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

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

TRUSTEE'S OBJECTION TO CLAIM NO. 288
FILED BY KRISTIE TALAMANTEZ

THIS IS AN OBJECTION TO YOUR CLAIM(S). THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW ALL OR A PORTION OF THE CLAIM(S) THAT YOU FILED IN THIS BANKRUPTCY CASE. YOU SHOULD IMMEDIATELY CONTACT THE OBJECTING PARTY TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE OBJECTING PARTY WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM(S) MAY BE DISALLOWED.

THIS MATTER HAS BEEN SET FOR HEARING ON DECEMBER 19, 2016 AT 9:00 A.M. (HOUSTON TIME) BEFORE THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE, 515 RUSK AVENUE, 4TH FLOOR, COURTROOM 404, HOUSTON, TEXAS 77002.

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 Objection to Claim No. 288 Filed by Kristie Talamantez (the "Objection"),[1] and respectfully states as follows:

[1] Unless defined differently herein, capitalized terms shall have the same use and meaning as in the Confirmation Order and Plan.

JURISDICTION

1. The Court has jurisdiction to consider this Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), and (O).

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1.

PARTIES

4. Claimant, Kristie Talamantez ("Claimant") may be served c/o Ezell Law Firm, LLC, 10761 Perkins Road, Ste A, Baton Rouge, LA 70810. Claimant filed Claim No. 288 in these jointly administered bankruptcy cases (the "Claim"). A register of filed claims may be found at Debtors' claims agent website at http://www.bmcgroup.com/restructuring/Claims.aspx?ClientID=372 or by contacting Kell C. Mercer, Kell C. Mercer, P.C., 1602 E. Cesar Chavez Street, Austin, Texas 78702; phone: (512) 627-3512; email: kell.mercer@mercer-law-pc.com.

BACKGROUND AND REQUEST FOR RELIEF

5. 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").

6. 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].

7. Pursuant to the Plan, 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.

8. Pursuant to the Plan and the Confirmation Order, the Liquidating Trustee is provided standing to review claims and to file objections to proofs of claim and scheduled claims. *See* Docket No. 376, Plan at Section 1.02(30). The Liquidating Trustee and his counsel have reviewed the proofs of claim and scheduled claims filed in the Bankruptcy Cases pursuant to a reconciliation process that includes identifying particular categories of Claims that may be targeted for disallowance and expungement, reduction and allowance, reassignment, or reclassification.

9. The Liquidating Trustee has reviewed the Claim and finds it objectionable. There is no supporting documentation attached to the Claim making it impossible to determine which Debtor, if any, the Claim may be against or the legal or factual basis for the Claim. Second, the Claim is filed for $1,000, but there is no basis provided for that calculation. If the obligation was transferred or assigned to Upstream Exploration, LLC, the Debtors and the Liquidating Trust have no liability. Based upon the foregoing, the Liquidating Trustee requests that Claim No. 288 be disallowed and expunged from the Claims Register.

10. This Claim Objection is supported by the attached Declaration of the Liquidating Trustee.

WHEREFORE, PREMISES CONSIDERED, Robert E. Ogle, as Trustee for the Liquidating Trust respectfully requests that the Court sustain its claim Objection as set forth herein, disallow and expunge Claim No. 288, and grant such other and further relief to which the Liquidating Trust may be justly entitled.

Dated: October 31, 2016

Respectfully Submitted,

KELL C. MERCER, P.C.
1602 E. Cesar Chavez Street
Austin, Texas 78702
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(512) 597-0767 (fax)
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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 October 31, 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, and upon:

Kristie Talamantez
c/o Ezell Law Firm, LLC
10761 Perkins Road, Suite A
Baton Rouge, LA 70810

/s/ *Kell C. Mercer*
Kell C. Mercer

SWORN DECLARATION OF ROBERT E. OGLE, LIQUIDATING TRUSTEE

I, Robert E. Ogle, hereby submit this declaration pursuant to 28 U.S.C. § 1746.

I declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct to the best of my knowledge and belief.

1. My name is Robert E. Ogle. I am over the age of 18 years, am competent to make this affidavit and have personal knowledge of the facts stated herein. Each and every statement contained herein is true and correct to the best of my knowledge.

2. I am the Liquidating Trustee of the RAAM Global Energy Company et al. Liquidating Trust. Together with my counsel, Kell C. Mercer, I have supervised the claims review process in these Bankruptcy Cases.

3. I have reviewed the proof(s) of claim subject to the attached Claim Objection, and I have reviewed the Claim Objection. I authorized the filing of an objection to the proof(s) of claim, and to the best of my knowledge and believe, the statements contained therein are true and correct.

4. Accordingly, I request that the Claim Objection be sustained, and the relief requested therein be granted by the Bankruptcy Court.

Robert E. Ogle, Liquidating Trustee