

IN THE DISTRICT COURT OF PAWNEE COUNTY
STATE OF OKLAHOMA

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

Plaintiff,

Case No. CJ-2016-00078

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.

**** UNOPPOSED ****

**PLAINTIFFS' MOTION TO APPROVE SETTLEMENT NOTICE
AND NOTICE PLAN, AND TO SET FINAL SETTLEMENT APPROVAL HEARING**

COMES NOW the Plaintiff and Class Representative James Adams and the Settlement Class ("Plaintiffs"), and move, unopposed, for the Court to approve the settlement notice and notice plan of the class action settlement with Petro Warrior, L.L.C ("Petro Warrior"), which this Court preliminarily approved on September 15, 2021.

1. Plaintiffs adopt and incorporate by reference their Motion to Preliminary Approve Class Action Settlement with Petro Warrior ("Motion") and its supporting

exhibits, including the Settlement Agreement (Exhibit 1), which were filed on September 8, 2021.

2. On September 15, 2021, the Court granted the Motion and entered its Order granting preliminary settlement approval.

3. As stated in the Motion, the settling parties have now agreed to the content of the settlement notice and the notice plan, which is the same notice and notice plan this Court has approved in the prior settlements with Eagle Road, Territory Resources, Cummings, Tarka, and EnerVest (together, the “Prior Settlements”).

4. The plan is described in the Declaration of Christie K. Reed provided as **Exhibit B**. Ms. Reed is the Vice President of Legal Notification Services at KCC Class Action Services, LLC (or “KCC”). KCC serves as the Settlement Administrator for this settlement with Petro Warrior and has also served as the Administrator of all the Prior Settlements.

5. By this motion, Plaintiffs seek entry of the Agreed Order (**Exhibit A**), which approves the settlement notice and notice plan as reasonable under 12 O.S. §2023 E and schedules the Final Settlement Approval Hearing on a day and time convenient for the Court and after the notice plan has been completed.

DATED: November 29, 2023,

Respectfully Submitted,



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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the day of November 29, 2023, I caused to be served a copy of the foregoing document upon the following counsel by electronic mail and with a request that anyone wishing a hard copy to follow by first-class mail to so advise. Counsel in this matter communicate by email regularly.

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