

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

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In re:		) Chapter 11
		)
COBALT INTERNATIONAL ENERGY, INC., <i>et al.</i> ,		) Case No. 17-36709 (MI)
		)
Debtors,		) (Jointly Administered)
		)
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COBALT INTERNATIONAL ENERGY, INC., <i>et al.</i> ,		) Adv. Pro. No. 17-03457 (MI)
		)
Plaintiffs,		)
		)
v.		)
		)
GAMCO GLOBAL GOLD, NATURAL RESOURCES		)
& INCOME TRUST, GAMCO NATURAL		)
RESOURCES, GOLD & INCOME TRUST, ST. LUCIE		)
COUNTY FIRE DISTRICT FIREFIGHTERS’		)
PENSION TRUST FUND, FIRE AND POLICE		)
RETIREE HEALTH CARE FUND, SAN ANTONIO,		)
SJUNDE AP-FONDEN, and UNIVERSAL		)
INVESTMENT GESELLSCHAFT M.B.H.,		)
		)
Defendants.		)
		)
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**SECURITIES PLAINTIFFS’ WITNESS AND EXHIBIT  
LIST FOR JANUARY 4, 2018 HEARING**

The plaintiffs and court-appointed class representatives (the “Securities Plaintiffs”)<sup>1</sup> for the certified class of investors they represent in the federal securities action entitled *In re Cobalt International Energy, Inc. Securities Action*, No. 4:14-cv-3428 (S.D. Tex.) (the “Securities Action”), pending in the United States District Court, Southern District of Texas, as defendants in the above-captioned adversary proceeding (the “Adversary Proceeding”), respectfully submit

<sup>1</sup> The Securities Plaintiffs are GAMCO Global Gold, Natural Resources & Income Trust, GAMCO Natural Resources, Gold & Income Trust, St. Lucie County Fire District Firefighters’ Pension Trust Fund, Fire and Police Retiree Health Care Fund, San Antonio, Sjunde AP-Fonden and Universal Investment Gesellschaft m.b.H.



their witness and exhibit list for the hearing set for January 4, 2018 at 9:00 a.m. (Central Time) (the “Hearing”), as follows:

**WITNESS LIST**

1. Any persons listed or called by any other party,
2. Any impeachment witness, and
3. Any rebuttal witness.

**EXHIBITS**

The Securities Plaintiffs may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
SP-1	<i>Declaration of Andrew J. Entwistle in Support of Securities Plaintiffs’ Opposition to the Debtors’ Motion to Stay or Enjoin Prosecution of the Pending Securities Action Against Non-Debtor Defendants (the “<u>Entwistle Declaration</u>”) (Adv. Pro. ECF No. 44-2)</i>				
SP-2	<i>Memorandum and Order denying certain motions to dismiss (Securities Action ECF No. 243, Ex. A to Entwistle Declaration)</i>				
SP-3	<i>Memorandum and Order denying motions for reconsideration of class certification and for stay of discovery (Securities Action ECF No. 273, Ex. B to Entwistle Declaration)</i>				
SP-4	<i>Notice of Request of Voluntary Dismissal of Defendant Cobalt International Energy, Inc. (Securities Action ECF No. 306, Ex. C to Entwistle Declaration)</i>				
SP-5	Bloomberg Law – Press Release re: December 19, 2017 announcement of settlement (Ex. D to Entwistle Declaration)				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
SP-6	Bloomberg pricing information re: debtors' bonds (Ex. E to Entwistle Declaration)				
SP-7	Excerpts from transcript of deposition of Kenneth W. Moore on November 29, 2017 (Ex. F to Entwistle Declaration)				
SP-8	Excerpts from transcript of deposition of William Utt on November 17, 2017 (Ex. G to Entwistle Declaration)				
SP-9	Excerpts from transcript of March 7, 2006 hearing in <i>In re Northwest Airlines Corp.</i> , Case No. 05-17930 (Bankr. S.D.N.Y.) (Ex. H to Entwistle Declaration)				
SP-10	<i>Memorandum and Order</i> dated January 19, 2016 re: motions to dismiss (Securities Action ECF No. 108)				
SP-11	<i>Second Consolidated Amended Class Action Complaint for Violations of the Federal Securities Laws</i> (Securities Action ECF No. 200)				
SP-12	<i>Memorandum and Order</i> dated June 15, 2017 re: class certification and appointment of class representatives and class counsel (Securities Action ECF No. 244)				
SP-13	Order denying motion for stay of Securities Action in <i>St. Lucie County Fire District Firefighters' Pension Trust Fund v. Bryant</i> , Case No. 17-20503, ECF No. 514157899 (5th Cir. Sep. 15, 2017)				
SP-14	<i>Cobalt's Fourth Amended Petition in Cobalt International Energy, Inc., et al. v. Illinois National Insurance Company and Axis National Insurance Company</i> , Case No. 17-01450, ECF No. 44 (S.D. Tex. Nov. 1, 2017)				

The Securities Plaintiffs reserve the right to (a) amend or supplement the foregoing lists of witnesses and exhibits at any time prior to the Hearing; (b) use additional exhibits for purposes of rebuttal or impeachment, whether or not designated herein, and to further supplement the foregoing lists of witnesses and exhibits as necessary in connection therewith; (c)

rely upon and use as evidence (i) additional documents produced by any party, (ii) exhibits included on the exhibit lists of any other party, and (iii) any pleading, hearing transcript, order, or other document filed with or by the Court in the above-captioned chapter 11 bankruptcy cases (the “Chapter 11 Cases”) or the Adversary Proceeding; and/or (d) request that the Court take judicial notice of any pleadings, hearing transcripts, orders, or other documents filed in the Chapter 11 Cases, the Adversary Proceeding, the Securities Action, and/or the insurance coverage action styled as *Cobalt Int’l Energy, Inc. v. Illinois Nat’l Ins. Co.*, No. 4:17-cv-01450 (S.D. Tex.).

Dated: January 2, 2018

/s/ Thomas R. Ajamie  
Thomas R. Ajamie (Texas Bar No. 00952400)  
**AJAMIE LLP**  
Pennzoil Place - South Tower  
711 Louisiana, Suite 2150  
Houston, TX 77002  
Telephone: (713) 860-1600  
Facsimile: (713) 860-1699

Andrew J. Entwistle (Texas Bar No. 24038131)  
Jonathan H. Beemer (admitted *pro hac vice*)  
**ENTWISTLE & CAPPUCCI LLP**  
299 Park Avenue, 20th Floor  
New York, NY 10171  
Telephone: (212)894-7200  
Facsimile: (212)894-7272

David R. Stickney (admitted *pro hac vice*)  
Jonathan D. Uslander (admitted *pro hac vice*)  
**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
12481 High Bluff Drive, Suite 300  
San Diego, CA 92030-3582  
Telephone: (858) 793-0070  
Facsimile: (858) 793-0323

Michael S. Etkin (admitted *pro hac vice*)  
Andrew Behlmann (admitted *pro hac vice*)

**LOWENSTEIN SANDLER LLP**

One Lowenstein Drive

Roseland, NJ07068

Telephone: (973) 597-2500

Facsimile: (973) 597-2400

*Counsel for the Securities Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on January 2, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Thomas R. Ajamie*  
Thomas R. Ajamie