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06/21/2018

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § Chapter 11
§
COBALT INTERNATIONAL ENERGY, INC., § Case No. 17-36709 (MI)
et al.,¹ §
§
Reorganized Debtors. § (Jointly Administered)

**ORDER GRANTING PLAN ADMINISTRATOR'S EXPEDITED MOTION FOR
APPROVAL OF (I) OMNIBUS CLAIMS OBJECTION PROCEDURES AND (II) THE
FORM OF NOTICE TO CLAIMANTS OF SUCH OBJECTIONS**

Upon the *Plan Administrator's Expedited Motion for Approval of (I) Omnibus Claims Objection Procedures and (II) the Form of Notice to Claimants of Such Objections* (the "Motion");² and upon consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice need be provided; and the Court having determined that there exists just cause for the relief granted herein; and upon the record of the hearing before the Court, and any responses to the Motion having been withdrawn, resolved, or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is

HEREBY ORDERED that:

1. The Motion is granted as set forth herein.

¹ The Reorganized Debtors in the Chapter 11 Cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Cobalt International Energy, Inc. (1169); Cobalt International Energy GP, LLC (7374); Cobalt International Energy, L.P. (2411); Cobalt GOM LLC (7188); Cobalt GOM # 1 LLC (7262); and Cobalt GOM # 2 LLC (7316). The Reorganized Debtors' service address is: 920 Memorial City Way, Suite 100, Houston, Texas 77024.

² Capitalized but undefined terms herein shall have the same meaning as ascribed to them in the Motion.



2. Notwithstanding anything to the contrary in the Bankruptcy Code and Bankruptcy Rules, and pursuant to Bankruptcy Rule 3007(c) and Bankruptcy Local Rule 3007-1, the Plan Administrator may file Omnibus Objections that include objections to claims on any basis provided for in subparagraphs (a), (b), (c), (d), (f), (g), (h), (l), or (m) of the Objection Grounds set forth in the motion..

3. The Plan Administrator shall file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are hereby approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e) and Bankruptcy Local Rule 3007-1.

4. The form of Objection Notice attached hereto as **Exhibit 2** is hereby approved.

5. The provisions below shall apply to any Omnibus Objection that includes a claim of the United States of America or a claim of any agency of the United States of America (collectively, the "United States"), notwithstanding anything to the contrary contained in this Order or the attached form of Objection Notice:

- (a) The deadline for the United States to respond to any Omnibus Objection will be thirty (30) days after the filing of the Omnibus Objection;
- (b) There is no requirement that a response by the United States to an Omnibus Objection be actually received by the Plan Administrator or his counsel; instead it must be served on the Plan Administrator or his counsel pursuant to the Federal Rules of Bankruptcy Procedure;
- (c) The Court will not hear any Omnibus Objection that includes a claim of the United States before the thirty-fourth (34th) day after such Omnibus Objection is filed, and the Plan Administrator shall not seek to schedule any hearing on any such Omnibus Objection before the thirty-fourth (34th) day after it is filed;
- (d) Pursuant to BLR 3007-1(d), the initial hearing on any Omnibus Objection that includes a claim of the United States will be non-evidentiary and used as a scheduling conference;
- (e) If either the Plan Administrator or the United States believes that

discovery is necessary in connection with an Omnibus Objection to a claim of the United States, either party may seek it pursuant to the Federal Rules of Bankruptcy Procedure and subject to any scheduling order that the Court may enter;

- (f) The United States is not required to attach any documentation or other evidence to a response to an Omnibus Objection; and
- (g) To the extent any of the procedures set forth in this Order or the attached form of Objection Notice concerning the form and timing of any response to an Omnibus Objection by the United States conflict with any Bankruptcy Local Rule or to any Federal Rule of Bankruptcy Procedure, the Bankruptcy Local Rules and Federal Rules of Bankruptcy Procedure shall govern.

6. Nothing in this Order shall affect the Plan Administrator's authority to pay claims to the extent authorized by a separate order of the Court.

7. Nothing in this Order shall obligate the Plan Administrator to settle or pursue a settlement of any particular claim. Settlements of claims may be negotiated and compromised by the Plan Administrator as provided for in the confirmed plan.

8. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order, the Motion, or the Objection Procedures shall be deemed:

- (a) an admission as to the validity of any prepetition claim against a Debtor entity;
- (b) a waiver of any right of the Plan Administrator to dispute any claim on any grounds;
- (c) a promise or requirement to pay any claim;
- (d) an implication or admission that any particular claim is of a type specified or defined in this Motion or any order granting the relief requested by this Motion;
- (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or
- (f) a waiver of any right of the Plan Administrator under the Bankruptcy Code or any other applicable law.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules are satisfied by such notice.

10. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. The Plan Administrator is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: 6-21, 2018



HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Objection Procedures

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: COBALT INTERNATIONAL ENERGY, INC., et al.,¹ Reorganized Debtors.	§ § § § § §	Chapter 11 Case No. 17-36709 (MI) (Jointly Administered)
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PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. **Grounds for Omnibus Objections.** In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), Nader Tavakoli, solely in his capacity as the Lead Member and Chairman of the Plan Administrator Committee of Cobalt International Energy, Inc. et al. (the “Plan Administrator”) appointed under the *Fourth Amended Joint Chapter 11 Plan of Cobalt International Energy, Inc. and Its Debtor Affiliates*, confirmed on April 5, 2018 (the “Plan”),² may file omnibus objections (each, an “Omnibus Objection”) to Claims on the following grounds, in part or in whole:

- a. A Claim is a duplicate of another Claim in that it asserts a single claim against a single debtor or it asserts a claim for the same debt against another debtor (the “Duplicate Claim”);
- b. A Claim has been amended or superseded (the “Amended Claim”);
- c. A Claim has been filed after the Bar Date or the Governmental Bar Date as applicable (the “Late Filed Claim”);
- d. A Claim is based on an equity interest (the “Equity Interest Claim”);

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² Capitalized but undefined terms used herein shall have the meanings given to such terms in the Plan.

- e. OMITTED
- f. A Claim was incorrectly classified (the “Misclassified Claim”);
- g. A Claim has been satisfied or released during the case in accordance with the Bankruptcy Code, applicable Bankruptcy Rules, or a Court Order (the “Satisfied Claim”);
- h. A Claim was filed in the wrong case (the “Wrongly Filed Claim”);
- i. OMITTED.
- j. OMITTED.
- k. OMITTED.
- l. A Claim should be re-classified into Class 7 because the Claim arises out of the purchase or sale of a security of the debtor or affiliate pursuant to section 510(b) of the Bankruptcy Code (the “Section 510(b) Claim”); and
- m. A Claim fails to specify a Debtor against whom the claim is asserted (the “No Debtor Claim”).

2. **Form of Omnibus Objection.** Each Omnibus Objection shall conform to the following requirements:

- a. Each Omnibus Objection shall be numbered sequentially and, to the extent possible, state the category which forms the primary basis for the objection in its title;
- b. An exhibit listing Claims to which the Omnibus Objection relates shall be attached to the Omnibus Objection;
- c. Each exhibit shall contain only those Claims to which there is one common basis for objection;
- d. A Claim for which there are two or more bases for objection shall be referenced on each applicable exhibit attached to each applicable Omnibus Objection; and

e. Each exhibit shall have the Claims listed alphabetically.

3. **Number of Claims in Omnibus Objections.** No Omnibus Objection may include more than 100 claims.

4. **Supporting Documentation.** To the extent appropriate, Omnibus Objections may include an affidavit or declaration that provides a factual basis for the Plan Administrator's objection to the claims, including from someone with personal knowledge of the Debtors' books and records and the manner in which they are maintained that states that the affiant or the declarant has reviewed the claims included therein and applicable supporting information and documentation provided therewith, made reasonable efforts to research the claim on the Debtors' books and records, and determined that the books and records do not reflect the debt or the amount of debt that is alleged in the claim. The evidentiary weight given to such an affidavit is not governed by these procedures.

5. **Claims Exhibits.** An exhibit listing the claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the claims to which there is a common basis for the objection. Claims for which there is more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information alphabetized by claimant:

- a. the claims that are the subject of the Omnibus Objection and, if applicable, the proof of claim number related thereto from the claims register;
- b. the asserted amount of the claim;
- c. the grounds for the objection;
- d. a cross-reference to the section of the Omnibus Objection discussing such claim; and
- e. other information, as applicable, including: (i) the proposed classification of claims the Plan Administrator seeks to reclassify; (ii) the reduced claim amounts of claims the Plan Administrator seeks to reduce; or (iii) the

surviving claims of claimants affected by the Omnibus Objection.

6. **Objection Notice**. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the “Objection Notice”), tailored, as appropriate, to address a particular creditor, claim, or objection, which will:

- a. describe the basic nature of the objection;
- b. inform creditors that their rights may be affected by the objection;
- c. describe the procedures for filing a written response (each, a “Response”)
- d. to the objection, including all relevant dates and deadlines related thereto;
- e. identify the hearing date, if applicable, and related information; and
- f. describe how copies of proofs of claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

7. **Notice and Service**. Each Omnibus Objection will be filed with the Court. In addition, each Omnibus Objection shall be served by United States First Class Mail, postage prepaid, on all claimants holding claims that are the subject of the Omnibus Objection.

