

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE:	§	(CHAPTER 11)
	§	
DUNE ENERGY, INC.;	§	CASE NUMBER 15-10336
DUNE OPERATING COMPANY;	§	CASE NUMBER 15-10337
DUNE PROPERTIES, INC.	§	CASE NUMBER 15-10338
	§	
DEBTORS.	§	(JOINTLY ADMINISTERED UNDER
	§	CASE NUMBER 15-10336)

**DEBTORS’ WITNESS AND EXHIBIT LIST
FOR COMBINED HEARING ON APPROVAL OF DISCLOSURE
STATEMENT AND CONFIRMATION OF CHAPTER 11 PLAN
ON SEPTEMBER 17, 2015**

Dune Energy, Inc. (“Dune Energy”), Dune Operating Company (“Dune Operating”), and Dune Properties, Inc. (“Dune Properties”), debtors-in-possession in the above-referenced chapter 11 cases (collectively, the “Debtors”) submit this Witness and Exhibit List for Combined Hearing on Approval of Disclosure Statement and Confirmation of Chapter 11 Plan on September 17, 2015 (the “Exhibit List”), and respectfully designate the following potential witnesses and exhibits:

WITNESSES

1. Donald R. Martin, Chief Restructuring Officer of the Debtors;
2. James F. Daloia, Director of Solicitations and Disbursements, Prime Clerk, LLC;
3. Witnesses called by any other party; and
4. Any rebuttal or impeachment witnesses.

EXHIBITS

	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
1	Ballots						
2	USSIC Payment & Indemnity Agreement dated October 31, 2005						
3	USSIC Payment & Indemnity Agreement dated June 19, 2007						
4	Bonds						
5	Lafourche Parish Recording Supplement to Operating Agreement and Financing Statement – Manti Exploration						
6	Proof of Claim No. 213 filed by Louisiana Department of Revenue						
7	Any exhibit designated by any other party						

The Debtors reserve the right to ask the Court to take judicial notice of pleadings and transcripts and/or documents filed in or in connection with these bankruptcy cases, to offer rebuttal exhibits, and to supplement or amend this Exhibit List at any time prior to the September 17, 2015 hearing. Designation of any exhibit above does not waive any objections that the Debtors may have to any exhibit listed on any other party’s exhibit list.

Pursuant to the *Order (I) Combining the Hearing on the Chapter 11 Plan of the Debtors and Disclosure Statement; (II) Establishing Voting Record Date; (III) Approving Solicitation Packages and Distribution Procedures; (IV) Approving and Establishing Procedures for Voting on the*

Chapter 11 Plan of the Debtors; (V) Approving Forms of Notices to Non-Voting Classes Under Plan; (VI) Establishing Voting Deadline to Accept or Reject Plan; (VII) Approving Procedures for Vote Tabulations; and (VIII) Granting Related Relief (Docket No. 453), digital copies of this Exhibit List and its corresponding exhibits can be found on the Prime Clerk internet website located at the following address: <https://cases.primeclerk.com/dunenergy/> under the heading “Important Information & Dates” on the main page. Hardcopies will be provided to the objecting parties at the Confirmation Hearing.

Dated: September 15, 2015

Respectfully submitted,

HAYNES AND BOONE, LLP

/s/ Charles A. Beckham, Jr.

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COUNSEL TO DEBTORS-IN-POSSESSION