



ENTERED
11/12/2019

**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 FURTHER 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.* (the “Plan Administrator”), on the one hand, and RLI Insurance Company (“RLI”), on the other hand (collectively, the “Parties”).

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

WHEREAS, on November 6, 2018, the Parties entered into the *Stipulation and Agreed Order Regard Proof of Claim No. 93 Filed by RLI Insurance Company* (D.I. 1185), wherein (i) RLI amended the Claim to assert a liquidated, general unsecured claim against Cobalt L.P. in the amount of \$1,100,000, and (ii) the Plan Administrator expressly reserved all rights to object to

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.



the Claim on any grounds whatsoever, 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* (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);

WHEREAS, on June 7, 2019, the Parties entered into the *Stipulation and Agreed Order Extending Claim Objection Deadline for Proof of Claim No. 93 Filed by RLI Insurance Company* (D.I. 1287), wherein the Claims Objection Deadline was further extended through and including October 31, 2019; 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 when a potential resolution may be reached over the next few months, the Parties have reached an

agreement, as set forth herein, on a further extension of the Claims Objection Deadline solely with respect to the Claim.

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:

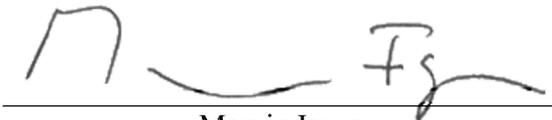
1. The Claims Objection Deadline shall be further extended through and including **Thursday, April 30, 2020** solely with respect to the Claim (the "Extended Deadline").

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

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

IT IS SO ORDERED.

Signed: November 09, 2019


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
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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 October 30, 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

United States Bankruptcy Court
Southern District of Texas

In re:
Cobalt International Energy, Inc.
Official Committee of Unsecured Creditors
Debtors

Case No. 17-36709-mi
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4

User: TylerLaws
Form ID: pdf002Page 1 of 3
Total Noticed: 72

Date Rcvd: Nov 12, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 14, 2019.

