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

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

JOINT MOTION TO HOLD TELEPHONIC STATUS CONFERENCE
ON LIQUIDATING TRUSTEE'S OBJECTION
TO CLAIMS OF LOUISIANA DEPARTMENT OF REVENUE
[Relating to Docket No. 553 and 590]

TO THE HONORABLE MARVIN ISGUR,
CHIEF UNITED STATES BANKRUPTCY JUDGE:

COME NOW Robert E. Ogle, the Liquidating Trustee (the "**Trustee**'), and the Louisiana Department of Revenue (the "**LDR,**" and collectively, the "**Parties**"), and file this Joint Motion to Hold Telephonic Status Conference on Liquidating Trustee's Objection to Claims of Louisiana Department of Revenue (the "Status Conference Motion"), and respectfully state the following:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the Status Conference Motion pursuant to 28 U.S.C. §§ 157 and 1334(b), and the standing order of reference for the Southern District of Texas. This is a core matter pursuant to 28 U.S.C. § 157(b)(2)(A), (B) and (O). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

FACTUAL BACKGROUND

2. An evidentiary hearing to consider the Trustee's Objections to the Proofs of Claim (Claim Nos. 302, 306, 315, and 316) filed by the LDR is scheduled before the Court on Monday, May 15, 2017, at 1:30 p.m. The four (4) Proofs of Claim at issue are in the combined

aggregate amount of $9,239,134.55. This is the last pending contested matter in the Bankruptcy Case. Upon its conclusion, the Trustee expects to file an application for final decree and to close the case.

3. The Trustee and the LDR have worked diligently and cooperatively to understand and resolve their differences. Substantial progress has been made. Most recently, on Friday, April 28, 2017, the Trustee and his counsel met in person with the LDR auditors and counsel in Baton Rouge, Louisiana to discuss all outstanding issues. At the meeting, it became evident that a substantial portion of the dispute between the Parties is subject to resolution by: (1) the submission by the Trustee of additional materials to the LDR auditors (the "**Audit Materials**"); and (2) the completion of an audit based upon such submission. Additionally, as a result of the discussions and information exchanged, the Trustee will be withdrawing his objection to Claim Nos. 315 and 316 – resolving claims in the amount of $10,514.55 and $21.11, respectively.[1] The withdrawal will be accomplished prior to the current setting on May 15, 2017.

4. With respect to Claim Nos. 302 and 306, as a result of the meeting, the Trustee has agreed to submit the Audit Materials as soon as possible. The Audit Materials are currently in the possession of Upstream Exploration, LLC ("**Upstream**"), the purchaser of the Debtor's assets. Upstream is cooperating with the Trustee in compiling the Audit Materials. It is anticipated that the submission will be complete before May 19, 2017. The audit is anticipated to greatly reduce, and potentially eliminate, the dispute between the Trustee and the LDR over Claim Nos. 302 and 306.

[1] The withdrawal of the objections to Claim Nos. 315 and 316 is expressly without prejudice to any and all rights, claims, objections, positions, and/or issues involved with respect to Claim Nos. 302 and 306. The withdrawal of the objections to Claim Nos. 315 and 316 is expressly without prejudice to any right, claim, or position between the Trustee and Upstream.

5. In order to allow the Trustee and the LDR time to complete the submission of Audit Materials and the audit, the parties would like to convert the evidentiary hearing to a telephonic status conference to update the Court and to discuss setting a final hearing date for any remaining issues, if any shall remain, for Claim Nos. 302 and 306.

WHEREFORE, the Trustee and the Louisiana Department of Revenue respectfully request entry of an order converting the hearing on the Trustee's objections on Claim Nos. 302 and 306 to a telephonic status conference, and granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of May 2017, a true and correct copy of this pleading was served, via the Court's CM/ECF notification system to the parties registered to receive such notice.

/s/ Kell C. Mercer
Kell C. Mercer