

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

IN RE ANADARKO BASIN OIL AND GAS
LEASE ANTITRUST LITIGATION

Case No. CIV-16-209-HE

**DECLARATION OF WARREN T. BURNS ON BEHALF OF CLASS COUNSEL
IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
SETTLEMENT AND PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND PAYMENT OF INCENTIVE
AWARDS**

I, Warren T. Burns, declare as follows:

1. I am a partner at the law firm Burns Charest LLP. The Court has appointed my firm as one of four firms designated as Co-Lead Counsel and Class Counsel for the Settlement Class. *See* Doc. 163 at 1 (appointing Burns Charest LLP, Cohen Milstein Sellers & Toll PLLC, Susman Godfrey LLP, and Schneider Wallace Cottrell Konecky Wotkyns, LLP as “Co-Lead Counsel”); Doc. 231 (the “Preliminary Approval Order”) ¶ 4 (appointing same as Class Counsel).¹

¹ In addition, Mitchell Declerk has served as Interim Liaison Counsel for the proposed Class. McIntyre Law, P.C., served as Local Counsel. Additional firms, acting under the direction of Co-Lead Counsel, have also served as counsel for the Class, including: Barrett Law Group; Berger Montague PC; Chemicles Schwartz Kriner & Donaldson-Smith LLP; Charles D. Watson, Jr., Attorney at Law LLC; Cuneo Gilbert & LaDuca, LLP; Daniel, Coker, Horton & Bell, P.A.; Fine, Kaplan and Black, RPC; Freedman Boyd Hollander Goldberg Urias & Ward, PA; Gibbs Law Group LLP; Gustafson Gluek PLLC; Mitchell A. Hallren, Attorney at Law; Keller Rohrback L.L.P.; Levin Papantonio; Lieff Cabraser Heimann & Bernstein, LLP; McCartney Stucky LLC; McCulley McCluer PLLC; Michael J. Blaschke, P.C.; Pate & Wolfe; Rachel Lawrence Mor, P.C.; Reinhardt Wendorf & Blanchfield; Sharp McQueen PA; Spector Roseman & Kodroff, P.C.; Steyer Lowenthal Boodrookas Alvarez & Smith LLP; Wheeler Trigg O'Donnell LLP; and Wright Schimmel

2. I submit this declaration on behalf of Co-Lead Counsel and other counsel for the Settlement Class² in support of Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Payment of Service Awards to the Class Representatives. I make this declaration based on personal knowledge and also based on the declarations of Counsel attached as Exhibits 1 to 31 hereto.

3. I have personally participated in all material aspects of this litigation from its pre-complaint investigation through settlement. As Co-Lead counsel, I have been responsible for drafting the complaints, overseeing the filing of all briefs and other documents in this case, the litigation strategy of this complex antitrust class action, and the

LLC. In this declaration, I refer to these firms, Interim Liaison Counsel, Local Counsel, and Co-Lead Counsel as "Counsel."

² The Court in the Preliminary Approval Order granted preliminary certification for purposes of settlement of the Settlement Class defined as:

All persons and entities who sold, leased or otherwise assigned or transferred to Chesapeake or SandRidge, or any of their respective predecessors, subsidiaries, agents (such as landmen) or affiliates, mineral rights and/or working interests on lands within the Mississippi Lime Play, at any time between December 27, 2007 and April 1, 2013. For purposes of this Settlement Class, the Mississippi Lime Play includes all depths and formations within the Oklahoma counties of Alfalfa, Blaine, Creek, Dewey, Ellis, Garfield, Grant, Harper, Kay, Kingfisher, Logan, Lincoln, Major, Noble, Osage, Pawnee, Payne, Tulsa, Washington, Woods, and Woodward, and the Kansas counties of Barber, Butler, Chase, Chautauqua, Cheyenne, Clark, Coffey, Comanche, Cowley, Dickinson, Edwards, Elk, Finney, Ford, Gove, Grant, Gray, Greenwood, Harper, Harvey, Haskell, Hodgeman, Kearny, Kingman, Kiowa, Lane, Logan, Lyon, Marion, McPherson, Meade, Montgomery, Morris, Ness, Pawnee, Pratt, Rawlins, Reno, Rice, Rush, Saline, Scott, Sedgwick, Seward, Sheridan, Sherman, Stafford, Stevens, Sumner, Thomas, Trego, Wallace, Wichita, Wilson, and Woodson.

Preliminary Approval Order ¶ 3.

negotiation of the Settlement with Defendants Chesapeake Energy Corp., Chesapeake Exploration, L.L.C., and Tom L. Ward (together, “Defendants”).

SUMMARY OF THE CASE AND THE SETTLEMENT

A. Investigation and Complaints

4. In drafting the complaints at the outset of this litigation, Counsel extensively investigated the alleged Conspiracy (the “Conspiracy”) and its effects, including, *inter alia*, reviewing materials from related civil and criminal litigation, researching the applicable law with respect to the claims asserted in the Action and the potential defenses, and consulting with industry experts.

5. Plaintiffs filed their first Consolidated Class Action Complaint (“CCAC”) on April 3, 2017, alleging that since at least December 27, 2007 through April 1, 2013, Defendants entered into and participated in a conspiracy to fix, stabilize, and artificially suppress prices paid to Plaintiffs and the other members of the proposed class (the “Class” or “class members”) for leasehold interests and producing properties in the Mississippi Lime Play area of the Anadarko Basin Region. Doc. 164.

B. Discovery

6. In this litigation, Counsel analyzed and catalogued thousands of documents produced from Defendants’ custodians, interviewed certain of Chesapeake’s key witnesses, defended the depositions of most of the named plaintiffs, and retained economic and industry experts who performed extensive analyses. With the help of these experts, we reviewed extensive transactional information relating to lease bonuses in the Mississippi Lime Play area of the Anadarko Basin Region.

7. Counsel also helped the Named Plaintiffs review and produce documents, respond to discovery, and provide deposition testimony.

8. Counsel conducted third-party discovery, including issuing subpoenas on Defendants' key decision makers and deposing third-party fact witnesses. In addition to this intensive fact-discovery, we attended a full-day proffer from Chesapeake regarding the alleged misconduct at issue.

C. Settlement Discussions

9. The Parties discussed the possibility of settlement intermittently throughout the course of this litigation.

10. Co-Lead Counsel and Chesapeake attended a mediation on January 31, 2018 in Oklahoma City with Judge Michael Burrage. Co-Lead Counsel and Chesapeake prepared extensive mediation statements in advance of the mediation, and both sides vigorously negotiated their respective positions during the mediation. Although no agreement was reached at the mediation, the Parties continued their settlement discussions in the following months.

11. Counsel for Plaintiffs, Chesapeake, and Mr. Ward attended the second mediation in Oklahoma City, Oklahoma presided by the Judge Burrage (ret.) in April 2018. Once again, the mediation session lasted for a full day and was hotly contested by both sides. The parties ultimately agreed to the material terms of a proposed settlement and executed a Memorandum of Understanding outlining those terms by the day's end.

12. After the Parties had preliminarily agreed on the dollar amount of the Settlement, they continued to negotiate the specifics of the Settlement terms for an additional four months.

13. At all times when the Settlement was being negotiated, Co-Lead Counsel had extensive knowledge of the case record and the oil and gas industry. The settlement negotiations were accompanied by frank discussions of the relative strengths and weaknesses of the Parties' claims and defenses.

14. Co-Lead Counsel's negotiations were informed by the assistance of their expert economist, Scott Dalrymple, and his consulting firm, BVA Group.

15. The Parties executed the Settlement Agreement on August 30, 2018.

16. The named Plaintiffs—Edward Clark, Inc., Curtis Crandall, Amy Herzog, Mahony-Killian, Inc., Ida Powers, and Brian Thieme—have all indicated to Co-Lead Counsel they support the Settlement and that they believe it is an excellent result for the Class.

17. Based on Co-Lead Counsel's extensive experience, this Settlement is an outstanding result for the Class. The Settlement provides significant, immediate, and certain cash payment of \$6.95 million, less attorneys' fees, expenses, administration costs, and service awards ("Net Settlement Fund").

18. Under the plan of allocation, part of the Settlement Fund will be used to pay any attorneys' fees, expenses, and incentive awards to class representatives after approval by the Court. Additionally, the parties have agreed that Defendants will not unreasonably withhold approval for Plaintiffs to deduct from the Settlement Fund expenses incurred for

notice and administrative costs. The Net Settlement Fund will be distributed *pro rata* among all members of the Settlement Class who submit valid and timely claim forms based on the proportion a Class Member's bonus payments bears to the total value of the bonus payments submitted by all Class Members who submit valid claims.

D. Dissemination of Notice to the Settlement Class Members

19. The Preliminary Approval Order required that notice be provided to members of the Settlement Class in the form and manner set forth in Plaintiffs' Memorandum in Support of Preliminary Approval and Exhibits 1 and 2 accompanying the Preliminary Approval Order. *See* Preliminary Approval Order ¶ 9.

20. Pursuant to the Preliminary Approval Order, the KCC LLC, the Settlement Administrator, commenced the mailing Direct Notice to the Class on January 22, 2019. Shortly after, the Settlement Administrator also commenced Published Notice through various media outlets and posted the Long-Form Notice along with other pertinent information and documents on a website devoted to this case (www.anadarkosettlement.com).³

21. Direct and Published Notices informs all Settlement Class members of, *inter alia*: (1) the nature of the action; (2) the definition of the class that is being certified; (3) the class claims, issues, or defenses; (4) the amount of the Settlement Fund; (5) that a class member may enter an appearance through an attorney if the member so desires; (6) that the

³ Published Notice included a press release on PR Newswire and publishing the Short-Form notice in 22 of the primary periodicals in the counties where the alleged conspiracies took place. *See* Declaration of Markham Sherwood re: Proof of Notice, Doc. 234-1.

Court will exclude from the class any member who requests exclusion; (7) the time and manner for objecting to the Settlement and/or requesting exclusion; (8) the binding effect of a class judgment on members and the terms of the releases; (9) the claims filing process and a description of the Plan of Allocation; and (10) that Counsel would be seeking a fee award of up to one-third of the total Settlement amount, reimbursement for costs and expenses.

22. Although Class members have until April 4, 2019 to object to the Settlement or request to be excluded from the Settlement, *see* Preliminary Approval Order ¶ 22, there have not been any objections or opt-outs as of the date of this Declaration.

CLASS COUNSEL'S LODESTAR AND EXPENSES

E. Counsel's Diligent Efforts and Substantial Out-of-Pocket Expenses

23. As set forth above, from the inception of this case, Counsel vigorously pursued this action, committing their services and resources and advancing substantial funds to prosecute this case. Counsel provided legal services to the Class and advanced necessary litigation expenses with no assurance of compensation or repayment. To date, Counsel have neither been paid for their efforts nor reimbursed for their out-of-pocket expenses. Instead, their compensation and expense reimbursement were entirely contingent upon obtaining a recovery on behalf of the Class.

24. Counsel diligently and skillfully prosecuted this litigation for three years in the face of intense opposition from Defendants and opposing counsel from some of the top defense firms in the country.

25. Specifically, Counsel's efforts on behalf of the Class included the following:

- Investigating the underlying factual record and developing the legal theories of the case;
- Drafting the initial complaints and the subsequent consolidated class action complaint;
- Issuing subpoenas to numerous third parties and engaging in meet and confer discussions concerning the scope of document production from these third parties;
- Preparing and serving requests for admission, interrogatories, and document requests;
- Responding to Defendants' interrogatories and document requests, including contention interrogatories;
- Reviewing, analyzing, summarizing, and organizing thousands of documents produced by Defendants and third parties;
- Deposing third-party witnesses on merits issues;
- Retaining an economic expert, working closely with him and his firm to prepare for mediation, motions for summary judgment, and Plaintiffs' motion for class certification;
- Preparing extensive mediation briefing and attending two mediations before the Honorable Judge Burrage;
- Conducting arm's-length settlement negotiations following the mediation;
- Developing and drafting the Settlement Agreement;
- Developing and drafting the Short-Form Notice, Long-Form Notice, and Motion for Preliminary Approval of the Settlement; and,
- Communicating with the Class Representatives throughout the duration of the litigation regarding updates on the litigation, settlement negotiations, and the notice and settlement approval process.

