

**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’ AMENDED AND
SUPPLEMENTAL NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE that the undersigned counsel hereby (a) appear in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession (the “Debtors”) for and on behalf of the plaintiffs and court-appointed class representatives (the “Securities Plaintiffs”)¹ for the certified class of investors (the “Certified Class”) in the federal securities action entitled *In re Cobalt International Energy, Inc. Securities Action*, No. 4:14-cv-3428 (S.D.

¹ 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.



Tex.) (the “Securities Action”), pending in the United States District Court, Southern District of Texas (the “District Court”), and (b) amend that certain notice of appearance and request for service of notices and pleadings (the “Initial NOA”) filed in the above-captioned adversary proceeding (the “Adversary Proceeding”) on December 21, 2017 (Adv. Pro. No. 17-03457, ECF No. 41).

PLEASE TAKE FURTHER NOTICE that the undersigned counsel hereby request service of any and all notices given or required to be given in the Chapter 11 Cases, and all papers served or required to be served in the Chapter 11 Cases, including the Adversary Proceeding and all other adversary proceedings and other related cases and proceedings (collectively, “Related Proceedings”), and request that the name and address of the undersigned counsel be added to all mailing matrices and service lists maintained in the Chapter 11 Cases.

Service may be made and directed as follows:

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PLEASE TAKE FURTHER NOTICE that the within request for service includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (wherever applicable), and the United States Bankruptcy Code, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, email, or electronic filing or otherwise filed or made with regard to the Chapter 11 Cases or any Related Proceedings, and for the purposes of CM/ECF.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by or on behalf of the Securities Plaintiffs and/or the Certified Class do not, shall not, and shall not be deemed to

- constitute a submission by the Securities Plaintiffs, either individually or on behalf of the Certified Class or anyone else, to the jurisdiction of the Bankruptcy Court;
- constitute consent by the Securities Plaintiffs, either individually or on behalf of the Certified Class or anyone else, to entry by the Bankruptcy Court of any final order or judgment in any non-core proceeding or on any matter with respect to which the Bankruptcy Court lacks jurisdiction and/or authority (constitutional, statutory, or otherwise) to enter a final order or judgment, **which consent is hereby withheld unless, and solely to the extent, expressly granted in the future with respect to a specific matter;**
- waive any substantive or procedural rights of the Securities Plaintiffs, the Certified Class, or anyone else, including but not limited to (a) the right to

challenge the authority (constitutional, statutory, or otherwise) of the Bankruptcy Court to enter a final order or judgment on any matter; (b) the right to have final orders in non-core matters entered only after de novo review by a district court judge; (c) the right to trial by jury in any proceedings so triable herein, in the Securities Action, or in any other case, controversy, or proceeding related to or arising from the Debtors, the Chapter 11 Cases, any Related Proceedings, or the Securities Action or the subject matter thereof; (d) the right to have the reference withdrawn by a United States District Court in any matter subject to mandatory or discretionary withdrawal; or (e) all other rights, claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which the Securities Plaintiffs and/or the Certified Class or any member thereof are or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, arguments, counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under any applicable law, rule, regulation, or order.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance supersedes the Initial NOA in all respects.

[*signature page follows*]

Dated: February 7, 2018

/s/ Thomas R. Ajamie

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*Counsel for Securities Plaintiffs
and the Certified Class*

CERTIFICATE OF SERVICE

I certify that on February 7, 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