

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

CHIEFTAIN ROYALTY COMPANY,)

)

)

Plaintiff,)

)

v.)

Case No. 6:17-cv-00336-KEW

)

(Removed from District Court of

NEWFIELD EXPLORATION)

Atoka County, State of Oklahoma,

MID-CONTINENT INC.,)

Case No. CJ-17-45)

)

Defendant.)

)

**CLASS COUNSEL’S MOTION FOR APPROVAL OF
REIMBURSEMENT OF LITIGATION EXPENSES**

Class Counsel respectfully file this Motion for Approval of Reimbursement of Litigation Expenses, and hereby move this Court for entry of an Order approving Class Counsel’s request for Reimbursement of Litigation Expenses which were incurred in successfully prosecuting and resolving this Litigation, in an amount not to exceed \$350,000 (the amount set forth in the Notice).

Class Counsel base this Motion on: (1) the Memorandum of Law in Support of this Motion and Exhibits thereto; (2) the Declaration of Patrick M. Ryan and Robert N. Barnes on Behalf of Class Counsel and Exhibits thereto (Joint Class Counsel Decl.”); (3) the Declaration of Geoffrey P. Miller in Support of the Stipulation and Agreement of Settlement, Class Counsel’s Application for Attorneys’ Fees, Reimbursement of Litigation Expenses, Class Representative’s Request for Case Contribution Award, and Notice of Proposed Settlement (“Miller Decl.”) (Doc. No. 57); (4) the Declaration of Chieftain Royalty Company (attached to Final Approval Memorandum as Ex. 1) (“Chieftain Decl.”); (5) the Affidavit of Dan Little (attached to the Final Approval Memorandum as Ex.. 6 (“Little Aff.”); (6) the Affidavit of Robert Gonce on behalf of absent class

member Castlerock Resources, Inc. attached to Final Approval Memorandum as Ex.7 (“Gonce Aff.”); (7) the Affidavit of Leslie Sue Healey on behalf of absent class member Barren Healey Energy, Inc., attached to Final Approval Memorandum as Ex. 8 (“Healey Aff.”); (8) the Affidavit of absent class member Citadel Energy, Inc., attached to the Final Approval Memorandum as Ex. 9 (“Steffano Aff.”); and the applicable law and all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if fully set forth herein.

Accordingly, Class Counsel respectfully request the Court enter the Proposed Order granting the relief stated above and grant any further relief to which the Court finds Class Counsel entitled.

DATED: February 3, 2020

Respectfully submitted,

s/Patranell Lewis

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CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2020, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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s/Patranell Lewis

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