8. **Omnibus Claims Objection Hearings**. Each Omnibus Objection shall be set for hearing no less than 30 days after service of the Omnibus Objection (each, a “Hearing”), unless otherwise ordered by the Court. For claims subject to an Omnibus Objection and with respect to which *either* no Response is filed in accordance with the proposed response procedures and no appearance is made at the Hearing *or* a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the Hearing, the Plan Administrator

may request at the Hearing that the Court enter an order granting the Omnibus Objection with respect to such claim and without further notice to the claimant or any other party. Contested claims for which a Response is filed in accordance with the proposed response procedures but such Response is not resolved prior to the Hearing *and* an appearance is made at the Hearing may be heard at the Hearing or adjourned to a subsequent hearing date as determined by the Court. If a subsequent hearing is determined to be necessary, the Plan Administrator shall file with the Court and serve on the affected claimants a notice of the hearing.

9. **Contested Matter.** Each claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such claim. The Plan Administrator may, but only to the extent authorized in the confirmed Plan, settle the priority, amount, and validity of such contested claims without any further notice to or action, order, or approval of the Court.

Responses to Omnibus Objections

10. **Parties Required to File a Response.** Any party who disagrees with an objection is required to file a Response in accordance with the procedures set forth herein. If a claimant whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below or fails to appear at the Hearing, the Court may grant the objection with respect to such claim without further notice to the claimant.

11. **Response Contents.** Each Response must contain the following (at a minimum):

- a. The case number and the title of the Omnibus Objection to which the Response relates;
- b. The name of the Claimant and a description of the basis for the amount of the Claim;
- c. A concise statement setting forth the reasons why the Claim should not be disallowed for the reasons set forth in the Omnibus Objection;
- d. A copy of other documentation or other evidence of the Claim, to the extent not included with the Proof of Claim, upon which the Claimant will rely in opposing the Omnibus Objection at the hearing on such Omnibus Objection; and
- e. The name(s), address(es), telephone number and facsimile number of the person(s) (who may be the Claimant and/or the Claimant's legal representative) to whom counsel for the Plan Administrator should serve any reply to the Response, and who possess the authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the Claimant's behalf.

12. **Filing and Service of the Response.** A Response will be deemed timely only if it is filed with the Court *and actually received by the Clerk* by 4:00 p.m. (prevailing Central Time) on the day that is twenty-one (21) calendar days from the date of service of the Omnibus Objection (the "Response Deadline"), unless as otherwise ordered by the Court.

13. **Discovery.** If the Plan Administrator or the claimant determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda letter for the hearing, or may be provided by separate notice.

14. **Failure to Respond.** A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Plan Administrator resolving the objection to a claim (as**

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described in the Objection Notice), failure to timely file and serve a Response as set forth
herein or to appear at the Hearing may result in the Court granting the Omnibus
Objection without further notice or hearing. Upon entry of an order sustaining an Omnibus
Objection, affected creditors will be served with such order.

Miscellaneous

15. **Additional Information.** Copies of these procedures, the Motion, the Order, or
any other pleadings (the "Pleadings") filed in these Chapter 11 Cases are available at no cost at
the claims administrator's website: <http://www.kccllc.net/cobalt>. You may also obtain copies of
any of the Pleadings filed in these Chapter 11 Cases for a fee at the Court's website at
<http://www.txs.uscourts.gov/bankruptcy>. A login identification and password to the Court's
Public Access to Court Electronic Records ("PACER") are required to access this information
and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>.

16. **Reservation of Rights.** NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A WAIVER OF ANY RIGHT OF THE PLAN ADMINISTRATOR TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (F) A WAIVER OF ANY RIGHT OF THE PLAN ADMINISTRATOR OR UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

EXHIBIT 2

Form of Objection Notice

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § Chapter 11
§
COBALT INTERNATIONAL ENERGY, *et al.*,⁶ § Case No. 17-36709 (MI)
§
Reorganized Debtors. § (Jointly Administered)

NOTICE OF PLAN ADMINISTRATOR'S OMNIBUS CLAIMS OBJECTION

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM 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 21 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 21 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

A HEARING HAS BEEN SET ON THIS MATTER ON [DATE] AT [TIME] IN COURTROOM 404, 515 RUSK, HOUSTON, TEXAS 77002.

