

**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 REPRESENTATIVES’ MOTION FOR
APPROVAL OF CASE CONTRIBUTION AWARD**

Class Representatives, Chieftain Royalty Company and Castlerock Resources, Inc., on behalf of themselves and on behalf of the Settlement Class preliminarily certified by the Court’s Order dated November 23, 2021 (Dkt. No. 164), respectfully file this Motion for Approval of Case Contribution Award and move this Court for entry of an Order approving Class Representatives’ request for a Case Contribution Award.

Class Representatives base this Motion on: (1) the Memorandum of Law in Support of this Motion and exhibits thereto; (2) the Declaration of Robert S. Abernathy; (3) the Declaration of Robert E. Gonce, Jr.; (4) the Declaration of Patrick M. Ryan, Andrew G. Pate, and Robert N. Barnes on Behalf of Class Counsel and exhibits thereto; (5) the Declaration of Jennifer M. Keough on Behalf of Settlement Administrator JND Legal Administration LLC, Regarding Notice Mailing and Administration of Settlement; (6) the Affidavit of Barbara A. Ley, CPA, CITP, CFF; (7) 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 (8) 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 Representatives respectfully request the Court enter the Proposed Order granting the relief stated above and any further relief deemed equitable and just.

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 6:15:14 PM Central Standard Time

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U.S. District Court

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

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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: [173](#)

Docket Text:

[MOTION Class Representatives' Motion for Approval of Case Contribution Award 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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