

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

PAULA PARKS MCCLINTOCK,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-16-136-KEW
)	
ENTERPRISE CRUDE OIL LLC,)	
)	
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 \$150,000.00 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, Robert N. Barnes and Patrick M. Ryan on Behalf of Class Counsel and exhibits thereto; (3) the Declaration of Bradley E. Beckworth on Behalf of Nix Patterson, LLP; (4) the Declaration of Patrick M. Ryan on behalf of Ryan Whaley Coldiron Jantzen Peters & Webber; (5) the Declaration of Robert N. Barnes, Patranell Britten Lewis, and Emily Nash Kitch on behalf of Barnes & Lewis LLP; (6) the Declaration of Michael Burrage; (7) the Declaration of Lawrence R. Murphy, Jr.; (8) the Declaration of Paula Parks McClintock; (9) the Declaration of Jennifer M. Keough on Behalf of Settlement Administrator JND Legal Administration LLC, Regarding Notice Mailing and

Administration of Settlement; (10) the Affidavit of Barbara A. Ley, CPA, CITP, CFF; (11) the Affidavits of Absent Class Members Kelsie Wagner Trust, Kepasa Corp., Chieftain Royalty Company, and Little Land Company, LP; and (12) 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 24, 2021.

Respectfully submitted,

/s/ Bradley E. Beckworth

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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 24, 2021.

/s/ Bradley E. Beckworth _____

Bradley E. Beckworth