

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

PERRY CLINE, on behalf of)
himself and all others)
similarly situated,)
))
Plaintiff,)
))
v.)
))
SUNOCO, INC. (R&M))
and SUNOCO PARTNERS)
MARKETING & TERMINALS, L.P.,)
))
Defendants.)

Case No. 17-cv-313-JAG

**CLASS COUNSEL’S MOTION FOR APPROVAL OF
ATTORNEYS’ FEES**

Class Counsel respectfully file this Motion for Approval of Attorneys’ Fees and hereby move the Court for entry of an Order approving Class Counsel’s request for an award of attorneys’ fees equal to 40% of the Judgment Common Fund recovered for the Certified Class. Class Counsel have obtained a common fund for the Class, consisting of the interest-accruing “Judgment Common Fund,” which is made up of \$80,691,486.00 in actual damages, \$75,000,000.00 in punitive damages, plus post-judgment interest, which is on deposit with the Judgment Administrator in an interest-bearing account.

As set forth more fully in the supporting memorandum of law, the Final Judgment amounts to almost **200%** of the Class’s actual damages. The requested percentage fee is within the range of percentages allowed in Oklahoma oil-and-gas class actions. Thus, Class Counsel’s request is fair, reasonable and, therefore, should be approved.

Class Counsel base this Motion on the Memorandum of Law in Support of this Motion and the following exhibits hereto:

- Declaration of Bradley E. Beckworth on behalf of Nix Patterson, LLP (Exhibit 1);
- Declaration of Class Representative, Perry Cline (Exhibit 2);
- Declaration of Pat Ryan on behalf of Ryan Whaley Coldiron Jantzen Peters & Webber PLLC (Exhibit 3);
- Declaration of Barnes & Lewis LLP (Exhibit 4);
- Declaration of Michael Burrage on Behalf of Whitten Burrage (Exhibit 5);
- Declaration of Lawrence R. Murphy, Jr. (Exhibit 6);
- Declaration of Geoffrey P. Miller (Exhibit 7);
- Declaration of Class Member Paul Walker (Exhibit 8);
- Declaration of Class Member Sagacity, Inc. (Exhibit 9);
- Declaration of Class Member Citadel Energy, Inc. (Exhibit 10);
- Declaration of Class Member Kelsie Wagner (Exhibit 11);
- Declaration of Class Member Pagosa Resources, LLC (Exhibit 12);
- Declaration of Class Member Chieftain Royalty Co. (Exhibit 13);
- Declaration of Class Member Castlerock Resources, Inc. (Exhibit 14);
- Declaration of Class Member Teresa Beauregard (Exhibit 15);
- Declaration of Class Member The Betty Woodruff Trust (Exhibit 16);
- Declaration of Class Member Michael Kernen (Exhibit 17);
- Declaration of Class Member Thomas Blakemore (Exhibit 18);
- Declaration of Dan Caldwell (Exhibit 19);
- Time records of Class Counsel (Exhibit 20);
- Declaration of Jennifer M. Keough on Behalf of Judgment Administrator JND Legal Administration LLC (Exhibit 21);

- Oklahoma State Court Cases (Exhibit 22);
- Declaration of Beck Redden (Exhibit 23); and
- the applicable law, and all pleadings, trial records, 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 may be entitled.

DATED: January 31, 2023.

Respectfully submitted,

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**CLASS COUNSEL AND ATTORNEYS FOR
CLASS REPRESENTATIVE**

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to all registered parties.

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

/s/Bradley E. Beckworth

Bradley E. Beckworth