

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

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

**STIPULATION AND AGREED ORDER EXTENDING CLAIM OBJECTION
DEADLINE FOR PROOF OF CLAIM NO. 93 FILED BY RLI INSURANCE
COMPANY**

This stipulation and agreed order (the “Stipulation and Agreed Order”) is made by and between Nader Tavakoli, solely in his capacity as the Lead Member and Chairman of the Plan Administrator Committee of Cobalt International, Inc., *et al.* (“Plan Administrator”) and RLI Insurance Company (“RLI”) (collectively, the “Parties”).

WHEREAS, on March 15, 2018, RLI filed *Proof of Claim No. 93* against Cobalt LP, asserting a general unsecured claim in an unliquidated amount (the “Claim”);

WHEREAS, on November 6, 2018, the Parties entered into a Stipulation (D.I. 1185) (the “Stipulation”), wherein (i) RLI amended the Claim to assert a liquidated, general unsecured claim against Cobalt International Energy, L.P. in the amount of \$1,100,000, and (ii) the Plan Administrator expressly reserved all rights to object to the Claim on any grounds whatsoever,

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: 945 Bunker Hill Road, Suite 625, Houston, TX 77024.

including without limitation, to assert any substantive or procedural objections he may have with respect to the Claim;

WHEREAS, on April 5, 2018, the Court entered the *Order (I) Confirming the Fourth Amended Joint Chapter 11 Plan of Cobalt International, Inc. and its Debtor Affiliates and (II) Approving the Sale Transactions* (the “Confirmation Order”) (D.I. 784). The Plan was effective on April 10, 2018 (the “Effective Date”);

WHEREAS, among other things, the Plan provides that “[a]ny objections to Claims or Interests shall be Filed on or before the Claims Objection Deadline, as such date may be extended pursuant to the Plan.” Plan Art. VII.E. The Claims Objection Deadline is defined in the Plan as “the later of (a) 365 days after the Effective Date and (b) such other period as may be specifically fixed by an order of the Bankruptcy Court for objecting to such Claims, as the same may be modified or extended from time to time by the Bankruptcy Court or on motion of a party in interest approved by the Bankruptcy Court.” *Id.* at Art. I.A;

WHEREAS, the Claims Objection Deadline was subsequently extended by Court order through and including June 10, 2019 (D.I. 1272); and

WHEREAS, as a result of discussions between the Parties concerning the Claim, and in an effort to avoid unnecessary time and expense associated with litigating the Claim while the Plan Administrator attempts to work with the Bureau of Ocean Energy Management (“BOEM”) to obtain BOEM’s release of the bond for which RLI is the surety, the Parties have reached an agreement, as set forth herein.

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation and Agreed Order, the Parties hereby stipulate and agree as follows:

1. The Claims Objection Deadline shall be extended through and including October 31, 2019 solely with respect to the Claim (the “Extended Deadline”).

2. The Plan Administrator’s right to assert all substantive or procedural objections he may have to the Claim is reserved and preserved through and including the Extended Deadline.

3. This Stipulation shall be without prejudice to any further extension agreements and/or similar stipulations among the Parties.

IT IS SO ORDERED.

Dated: _____

HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO BY:

RLI INSURANCE COMPANY

By: /s/ Geoffrey King

Geoffrey King

Director of Underwriting

2925 Richmond Avenue, Suite 1600

Houston, Texas 77098

Telephone 713-874-8823

Geoff.King@rlicorp.com

Pro Se

By: /s/ David R. Eastlake

Shari L. Heyen

Texas State Bar No. 09564750

HeyenS@gtlaw.com

David R. Eastlake

Texas State Bar No. 24074165

EastlakeD@gtlaw.com

GREENBERG TRAURIG, LLP

1000 Louisiana, Suite 1700

Houston, Texas 77002

Telephone: 713-374-3500

Facsimile: 713-374-3505

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.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 7, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of the United States Bankruptcy Court for the Southern District of Texas, and was served upon the parties eligible to receive notice through the Court's ECF facilities by electronic mail.

/s/ David R. Eastlake

David R. Eastlake