

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

CHIEFTAIN ROYALTY COMPANY)	
and CASTLEROCK RESOURCES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
BP AMERICA PRODUCTION COMPANY,)	
)	
Defendant.)	

Case No. 18-cv-00054-JFH-JFJ

**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 incurred by successfully prosecuting and resolving this Litigation in an amount not to exceed \$600,000.00 and Reimbursement of Administration, Notice and Distribution Costs actually incurred and not to exceed \$400,000.00—the amounts 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, Andrew G. Pate, and Robert N. Barnes on Behalf of Class Counsel and exhibits thereto; (3) the Declaration of Andrew G. Pate on Behalf of Nix Patterson, LLP; (4) the Declaration of Patrick M. Ryan on behalf of Ryan Whaley Coldiron Jantzen Peters & Webber PLLC; (5) the Declaration of Robert N. Barnes, Patranell Britten Lewis, and Emily Nash Kitch on behalf of Barnes & Lewis LLP; (6) the Declaration of Michael Burrage; (7) the Declaration of Robert S. Abernathy; (8) the Declaration of Robert E. Gonce, Jr.; (9) the Declaration of Jennifer M. Keough on Behalf of Settlement Administrator JND Legal Administration LLC, Regarding Notice Mailing and Administration of Settlement; (10) the

Affidavit of Barbara A. Ley, CPA, CITP, CFF; (11) the Affidavits of Absent Class Members: Pagosa Resources, LLC; Wentz Production, LLC; Kelsie Wagner, Trustee of the Kelsie Wagner Trust and Successor Trustee of the Wade Costello Trust; Citadel Energy, Inc.; Dwayne Sager; and Sagacity, Inc.; and (12) the applicable law, and all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if set forth fully 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: January 21, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2022, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record through the Court's CM/ECF filing system.

/s/ Bradley E. Beckworth

Bradley E. Beckworth

Subject: Activity in OKND case 4:18-cv-00054-JFH-JFJ Chieftain Royalty Company, et al v. BP America Production Company - Motion for Miscellaneous Relief

Date: Friday, January 21, 2022 at 6:09:17 PM Central Standard Time

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U.S. District Court

U.S. District Court for the Northern District of Oklahoma

Notice of Electronic Filing

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Case Name: Chieftain Royalty Company, et al v. BP America Production Company

Case Number: [4:18-cv-00054-JFH-JFJ](#)

Filer: Castlerock Resources, Inc.
Chieftain Royalty Company

Document Number: [171](#)

Docket Text:

[MOTION Class Counsel's Motion for Approval of Reimbursement of Litigation Expenses by Castlerock Resources, Inc., Chieftain Royalty Company \(Beckworth, Bradley\)](#)

4:18-cv-00054-JFH-JFJ Notice has been electronically mailed to:

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