

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

Class Counsel respectfully files this Motion for Approval of Reimbursement of Litigation Expenses, and hereby moves 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 \$800,000.00 and Reimbursement of Administration, Notice and Distribution Costs actually incurred and not to exceed \$225,000.00—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 Bradley E. Beckworth and Robert N. Barnes on Behalf of Class Counsel and exhibits thereto; (3) the Declaration of Robert Abernathy, President of Chieftain Royalty Company; (4) the Affidavit of Barbara A. Ley; (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 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: 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