Important Information Regarding the Objection

Grounds for the Objection. By the Objection, the Plan Administrator is seeking to [disallow/expunge/reclassify/reduce/ subordinate] your claim(s) listed in the table below on the grounds that your claim(s) [is/are] [_____]. The claim(s) subject to the Objection may also be found on the schedules attached to the Objection, a copy of which has been provided with this notice.

Objection Procedures. On [____], 2018, the United States Bankruptcy Court for the Southern District of Texas (the "Court") entered an order [Docket No. ____] approving procedures for filing and resolving objections to claims asserted against the Debtors in these Chapter 11 Cases (the "Objection Procedures"). A copy of the Objection Procedures is included with this

⁶ The Reorganized Debtors in the Chapter 11 Cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Cobalt International Energy, Inc. (1169); Cobalt International Energy GP, LLC (7374); Cobalt International Energy, L.P. (2411); Cobalt GOM LLC (7188); Cobalt GOM # 1 LLC (7262); and Cobalt GOM # 2 LLC (7316). The Reorganized Debtors' service address is: 920 Memorial City Way, Suite 100, Houston, Texas 77024.

notice. Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.

Resolving the Objection

Parties Required to File a Response. If you disagree with the Objection filed with respect to your claim, you must file a response (each, a “Response”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

Response Contents. Each Response must contain the following (at a minimum):

- a. The case number and the title of the Omnibus Objection to which the Response relates;
- b. The name of the Claimant and a description of the basis for the amount of the Claim;
- c. A concise statement setting forth the reasons why the Claim should not be disallowed for the reasons set forth in the Omnibus Objection;
- d. A copy of other documentation or other evidence of the Claim, to the extent not included with the Proof of Claim, upon which the Claimant will rely in opposing the Omnibus Objection at the hearing on such Omnibus Objection; and
- e. The name(s), address(es), telephone number and facsimile number of the person(s) (who may be the Claimant and/or the Claimant’s legal representative) to whom counsel for the Plan Administrator should serve any reply to the Response, and who possess the authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the Claimant’s behalf.

Notice and Service. Your Response must be filed with the Court so as to be *actually received by the Clerk* by 4:00 p.m. (prevailing Central Time) on [], 2018 (the “Response Deadline”)

Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent an agreement with the Plan Administrator resolving the Objection to a claim, failure to timely file and serve a Response as set forth herein and appear at the Hearing may result in the Court granting the Objection without further notice or hearing.** Upon entry of an order, affected creditors will be served with a notice of entry, and a copy, of the order.

Hearing on the Objection

Date, Time, and Location. A hearing (the "Hearing") on the Objection will be held on ☐, at ☐ prevailing Central Time, before the Honorable Marvin Isgur, United States Bankruptcy Judge, in Courtroom 404, 515 Rusk, Houston, Texas 77002. The Hearing may be adjourned to a subsequent date in these Chapter 11 Cases as determined by the Court. **You should attend the Hearing if you disagree with the Objection and have filed a Response.** Contested claims for which (a) a Response is filed in accordance with the proposed response procedures but such Response is not resolved prior to the Hearing and (b) an appearance is made at the Hearing may be heard at the Hearing or adjourned to a subsequent hearing as determined by the Court.

Discovery. If the Plan Administrator or a claimant determines that discovery is necessary in advance of a hearing on an Objection, the party seeking discovery will serve notice of the discovery and the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation.

Additional Information

Questions or Information. Copies of these procedures, the Motion, the Order, or any other pleadings (the "Pleadings") filed in these Chapter 11 Cases are available at no cost at the claims administrator's website: <http://www.kccllc.net/cobalt>. You may also obtain copies of any of the Pleadings filed in these Chapter 11 Cases for a fee at the Court's website at <http://www.txs.uscourts.gov/bankruptcy>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. **Please do not contact the Court to discuss the merits of any claim or any Objection filed with respect thereto.**

Reservation of Rights

NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A

WAIVER OF ANY RIGHT OF THE PLAN ADMINSTRATOR TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (F) A WAIVER OF ANY RIGHT OF THE PLAN ADMINSTRATOR UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

Dated: _____, 2018.

GREENBERG TRAURIG, LLP

By: _____

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***Counsel for Nader Tavakoli, solely in his capacity
as the Lead Member and Chairman of the Plan
Administrator Committee of Cobalt International
Energy, Inc. et al.***

Date Filed	Court Claim No.	KCC Claim No.	Debtor	Asserted Claim Amount ⁷	Basis for Objection	Proposed Treatment	Surviving Claim No.

⁷ Asserted claim amounts listed as \$0.00 reflect that the claim amount asserted is unliquidated.