

**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)
	§	RE: DOCKET NO. 1355

**CERTIFICATE OF NO OBJECTION TO MOTION OF NADER
TAVAKOLI, ACTING SOLELY AS PLAN ADMINISTRATOR, FOR
ENTRY OF ORDER PURSUANT TO BANKRUPTCY RULE 9019
APPROVING SETTLEMENT AGREEMENT RELATING TO TOTAL
E&P, USA LITIGATION**

1. The undersigned hereby certifies that on October 29, 2020, Nader Tavakoli, solely in his capacity as Plan Administrator of Cobalt International Energy, Inc., *et al.* (the “Plan Administrator”), filed the *Motion of Nader Tavakoli, Acting Solely as Plan Administrator, for Entry of Order Pursuant to Bankruptcy Rule 9019 Approving Settlement Agreement Relating to TOTAL E&P, USA Litigation* [Docket No. 1355] (the “Motion”).

2. Any objections or other responses to the Motion were due on or before November 19, 2020. The undersigned certifies that the Court’s docket has been reviewed in these chapter 11 cases, and no answer, objection, or other responsive pleading to the Motion appears thereon. Further, the undersigned is unaware of any objections or responses to the Motion, whether filed or unfiled.

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).



3. Accordingly, the Plan Administrator requests that the Court enter the proposed order granting the Motion, attached hereto and at Docket No. 1355-2, at the Court's earliest convenience.

Date: November 24, 2020

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 24, 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/ Kristen M. Jacobsen

Kristen M. Jacobsen

EXHIBIT A

Proposed Order

**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)
	§	

**ORDER APPROVING MOTION OF NADER TAVAKOLI,
ACTING SOLELY AS PLAN ADMINISTRATOR,
FOR ENTRY OF ORDER PURSUANT TO BANKRUPTCY RULE 9019
APPROVING SETTLEMENT AGREEMENT
[REGARDING DOCKET NO. 1355]**

Upon the *Motion of Nader Tavakoli, solely in his capacity as Plan Administrator, for Entry of Order Pursuant to Bankruptcy Rule 9019 Approving Settlement Agreement Relating to Total E&P, USA Litigation* [Docket No. 1355] (the “Motion”);² upon consideration of the Motion and the relief requested therein; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice need be provided; and upon the record of all the proceedings had before the Court; and objections to the Motion, if any, having been withdrawn or denied on the merits; and the Court having determined that there exists just

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² Unless otherwise indicated, all capitalized terms in this Order shall have the same meaning as ascribed to them in the Motion.

cause for the relief granted herein; and the Court having determined that the relief sought in the Motion is in the best interest of the Debtors, their estates and their creditors and all parties in interest in these jointly administered chapter 11 cases; and the Court having determined that the Settlement Agreement is the product of good faith, arm's-length bargaining; and after due deliberation and sufficient cause appearing therefore, it is HEREBY ORDERED that:

1. The Motion is hereby GRANTED as set forth herein.
2. The Settlement Agreement, including all terms and conditions of the settlement embodied therein, is approved in all respects.
3. The Plan Administrator is authorized to enter into the Settlement Agreement and take such actions as may be necessary or appropriate to effectuate, implement, and further evidence the terms and conditions of the Settlement Agreement.
4. This Order including the terms set forth in the Settlement Agreement shall be immediately effective and enforceable upon its Entry.
5. The Court retains jurisdiction with respect to all matters arising from or relating to the interpretation, implementation, and enforcement of the Settlement Agreement and this Order.

Dated: _____, 2020
Houston, Texas

THE HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE