

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

WHITE FAMILY MINERALS, LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 6:19-CV-409-KEW
)	
EOG RESOURCES, INC.,)	
)	
Defendant.)	

**CLASS COUNSEL’S MOTION FOR APPROVAL OF
REIMBURSEMENT OF LITIGATION EXPENSES**

Class Counsel respectfully file this Motion for Approval of Reimbursement of Litigation Expenses, and hereby move 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 \$100,000.00 and Reimbursement of Administration, Notice and Distribution Costs actually incurred and not to exceed \$150,000.00—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 Patrick M. Ryan, Andrew G. Pate, and Robert N. Barnes on Behalf of Class Counsel and exhibits thereto; (3) the Declaration of Andrew G. Pate 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 Jerry N. White, authorized representative of Named Plaintiff White Family Minerals, LLC; (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 Robert Odom, Robert Abernathy, and Robert Gonce; 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: October 13, 2021.

Respectfully submitted,

/s/ Patrick M. Ryan

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CLASS COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2021, I electronically transmitted the attached document to the clerk of this Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

J. Todd Woolery – todd.woolery@mcafeetaft.com
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/s/ Patrick M. Ryan

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