26. Even now, the work on this litigation has not ended and will not end until the last settlement distribution payment is made to Class, the taxes on the escrow accounts are

paid, and a final report is made to the Court. Counsel will continue to expend many additional hours—which are not included in the lodestar cross-check calculations—in connection with the Settlement administration process, responding to Class member inquiries, working to secure final approval of the Settlement, preparing for the Fairness Hearing scheduled for May 22, 2019, and dealing with logistical matters involving Settlement administration.

27. Co-Lead Counsel are comprised of some of the preeminent plaintiffs' class action and antitrust litigation firms in the country, with decades of experience prosecuting and trying complex antitrust actions. All four firms have led multiple complex cases to successful conclusions. Co-Lead Counsel applied their knowledge and experience to obtain a positive result for the Class. Co-Lead Counsel also faced formidable opposition from defense counsel from nationally recognized law firms, including counsel with decades of antitrust and class action experience who vigorously defended this litigation.

F. Counsel's Total Lodestar is \$4,991,713.25 for 10,145.89 Hours of Work

28. This litigation required a substantial investment of time by Counsel. Counsel necessarily expended more than 10,000 hours over the more than three years of litigation preparing, litigating, and eventually negotiating the Settlement of this case.

29. And Co-Lead Counsel's commitment to this litigation is not over. Co-Lead Counsel will spend substantial additional time preparing for and participating in the final approval hearing and handling Settlement administration.

30. From the inception of this matter through February 28, 2019, Co-Lead Counsel expended over 10,000 hours prosecuting this complex, contingent litigation over

the past three years, resulting in a total lodestar of \$4,991,713.25 at historical rates.⁴ The sought fee of one-third of the Settlement amount reflects a multiplier of .46, and thus reflects that the sought fee of \$2,316,666.67 (*i.e.*, one-third of the \$6.95 million Settlement Fund after deduction of incentive fees and costs) would provide modest compensation that the risks Co-Lead Counsel took with no guarantee of recoupment.

31. After their appointment as interim Co-Lead Counsel, Co-Lead Counsel established a procedure for monthly reporting of time and expenses for all firms actively involved in this case. This allowed Co-Lead Counsel to monitor the reported work of the firms, allocate work among the firms, and to understand on an ongoing basis the time and costs being billed. These monthly submissions included the identity of time keepers, the amount of time spent on tasks delineated by category, and a cumulative running total of hours spent working on the case, the resulting lodestar, and expenses incurred.

32. After the Court granted preliminary approval of the Settlement, Co-Lead Counsel reviewed the time expense reports submitted by Counsel firms to confirm that the time and expense reports submitted by each firm were accurate, compensable, and adequately supported. Co-Lead Counsel requested that each firm provide contemporaneous time records (at historical rates) that identify (a) the name and title/role of each individual biller (*i.e.*, partner, associate, staff attorney, paralegal, etc.), and (b) a brief description of

⁴ “Historical Rates” means the rates at the time the work was done, and not current rates. This is a more conservative means of recording and billing time and does not account for the fact that the case was done on a fully contingent basis, and that bills were not paid by clients on a contemporaneous basis.

the work undertaken for the time reported and proof of payment of all submitted expenses. Each firm was also asked to review its prior submissions to ensure they were accurate.

33. Co-Lead Counsel carefully reviewed the materials submitted by Counsel to ensure that: (1) any time for work not authorized by Co-Lead Counsel and non-litigation related time be removed; (2) all billings be reasonable, including in the hourly rate charged and commensurate with the biller's experience level, and the time reported be commensurate with the work assigned; (3) all firms complied with Co-Lead Counsel's instructions to cap the hourly rate for attorneys conducting document review at \$300 per hour; and (4) unreasonable or unapproved costs and expenses be removed.

34. Attached as Exhibits 1 to 31 are the sworn declarations of Counsel's firms specifying (by professional) the number of hours and total lodestar based on blended historical rates contemporaneously recorded in the prosecution of this case; the amounts (by category) each advanced for litigation expenses; and a summary of the work performed by each firm.

35. Based on these sworn declarations, the table below summarizes the aggregate time and lodestar of all Counsel based on the contemporaneous, daily time records regularly prepared and maintained by each firm.

| Firm | Hours | Lodestar |
|-------------------------------|---------|----------------|
| Barrett Law Group | 86.00 | \$62,665.00 |
| Berger Montague PC | 285.70 | \$107,824.00 |
| Burns Charest | 1042.3 | \$716,687.50 |
| Chimicles Schwartz Kriner | 569.55 | \$224,548.25 |
| Charles D. Watson | 101.90 | \$30,570.00 |
| Cohen Milstein Sellers & Toll | 2514.00 | \$1,224,740.00 |
| Cuneo Gilbert & LaDuca | 92.75 | \$63,218.75 |

| | | |
|---------------------------------|------------------|-----------------------|
| Daniel, Coker, Horton & Bell | 30.40 | \$24,320.00 |
| Fine, Kaplan and Black | 4.70 | \$3,632.50 |
| Freedman Boyd Hollander | 54.74 | \$17,799.00 |
| Gibbs Law Group | 61.50 | \$28,916.00 |
| Gustafson Gluek | 57.25 | \$22,687.50 |
| Mitchell A. Hallren | 67.25 | \$26,900.00 |
| Keller Rohrback | 422.90 | \$277,129.50 |
| Levin Papantonio | 192.70 | \$57,810.00 |
| Lieff Cabraser | 92.40 | \$52,785.00 |
| McCartney Stucky | 28.20 | \$10,380.00 |
| McCulley McCluer | 373.20 | \$226,588.50 |
| McIntyre Law | 116.00 | \$14,650.00 |
| Michael J. Blaschke | 134.25 | \$53,700.00 |
| Mitchell DeClerck | 486.25 | \$194,260.00 |
| Pate & Wolfe | 42.00 | \$12,600.00 |
| Rachel Lawrence Mor | 35.50 | \$10,650.00 |
| Reinhardt Wendorf & Blanchfield | 395.40 | \$175,807.00 |
| Schneider Wallace | 709.20 | \$351,754.00 |
| Sharp McQueen | 287.80 | \$115,230.00 |
| Spector Roseman & Kodroff | 372.45 | \$126,221.25 |
| Steyer Lowenthal | 241.30 | \$188,712.50 |
| Susman Godfrey | 823.70 | \$437,815.00 |
| Wheeler Trigg O'Donnell | 210.20 | \$65,622.00 |
| Wright Schimmel | 214.40 | \$65,490.00 |
| Total Lodestar | 10,145.89 | \$4,991,713.25 |

G. Counsel's Out-of-Pocket and Unpaid Expenses Total \$601,591.33

1. Summary of Total Expenses

36. Counsel has reasonably incurred, and seeks reimbursement of, expenses in the amount of \$601,591.33 (from inception through February 28, 2019). All of the time and funds advanced by Counsel were fully contingent on a successful outcome. During the case, Counsel, at the direction of Co-Lead Counsel, contributed to a Litigation Fund for

common expenses. The Litigation Fund has been fully depleted paying expenses necessary to prosecute this case. Counsel also individually advanced and documented additional expenses over the course of the litigation. Finally, the Litigation Fund has unpaid bills owed for the work of Plaintiffs' expert Scott Dalrymple (and his consulting firm, BVA Group).

37. Based on the sworn declarations of Counsel, the table below summarizes the expenses incurred by each firm (including, but not limited to, contributions to the Litigation Fund) based on expense vouchers, receipts, and other source materials and represent an accurate recording of the expenses incurred by Counsel.

| Firm | Total Expenses |
|-------------------------------|-----------------------|
| Barrett Law Group | \$773.97 |
| Berger Montague PC | \$88.29 |
| Burns Charest | \$223,055.53 |
| Chimicles Schwartz Kriner | \$27,838.03 |
| Charles D. Watson | \$1,354.73 |
| Cohen Milstein Sellers & Toll | \$65,207.13 |
| Cuneo Gilbert & LaDuca | \$1,328.33 |
| Fine, Kaplan and Black | \$150.00 |
| Freedman Boyd Hollander | \$1,543.94 |
| Gibbs Law Group | \$221.92 |
| Gustafson Gluek | \$50.77 |
| Keller Rohrback | \$27,378.72 |
| Levin Papantonio | \$116.69 |
| Lieff Cabraser | \$825.74 |
| McCulley McCluer | \$25,000.00 |
| McIntyre Law | \$883.60 |
| Rachel Lawrence Mor | \$400.00 |
| Reinhardt Wendorf | \$27,433.56 |
| Schneider Wallace | \$101,560.42 |
| Sharp McQueen | \$4,609.68 |

| | |
|------------------------------------|---------------------|
| Spector Roseman & Kodroff | \$25,246.39 |
| Steyer Lowenthal | \$4,334.55 |
| Susman Godfrey | \$61,307.93 |
| Wheeler Trigg O'Donnell | \$770.28 |
| Sub-Total | \$601,480.20 |
| Litigation Fund Contributions | (\$275,000) |
| Total Reimbursable Expenses | \$326,591.33 |

2. Description of Total Expenses

38. A substantial portion of the expenses were necessary payments to economic experts, who were essential to the prosecution of this economic-heavy case. Scott Dalrymple worked extensively on issues related to class certification, liability, and damages.

39. Another significant expense was hosting and managing the thousands of documents produced by Defendants and third parties in this case on a secure database.

40. Other expenses included costs associated with travel to depositions, Court hearings, and meetings around the country, cost-sharing for certain third-party discovery productions, and costs incurred in consulting with industry experts. These expenses, as well as others routinely charged to hourly-fee-paying clients, such as court reporting expenses, photo and data copying charges, and computerized legal research costs, were reasonable and appropriate.

41. While the declarations reflect contributions to a litigation fund established by Interim Co-Lead Counsel, those contributions do not reflect expenses taxable to the class. Accordingly, they have been deducted from the expense total.

42. Based on each Counsel's sworn declaration, the table below sets forth, by category, Counsel's expenses as a whole by category.

| Expense Categories | Total |
|--|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$13,121.17 |
| Court Costs - Filing Fees | \$7,010.96 |
| Federal Express/Overnight Delivery/Messengers | \$1,886.55 |
| Photocopies - In House | \$1,301.92 |
| Photocopies - Outside | \$69.22 |
| Postage | \$615.29 |
| Service of Process Fees | \$1,361.36 |
| Telephone / Fax | \$427.42 |
| Transportation / Meals / Lodging | \$47,245.36 |
| Co-Counsel Fees | \$0.00 |
| Experts/Consultant Fees | \$163,319.76 |
| Court Reporter Service/Hearing Transcript Fees | \$2,365.65 |
| Client Outreach Fees | \$1,125.09 |
| Document Hosting and Storage | \$86,741.58 |
| Total Expenses | \$326,591.33 |

43. As discussed above, each of the Class Representatives affirmatively supports the fee and expense request.

THE EFFORTS OF THE CLASS REPRESENTATIVES

44. Plaintiffs Edward Clark, Inc., Curtis Crandall, Amy Herzog, Mahony-Killian, Inc., Ida Powers, and Brian Thieme expended significant time and effort in prosecuting this action for the benefit of the Class.

45. Each Plaintiff significantly contributed to the prosecution of this litigation by, among other things, producing documents and responding to discovery requests. Mahony-Killian, Ida Powers, and Brian Thieme each additionally prepared and sat for

depositions, and the remaining Class Representatives were in the process of scheduling depositions when the Settlement was reached. And they made these efforts even though each of their respective recoveries was likely going to be relatively small compared to those of some of the larger members of the Class. Without their participation, the Class would have recovered nothing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2019, in Dallas, TX.



