

EXHIBIT B

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

**JAMES ADAMS, on behalf of himself and
other Oklahoma citizens similarly situated,**

Plaintiff,

v.

**(1) EAGLE ROAD OIL LLC,
(2) CUMMINGS OIL COMPANY,
(3) TERRITORY RESOURCES, LLC,
(4) ENERVEST OPERATING, L.L.C.,
(5) PETRO WARRIOR, L.L.C.,
(6) PETROQUEST ENERGY, LLC, and
(7) TRINITY OPERATING (USG), LLC,**

Defendants.

Case No. CJ-2016-00078

DECLARATION OF CHRISTIE K. REED REGARDING NOTICE PROCEDURES

I, Christie K. Reed, declare and state as follows:

1. My name is Christie K. Reed. I have personal knowledge of the matters set forth herein.

2. I am Vice President of Legal Notification Services at KCC Class Action Services, LLC (“KCC”), a firm that specializes in comprehensive class action services, including legal notification, email and postal mailing campaign implementation, website design, call center support, class member data management, claims processing, check and voucher disbursements, tax reporting, settlement fund escrow and reporting, and other related services critical to the effective administration of class action settlements. With more than 30 years of industry experience, KCC has developed efficient, secure and cost-effective methods to properly handle the voluminous data and mailings associated with the noticing, claims processing and

disbursement requirements of these matters to ensure the orderly and fair treatment of class members and all parties in interest. KCC has been retained to administer more than 7,200 class actions and distributed settlement payments totaling well over a trillion in assets.

3. The purpose of this declaration is to detail the settlement notice program (“Notice Plan”) proposed here for the Settlement with Petro Warrior, L.L.C. in *Adams, et al. v. Eagle Road, et al.*, Case No. CJ-2016-00078 (the “Action”).

NOTICE PLAN

Class Definition

4. The Notice Plan is designed to provide notice to the following Settlement Class: all citizens of Oklahoma, municipalities, county governments, or tribal governments, who own or owned real property within the borders of Oklahoma or have or had a property interest therein between March 3, 2015 through the time the Settlement Class is certified (the “Settlement Class Period”), and which suffered earthquake damages from earthquakes with epicenters within 20 miles of Pawnee, Oklahoma (“Settlement Class Members”).

5. Excluded from the Settlement Class are Petro Warrior, L.L.C. or its owners, directors, officers, employees, and/or agents, the judge presiding over this Action and his immediate family members; and any person that timely and properly excludes himself/herself/itself pursuant to the orders of the Court.

Individual Notice

6. A Summary Notice will be emailed to all Settlement Class Members who submitted a valid claim and provided an email address in previous settlements in the Action.

7. A single postcard Summary Notice will be mailed to all Settlement Class Members whose email is known not to have been successfully delivered.

8. Prior to mailing, the addresses will be checked against the National Change of Address (NCOA)¹ database maintained by the United States Postal Service (USPS); certified via the Coding Accuracy Support System (CASS);² and verified through Delivery Point Validation (DPV).³

9. Notices returned by USPS as undeliverable will be re-mailed to any address available through postal service forwarding order information.

Publication Notice

10. In addition to the individual notice effort, KCC will implement a paid notice campaign.

11. KCC will cause the Summary Notice to be placed as quarter-page ad units in Oklahoma City's *The Oklahoman*, the *Tulsa World*, *The Shawnee News-Star*, the *Cushing Citizen*, *The Cleveland American*, and *The Pawnee Chief* once a week for four consecutive weeks, for a total of 24 insertions.

12. Additionally, KCC will implement a digital media campaign consisting of approximately 4,150,100 impressions over a period of thirty days. The impressions will be purchased programmatically and distributed on websites and mobile apps on various ad exchanges (e.g., Google Display Network). The impressions will be geographically targeted to adults 18 years of age or older in Oklahoma statewide, as well as to Pawnee County and to Creek, Noble, Osage, Payne, and Tulsa counties.

¹ The NCOA database contains records of all permanent change of address submissions received by the United States Postal Service ("USPS") for the last four years. The USPS makes this data available to mailing firms and lists submitted to it are automatically updated with any reported move based on a comparison with the person's name and last known address.

² Coding Accuracy Support System is a certification system used by the USPS to ensure the quality of ZIP+4 coding systems.

³ Records that are ZIP+4 coded are then sent through Delivery Point Validation to verify the address and identify Commercial Mail Receiving Agencies. DPV verifies the accuracy of addresses and reports exactly what is wrong with incorrect addresses.

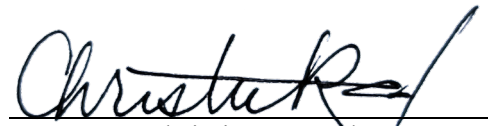
Response Mechanisms

13. KCC will establish and maintain a case-specific website to allow Settlement Class Members to obtain additional information and documents about the Settlement and file a Claim Form online. Settlement Class Members will also be able to view, download, and/or print the Long-Form Notice, Claim Form, Settlement Agreement, and other relevant settlement and court documents.

14. KCC will establish a case-specific toll-free number to allow Settlement Class Members to call and learn more about the case in the form of frequently asked questions and request a notice be mailed to them.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of November 2023, at Lakewood, CA.


Christie K. Reed