

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

CHIEFTAIN ROYALTY COMPANY)	
and CASTLEROCK RESOURCES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 18-cv-00054-JFH-JFJ
)	
BP AMERICA PRODUCTION COMPANY,)	
)	
Defendant.)	

**PLAINTIFFS’ MOTION TO CERTIFY THE SETTLEMENT CLASS FOR
SETTLEMENT PURPOSES, PRELIMINARILY APPROVE CLASS ACTION
SETTLEMENT, APPROVE FORM AND MANNER OF NOTICE
AND SET DATE FOR FINAL APPROVAL HEARING**

Plaintiffs Chieftain Royalty Company and Castlerock Resources, Inc. (“Plaintiffs”), respectfully file this Motion to Certify the Settlement Class for Settlement Purposes, Preliminarily Approve Class Action Settlement, Approve Form and Manner of Notice and Set Date for Final Approval Hearing (the “Motion”), and hereby move the Court for entry of an Order:

1. Certifying the Settlement Class for settlement purposes;¹
2. Preliminarily approving the Settlement of the above-captioned action;
3. Appointing Plaintiffs as Class Representatives of the Settlement Class;
4. Appointing Nix Patterson, LLP, Ryan Whaley Coldiron Jantzen Peters & Webber

PLLC and Barnes & Lewis, LLP as Class Counsel for the Settlement Class, and Whitten Burrage as liaison local counsel for the Settlement Class;

¹ All capitalized terms not otherwise defined herein shall have the meaning given to them in the August 16, 2021 Stipulation and Agreement of Settlement (“Settlement Agreement”), a copy of which is attached as Exhibit 1 to the Memorandum of Law in Support of this Motion, which is filed concurrently herewith.

5. Approving the form and manner of providing notice of the Settlement to the Settlement Class;

6. Appointing a Settlement Administrator; and

7. Setting a hearing date for final approval of the Settlement and application for an award of Attorneys' Fees, Litigation Expenses, and Case Contribution Award to Plaintiffs.

Plaintiffs base this Motion on the applicable law and all records and documents on file, including the Memorandum of Law in Support of this Motion, which is being filed concurrently herewith and is incorporated by reference as if set forth fully herein.

Accordingly, Plaintiffs respectfully request that this Court enter an Order granting the relief listed above, and any such further relief to which the Court finds the Settlement Class entitled.

Respectfully submitted,

s/Bradley E. Beckworth

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2021, 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