Warren T. Burns

EXHIBIT 1

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF JOHN W. BARRET IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, John W. Barrett, declare as follows:

1. I am a partner with Barrett Law Group, P.A. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as co-counsel for Plaintiff in the case of *Harold Koppitz, on behalf of himself and all others similarly situated v. Chesapeake Energy Corporation, et al.*, filed in Woods County, State of Oklahoma.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 86.0, with a corresponding lodestar (at historical rates) of \$62,665.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with the prosecution of the plaintiff's claims in the case, my firm did the following: researched and developed the factual and legal bases for the complaint, assisted with the drafting of the complaint and subsequent written motions,

including the motion to dismiss, motion to stay, and appellate briefing, and participated in all subsequent case management tasks. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters and/or approved by courts in similar complex litigation matters.

4. My firm has expended a total of \$773.97 in unreimbursed costs and expenses in connection with our work in the related case from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm and have not been reimbursed.

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

Executed this 20th day of March, 2019 at Lexington, MS.

/s/ John W. Barrett

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF BARRETT LAW GROUP, P.A. IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------|-----------------|--------------|--|--------------------|
| Don Barrett | P | 65.4 | \$825 | \$53,955.00 |
| David McMullan | P | 16.6 | \$475 | \$7,885.00 |
| Cate Barnes | PL | 1 | \$150 | \$150.00 |
| Nanci Maddux | PL | 3 | \$225 | \$675.00 |
| Total | | 86.0 | | \$62,665.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF BARRETT LAW GROUP, P.A. IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$37.56 |
| Court Costs - Filing Fees | \$720.00 |
| Federal Express/Overnight Delivery/Messengers | 0 |
| Photocopies - In House | 0 |
| Photocopies - Outside | 0 |
| Postage | \$6.55 |
| Service of Process Fees | 0 |
| Telephone / Fax | \$9.86 |
| Transportation / Meals / Lodging | 0 |
| Co-Counsel Fees | 0 |
| Experts/Consultant Fees | 0 |
| Court Reporter Service/Hearing Transcript Fees | 0 |
| TOTAL EXPENSES | \$773.97 |

EXHIBIT 2

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF BERGER MONTAGUE PC IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND LITIGATION EXPENSES**

I, Michael Dell'Angelo, declare as follows:

1. I am a managing shareholder with Berger Montague PC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period were 285.70, with a corresponding lodestar (at historical rates) of \$107,824.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action, my firm did the following: reviewed, analyzed, and edited pleadings; conducted legal research regarding the Class' claims and the law and procedures regarding various estate and probate matters related to the McClendon Estate; and reviewed documents of custodians regarding various

merits and class certification issues. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$88.29 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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



Michael Dell'Angelo

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF BERGER MONTAGUE PC
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------------|-----------------|---------------|------------------------------------|---------------------|
| Eric L. Cramer | S | 2.60 | \$925 | \$2,405.00 |
| Gary E. Cantor | S | 1.20 | \$755 | \$906.00 |
| Michael Dell'Angelo | S | 24.30 | \$703 | \$17,083.00 |
| Luke Henry | CA | 217.00 | \$300 | \$65,100.00 |
| Jenna E. MacNaughton | A | 40.60 | \$550 | \$22,330.00 |
| Total | | 285.70 | | \$107,824.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF BERGER MONTAGUE PC
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report

Inception through February 28, 2019

| Expense | Total Amount |
|--|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$6.00 |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | \$14.50 |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | \$67.79 |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| Total Expenses | \$88.29 |

EXHIBIT 3

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF WARREN T. BURNS IN SUPPORT OF PLAINTIFFS’
MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND LITIGATION
EXPENSES**

I, Warren T. Burns, declare as follows:

1. I am a partner with Burns Charest LLP. I submit this declaration in support of Plaintiffs’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the “Action”).

2. My firm served as Plaintiffs’ Co-Lead Counsel in the Action.

3. The schedule attached as Exhibit 1 sets forth my firm’s total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 1042.3, with a corresponding lodestar (at historical rates) of \$716,687.50. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: investigating the underlying factual record and developing the legal theories of the case; drafting the initial complaints and the subsequent consolidated class action complaint; reviewing, analyzing, summarizing, and organizing documents produced by Defendants and third parties; preparing extensive briefing and attending two mediations

before the Honorable Judge Burrage; conducting negotiations after settlement; drafting the Memorandum of Understanding and the Settlement Agreement; coordinating case strategy and discovery with the member firms; drafting the preliminary and final approval motions; and developing the notice plan and coordinate claims administration with the claims administrator. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$ \$223,055.53 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

5. Burns Charest has significant experience managing complex antitrust class actions. Courts have routinely appointed Burns Charest to leadership positions in antitrust class actions that involve price-fixing, bid-rigging, and market allocation in different industries, including: *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices, and Antitrust Litig.*, MDL 2785 (D. Kan.), *In re German Automotive Manufacturers Antitrust Litig.*, MDL 2796 (N.D. Cal.), *In re Vehicle Carrier Services Antitrust Litig.*, MDL 2471 (D.N.J.); *In re Crude Oil Commodity Futures Litig.*, No. 11-

cv-03600 (S.D.N.Y.); *In re Domestic Airline Travel Antitrust Litig.*, MDL 2656 (D.D.C.), and *In re Dental Supplies Antitrust Litig.*, No. 16-cv-696 (E.D.N.Y.).

6. In addition to its expertise in antitrust actions in different industries, Burns Charest is also highly experienced in oil and gas litigation, and has previously recovered significant sums in unpaid royalties—including previously from Defendant Chesapeake—on behalf of its clients. Burns Charest’s experience with price-fixing antitrust cases and in oil and gas litigation give Burns Charest significant insight into the industry’s business practices, terms, and litigation strategies, which it brought to bear in successfully pursuing Plaintiffs’ claims here.

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



Warren T. Burns
Partner
Burns Charest LLP

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF WARREN T. BURNS IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|-------------------|-----------------|--------------|------------------------------------|-----------------|
| Warren Burns | P | 419.1 | \$875 | \$366,712.50 |
| Andrew Bynum | PL | 107.3 | \$225 | \$24,142.50 |
| Daniel Charest | P | 12.5 | \$875 | \$10,937.50 |
| Chris Cormier | P | 16.2 | \$900 | \$14,580.00 |
| Maggie Kewik | PL | 47.3 | \$225 | \$10,642.50 |
| Korey Nelson | P | 2.1 | \$825 | \$1,732.50 |
| Kyle Oxford | A | 327.7 | \$625 | \$204,812.50 |
| Will Thompson | A | 42.7 | \$775 | \$33,092.50 |
| Larry Vincent | OC | 63.4 | \$775 | \$49,135.00 |
| Tenacia Whitesite | PL | 4.0 | \$225 | \$900.00 |
| Total | | 1042.3 | | \$716,687.50 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF WARREN T. BURNS IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$264.10 |
| Court Costs - Filing Fees | \$1,276.96 |
| Litigation Fund Contribution | \$50,000.00 |
| Federal Express/Overnight Delivery/Messengers | \$0.00 |
| Photocopies - In House | \$0.00 |
| Photocopies - Outside | \$0.00 |
| Postage | \$361.54 |
| Service of Process Fees | \$572.00 |
| Telephone / Fax | \$0.00 |
| Transportation / Meals / Lodging | \$6,406.03 |
| Co-Counsel Fees | \$0.00 |
| Experts/Consultant Fees | \$163,208.63 |
| Court Reporter Service/Hearing Transcript Fees | \$1,077.40 |
| TOTAL EXPENSES | \$223,166.66 |

EXHIBIT 4

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF BENJAMIN F. JOHNS IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

I, Benjamin F. Johns, declare as follows:

1. I am partner at the law firm of Chimicles Schwartz Kriner & Donaldson-Smith LLP, and counsel for Plaintiffs. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action"). I have personal knowledge of the information contained in this declaration, and if called as a witness I could and would testify competently thereto.

2. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including January 31, 2019. The total numbers of hours spent by my firm during this period was 569.55, with a corresponding lodestar (at historical rates) of \$224,548.25. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm.

3. Over the course of this case, my firm has performed the following tasks:

- Investigated the prospect of filing the case. This included evaluating materials from the Department of Justice, reading news articles, pulling relevant materials from the Securities and Exchange website, and interviewing potential clients.
- Retained two clients, and evaluated their facts and documents.
- At the direction of Lead Counsel, helped prepare client questionnaires to assist in evaluating which potential plaintiffs to include in the operative amended complaint. As part of this process, my firm participated in several telephone interviews with numerous clients.
- Conducted research on various legal issues, including potential state antitrust claims, DOJ leniency policies, class certification issues, ability to assign a cause of action via a contract; the potential impact of a bankruptcy filing, and how owning stock in a defendant-corporation could possibly raise conflict or adequacy issues.
- Reviewed and analyzed documents produced in discovery, at the direction of Lead Counsel.
- Attended and defended a plaintiff deposition in Oklahoma.
- At Lead Counsel's request, prepared subpoenas directed to several phone carriers for the purpose of obtaining certain call records among the Defendants. This included participating in several calls with Lead Counsel, as well as counsel for the Defendants and phone carriers, and negotiating the cost associated with obtaining this information.
- Made a contribution to the litigation fund in the amount of \$25,000 on October 24, 2017, at the request of Lead Counsel.

4. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

5. My firm has expended a total of \$27,838.03 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including January 31, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm, and have not been reimbursed.

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



Benjamin F. Johns
**Chimicles Schwartz Kriner
& Donaldson-Smith LLP**
361 W. Lancaster Avenue
Haverford, PA 19041
Phone: (610) 642-8500
Email: bfj@chimicles.com

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF CHIMICLES SCHWARTZ KRINER &
DONALDSON-SMITH LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar

Inception through January 31, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------------|-----------------|---------------|------------------------------------|---------------------|
| Tikellis, Pamela S. | P | 1.00 | \$895.00 | \$895.00 |
| Johns, Benjamin | P | 119.10 | \$625.00 | \$74,437.50 |
| DeSanto, Mark | A | 20.00 | \$450.00 | \$9,000.00 |
| Ferich, Andrew | A | 144.40 | \$405.00 | \$58,482.00 |
| Beatty, Zachary | A | 31.50 | \$350.00 | \$11,025.00 |
| Saunders, Stephanie | A | 7.25 | \$325.00 | \$2,356.25 |
| Geyelin, Anthony | OC | 196.00 | \$300.00 | \$58,800.00 |
| Mastraghin, Corneliu | PL | 11.45 | \$250.00 | \$2,862.50 |
| Birch, David | PL | 0.70 | \$250.00 | \$175.00 |
| Kelly, Ryan | LC | 18.50 | \$190.00 | \$3,515.00 |
| Sachs, Kimberly | LC | 9.25 | \$190.00 | \$1,757.50 |
| Boyer, Justin | PL | 4.90 | \$175.00 | \$857.50 |
| Haddad, Yasmine | LC | 5.50 | \$70.00 | \$385.00 |
| TOTAL | | 569.55 | | \$224,548.25 |

Role Legend

| | | | |
|----|----------------|----|-------------------|
| P | Partner | PL | Paralegal |
| S | Shareholder | I | Investigator |
| SC | Senior Counsel | SA | Staff Attorney |
| OC | Of Counsel | CA | Contract Attorney |
| A | Associate | | |
| LC | Law Clerk | | |

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF CHIMICLES SCHWARTZ KRINER
& DONALDSON-SMITH LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through January 31, 2019

| Expense | Total Amount |
|---|---------------------|
| Litigation Fund Contribution | \$25,000.00 |
| Transportation / Meals / Lodging | \$1,138.41 |
| Electronic Research (Lexis/Westlaw/PACER) | \$675.25 |
| Court Costs - Filing Fees | \$550.00 |
| Photocopies - In House | \$219.25 |
| Experts/Consultant Fees | \$111.13 |
| Postage | \$85.28 |
| Federal Express/Overnight Delivery/Messengers | \$58.71 |
| TOTAL EXPENSES | \$27,838.03 |

EXHIBIT 5

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

| | | |
|----------------------------------|---|-----------------------|
| IN RE ANADARKO BASIN OIL AND GAS |) | NO. CIV-16-0209-HE |
| LEASE ANTITRUST LITIGATION |) | (Consolidated Number) |

DECLARATION OF CHARLES D. WATSON, JR. IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES

I, Charles D. Watson, Jr., declare as follows:

1. I am the sole shareholder and senior counsel in the law firm of Charles D. Watson, Jr., Attorney at Law LLC, Drumright, Oklahoma, and I submit this Declaration in support of Plaintiffs' motion for an award of attorneys' fees and litigation expenses incurred in the above styled and entitled action.

