

**IN THE DISTRICT COURT OF BLAINE COUNTY
STATE OF OKLAHOMA**


DDL OIL & GAS, LLC)
and DUSTIN M. FREEMAN,)
)
Plaintiffs,)
)
v.)
)
DIVERSIFIED PRODUCTION, LLC)
successor by merger with)
TAPSTONE ENERGY, LLC,)
)
Defendant.)

Case No. CJ-2019-17

BLAINE COUNTY, OKLAHOMA

F I L E D

AUG 18 2023

CHRISTY MATLI, CLERK
BY  DEPUTY

**CLASS COUNSEL'S MOTION FOR APPROVAL OF
REIMBURSEMENT OF LITIGATION EXPENSES AND
ADMINISTRATION, NOTICE, AND DISTRIBUTION COSTS**

Class Counsel respectfully file this *Motion for Approval of Reimbursement of Litigation Expenses and Administration, Notice, and Distribution Costs*, and hereby move this Court for entry of an Order approving Class Counsel's request for reimbursement of: (a) Litigation Expenses incurred by successfully prosecuting and resolving this Litigation in an amount not to exceed \$100,000.00, and (b) Administration, Notice, and Distribution Costs actually incurred and not to exceed \$300,000.00 – *i.e.*, the amounts set forth in the Notice to the Settlement Class.

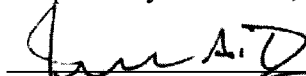
Class Counsel base this Motion on: (1) the Memorandum of Law in Support of this Motion and exhibits thereto; (2) the Declaration of Jason A. Ryan and Drew Pate on Behalf of Class Counsel; (3) the Declaration of Drew Pate on Behalf of Nix Patterson, LLP; (4) the Declaration of Patrick M. Ryan on behalf of Ryan Whaley Coldiron Jantzen Peters & Webber PLLC; (5) the Declaration of Robert Barnes, Patranell Lewis, and Emily Kitch on behalf of Barnes & Lewis, LLP; (6) the Declaration of Michael Burrage on behalf of Whitten Burrage; (7) the Declaration of Dustin M. Freeman; (8) the Declaration of Jennifer M. Keough on Behalf of Settlement

Administrator JND Legal Administration LLC, Regarding Notice Mailing and Administration of Settlement; (9) the Affidavit of Barbara A. Ley, CPA, CITP, CFF; (10) the Affidavits of Absent Class Members Chieftain Royalty Company, Castlerock Resources, Inc., and Sagacity, Inc., and (11) 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 such further relief to which the Court finds Class Counsel entitled.

DATED: August 18, 2023.

Respectfully submitted,



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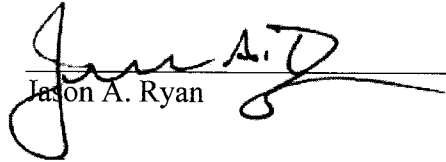
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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023 a true and correct copy of the foregoing document was sent, via first class mail and/or electronic mail, to the following counsel of record:

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