

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

CHIEFTAIN ROYALTY COMPANY,)

Plaintiff,)

v.)

Case No. CIV-11-29-KEW

XTO ENERGY INC.,)

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, which were incurred in successfully prosecuting and resolving this Litigation, in an amount not to exceed \$3,250,000, plus interest—the amount 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, Patranell Lewis and Rex A. Sharp on Behalf of Class Counsel and exhibits thereto; (3) the Declaration of Geoffrey P. Miller in Support of the Settlement Agreement, Certification of the Settlement Class for Settlement Purposes, Class Counsel’s Application for Attorneys’ Fees, Reimbursement of Litigation Expenses, Class Representative’s Request for Case Contribution Award, and Notice Of Proposed Settlement (Docket No. 206); (4) the Declaration of Bradley E. Beckworth Filed on Behalf of Nix, Patterson & Roach, LLP; (5) the Declaration of Joseph R. Gunderson and Rex A. Sharp; (6) the Declaration of Robert N. Barnes and Patranell Britten Lewis; (7) the Declaration of Michael

Burrage; (8) the Declaration of Robert Abernathy President of Chieftain Royalty Company; (9) the Affidavits of Absent Class Members, Dan Little; Clear Fork Minerals, LLC; Michael P. Starceovich; Michael J. Weeks (on behalf of three class members: Pagosa Resources, LLC; Legacy Royalty, LLC; and Michael J. Weeks Revocable Trust); Clear Energy, Ltd.; Allen Tim Meyer Trustee of the Allen Tim Meyer Revocable Trust; and (10) 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: February 26, 2018

Respectfully submitted,

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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: February 26, 2018.

s/ Bradley E. Beckworth
Bradley E. Beckworth