



ENTERED
01/23/2020

**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)
)	
)	

**AGREED ORDER AMENDING CONFIDENTIALITY
AGREEMENT AND AGREED PROTECTIVE ORDER**

WHEREAS, the Court entered the Confidentiality Agreement and Agreed Protective Order (“Protective Order”) on June 7, 2018 (Docket No. 905);

WHEREAS, the Protective Order defined “Dispute” as relating to the Debtors’ remaining inventory;

WHEREAS, the dispute between Nader Tavakoli, solely in his capacity as Lead Member and Chairman of the Plan Administrator Committee of Cobalt International Energy, Inc., *et al.* (the “Plan Administrator”) and Total E&P USA, Inc. (“Total E&P”) also includes disagreements regarding the proper purchase price adjustment under the North Platte Asset Purchase Agreement; and

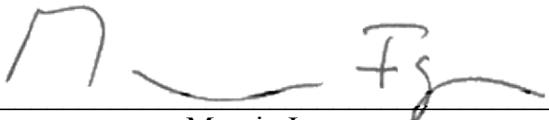
WHEREAS, the Plan Administrator and Total E&P desire the Protective Order to apply all disputed issues between them.

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each 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 Debtors’ service address is: 920 Memorial City Way, Suite 100, Houston, Texas 77024.



IT IS THEREFORE ORDERED the definition of “Dispute” in the Protective Order is amended to include the dispute regarding the Debtors’ remaining inventory, the dispute regarding the proper purchase price adjustment under the North Platte Asset Purchase Agreement, and any other disputes that have arisen or arise in the future in this case between the Plan Administrator and Total E&P.

Signed: January 23, 2020


Marvin Isgur
United States Bankruptcy Judge

AGREED TO IN FORM AND SUBSTANCE BY:

**AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING PC**

By: /s/ Ryan Hackney
Demetrios Anaipakos
State Bar No. 00793258
Federal I.D. 20323
John Zavitsanos
State Bar No. 22251650
Federal I.D. 9122
Sammy Ford IV
State Bar No. 24061331
Federal I.D. 950682
Ryan Hackney
State Bar No. 24069850
Federal I.D. 1106438
1221 McKinney Street, Suite 2500
Houston, Texas 77010
Tel: (713) 655-1101
Fax: (713) 655-0062
danaipakos@azalaw.com
jzavitsanos@azalaw.com
sford@azalaw.com
rhackney@azalaw.com

Counsel for Total E&P USA, Inc.

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen
Shari L. Heyen
HeyenS@gtlaw.com
Texas State Bar No. 09564750
1000 Louisiana, Suite 1700
Houston, Texas 77002
Telephone: 713-374-3500
Facsimile: 713-374-3505

Karl G. Dial
diak@gtlaw.com
Texas State Bar No. 05800400
Chris M. LaVigne
lavignec@gtlaw.com
Texas State Bar No. 24026984
2200 Ross Avenue, Suite 5200
Dallas, TX 75201
Telephone: 214-665-3600
Facsimile: 214-665-3601

***Counsel for Nader Tavakoli, solely in his
capacity as Lead Member and Chairman of
the Plan Administrator Committee of Cobalt
International Energy, Inc. et al.***