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.	§	

PLAN TRUSTEE'S
STATUS REPORT REGARDING OBJECTIONS TO CLAIM NOS. 302 & 306
FILED BY THE LOUISIANA DEPARTMENT OF REVENUE
& REQUEST FOR EXTENTION OF DEADLINES
[Relating to Docket No. 553 and 590]

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

COMES NOW Robert E. Ogle, the Liquidating Trustee (the "**Trustee**"), and files this his Status Report Regarding Objections to Claim Nos. 302 and 306 Filed by the Louisiana Department of Revenue & Request for Extension of Deadlines, and respectfully states as follows:

1. The Trustee originally objected to several of the Louisiana Department of Revenue's Claims, including Claim Nos. 145 & 169 (as amended by Claim Nos. 315 & 316), and 302 & 306. Following a meeting and exchange of information, the Trustee withdrew his objection to Claim Nos. 315 & 316 (the "Withdrawn Claim Objections").

2. At a telephonic status conference held by the Court on August 3, 2017, the parties were provided until October 2, 2017, to upload an agreed order, file a 9019, or request an evidentiary hearing (the "Action Deadline").

3. With respect to Claim Nos. 302 and 306, the Trustee has made a written proposal to the Louisiana Department of Revenue ("LDR") which would resolve the remaining disputes. These issues are the last contested matters in the bankruptcy case, and upon resolution it is

anticipated that a final decree will be requested. The proposal made by the Trustee remains under review by the LDR. The review involves multiple levels of consideration within the LDR. The Trustee is advised that consideration of the proposal is making progress, but the review has not yet been completed. Counsel for the LDR has advised the Trustee that an additional 30 days would be sufficient to complete that review and conclude negotiations.

4. The Trustee is mindful of the need to complete this matter and bring this case to a prompt conclusion. However, the Trustee would like to avoid the time and expense upon the Trust's limited resources if a resolution of this matter can be obtained. It appears to the Trustee that a resolution is likely and that the additional requested time will be adequate to bring the negotiations to a conclusion.

5. Based upon the foregoing, the Trustee requests that the Court extend the period to conclude the negotiations until November 3, 2017. If the request is granted, by that date, the Trustee will either: (1) upload an agreed order; (2) file a 9019; or (3) request an evidentiary hearing. The Louisiana Department of Revenue ("LDR") is reviewing the Trustee's proposal.

WHEREFORE, PREMISES CONSIDERED, Robert E. Ogle, as Trustee for the Liquidating Trust respectfully provides this status report, and requests that the Court enter an order extending the Action Deadline by 30 days to November 3, 2017, and grant such other and further relief to which the Trustee may be justly entitled.

Respectfully submitted,

Kell C. Mercer, PC
1602 E. Cesar Chavez Street
Austin, Texas 78702
(512) 627-3512
(512) 597-0767 (fax)
kell.mercer@mercer-law-pc.com

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

COUNSEL FOR THE LIQUIDATING TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of September 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 and was sent by regular United States Mail to:

Florence Bonaccorso-Saenz
Bankruptcy Counsel
617 N. Third St., Office 780
Baton Rouge, LA 70802

/s/ Kell C. Mercer
Kell C. Mercer