

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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In re	:	Chapter 11
	:	
SWIFT ENERGY COMPANY, <i>et al.</i> , <sup>1</sup>	:	Case No. 15-12670 (MFW)
	:	
Debtors.	:	(Jointly Administered)
	:	Re: Docket No. 490

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**NOTICE OF FILING RETAINED CAUSES OF ACTION  
EXHIBIT TO THE SECOND AMENDED JOINT PLAN OF  
REORGANIZATION OF THE DEBTORS AND DEBTORS IN POSSESSION**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On March 28, 2016, the Debtors filed the Second Amended Joint Plan of Reorganization of the Debtors and Debtors in Possession (as amended, supplemented and modified, the "Plan") [D.I. 490], which includes, among other modifications, the new defined term "Retained Causes of Action." (See Plan § I.A.113.) Retained Causes of Action means "the causes of action set forth in Exhibit I.A.113." to the Plan. (Id.)

2. Exhibit I.A.1113. to the Plan is attached hereto as Exhibit A.

3. The Debtors reserve the right to modify, amend, supplement, restate or withdraw any of the exhibits to the Plan as necessary or appropriate. Copies of the Plan, the related disclosure statement and the other exhibits to the Plan can be obtained and/or viewed, free of charge, by visiting the Debtors' restructuring website at [www.kccllc.net/swiftenergy](http://www.kccllc.net/swiftenergy).

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<sup>1</sup> The Debtors are the following nine entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Swift Energy Company (0661); Swift Energy International, Inc. (6721); Swift Energy Group, Inc. (8150); Swift Energy USA, Inc. (8212); Swift Energy Alaska, Inc. (6493); Swift Energy Operating, LLC (2961); GASRS LLC (4381); SWENCO-Western, LLC (0449); and Swift Energy Exploration Services, Inc. (2199). The address of each of the Debtors is 17001 Northchase Drive, Suite 100, Houston, Texas 77060.



4. As previously noticed, a hearing to consider confirmation of the Plan will be held before The Honorable Mary F. Walrath, United States Bankruptcy Judge, in Courtroom No. 4, 5th Floor, at the Bankruptcy Court, 824 N. Market Street, Wilmington, Delaware 19801, **on March 30, 2016, at 10:30 a.m. (prevailing Eastern Time).**

Dated: March 29, 2016  
Wilmington, Delaware

Respectfully submitted,

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ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**EXHIBIT A**

**EXHIBIT I.A.113**

**SCHEDULE OF RETAINED CAUSES OF ACTION**

This following schedule represents the most current list of causes of action to be retained in connection with the Plan (defined in the Plan as the "Retained Causes of Action"). The Debtors expressly reserve the right to alter, modify, amend, remove, augment, or supplement this schedule at any time in accordance with the Plan.

As set forth in Section IV.J of the Plan, in accordance with section 1123(b) of the Bankruptcy Code, and to the fullest extent possible under applicable law, the Reorganized Debtors shall retain and may enforce, and shall have the sole right to enforce, any claims, demands, rights and causes of action that any Debtor or Estate may hold against any Entity, including the Retained Causes of Action, whether arising before or after the applicable Petition Date. The Reorganized Debtors or their successors may pursue such retained claims, demands, rights or causes of action, as appropriate, in accordance with the best interests of the Reorganized Debtors or their successors holding such claims, demands, rights or causes of action. Further, the Reorganized Debtors retain their right to File and pursue, and shall have the sole right to File and pursue, any adversary proceedings against any trade creditor or vendor related to debit balances or deposits owed to any Debtor, as well as any Retained Cause of Action.

No Entity may rely on the absence of a specific reference in the Plan, the Plan Exhibits, or the Disclosure Statement to any Retained Cause of Action against them as any indication that the Debtors or the Reorganized Debtors, as applicable, shall not pursue any and all available Retained Causes of Action against them.

The Debtors or the Reorganized Debtors, as applicable, expressly reserve all rights to prosecute any and all Retained Causes of Action against any Entity, except as otherwise expressly provided in the Plan. The Reorganized Debtors expressly reserve all Retained Causes of Action for later adjudication, and, therefore, no preclusion doctrine, including the doctrines of res judicata, collateral estoppel, issue preclusion, claim preclusion, estoppel (judicial, equitable, or otherwise), or laches, shall apply to such Retained Causes of Action upon, after, or as a consequence of the Confirmation or the occurrence of the Effective Date. In accordance with section 1123(b)(3) of the Bankruptcy Code, any Retained Causes of Action that any Debtor may hold against any Entity shall vest in Reorganized Swift.

