

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

DORSEY J. REIRDON,

Plaintiff,

v.

XTO ENERGY INC.,

Defendant.

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Case No. 6:16-cv-00087-KEW

**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 \$300,000, 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 and Patrick M. Ryan on Behalf of Class Counsel and exhibits thereto; (3) the Declaration of Geoffrey P. Miller in Support of the Stipulation and Agreement of Settlement, Class Counsel’s Application for Attorneys’ Fees, Reimbursement of Litigation Expenses, Class Representative’s Request for Case Contribution Award, and Notice Of Proposed Settlement; (4) the Declaration of Bradley E. Beckworth Filed on Behalf of Nix, Patterson & Roach, LLP; (5) the Declaration of Patrick M. Ryan Filed on Behalf of Ryan Whaley Coldiron Jantzen Peters & Webber PLLC; (6) the Declaration of Lawrence R. Murphy, Jr. on Behalf of Richards & Connor, PLLP; (7) the

Declaration of Robert N. Barnes and Patranell Britten Lewis; (8) the Declaration of Michael Burrage; (9) the Declaration of Dorsey J. Reirdon (“Reirdon Decl.”); (10) the Affidavits of Absent Class Members, Michael J. Weeks (on behalf of three class members: Pagosa Resources, LLC; Legacy Royalty, LLC; and Michael J. Weeks Revocable Trust), Earl Dwayne Sager, and Robert Lovelace; 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 grant any further relief to which the Court finds Class Counsel entitled.

Dated: December 27, 2017

Respectfully submitted,

s/ Bradley E. Beckworth

Bradley E. Beckworth

bbeckworth@nixlaw.com

Jeffrey Angelovich

jangelovich@nixlaw.com

Andrew G. Pate

dpate@nixlaw.com

Trey Duck

tduck@nixlaw.com

NIX, PATTERSON & ROACH, LLP

3600 North Capital of Texas Highway

Suite 350, Building B

Austin Texas, 78746

(512) 328-5333

(512) 328-5335

Susan Whatley

swhatley@nixlaw.com

NIX, PATTERSON & ROACH, LLP

205 Linda Drive

Daingerfield, TX 75638

(903) 645-7333 telephone

(903) 645-4415 facsimile

Patrick M. Ryan, OBA No. 7864
Phillip G. Whaley, OBA No. 13371
Jason A. Ryan, OBA No. 18824
Paula M. Jantzen, OBA No. 20464
RYAN WHALEY COLDIRON
JANTZEN PETERS & WEBBER PLLC
900 Robinson Renaissance
119 North Robinson
Oklahoma City, OK 73102
Telephone: 405-239-6040
Facsimile: 405-239-6766
pryan@ryanwhaley.com
pwhaley@ryanwhaley.com
jryan@ryanwhaley.com
pjantzen@ryanwhaley.com

Michael Burrage
Mburrage@whittenburragelaw.com
WHITTEN BURRAGE
1215 Classen Dr.
Oklahoma City, OK 73103
(405) 516-7800
(405) 516-7859

Lawrence R. Murphy, Jr.
Lmurphy@richardsconnor.com
RICHARDS & CONNOR, PLLP
525 S Main St. 12th Floor
Tulsa, OK 74103
(918) 585-2394
(918) 585-1449

Robert N. Barnes, OBA No. 537
rbarnes@barneslewis.com
Patranell Britten Lewis, OBA No. 12279
plewis@barneslewis.com
BARNES & LEWIS, LLP
720 N.W. 50th Street
Suite 200B
Oklahoma City, Oklahoma 73118
(405) 843-0363 telephone
(405) 843-0790 facsimile

PLAINTIFF'S 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: December 27, 2017.

s/ Bradley E. Beckworth

Bradley E. Beckworth