2. My firm served as co-counsel for plaintiff in the case of Harold Koppitz On Behalf of Himself and all Others Similarly Situated v Chesapeake Energy Corporation, et al. filed in Woods County, State of Oklahoma.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates for the period from inception of the case through and including February 28, 2019. The total number of hours spent by my firm during this period was 101.90, with a corresponding lodestar (at historical rates) of \$30,570.00. This schedule was prepared from contemporaneous daily time records prepared and maintained by my firm. In connection with the prosecution of the plaintiffs' claims

in the case, my firm did the following: researched and developed the factual and legal basis for the Petition; assisted with the drafting of the Petition and subsequent written motions and responses, together with substantial appellate briefing, and participation in case management tasks. The lodestar amount in Exhibit 1 is for work performed by me for the benefit of the class. The hourly rate reflected in Exhibit 1 is the usual and customary hourly rate historically charged by my firm in similar complex litigation matters and previously approved by courts in similar complex litigation matters.

4. My firm has expended a total of \$1,354.73 in unreimbursed costs and expenses in connection with my work in the related case from the inception of the case through and including February 28, 2019. These costs are set forth in the schedule attached as Exhibit 2, and are reflected on the books and records of my firm and have not been reimbursed.

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

Executed this 19th day of March, 2019..



CHARLES D. WATSON, JR. OBA #9388
Attorney at Law
P. O. Box 647
Drumright, OK 74030

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

IN RE ANADARKO BASIN OIL AND GAS)
LEASE ANTITRUST LITIGATION) NO. CIV-16-0209-HE
(Consolidated Number)

EXHIBIT 1 TO DECLARATION OF
CHARLES D. WATSON, JR.

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------|----------|--------|----------------------------|-------------|
| C.D. Watson Jr | S/SC | 101,90 | \$300/Hr. | \$30,570.00 |
| | | | | |
| | | | | |
| | | | | |
| Total | | | | |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

| | | |
|----------------------------------|---|-----------------------|
| IN RE ANADARKO BASIN OIL AND GAS |) | NO. CIV-16-0209-HE |
| LEASE ANTITRUST LITIGATION |) | (Consolidated Number) |

EXHIBIT 2 TO DECLARATION OF
CHARLES D. WATSON, JR.

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|-----------------|
| Electronic Research (Lexis/Westlaw/PACER) | 0 |
| Court Costs - Filing Fees | 314.50 |
| Litigation Fund Contribution | 0 |
| Federal Express/Overnight Delivery/Messengers | 0 |
| Photocopies - In House | 152.54 |
| Photocopies - Outside | 0 |
| Postage | 100.00 |
| Service of Process Fees | 0 |
| Telephone / Fax | 0 |
| Transportation / Meals / Lodging | 787.69 |
| Co-Counsel Fees | 0 |
| Experts/Consultant Fees | 0 |
| Court Reporter Service/Hearing Transcript Fees | 0 |
| TOTAL EXPENSES | 1,354.73 |

EXHIBIT 6

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF COHEN MILSTEIN SELLERS & TOLL PLLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

I, Emmy L. Levens, declare as follows:

1. I am a partner with Cohen Milstein Sellers & Toll PLLC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' Co-Lead Counsel in the Action.

3. For over 45 years, Cohen Milstein has litigated some of the nation's most complex class cases and has recovered billions of dollars in damages for injured plaintiffs. With over 90 lawyers and offices in Washington, D.C. and six other cities, Cohen Milstein is one of the largest, most successful, and most respected plaintiffs' class action firms in the country. Notable recent successes as lead or co-lead counsel include negotiating an \$835 million settlement with Dow Chemical after convincing a jury to award the largest price-fixing verdict in U.S. history (more than \$1 billion after trebling) in *In re Urethane Antitrust Litigation*; achieving \$566 million in settlements in *In re Electronic Books Antitrust Litigation* (nearly twice the damages suffered by the class); and recovering over \$1.5 billion in settlements in residential mortgage-backed securities class actions.

4. The Trial Lawyer has named Cohen Milstein as one of “America’s 25 Most Influential Law Firms,” the firm has been ranked by *Legal 500* as a “Leading Plaintiff Class Action Antitrust Firm” for the past eight years, and *Law360* has named it one of the “Most Feared Plaintiff’s Firms” for the past three years. *The National Law Journal* has repeatedly selected the firm to its Plaintiffs’ Hot List, including for 2015 and 2016, and Law360 named Cohen Milstein a “Competition Group of the Year” in 2014 – the first time the publication ever included a plaintiff-side firm amongst its honorees – as well as a “Class Action Group of the Year” in 2015. *Id.*

5. The schedule attached as Exhibit 1 sets forth my firm’s total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 2514.00, with a corresponding lodestar (at historical rates) of \$1,224,740.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm was involved in managing every aspect of the case, from the initial stages of the litigation through discovery and settlement. My firm prepared initial and amended complaints; negotiated a class settlement with Sandridge’s bankruptcy estate; argued a motion regarding contact with class members; organized discovery; reviewed thousands of documents; interviewed witnesses; and negotiated the settlement. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and

professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

6. My firm has expended a total of \$65,207.13 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

/s/ Emmy L. Levens

Emmy L. Levens

COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Ave. NW, Suite 500
Washington, DC 20005
202-408-4600
elevens@cohenmilstein.com

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF COHEN MILSTEIN SELLERS &
TOLL PLLC IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|------------------------|-----------------|-----------------|------------------------------------|---------------------|
| Christopher J. Cormier | P | 924.75 | 681.14 | 629,882.50 |
| Robert Cobbs | A | 652.50 | 451.42 | 294,552.50 |
| Nada Sulaiman | CA | 512.75 | 300.00 | 153,825.00 |
| Maya Campbell | PL | 246.75 | 281.18 | 69,380.00 |
| Suzanne Clarke | I | 47.50 | 451.16 | 21,430.00 |
| Robert Braun | A | 36.00 | 450.00 | 16,200.00 |
| Richard A. Koffman | P | 18.25 | 790.82 | 14,432.50 |
| Alex Noronha | PL | 47.75 | 290.00 | 13,670.00 |
| Brent Johnson | P | 7.25 | 650.00 | 4,712.50 |
| Jonathan Abetti | PL | 9.25 | 280.27 | 2,592.50 |
| Jay Clayton | PL | 8.00 | 287.19 | 2,297.50 |
| Emmy Levens | P | 1.50 | 530.00 | 795.00 |
| George Farah | P | 1.00 | 605.00 | 605.00 |
| Daniel Small | P | 0.25 | 900.00 | 225.00 |
| Total | | 2,514.00 | 487.16 | 1,224,740.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk

| | |
|----|-------------------|
| PL | Paralegal |
| I | Investigator |
| SA | Staff Attorney |
| CA | Contract Attorney |

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF COHEN MILSTEIN SELLERS &
TOLL PLLC IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|--|---------------------|
| Electronic & Print Research (Lexis/Westlaw/PACER) | 2,806.57 |
| Court Costs - Filing Fees | 1,000.00 |
| Litigation Fund Contribution | 50,000.00 |
| Federal Express/Overnight Delivery/Messengers | 1,270.39 |
| Photocopies - In House | 20.40 |
| Photocopies - Outside | 0.00 |
| Postage | 29.20 |
| Service of Process Fees | 344.50 |
| Telephone / Fax | 74.66 |
| Transportation / Meals / Lodging | 9,661.41 |
| Co-Counsel Fees | 0.00 |
| Experts/Consultant Fees | 0.00 |
| Court Reporter Service/Hearing Transcript Fees | 0.00 |
| TOTAL EXPENSES | 65,207.13 |

EXHIBIT 7

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF JONATHAN W. CUNEO IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Jonathan W. Cuneo, declare as follows:

1. I am a partner with Cuneo Gilbert & LaDuca, LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as co-counsel for Plaintiff in the case of *Harold Koppitz, on behalf of himself and all others similarly situated v. Chesapeake Energy Corporation, et al.*, filed in Woods County, State of Oklahoma.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 92.75, with a corresponding lodestar (at historical rates) of \$63,218.75. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with the prosecution of the plaintiff's claims in the case, my firm did the following: researched and developed the factual and legal bases for the complaint, assisted with the drafting of the complaint and subsequent written motions,

including the motion to dismiss, motion to stay, and appellate briefing, and participated in all subsequent case management tasks. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters and/or approved by courts in similar complex litigation matters.

4. My firm has expended a total of \$1,328.33 in unreimbursed costs and expenses in connection with our work in the related case from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm and have not been reimbursed.

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

Executed this 19th day of March, 2019 at Washington, DC.

/s/ Jonathan W. Cuneo

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF CUNEO GILBERT & LADUCA, LLP
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Year | Hours | Average Historical Rate | Lodestar |
|--------------------|-----------------|-------------|--------------|--|-----------------|
| Jonathan Cuneo | P | 2018 | 31.25 | \$895 | \$27,968.75 |
| Monica Miller | P | 2017 | 30.75 | \$775 | \$23,831.25 |
| Taylor Asen | A | 2016 | 14.75 | \$550 | \$8,112.50 |
| Peter Gil-Montllor | A | 2016 | 0.25 | \$500 | \$125.00 |
| Benjamin Elga | A | 2016 | 2.00 | \$450 | \$900.00 |
| Melisa Azak | PL | 2016 | 7.00 | \$175 | \$1,225.00 |
| Ally Peck | PL | 2016 | 2.00 | \$175 | \$350.00 |
| John Yuill | PL | 2016 | 3.75 | \$175 | \$656.25 |
| Billy Czerwinski | PL | 2016 | 1.00 | \$50 | \$50.00 |
| Total | | | 92.75 | | \$63,218.75 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF CUNEO GILBERT & LADUCA, LLP
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$34.70 |
| Court Costs - Filing Fees | \$385.00 |
| Federal Express/Overnight Delivery/Messengers | \$22.34 |
| Photocopies - In House | 0 |
| Photocopies - Outside | 0 |
| Postage | 0 |
| Service of Process Fees | \$175.00 |
| Telephone / Fax | \$36.62 |
| Transportation / Meals / Lodging | \$674.67 |
| Co-Counsel Fees | 0 |
| Experts/Consultant Fees | 0 |
| Court Reporter Service/Hearing Transcript Fees | 0 |
| TOTAL EXPENSES | \$1,328.33 |

EXHIBIT 8

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF LARRY D. MOFFET IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND LITIGATION EXPENSES**

I, Larry D. Moffett, declare as follows:

1. I am a partner with the law firm of Daniel, Coker, Horton & Bell, P.A. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm and others served as Plaintiff's counsel in the case of *Harold Koppitz, on behalf of himself and all others similarly situated v. Chesapeake Energy Corporation, et al.*, No. CIV-16-427-D on the docket of the United State District Court for the Western District of Oklahoma, and No. CJ-16-19 on the docket of the District Court of Woods County, State of Oklahoma.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total number of hours spent by my firm during this period was 30.4, with a corresponding lodestar (at historical rates) of \$24,320.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiff in the case my firm did the following:

investigated Plaintiff's claims against Defendants, conducted legal research regarding the claims and potential defenses to the claims, drafted the complaint, worked on Plaintiff's responses to motions to stay and motions to dismiss filed by Defendants, and participated in multiple communications (email and telephonic) with co-counsel regarding litigation strategy and developments in the case. The lodestar amount reflected in Exhibit 1 is for work performed by my firm for the benefit of the Class. My hourly rate reflected in Exhibit 1 is the usual and customary hourly rate historically charged by my firm for my work in similar complex litigation matters and/or approved by courts in similar complex litigation matters.

4. My firm does not seek recovery of any costs or expenses.

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

THIS, the 19th day of March, 2019.


LARRY D. MOFFETT
DANIEL COKER HORTON & BELL, P.A.
POST OFFICE BOX 1396
265 N. LAMAR BLVD., STE. R
OXFORD, MISSISSIPPI 38655
T: (662) 232-8979
F: (662) 232-8940

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF LARRY D. MOFFETT
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|------------------|-----------------|--------------|------------------------------------|-----------------|
| Larry D. Moffett | P | 30.4 | \$800 | \$24,320.00 |
| | | | | |
| | | | | |
| | | | | |
| Total | | | | \$24, 320.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

EXHIBIT 9

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF FINE, KAPLAN AND BLACK, RPC IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, Roberta D. Liebenberg, declare as follows:

1. I am senior partner with Fine, Kaplan and Black, RPC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

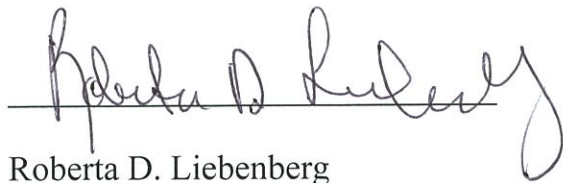
2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 4.7, with a corresponding lodestar (at historical rates) of \$3,632.50. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: assisted Co-Lead Counsel in preparing the complaint filed by named plaintiff, Ida Powers, including raising and discussing legal and factual issues to be addressed, and addressed defendant's 2016 bankruptcy-related contacts with putative

class members. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$150.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

A handwritten signature in cursive script, appearing to read "Roberta D. Liebenberg", written over a horizontal line.

Roberta D. Liebenberg
Senior Partner
Fine, Kaplan and Black, RPC

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF FINE, KAPLAN AND BLACK, RPC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|-------------------------------|-----------------|--------------|------------------------------------|-----------------|
| Roberta D. Liebenberg | Partner | 3.50 | 795.00 | 2,782.50 |
| Donald L. Perelman | Partner | 1.00 | 795.00 | 795.00 |
| Nancy M. Blakeslee | Paralegal | .20 | 275.00 | 55.00 |
| | | | | |
| Total | | 4.70 | | 3,632.50 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF FINE, KAPLAN AND BLACK, RPC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | 150.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | 150.00 |

EXHIBIT 10

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF FREEDMAN BOYD HALLANDER GOLDBERG URIAS &
WARD, P.A. IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

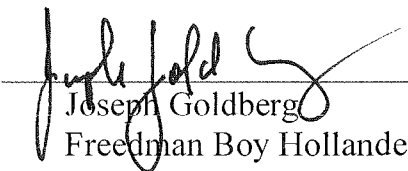
I, Joseph Goldberg, declare as follows:

1. I am a partner with Freedman Boyd Hollander Goldberg Urias & Ward, PA. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").
2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.
3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 54.74, with a corresponding lodestar (at historical rates) of \$17,799.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: consulted with co-lead counsel about case strategy and assisted co-lead counsel in certain work with experts. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit

of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$1,543.94 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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



Joseph Goldberg
Freedman Boy Hollander Goldberg Urias &
Ward, P.A.

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF FREEDMAN BOYD HOLLANDER
GOLDBERG URIAS & WARD, P.A. IN SUPPORT OF PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|-----------------|-----------------|--------------|------------------------------------|-----------------|
| Joseph Goldberg | P | 31 | 450 | 13,950.00 |
| Vince Ward | P | 1 | 275 | 275.00 |
| Deborah Tope | PL | 10.74 | 100 | 1,074.00 |
| Frank Davis | A | 9.5 | 225 | 2,137.50 |
| Jeremy Farris | A | 2.5 | 225 | 562.50 |
| Total | | 54.74 | 1,187.50 | 17,799.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF FREEDMAN BOYD HOLLANDER
GOLDBERG URIAS & WARD, P.A. IN SUPPORT OF PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | 100.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | 1,443.94 |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | 1,543.94 |

EXHIBIT 11

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MICHAEL SCHRAG OF GIBBS LAW GROUP LLP IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

I, Michael Schrag, declare as follows:

1. I am a partner with Gibbs Law Group LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 61.5, with a corresponding lodestar (at historical rates) of \$28,916.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: analyzed the potential to reopen the case after bankruptcy proceedings ended, worked with Co-Lead Counsel to fill out a plaintiff questionnaire, and discussed settlement offers with Co-Lead Counsel (among other tasks). The lodestar amount reflected in Exhibit

1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$221.92 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

/s/ Michael Schrag

Michael Schrag of Gibbs Law Group LLP

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF MICHAEL SCHRAG OF GIBBS LAW
GROUP LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------|-----------------|--------------|------------------------------------|--------------------|
| Michael Schrag | P | 22.7 | \$674.45 | \$15,310.00 |
| Linda Lam | A | 21.8 | \$351.19 | \$7,656.00 |
| Steven Lopez | A | 17 | \$350.00 | \$5,950.00 |
| | | | | |
| Total | | 61.5 | | \$28,916.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF MICHAEL SCHRAG OF GIBBS LAW
GROUP LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$121.92 |
| Court Costs - Filing Fees | \$100.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$221.92 |

EXHIBIT 12

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF GUSTAFSON GLUEK PLLC IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, Daniel C. Hedlund, declare as follows:

1. I am a member with Gustafson Gluek PLLC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 57.25, with a corresponding lodestar (at historical rates) of \$22,687.50. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: assisted in research and drafting of complaint; evaluated the sufficiency of document production made by defendants; reviewed, analyzed, and coded documents produced by defendants; summarized key documents identified during discovery; prepared

for and participated in conference calls with co-counsel to discuss and coordinate work related to discovery; and analyzed court filings, correspondence, and other case documents only to the extent required to perform tasks assigned by Co-Lead Counsel. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$50.77 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

Date: March 18, 2019

/s/ Daniel C. Hedlund
Daniel C. Hedlund, member
Gustafson Gluck PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Phone: (612) 333-8844
Fax: (612) 339-6622
dhedlund@gustafsongluck.com

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF GUSTAFSON GLUEK PLLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|-------------------|-----------------|--------------|------------------------------------|--------------------|
| Jason S. Kilene | P | 1 | \$800.00 | \$800.00 |
| Daniel C. Hedlund | P | 9.25 | \$804.05 | \$7,437.50 |
| Michelle J. Looby | P | 0.5 | \$500.00 | \$250.00 |
| Daniel J. Nordin | A | 6.75 | \$400.00 | \$2,700.00 |
| Riley A. Conlin | LC | 35.5 | \$300.00 | \$10,650.00 |
| Jamie L. Holzer | PL | 4.25 | \$200.00 | \$850.00 |
| Total | | 57.25 | | \$22,687.50 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF GUSTAFSON GLUEK PLLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$33.76 |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | \$11.60 |
| Photocopies - Outside | |
| Postage | \$0.46 |
| Service of Process Fees | |
| Telephone / Fax | \$4.95 |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$50.77 |

EXHIBIT 13

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MITCHELL A. HALLREN
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Mitchell A. Hallren, declare as follows:

1. I am an attorney with Mitchell A. Hallren, Attorney at Law. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 67.25, with a corresponding lodestar (at historical rates) of \$26,900.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: supported co-lead counsel in all phases of the litigation, drafted instruments, reviewed records and attended depositions. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with

my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$0.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

A handwritten signature in black ink, appearing to read "Mitchell A. Hallren", is written over a horizontal line.

Mitchell A. Hallren
Attorney at Law
P.O. Box 428
Fairview, OK 73737
(580) 227-4449 Telephone
Hallrenlaw@sbcglobal.net

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF MITCHELL A. HALLREN
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|---------------------|-----------------|--------------|------------------------------------|-----------------|
| Mitchell A. Hallren | OC | 67.25 | \$400.00 | \$26,900.00 |
| | | | | |
| | | | | |
| Total | | | | |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF MITCHELL A. HALLREN
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$0.00 |

EXHIBIT 14

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF KELLER ROHRBACK L.L.P. IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, Mark A. Griffin, declare as follows:

1. I am a partner with Keller Rohrback L.L.P. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel and as part of the Executive Committee.


3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 422.9, with a corresponding lodestar (at historical rates) of \$277,129.50. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action, my firm did the following: drafted pleadings, reviewed claims, and analyzed documents and data to build the Class's case, including analysis and research regarding bankruptcy issues. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at

my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$27,378.72 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

Dated this 15th day of March, 2019.



Mark Griffin, Partner
Keller Rohrback L.L.P

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF KELLER ROHRBACK L.L.P. IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|---------------------|-----------------|--------------|------------------------------------|---------------------|
| Amy Williams- Derry | P | .5 | \$750.00 | \$375.00 |
| Cari Laufenberg | P | 3.5 | \$685.00 | \$2,397.50 |
| Carly Eyler | PL | .8 | \$230.00 | \$184.00 |
| Christopher Graver | P | 59.3 | \$800.00 | \$47,440.00 |
| Darla Marshall | PL | 17.3 | \$230.12 | \$3,981.00 |
| Deborah Heller | PL | .5 | \$241.00 | \$120.50 |
| Derek Loeser | P | 12.6 | \$835.00 | \$10,521.00 |
| Kris Bartlett | PL | 1.3 | \$225.00 | \$292.50 |
| Lynn Sarko | P | 1.6 | \$929.69 | \$1,487.50 |
| Mark Griffin | P | 93.5 | \$852.50 | \$79,709.00 |
| Mary Montgomery | PL | 4.4 | \$299.20 | \$1,316.50 |
| Raymond Farrow | P | 140.4 | \$658.69 | \$92,480.00 |
| RoxAnn Ward | PL | .1 | \$220.00 | \$22.00 |
| Tana Lin | P | 32.5 | \$704.00 | \$22,880.00 |
| Tana Daugherty | PL | 54.6 | \$255.00 | \$13,923.00 |
| Total | | 422.9 | \$655.31 | \$277,129.50 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal

I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF KELLER ROHRBACK L.L.P. IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report

Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$552.6 |
| Court Costs - Filing Fees | \$4.50 |
| Litigation Fund Contribution | \$25,000.00 |
| Federal Express/Overnight Delivery/Messengers | \$45.04 |
| Photocopies - In House | \$61.43 |
| Photocopies - Outside | \$0.00 |
| Postage | \$1.82 |
| Service of Process Fees | \$260.00 |
| Telephone / Fax | \$31.84 |
| Transportation / Meals / Lodging | \$296.40 |
| Co-Counsel Fees | \$0.00 |
| Experts/Consultant Fees | \$0.00 |
| Court Reporter Service/Hearing Transcript Fees | \$0.00 |
| Other (Client Outreach Expense) | \$1,125.09 |
| TOTAL EXPENSES | \$27,378.72 |

EXHIBIT 15

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF LEVIN PAPANTONIO IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Peter Mougey, declare as follows:

1. I am an attorney with Levin Papantonio. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

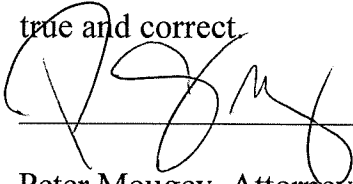
3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 192.7, with a corresponding lodestar (at historical rates) of \$57,810.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: Examination of Documents. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional

staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$116.90 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct.

A handwritten signature in black ink, appearing to read "PM", is written over a horizontal line.

Peter Mougey, Attorney, Levin Papantonio

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF LEVIN PAPANTONIO IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Year | Hours | Rate | Lodestar |
|------------------|-----------------|-------------|--------------|-------------|-----------------|
| Ashley Armstrong | OC | 2017-2018 | 192.7 | \$300.00 | \$57,810.00 |
| | | | | | |
| | | | | | |
| | | | | | |
| Total | | | 192.7 | | \$57,810.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF LEVIN PAPANTONIO IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$0.00 |
| Court Costs - Filing Fees | \$100.00 |
| Litigation Fund Contribution | \$0.00 |
| Federal Express/Overnight Delivery/Messengers | \$0.00 |
| Photocopies - In House | \$0.00 |
| Photocopies - Outside | \$4.40 |
| Postage | \$12.29 |
| Service of Process Fees | \$0.00 |
| Telephone / Fax | \$0.00 |
| Transportation / Meals / Lodging | \$0.00 |
| Co-Counsel Fees | \$0.00 |
| Experts/Consultant Fees | \$0.00 |
| Court Reporter Service/Hearing Transcript Fees | \$0.00 |
| TOTAL EXPENSES | \$116.69 |

EXHIBIT 16

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF DANIEL E. SELTZ IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Daniel E. Seltz, declare as follows:

1. I am a partner with Lieff Cabraser Heimann & Bernstein, LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as co-counsel for Plaintiff in the case of *Harold Koppitz, on behalf of himself and all others similarly situated v. Chesapeake Energy Corporation, et al.*, No. 16-cv-427-D in the Western District of Oklahoma, and on the docket of District Court of Woods County, State of Oklahoma.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 92.40, with a corresponding lodestar (at historical rates) of \$52,785.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with the prosecution of the plaintiff's claims in the case, my firm did the following: researched and developed the factual and legal bases for

the complaint, assisted with the drafting of the complaint and subsequent written motions, including the motion to dismiss, motion to stay, and appellate briefing, and participated in all subsequent case management tasks. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters and/or approved by courts in similar complex litigation matters.

4. My firm has expended a total of \$825.74 in unreimbursed costs and expenses in connection with our work in the related case from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm and have not been reimbursed.

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

Executed this 18th day of March, 2019 at New York, New York.

/s/ Daniel E. Seltz

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF DANIEL E. SELTZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Reported Hours and Average Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Rate | Lodestar |
|---------------------------|-----------------------|--------------|-------------|-----------------|
| Daniel Seltz | Partner | 78.5 | 609.90 | 47,880.00 |
| Brendan Glackin | Partner | 0.30 | 700.00 | 210.00 |
| Eileen Beltran | Paralegal | 3.00 | 345.00 | 1,035.00 |
| Nikki Belushko Barrows | Paralegal | 1.90 | 345.00 | 655.50 |
| Yun Swenson | Paralegal | 0.40 | 352.50 | 141.00 |
| Siobhan Innes- Gawn | Litigation Support | 8.30 | 345.00 | 2,863.50 |
| | | | | |
| Total | | 92.40 | | 52,785.00 |

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF DANIEL E. SELTZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | 132.08 |
| Court Costs - Filing Fees | 350.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | 23.25 |
| Photocopies - In House | 33.20 |
| Printing | 67.80 |
| Postage | 9.52 |
| Service of Process Fees | |
| Telephone / Fax | 209.89 |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | 825.74 |

EXHIBIT 17

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF McCARTNEY STUCKY IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Christopher Stucky, declare as follows:

1. I am an attorney with McCartney Stucky LLC, I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 28.2, with a corresponding lodestar (at historical rates) of \$10,380.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: worked with our individual clients to investigate the factual background and validity of their claims, communicated with the clients throughout the litigation, worked with the clients and Plaintiffs' co-lead counsel to prepare discovery

responses and gather relevant documents, and coordinated with the clients on scheduling events throughout the litigation. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

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



Christopher Stucky, Partner
McCartney Stucky LLC

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**EXHIBIT 1 TO THE DECLARATION OF McCARTNEY STUCKY IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

**Reported Hours and Historical Lodestar
Inception through February 28, 2019**

| Name | Position | Hours | Average Historical Rate | Lodestar |
|--------------------|-----------------|--------------|------------------------------------|--------------------|
| Christopher Stucky | P | 15.0 | \$450.00 | \$6,750.00 |
| Austin Osborn | A | 13.2 | \$275.00 | \$3,630.00 |
| Total | | 28.2 | | \$10,380.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

EXHIBIT 18

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MCCULLEY MCCLUER PLLC IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, Stuart H. McCluer, declare as follows:

1. I am partner with McCulley McCluer PLLC ("the Firm"). I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2018. The Firm is not seeking fees for time spent on this matter after this period. The total numbers of hours spent by my firm during this period was 373.2, with a corresponding lodestar (at historical rates) of \$226,588.50. This schedule was prepared from contemporaneous, daily time records prepared and maintained by the Firm. In connection with representing the Plaintiffs in the Action my firm did, among other things, the following: participated in litigation strategy including case coordination; coordinated discovery with multiple named class representative including scheduling depositions; and undertook document review. The lodestar amount

reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$25,000.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of the Firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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



Stuart H. McCluer, Partner
McCulley McCluer PLLC

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**EXHIBIT 1 TO THE DECLARATION OF MCCULLEY MCCLUER PLLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

**Reported Hours and Historical Lodestar
Inception through February 28, 2018**

| Name | Position | Hours | Average Historical Rate | Lodestar |
|---------------------|-----------------|--------------|------------------------------------|---------------------|
| R. Bryant McCulley | P | 135 | \$711.38 | \$96,036.00 |
| Stuart H. McCluer | P | 145.3 | \$681.64 | \$99,042.50 |
| Frank B. Ulmer | OC | 18.2 | \$500.00 | \$9,100.00 |
| Frank B. Ulmer (DR) | OC | 74.7 | \$300.00 | \$22,410.00 |
| Total | | 373.2 | | \$226,588.50 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**EXHIBIT 2 TO THE DECLARATION OF MCCULLEY MCCLUER PLLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

**Summary Expense Report
Inception through February 28, 2019**

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | \$25,000.00 |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$25,000.00 |

EXHIBIT 19

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MCINTYRE LAW P.C. IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Noble McIntyre, declare as follows:

1. I am the senior partner with McIntyre Law, P.C.. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

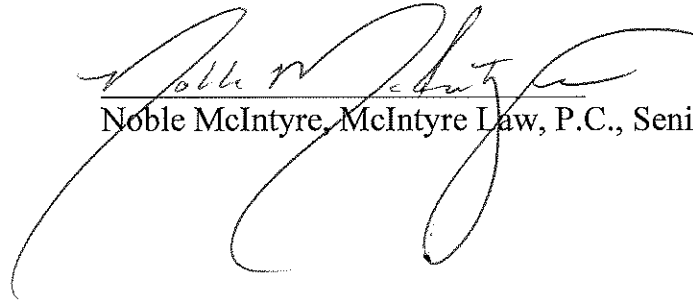
2. My firm served as local counsel for Keller Rohrback L.L.P.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 116, with a corresponding lodestar (at historical rates) of \$200.00 per hour. This schedule was prepared from time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: Filed the initial complaint working with Keller Rohrback. Reviewed all pleadings and filings as they came through. Gave input as local counsel on issues such as settlement in the case. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates

for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$883.60 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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



Noble McIntyre, McIntyre Law, P.C., Senior Partner

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF MCINTYRE LAW, P.C. IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------|-----------------|--------------|------------------------------------|-----------------|
| Jeremy Thurman | P | 18 | \$250.00 | \$4,500.00 |
| Noble McIntyre | P | 21 | \$300.00 | \$6,300.00 |
| Mandy Byte | PL | 77 | \$50.00 | \$3,850.00 |
| | | | | |
| Total | | 116 | | \$14,650.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF MCINTYRE LAW, P.C., IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | \$600.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | \$283.60 |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$883.60 |

EXHIBIT 20

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MICHAEL J. BLASCHKE, P.C.
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Michael J. Blaschke, declare as follows:

1. I am an attorney with Michael J. Blaschke, P.C. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 134.25, with a corresponding lodestar (at historical rates) of \$53,700.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: supported co-lead counsel in all phases of the litigation, drafted instruments, reviewed records and attended depositions. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with

my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$0.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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



Michael J. Blaschke, Esq.
MICHAEL J. BLASCHKE, P.C.
3037 N.W. 63rd Street, Suite 205
Oklahoma City, OK 73116
(405) 562-7771 Telephone
(405) 285-9350 Facsimile
mblaschke@thelawgroupokc.com

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF MICHAEL J. BLASCHKE, P.C.
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|---------------------|-----------------|--------------|------------------------------------|-----------------|
| Michael J. Blaschke | OC | 134.25 | \$400 | \$53,700.00 |
| | | | | |
| | | | | |
| Total | | | | |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF MICHAEL J. BLASCHKE, P.C.
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$0.00 |

EXHIBIT 21

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MITCHELL DeCLERCK IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Larry D. Lahman, declare as follows:

1. I am the Senior Partner/Member of Mitchell DeClerck. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

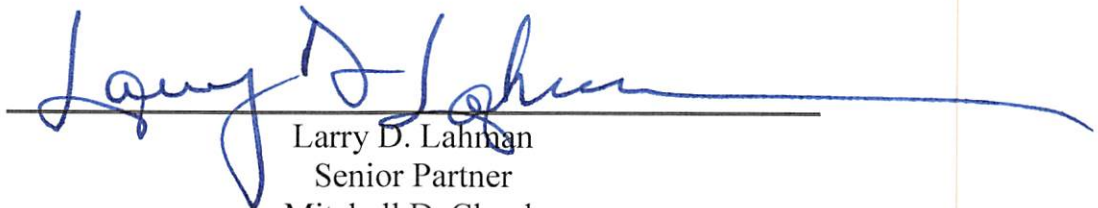
2. My firm served as Interim Local Counsel working under the direction of Plaintiffs' Co-Lead Counsel in the Action.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 486.25, with a corresponding lodestar (at historical rates) of \$194,260.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm served as Interim Local Counsel including but not limited to reviewing and filing pleadings for the Class including the Consolidated Class Action Complaint; reviewing all adverse pleadings;

interviewing potential fact witnesses; collecting, analyzing and electronically mapping relevant electronic and physical leasing data from County Clerks in the impacted area; preparation and participation in obtaining witness deposition testimony; researching and monitoring the estate of Aubrey McClendon filed in the District Court of Oklahoma County involving numerous hearings and thousands of documents and pleadings to analyze and ascertain the wisdom of joining the McClendon Estate in the Action; and appearing at all conferences with and hearings before this Court among other things all of which materially contributed to the successful resolution of the Action. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended several thousand dollars in unreimbursed costs and expenses in connection with the prosecution of the Action but has elected to not seek reimbursement for such.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct on March 17, 2019.


Larry D. Lahman
Senior Partner
Mitchell DeClerck

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**EXHIBIT 1 TO THE DECLARATION OF MITCHELL DeCLERCK IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

**Reported Hours and Historical Lodestar
Inception through February 28, 2019**

| Name | Position | Hours | Average Historical Rate | Lodestar |
|------------------|-----------------|---------------|------------------------------------|---------------------|
| Larry D. Lahman | P | 325.80 | \$450.00 | \$146,610.00 |
| Michael E. Kelly | P | 111.20 | \$300.00 | \$33,360.00 |
| Carol H. Lahman | OC | 14.80 | \$400.00 | \$5,920.00 |
| Roger L. Ediger | P | 12.65 | \$300.00 | \$3,795.00 |
| David C. Butler | P | 3.40 | \$400.00 | \$1,360.00 |
| Tim E. DeClerck | P | 0.20 | \$350.00 | \$70.00 |
| Ben J. Barker | OC | 0.50 | \$200.00 | \$100.00 |
| Alice Hurt | PL | 17.00 | \$175.00 | \$2,975.00 |
| Betty Davis | PL | 0.70 | \$100.00 | \$70.00 |
| Total | | 486.25 | | \$194,260.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

EXHIBIT 22

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF MARK A. WOLFE IN SUPPORT OF PLAINTIFFS’
MOTION FOR AN AWARD OF ATTORNEYS’ FEES**

I, Mark A. Wolfe, declare as follows:

1. I am a partner with Pate & Wolfe. I submit this declaration in support of Plaintiffs’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the “Action”).