Debtor Party to Litigation	Non-Debtor Parties to Litigation	Case Number	Jurisdiction	Type of Action
Swift Energy Operating, LLC	A&B Valve (Billy Price Litigation)	N/A	N/A	Indemnity to Personal Injury
Swift Energy Operating, LLC	Anadarko E&P Onshore LLC (Successor in interest to Andarko E&P Company LP)	N/A	N/A	Pipeline Indemnity Dispute
Swift Energy Operating, LLC	BHP Billiton Petroleum Properties (N.A.), LP South Texas Shale, LLC	M-15-0057-CV-A	36th JDC, McMullen County, Texas	Contract Dispute
Swift Energy Company	Hunt Petroleum Corporation and Rosewood Resources, Inc.	34-592	24th JDS for the Parish of Plaquemines, State of Louisiana, Division "B"	Concursus Proceeding
Swift Energy Operating, LLC	Knolle Operating Company, Ltd. (Plaintiff), Burlington Resources Oil & Gas Company LP, Omar Alderman, Jr., Rhonda Gail Hartman, Doris Lee Felps	14-12-0026-CVL	218th JDC, La Salle County, Texas	Contract Litigation
Swift Energy Operating, LLC	Leo O. Quintanilla, Hector Quintanilla, Paloma Cattle Company, Ltd., LHQ Management, LLC, Escondido Hunting, Inc., John B. Dickinson, R. Ross Dickinson, Doris A. Dickinson, Jeffrey L. Dickinson, Jill E. Radar, Regency Field Services, LLC, Regency Energy Partners, LP, Regency GP LP, Regency GP LLC	M-14-0029-CV-C	343rd JDC, McMullen County, Texas	Environmental
Swift Energy Company	Nancy Mancil, et al	216318	9th JDC, Parish of Rapides, State of Louisiana, Division "E"	Concursus Proceeding
Swift Energy Operating, LLC	Petty Business Enterprises, LP, Peacock Oil and Gas Properties, Ltd., Susan P. Arnim, et vir. Thomas V. Arnim, Scott James Petty, Scott Petty, Jr. et ux, Eleanor O. Petty, Todd L. Blackwell, Trustee of the Petty 2007 Grandchildren's Trust, PGE Mineral Properties, LLC, Joan L. Petty, Eleanor O. Petty, individually, Ezra Alderman Ranches, Inc., Bacon Tomsons, Ltd., Joe Amberson, Jr., B.H.C.H. Mineral, Ltd., Corazon Minerals, L.P., Appling Minerals, Ltd., Jett Black Ventures, LP, Trinity Mineral Management, Ltd., MSC Minerals, Ltd., Mark R. Paulson, Chilton Minerals, Ltd.	15-06-00095-CVL	81st/218th JDC, La Salle County, Texas	Interpleader
Swift Energy Operating, LLC	Plaquemines Parish Government and Geessler Saul, In Her Capacity as Sales Tax Collector For Plaquemines parish Government, Sales Tax Division	L00154	Board of Tax Appeals, Local Tax Division	Sales Tax Appeal
Swift Energy Operating, LLC	Plaquemines Parish Government and Geessler Saul, In Her Capacity as Sales Tax Collector For Plaquemines parish Government, Sales Tax Division	L00238	Board of Tax Appeals, Local Tax Division	Sales Tax Appeal
Swift Energy Operating, LLC	State of Louisiana	N/A	N/A	Royalty Refund
Swift Energy Company	The Wood Group (Joe Garza Litigation)	15-12-00198-CVL	218th District Court of LaSalle County, Texas	Indemnity to Personal Injury
Swift Energy Operating, LLC	UV Logistics, LLC d/b/a United Vision Logistics (Philip J. Benoit Litigation)	60-267	25th JDC, Parish of Plaquemines, State of Louisiana, Division "A"	Indemnity to Personal Injury
Swift Energy Operating, LLC	Weatherford International (Glynn Mitchell Sens Litigation)	14-01-52931-cv	79th JDC, Jim Wells County, Texas	Indemnity to Personal Injury
Swift Energy Operating, LLC	William Brents Lee, Gloria Casey, Shelton Casey, Peyton Casey	N/A	N/A	Frisco City, Alabama, Property Damage Dispute
Swift Energy Operating, LLC	Wood Group PSN (Robert Dahl Litigation)	N/A	N/A	Indemnity to Personal Injury