db +Cobalt GOM #1 LLC, 920 Memorial City Way, Suite 100, Houston, TX 77024-2649
db +Cobalt GOM #2 LLC, 920 Memorial City Way, Suite 100, Houston, TX 77024-2649
db +Cobalt GOM LLC, 920 Memorial City Way, Suite 100, Houston, TX 77024-2649
db #+Cobalt International Energy GP, LLC, 920 Memorial City Way, Suite 100, Houston, TX 77024-2649
db #+Cobalt International Energy, Inc., 920 Memorial City Way, Suite 100, Houston, TX 77024-2649
db #+Cobalt International Energy, L.P., 920 Memorial City Way, Suite 100, Houston, TX 77024-2649
aty +Alan J. Kornfeld, Pachulski Stang et al., 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067-4003
aty +Andrew Behlmann, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, TX 07068-1791
aty +Beth E. Levine, Pachulski Stang et al, 780 Third Ave., 34th Fl., New York, NY 10017-2024
aty +Brad Weiland, Kirkland & Ellis LLP, 300 North LaSalle, Chicago, IL 60654-5412
aty +Brett P. Lowe, Milbank Tweed et al, 1850 K St., NW, Ste. 1100, Washington, DC 20006-2236
aty +Carrie M. Reilly, Wachtell Lipton et al, 51 W. 52nd St., New York, NY 10019-6150
aty +Charles C Platt, Wilmer Cutler et al, 7 World Trade Center, 250 Greenwich St., New York, NY 10007-2140
aty +Christopher R Harris, 1805 Mercury Way, Sacramento, CA 95864-1707
aty +David S Cohen, Milbank Tweed Hadley And McCloy LLP, 1850 K Street NW, Ste 1100, Washington, DC 20006-2236
aty +Delos E. Flint, Jr., Lugenbuhl, Wheaton, Peck, Rankin, Hubbar, 601 Poydras Street, Suite 2775, New Orleans, LA 70130-6041
aty +Emil A. Kleinhaus, Wachtell Lipton et al, 51 W. 52nd St., New York, NY 10019-6150
aty +Eric K. Stodola, Milbank Tweed et al, 28 Liberty St., New York, NY 10005-1413
aty +George T. Conway, III, Wachtell Lipton et al, 51 West 52nd St., New York, NY 10019-6150
aty +Gerard Uzzi, Milbank Tweed Hadley & McCloy LLP, 26 Liberty St, New York, NY 10005
aty +Hugh Keenan Murtagh, Latham & Watkins LLP, 885 Third Ave., New York, NY 10022-4874
aty +IRA Kharasch, Pachulski Stang et al, 10100 Santa Monica Blvd., 13th Fl., Los Angeles, CA 90067-4003
aty +James H.M. Sprayregen, P.C., Kirkland & Ellis LLP, 300 North LaSalle, Chicago, IL 60654-5412
aty +James Savin, Akin Gump et al, 2001 K St, NW, Washington, DC 20006-1037
aty +Jeffrey N Pomerantz, Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Boulevard, 13th Floor, Los Angeles, CA 90067-4003
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aty +Joshua K. Porter, Entwistle & Cappucci LLP, 299 Park Ave., 20th Fl, New York, NY 10171-2301
aty +Katherine Doorley, Akin Gump et al, 1333 New Hampshire Ave., N.W., Washington, DC 20036-1511
aty +Kevin D. Finger, Greenberg Traurig LLP, 77 West Wacker Dr., Ste. 3100, Chicago, IL 60601-4904
aty +Kirkland & Ellis LLP and Kirkland & Ellis Internat, 300 North LaSalle, Chicago, IL 60654-3427
aty +Laura E. Krucks, Kirkland & Ellis LP, 300 North LaSalle, Chicago, IL 60654-5412
aty +Lauren Lifland, Wilmer Cutler et al, 7 World Trade Center, 250 Greenwich St., New York, NY 10007-2140
aty +Lynch Lynch, Wachtell Lipton et al, 51 W. 52nd St., New York, NY 10019-6150
aty +Marc Kieselstein, Kirkland & Ellis, 300 North LaSalle, Chicago, IL 60654-5412
aty +Matthew S. Barr, Weil Goshal et al, 767 Fifth Avenue, New York, NY 10153-0119
aty +Matthew Ziegler, Morgan Lewis & Bockius LLP, 101 Park Avenue, New York, NY 10178-0060
aty +Nicholas J. Brannick, Cole Shotz PC, 500 Delaware Avenue, Wilmington, DE 19801-1490
aty +Paul Vizcarrondo, Wachtell, Lipton, Rosen & Katz, 51 W 52nd St, New York, NY 10019-6150
aty +Robert J. Feinstein, Pachulski Stang et al, 780 Third Ave., 34th Fl., New York, NY 10017-2024
aty +Stacy Pepper, Kirkland & Ellis LLP, 300 North LaSalle, Chicago, IL 60654-5412
aty +Steven Cox, Burns Charest LLP, 900 Jackson St., Ste. 500, Dallas, TX 75202-4406
aty +Weatherford International, LLC, Hughes Watters Askanase, Total Plaza, 1201 Louisiana Street, 28th Floor, Houston, TX 77002-5607
aty +Zack A. Clement PLLC, 3753 Drummond, Houston, TX 77025-2417
cr +A2D Technologies, Inc., d/b/a TGS Geological Produ, c/o Andrew A Braun, Suite 4800, 701 Poydras Street, 701 Poydras Street, New Orleans, LA 70139-7756
intp +Ad Hoc First Lien Group, Weil, Gotshal & Manges LLP, 700 Louisiana, Suite 1700, Houston, TX 77002-2784
intp #+Ad Hoc Group of Second Lien Noteholders, c/o Marty L. Brimmage Jr., Akin Gump Strauss Hauer & Feld LLP, 1700 Pacific Avenue, Suite 4100, Dallas, TX 75201-4624
intp +Angela Dodd United States Securities & Exchange Co, 175 W. Jackson Blvd., Suite 1450, Chicago, IL 60604-2710
sp +Baker Botts L.L.P., 2001 Ross Avenue, Dallas, TX 75201-2980
cr Baker Hughes, a GE Company, LLC, P O Box 4740, Houston, TX 77210-4740

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Page 3 of 3
Total Noticed: 72

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***** BYPASSED RECIPIENTS (continued) *****

cr Spring Branch Independent School District
cr Spring Branch Independent School District and City
cr St. Lucie County Fire District Firefighters Pensio
intp TGS Canada Corp. f/k/a Arcis Seismic Solutions Cor
intp TGS-NOPEC Geophysical Company (successor in intere
intp TGS-NOPEC Geophysical Company ASA
intp TOTAL E&P USA, INC.
cr The Goldman Sachs Group, Inc.
intp United States Of America
cr Universal Investment Gesellschaft m.b.H.
cr Weatherford Laboratories, Inc.
cr Wells Fargo Bank, National Association
intp WesternGeco Seismic Holdings Limited
cr WesternGenco, L.L.C.
intp Whitton Petroleum Services Limited
cr Wilmington Trust, National Association, as Indentu

TOTALS: 47, * 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update.
While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 14, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 12, 2019 at the address(es) listed below:
NONE.

TOTAL: 0