2. My firm served as co-counsel for Plaintiff in the case of *Harold Koppitz, on behalf of himself and all others similarly situated v. Chesapeake Energy Corporation, et al.*, filed in Woods County, State of Oklahoma.

3. The schedule attached as Exhibit 1 sets forth my firm’s total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was forty two (42), with a corresponding lodestar (at historical rates) of \$12,600.00. This schedule was prepared from time records prepared and maintained by my firm. In connection with the prosecution of the plaintiff’s claims in the case, my firm did the following: drafting and consulting in the drafting of various pleadings in *Koppitz v. Chesapeake Energy Corp., et al.*, District Court of Woods County, Oklahoma, CJ-2016-26;

Meetings (in person and telephonic) with the Plaintiff; factual investigation relating to the claims in the case; review of oil and gas data/documentation; Multiple trips to Woods County; participated in certain case management tasks. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys with my firm for the benefit of the Class. The hourly rates for the attorneys in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters and/or approved by courts in similar complex litigation matters.

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

Executed this 19th day of March, 2019, at Oklahoma City, Oklahoma.

/s/ Mark A. Wolfe
Mark A. Wolfe, OBA No. 12534
Pate & Wolfe
1900 N.W. Expressway
Suite 1300
Oklahoma City, OK 73118
(405) 858.0012
pate_wolfe@sbcglobal.net

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF MARK A. WOLFE IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Year | Hours | Rate | Lodestar |
|--------------------------|-----------------|-------------|--------------|-------------|-----------------|
| <i>Mark A. Wolfe</i> | P | | 34.5 | \$300.00 | \$10,350.00 |
| <i>Kandi Jepsen Pate</i> | P | | 7.5 | \$300.00 | \$2,250.00 |
| | | | | | |
| | | | | | |
| Total | | | 42 | | \$12,600.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

EXHIBIT 23

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF RACHEL LAWRENCE MOR, P.C.
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Rachel Lawrence Mor, declare as follows:

1. I am an attorney with Rachel Lawrence Mor, P.C. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

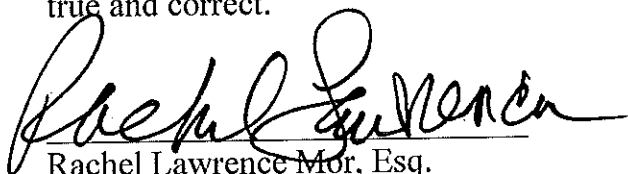
2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 35.50, with a corresponding lodestar (at historical rates) of \$10,650.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: supported co-lead counsel in all phases of the litigation, drafted instruments, reviewed records and attended depositions. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with

my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$400.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

A handwritten signature in black ink, appearing to read "Rachel Lawrence Mor", is written over a horizontal line.

Rachel Lawrence Mor, Esq.
RACHEL LAWRENCE MOR, P.C.
3037 N.W. 63rd Street, Suite 205
Oklahoma City, OK 73116
(405) 562-7771 Telephone
(405) 285-9350 Facsimile
rmor@thelawgroupokc.com

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF RACHEL LAWRENCE MOR, P.C.
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|---------------------|-----------------|--------------|------------------------------------|-----------------|
| Rachel Lawrence Mor | OC | 35.50 | \$300.00 | \$10,650.00 |
| | | | | |
| | | | | |
| Total | | | | |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF RACHEL LAWRENCE MOR, P.C.
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | \$400.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$400.00 |

EXHIBIT 24

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF REINHARDT WENDORF & BLANCHFIELD IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, Garrett D. Blanchfield, declare as follows:

1. I am a partner with Reinhardt Wendorf & Blanchfield. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 395.4, with a corresponding lodestar (at historical rates) of \$175,807.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action, my firm did the following: worked with our client on prosecution of this matter; researched and prepared memoranda related to impact and damages; drafted discovery requests for defendant SandRidge; and participated in document review as part of the Witness Review Team. The

lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$27,433.56 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

Dated: March 15, 2019

s/Garrett D. Blanchfield
Garrett D. Blanchfield, Partner
Reinhardt Wendorf & Blanchfield

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF REINHARDT WENDORF &
BLANCHFIELD IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------------|-----------------|--------------|------------------------------------|---------------------|
| Blanchfield, Garrett | P | 120.6 | 700.83 | \$84,519.50 |
| Reinhardt, Mark | P | 2.4 | 825 | \$1,980.00 |
| Wendorf, Mark | P | 1.1 | 775 | \$852.50 |
| Penney, Brant | A | 66.1 | 406.88 | \$26,895.00 |
| Yard, Roberta | A | 205.2 | 300 | \$61,560.00 |
| Total | | 395.4 | | \$175,807.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

***EXHIBIT 2 TO THE DECLARATION OF REINHARDT WENDORF &
BLANCHFIELD IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES***

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$1,766.36 |
| Court Costs - Filing Fees | \$600.00 |
| Litigation Fund Contribution | \$25,000.00 |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | \$67.20 |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$27,433.56 |

EXHIBIT 25

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF SCHNEIDER WALLACE COTTRELL KONECKY
WOTKYNS IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Todd M. Schneider, declare as follows:

1. I am the founder and managing partner of Schneider Wallace Cottrell Konecky Wotkyms ("Schneider Wallace"). I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' Co-Lead Counsel in the Action.

3. Schneider Wallace is experienced and successful in complex federal class actions. Among other things, it has recently obtained a \$75 million settlement on behalf of a class of retirement investors in *In re JP Morgan Stable Value Fund ERISA Litigation* (final approval pending). Other substantial recent ERISA settlements include two related class actions against Northern Trust Corp. arising from its securities-lending activities for retirement plans, which settled for a total of \$60 million. Schneider Wallace is also active in class actions arising under the Americans With Disabilities Act. Most recently, it has obtained a settlement with relief valued at \$1.367 billion against the City of Los Angeles on behalf of a class of disabled Los Angeles residents.

4. In the antitrust field, Schneider Wallace is actively involved in many of the most significant matters currently pending in federal court. It represents a putative class of indirect purchasers in *Contant v. Bank of America Corp.*, a case alleging price fixing in the foreign exchange market, and has preliminarily obtained settlements from two defendants. In addition to representing classes, Schneider Wallace also represents major corporations as individual plaintiffs in antitrust matters. It represents one of the nation's largest health plans in multidistrict litigation alleging price fixing in the generic pharmaceuticals market and three major industrial aluminum purchasers in litigation alleging price fixing in the aluminum market.

5. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 709.2, with a corresponding lodestar (at historical rates) of \$351,754. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following:

- Drafted the Consolidated Amended Complaint that was filed in the Action on behalf of Plaintiffs;
- Negotiated with Defendants concerning the scope of documents to be produced in the Action;
- Reviewed documents produced by Defendants;

- Drafted correspondence with both Plaintiffs and Defendants as necessary for the prosecution of the Action;
- Participated in hearing and status conferences with the Court as necessary;
- Presented Plaintiffs for deposition;
- Participated in multiple mediations that ultimately resulted in the settlement of the Action;

6. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

7. My firm has expended a total of \$101,560.42 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

/s/ Todd M. Schneider

Todd M. Schneider
Partner
Schneider Wallace Cottrell Konecky Wotkyns LLP

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF SCHNEIDER WALLACE COTTRELL
KONECKY WOTKYNs LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|------------------------|-----------------|--------------|------------------------------------|-----------------|
| Todd M. Schneider | P | 73.8 | 817.5 | 60,331.5 |
| Jason H. Kim | P | 78.4 | 762.5 | 59,780 |
| Kyle G. Bates | A | 149.4 | 662.5 | 98,977.5 |
| Abigail M. Laudick | A | 276.3 | 300 | 82,890 |
| John M. Gaudette | SA | 98.8 | 300 | 29,640 |
| Ryan R. Hicks | A | 19.5 | 750 | 14,625 |
| David W. Whitehead | SA | 2.2 | 300 | 660 |
| Jemima D. Dominguez | LC | 2 | 125 | 250 |
| Sam T. Marks | PL | 3.2 | 300 | 960 |
| Travis C. Close | SA | 5.6 | 650 | 3,640 |
| Total | | 709.2 | | 351,754 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF SCHNEIDER WALLACE COTTRELL
KONECKY WOTKYNs LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | 163.31 |
| Court Costs - Filing Fees | 160 |
| Litigation Fund Contribution | 0 |
| Federal Express/Overnight Delivery/Messengers | 276.09 |
| Photocopies - In House | 0 |
| Photocopies - Outside | 48.75 |
| Postage | 24.7 |
| Service of Process Fees | 0 |
| Telephone / Fax | 0 |
| Transportation / Meals / Lodging | 13,645 |
| Co-Counsel Fees | 0 |
| Experts/Consultant Fees | 0 |
| Court Reporter Service/Hearing Transcript Fees | 500.99 |
| Document Hosting & Storage | 86,741.58 |
| TOTAL EXPENSES | 101,560.42 |

Exhibit 26

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF SHARP MCQUEEN PA IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Isaac Diel, declare as follows:

1. I am a partner with Sharp McQueen PA. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total number of hours spent by my firm during this period was 287.8, with a corresponding lodestar (at historical rates) of \$115,230.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm was active since the case's inception and did the following. I personally met with our long time firm client and Alfalfa County mineral owner, Brian Thieme, and researched the allegations made by the government and our case. This process involved the analysis of voluminous leasing

documents. I strategized with Co- Lead counsel Warren Burns regarding the factual allegations of the suit and the venue for filing the same. Mr. Burns and I then filed one of the first, if not the first, complaints in this matter titled Brian Thieme v. Chesapeake Energy Corp et. al. Case No. 16-cv-206-M. I analyzed Mr. Thieme's lease documentation during class discovery and produced pertinent documents to defendants. I then worked with Mr. Thieme to prepare for his deposition as a class representative and then defended Mr. Thieme at his class representative deposition. I also analyzed numerous defendant documents produced in this matter and met with experts retained in the case. During the pendency of the case I kept Mr. Thieme informed of case developments and eventually the details of the settlement. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$4609.68 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

Isaac Diel, Partner- Sharp McQueen PA

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF SHARP MCQUEEN PA IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|--------------|-----------------|--------------|------------------------------------|-----------------|
| Isaac Diel | P | 287.8 | \$400.38/hr | \$115,230.00 |
| | | | | |
| | | | | |
| | | | | |
| Total | | | | |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF SHARP MCQUEEN PA IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | \$4111.42 |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | \$498.26 |
| TOTAL EXPENSES | \$4609.68 |

Exhibit 27

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF SPECTOR ROSEMAN & KADROFF, P.C. IN SUPPORT
OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, William G. Caldes, declare as follows:

1. I am a Partner with Spector Roseman & Kodroff, P.C. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

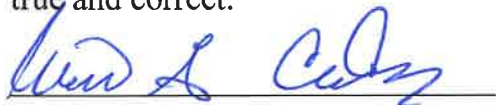
2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 372.45 with a corresponding lodestar (at historical rates) of \$126,221.25. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: During the course of this litigation, the Firm has been involved in the following activities on behalf of the class at the request and under the direction of co-lead class counsel ("Co-Lead Counsel") including being in contact with Co-Lead Counsel and participating in the review,

analysis and coding of English language documents in preparation for depositions, discovery and settlement purposes. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$25,246.39 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

A handwritten signature in blue ink, appearing to read "William G. Caldes", is written over a horizontal line.

William G. Caldes
Partner
Spector Roseman & Kodroff, P.C.

