

IN THE DISTRICT COURT OF GARVIN COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA }
GARVIN COUNTY } SS:
FILED
DEC 17 2024
AT _____ O'CLOCK _____ M.
LAURA LEE, Court Clerk
BY _____ DEPUTY

Wake Energy, LLC, on behalf of itself and all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Case No. CJ-2024-267
)	
)	
Devon Energy Production Company, L.P.,)	
)	
Defendant.)	

**CLASS COUNSEL'S MOTION FOR APPROVAL OF
REIMBURSEMENT OF LITIGATION EXPENSES AND
ADMINISTRATION, NOTICE, AND DISTRIBUTION COSTS**

Class Counsel¹ respectfully file this *Motion for Approval of Reimbursement of Litigation Expenses and Administration, Notice, and Distribution Costs*, and hereby move this Court for entry of an Order approving Class Counsel's request for reimbursement of: (a) Litigation Expenses incurred by successfully prosecuting and resolving this Litigation in an amount not to exceed \$39,000.00, and (b) Administration, Notice, and Distribution Costs actually incurred and not to exceed \$130,000.00.

Class Counsel base this Motion on: (1) the Memorandum of Law in Support of this Motion and exhibits thereto; (2) Class Counsel's Declaration;² (3) Class Representative's Declaration;³ (4) Settlement Administrator's Declaration⁴; (5) the Affidavit of George N. Keeney, III;⁵ (6) the

¹ All capitalized terms not otherwise defined herein shall have the meaning given to them in the September 30, 2024 Settlement Agreement, a copy of which is attached as Exhibit 1 to the *Memorandum of Law in Support of Plaintiff's Unopposed Motion to Certify the Settlement Class for Settlement Purposes, Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice and Set Date for Final Approval Hearing* that was filed on October 17, 2024.

² Attached as Exhibit 2 to Class Representative's Memorandum of Law in Support of Motion for Final Approval.

³ Attached as Exhibit 1 to Class Representative's Memorandum of Law in Support of Motion for Final Approval.

⁴ Attached as Exhibit 3 to Class Representative's Memorandum of Law in Support of Motion for Final Approval.

⁵ Attached as Exhibit 4 to Class Representative's Memorandum of Law in Support of Motion for Final Approval.

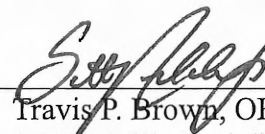
applicable law; and (7) all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if set forth fully herein.

Accordingly, Class Counsel respectfully request the Court enter the Proposed Order granting the relief stated above and such further relief to which the Court finds Class Counsel entitled.

Respectfully submitted,

Dated: December 17, 2024.

By:



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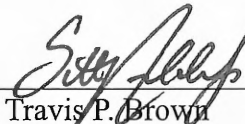
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**ATTORNEYS FOR PLAINTIFF AND CLASS
MEMBERS**

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2024, a copy of the forgoing was mailed to the following counsel:

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