

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

CHIEFTAIN ROYALTY COMPANY,)
)
 Plaintiff,)
)
 v.) Case No. CIV-18-1225-J
)
 SM ENERGY COMPANY (including)
 predecessors, successors and affiliates),)
)
 Defendant.)

**CLASS REPRESENTATIVE’S MOTION FOR
APPROVAL OF CASE CONTRIBUTION AWARD**

Class Representative, Chieftain Royalty Company, for itself and on behalf of the Settlement Class preliminarily certified by the Court’s Order dated January 13, 2021 (Dkt. No. 97), respectfully files this Motion for Approval of Case Contribution Award, and hereby moves this Court for entry of an Order approving Class Representative’s request for a Case Contribution Award.

Class Representative bases this Motion on: (1) the Memorandum of Law in Support of this Motion and exhibits thereto; (2) the Declaration of Robert Abernathy, President of Chieftain Royalty Company; (3) the Declaration of Bradley E. Beckworth and Robert N. Barnes on Behalf of Class Counsel and exhibits thereto; (4) the Declaration of Geoffrey P. Miller; (5) the Affidavits of Absent Class Members: Dan Little on behalf of Sagacity, Inc.; Mike J. Weeks on behalf of Pagosa Resources, LLC; Ben Barresi on behalf of Cosmo Energy LLC; and Robert E. Gonce, Jr. on behalf of Castlerock Resources, Inc.; and (6) 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 Representative respectfully requests the Court enter the proposed Order granting the relief stated above and grant any further relief to which the Court finds Class Representative entitled.

DATED: March 29, 2021.

Respectfully submitted,

/s/ Bradley E. Beckworth

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CLASS COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to all registered parties.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: March 29, 2021.

/s/ Bradley E. Beckworth
Bradley E. Beckworth