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**EXHIBIT 1 TO THE DECLARATION OF SPECTOR ROSEMAN & KODROFF,
P.C. IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

**Reported Hours and Historical Lodestar
Inception through February 28, 2019**

| Name | Position | Hours | Average Historical Rate | Lodestar |
|---------------|-----------------|---------------|------------------------------------|---------------------|
| E. Spector | P | 1.5 | \$835.00 | \$1,252.50 |
| J. Spector | A | 3.3 | \$426.82 | \$1,408.50 |
| G. DeMarshall | PL | 7.8 | \$239.07 | \$1,864.75 |
| W. Caldes | P | 34.15 | \$707.92 | \$24,175.50 |
| C. Jadge | OC | 323.7 | \$300.00 | \$97,110.00 |
| C. Srey | PL | 1.0 | \$160.00 | \$160.00 |
| C. Briglia | PL | 1.0 | \$250.00 | \$250.00 |
| Total | | 372.45 | | \$126,221.25 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF SPECTOR ROSEMAN & KODROFF,
P.C. IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$53.80 |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | 25,000.00 |
| Federal Express/Overnight Delivery/Messengers | .68 |
| Photocopies - In House | 14.50 |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | 1.67 |
| Transportation / Meals / Lodging | 175.74 |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$25,246.39 |

Exhibit 28

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF STEYER LOWENTHAL BOODROOKAS ALVAREZ &
SMITH LLP IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Allan Steyer, declare as follows:

1. I am a partner with Steyer Lowenthal Boodrookas Alvarez & Smith LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 241.3, with a corresponding lodestar at historical rates of \$188,712.50. I excluded from this amount any person from our firm that billed less than five hours to this case. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: performed legal research regarding antitrust laws, ACPERA, and Oklahoma laws; performed research regarding Chesapeake Energy Corp. and Sandridge

Energy, Inc.; discovery work including meeting with defense counsel and our co-counsel in Dallas, Texas; attended court hearing in federal court in Oklahoma City, and discussed case strategy with co-lead counsel. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$4,334.55 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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



Allan Steyer, Partner

Steyer Lowenthal Boodrookas Alvarez & Smith LLP

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF STEYER LOWENTHAL
BOODROOKAS ALVAREZ & SMITH LLP IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|-----------------------------|-----------------|--------------|------------------------------------|-----------------|
| Allan Steyer | P | 87.9 | \$950.43 | \$83,543.00 |
| D. Scott Macrae | OC | 109.6 | \$855.63 | \$93,777.00 |
| Jill K. Cohoe | A | 7.5 | \$380.00 | \$2,850.00 |
| Laura L. Gildengorin | A | 7.5 | \$300.00 | \$2,250.00 |
| Brittney Webb | PL | 13.5 | \$195.00 | \$2,632.50 |
| Adison Marshall | PL | 15.3 | \$239.22 | \$3,660.00 |
| Total | | 241.3 | | \$188,712.50 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**EXHIBIT 2 TO THE DECLARATION OF STEYER LOWENTHAL
BOODROOKAS ALVAREZ & SMITH LLP IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | 1,403.59 |
| Court Costs - Filing Fees | 100.00 |
| Litigation Fund Contribution | 0.00 |
| Federal Express/Overnight Delivery/Messengers | 18.54 |
| Photocopies - In House | 0.00 |
| Photocopies - Outside | 0.00 |
| Postage | 0.00 |
| Service of Process Fees | 0.00 |
| Telephone / Fax | 0.00 |
| Transportation / Meals / Lodging | \$2,812.42 |
| Co-Counsel Fees | 0.00 |
| Experts/Consultant Fees | 0.00 |
| Court Reporter Service/Hearing Transcript Fees | 0.00 |
| TOTAL EXPENSES | \$4,334.55 |

Exhibit 29

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF SUSMAN GODFREY LLP IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION
EXPENSES**

I, Terrell W. Oxford, declare as follows:

1. I am, through my L.L.C., a partner with Susman Godfrey L.L.P. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' Co-Lead Counsel in the Action.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 823.7, with a corresponding lodestar (at historical rates) of \$437,815. This schedule was prepared by firm personnel at my direction from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: Investigated the Class's claims, drafted pleadings and motions, performed legal research, reviewed documents produced by Defendants and responded to discovery requests, prepared for and attended Court proceedings, participated in mediation and settlement negotiations, and, as Co-Lead Counsel, managed litigation

strategy and supervised work performed by other counsel for the Class. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$61,307.93 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.


5. Since my firm's founding in 1980, it has served as lead counsel in hundreds of antitrust class actions and other complex commercial disputes in courts throughout the country. The firm has represented clients in some of the largest and most complex cases ever litigated and earned a reputation for handling those cases effectively and efficiently. In recognition of its successes, Susman Godfrey has been recognized as "Litigation Boutique of the Year" by The American Lawyer, listed as one of "America's Elite Trial Lawyers" by The National Law Journal, and named one the "Most Feared" litigation firms in the nation by Law360.

6. My firm has tried more than a dozen significant antitrust cases to a jury, yielding over \$1 billion in verdicts, and has been appointed to serve as lead or co-lead counsel in numerous antitrust class actions and other class actions, including: *In re Qualcomm Antitrust Litigation* (N.D. Cal., appointed 2018); *In re Automotive Parts*

Antitrust Litigation (E.D. Mich., appointed 2012); *In re Toyota Motor Corp. Unintended Acceleration Marketing Sales Practices, and Product Liability Litigation* (C.D. Cal., appointed 2010); *In re Vitamin C Antitrust Litigation* (E.D.N.Y. 2006); *In re Crude Oil Commodity Futures Litigation* (S.D.N.Y. 2012); *White v. Nat'l Collegiate Athletic Ass'n* (C.D. Cal. 2006); *In re LIBOR-Based Fin. Instruments Antitrust Litigation* (S.D.N.Y. 2011); *In re Ready-Mixed Concrete Antitrust Litigation* (S.D. Ind. 2005); *In re Municipal Derivatives Antitrust Litigation* (S.D.N.Y. 2011); *In re Universal Serv. Fund Tel. Billing Practices Litigation* (D. Kan. 2004); *Behrend v. Comcast Corp.* (E.D. Pa. 2010); *In re Lease Oil Antitrust Litigation* (S.D. Tex. 1999); *In re Korean Air Lines Co. Antitrust Litigation* (C.D. Cal. 2008); *In re Vitamins Antitrust Litigation* (D.D.C. 1999); *In re Processed Egg Products Antitrust Litigation* (E.D. Pa. 2008); and *In re Commercial Explosives Antitrust Litigation* (D. Utah 1996).

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

Executed this 15th day of March, 2019, at Houston, Texas.



TERRELL W. OXFORD
Partner, Susman Godfrey L.L.P.
Co-Lead Counsel for Plaintiffs

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF SUSMAN GODFREY LLP IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|--------------------|-----------------|--------------|------------------------------------|---------------------|
| Bhatia, Vineet | P | 4.2 | \$825.00 | \$3,465.00 |
| Dinh, Cindy | A | 198.9 | \$376.13 | \$74,812.50 |
| Howell, Chase | SA | 39.7 | \$300.00 | \$11,910.00 |
| Mohsen, Rania | SA | 108.6 | \$286.28 | \$31,090.00 |
| Oxford, Terrell W. | P | 221.4 | \$900.00 | \$199,260.00 |
| Polanco, Rodney | PL | 9.2 | \$225.00 | \$2,070.00 |
| Raymond, Shawn | P | 139.0 | \$627.82 | \$87,267.50 |
| Stanley, Joanna | PL | 0.8 | \$275.00 | \$220.00 |
| Wojtczak, Richard | PL | 101.9 | \$272.03 | \$27,720.00 |
| Total | | 823.7 | | \$437,815.00 |

Role Legend

P Partner
A Associate
PL Paralegal
SA Staff Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF SUSMAN GODFREY LLP IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$4,399.29 |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | \$50,000.00 |
| Federal Express/Overnight Delivery/Messengers | \$171.51 |
| Photocopies - In House | \$355.90 |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | \$6,092.23 |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | \$289.00 |
| TOTAL EXPENSES | \$61,307.93 |

Exhibit 30

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**DECLARATION OF WHEELER TRIGG O'DONNELL LLP IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES**

I, Kathryn A. Reilly, declare as follows:

1. I am a partner with Wheeler Trigg O'Donnell LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

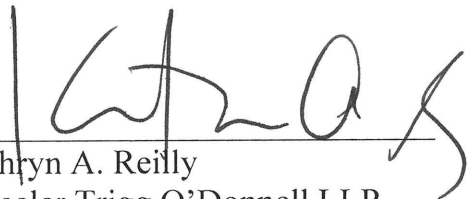
2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 210.2, with a corresponding lodestar (at historical rates) of \$65,622.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: performed legal research and analysis regarding the impact of SandRidge's bankruptcy petition on Plaintiffs' claims, and assisted with document review. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys

and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$770.28 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

A handwritten signature in black ink, appearing to read 'K. Reilly', written over a horizontal line.

Kathryn A. Reilly
Wheeler Trigg O'Donnell LLP
370 17th Street, Suite 4500
Denver, CO 80202-5647

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF WHEELER TRIGG O'DONNELL LLP
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|----------------|-----------------|--------------|------------------------------------|--------------------|
| Kathryn Reilly | P | 11.3 | \$450.00 | \$5,085.00 |
| Natalie West | SA | 28.9 | \$330.00 | \$9,537.00 |
| Cynthia Ivers | SA | 170.0 | \$300.00 | \$51,000.00 |
| | | | | |
| | | | | |
| Total | | 210.2 | | \$65,622.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF WHEELER TRIGG O'DONNELL LLP
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | \$670.28 |
| Court Costs - Filing Fees | \$100.00 |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$770.28 |

Exhibit 31

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

**IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION**

**NO. CIV-16-0209-HE
(Consolidated Number)**

**DECLARATION OF WRIGHT SCHIMMEL LLC
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Greg Wright, declare as follows:

1. I am a partner with Wright Schimmel LLC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in *In re Anadarko Basin Oil and Gas Lease Antitrust Litigation* (the "Action").

2. My firm served as Plaintiffs' counsel in the Action, working under the direction of Plaintiffs' Co-Lead Counsel.

3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through and including February 28, 2019. The total numbers of hours spent by my firm during this period was 214.4, with a corresponding lodestar (at historical rates) of \$65,490.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action my firm did the following: Reviewed and analyzed documents produced by the defendants and third-parties and coded them for relevancy and issues in the case. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with

my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$0.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including February 28, 2019. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

Dated: March 15, 2019



Greg Wright, Partner
Wright Schimmel LLC
6900 College Blvd., Suite 285
Overland Park, KS 66211
T: (913) 534-8530
F: (913) 534-8536
E: greg@wrightschimmel.com

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 1 TO THE DECLARATION OF WRIGHT SCHIMMEL LLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Reported Hours and Historical Lodestar
Inception through February 28, 2019

| Name | Position | Hours | Average Historical Rate | Lodestar |
|--------------|-----------------|--------------|------------------------------------|-----------------|
| Greg Wright | P | 214.4 | \$305.46 | \$65,490.00 |
| | | | | |
| | | | | |
| | | | | |
| Total | | 214.4 | \$305.46 | \$65,490.00 |

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

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

IN RE ANADARKO BASIN OIL AND
GAS LEASE ANTITRUST LITIGATION

NO. CIV-16-0209-HE
(Consolidated Number)

**EXHIBIT 2 TO THE DECLARATION OF WRIGHT SCHIMMEL LLC IN
SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES**

Summary Expense Report
Inception through February 28, 2019

| Expense | Total Amount |
|---|---------------------|
| Electronic Research (Lexis/Westlaw/PACER) | |
| Court Costs - Filing Fees | |
| Litigation Fund Contribution | |
| Federal Express/Overnight Delivery/Messengers | |
| Photocopies - In House | |
| Photocopies - Outside | |
| Postage | |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Co-Counsel Fees | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | \$0.00 |