extension will allow the Trustee to complete the claims review and objection preparation process that has been underway. The Trustee, his Counsel, and staff at The Claro Group have worked diligently on the claims review and reconciliation process. However, it is not yet complete. At a claims review team meeting held on Friday, September 23, 2016, it was determined that additional time would be necessary to complete the reconciliation process and file claims objections. However, this will be the final requested extension.

8. Based upon the foregoing cause, the Trustee respectfully requests a final extension until October 31, 2016 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 October 31, 2016, and grant such other and further relief to which the Liquidating Trust may be justly entitled.

Dated: September 24, 2016

Respectfully Submitted,

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

CERTIFICATE OF SERVICE

This will certify that on September 24, 2016, a true and correct copy of the foregoing pleading was forwarded via this Courts 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