

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)
)	
)	

**NOTICE OF WITHDRAWAL OF MOTION
FOR PROTECTION**

[Relates to Docket No. 1331]

PLEASE TAKE NOTICE THAT on May 27, 2020, Nader Tavakoli, solely in his capacity as the Plan Administrator of Cobalt International Energy, Inc., *et al.* (the “Plan Administrator”), filed the *Motion for Protective Order* [Docket No. 1331] (the “Motion”). The Motion, wherein the Plan Administrator seeks entry of a protective order by this Court, was filed in response to *Total E&P USA’S 30(b)(6) Notice of Deposition of The Corporate Representative of Cobalt International Energy, Inc.* (“Notice of Deposition”), which was served on the Plan Administrator on May 5, 2020.

PLEASE TAKE NOTICE THAT on June 15, 2020, Total E&P USA, Inc. (“Total”) withdrew all deposition notices including the Notice of Deposition in light of the parties’ agreement to proceed to mediation but reserved the right to reissue deposition notices in the future if the disputes between the parties are not resolved a mediation.

¹ The Reorganized Debtors in these 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, Texas 77024.



PLEASE TAKE NOTICE THAT the Plan Administrator withdraws the Motion without prejudice and reserves the right to seek protection from the Court should Total notice any depositions in the future.

Date: June 16, 2020

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**COUNSEL FOR NADER TAVAKOLI, SOLELY
IN HIS CAPACITY AS THE PLAN
ADMINISTRATOR OF COBALT
INTERNATIONAL ENERGY, INC., ET AL.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 16, 2020, I caused a copy of the foregoing to be served on all parties eligible to receive service through the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas by electronic mail.

By: /s/ Shari L. Heyen
Shari L. Heyen