

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

Case No. CIV-16-209-HE

**PLAINTIFFS' NOTICE OF AND MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND INCENTIVE AWARD**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on April 25, 2019, at the United States District Court for the Western District of Oklahoma, 200 N.W. 4th St. Oklahoma City, OK 73102 in the Courtroom of the Honorable Chief Judge Joe Heaton, Rm 3301, Courtroom 301, Plaintiffs will, and hereby do, move the Court, upon Plaintiffs' Memorandum in Support of Motion for Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards; the Declaration of Warren T. Burns in support; and all other papers and proceedings herein, Plaintiffs hereby move the Court to enter an order: (1) awarding attorneys' fees in the amount of \$2,316,666.67, which is one-third of the \$6.95 million Settlement Fund after deduction of reasonable expenses and incentive awards; (2) approving reimbursement of reasonably incurred expenses as they appear on the books and records of the firms acting as Class Counsel in this litigation in the amount of \$326,591.33; and (3) granting incentive awards of \$10,000 for each of the six Class Representatives.

Submitted herewith in support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards are (i) Plaintiffs' Memorandum in Support of Motion for Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards; (ii) the Declaration of Warren T. Burns in support and exhibits thereto; and (iii) the [Proposed] Order Granting Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards.

Dated: March 21, 2019

Respectfully submitted,

/s/ Warren T. Burns

Warren T. Burns
Daniel H. Charest
Kyle K. Oxford
BURNS CHAREST LLP
900 Jackson Street, Suite 500
Dallas, Texas 75201
Tel: (469) 904-4550
wburns@burnscharest.com
dcharrest@burnscharest.com
koxford@burnscharest.com

Christopher Cormier
BURNS CHAREST LLP
5290 Denver Tech Center Parkway, Suite 150
Greenwood Village, Colorado 80111
Tel: (720) 630-2092
ccormier@burnscharest.com

/s/ Terrell W. Oxford

Terrell W. Oxford
Shawn Raymond
SUSMAN GODFREY LLP
1000 Louisiana, Suite 5100
Houston, Texas 77002-5096
Tel: (713) 651-9366
toxford@susmangodfrey.com

William C. Carmody

/s/ Robert A. Koffman

Richard A. Koffman
Robert W. Cobbs
COHEN MILSTEIN SELLERS &
TOLL, PLLC
1100 New York Avenue, NW, Suite 500
Washington, D.C. 20005 Tel: (202) 408-
4600
rkoffman@cohenmilstein.com
rcobbs@cohenmilstein.com

/s/ Todd M. Schneider

Todd M. Schneider
Jason Kim
Kyle G. Bates
SCHNEIDER WALLACE COTTRELL
KONECKY WOTKYNS, LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Tel: (415) 421-7100
TSchneider@schneiderwallace.com
jkim@schneiderwallace.com
kbates@schneiderwallace.com

Arun Subramanian
SUSMAN GODFREY LLP
560 Lexington Avenue, 5th Floor
New York, NY 1002-6828
Tel: (212) 336-8330
bcarmody@susmangodfrey.com
asubramanian@susmangodfrey.com

Co-Lead Counsel for the Proposed Settlement Class

/s/ Larry D. Lahman

Larry D. Lahman
Michael E. Kelly
Carol Hambrick Lahman
MITCHELL DECLERCK
202 West Broadway Avenue
Enid, Oklahoma 73701
Tel: (800) 287-5144

Liaison Counsel for the Proposed Settlement Class

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was duly served electronically on all known counsel of record through the Court's Electronic Filing System on March 21, 2018.

By: /s/ Warren Burns
Warren Burns