

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

**CHIEFTAIN ROYALTY COMPANY** )  
**and JACK LANCET** )  
*Plaintiffs* )  
 )  
**v.** )  
 )  
**QEP ENERGY COMPANY** )  
*Defendant* )  
\_\_\_\_\_ )

Civil Action No. CIV-11-212-R

**MOTION FOR APPROVAL OF ATTORNEYS’ FEES,  
LITIGATION EXPENSES AND CASE CONTRIBUTION AWARD**

Class Representatives, Chieftain Royalty Company and Jack Lancet (collectively “Class Representatives”),<sup>1</sup> individually, and on behalf of all others similarly situated, and Nix, Patterson & Roach, LLP and Barnes & Lewis, LLP (collectively, “Class Counsel”) respectfully file this their Motion for Approval of Attorneys’ Fees, Litigation Expenses and Case Contribution Award (the “Motion”), and hereby move this Court for entry of an Order approving:

1. Class Counsel’s request for attorneys’ fees;
2. Class Counsel’s request for reimbursement of Litigation Expenses; and
3. Class Representatives’ request for Case Contribution Awards.

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meaning given to them in the February 13, 2013 Stipulation and Agreement of Settlement, a copy of which is attached as Exhibit 1 to the Class Representatives’ Memorandum of Law in Support of Settling Parties’ Joint Motion to Preliminarily Approve Class Action Settlement, Approve Form and Manner of Notice and Set Date for Final Fairness Hearing, Docket No. 119.

Class Representatives and Class Counsel base this motion on the Memorandum of Law in Support of this Motion and exhibits thereto, the applicable law, and all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if set forth fully herein. No later than one (1) week prior to the Final Approval Hearing, Class Representatives and Class Counsel will submit a proposed Order Awarding Class Counsel Attorneys' Fees and Litigation Expenses (the "Proposed Fee Order") and a proposed Order Approving Class Representatives' Case Contribution Awards (the "Proposed Case Contribution Award Order").

Accordingly, Class Representatives and Class Counsel respectfully request that this Court enter the Proposed Fee Order and the Proposed Case Contribution Award Order granting the relief listed above and grant any further relief to which the Court finds Class Representatives and Class Counsel entitled.

Dated: May 7, 2013

Respectfully submitted,

/s/ Bradley E. Beckworth

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**CLASS COUNSEL AND  
ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2013, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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Dated: May 7, 2013

*/s/ Bradley E. Beckworth* \_\_\_\_\_

**Motions**[5:11-cv-00212-R Chieftain Royalty Company v. QEP Energy Company](#)**U.S. District Court****Western District of Oklahoma[LIVE]****Notice of Electronic Filing**

The following transaction was entered by Beckworth, Bradley on 5/7/2013 at 3:00 PM CDT and filed on 5/7/2013

**Case Name:** Chieftain Royalty Company v. QEP Energy Company

**Case Number:** [5:11-cv-00212-R](#)

**Filer:** Chieftain Royalty Company  
Jack Lancet

**Document Number:** [161](#)

**Docket Text:**

**[MOTION for Attorney Fees Motion for Approval of Attorneys' Fees, Litigation Expenses and Case Contribution Award by All Plaintiffs. \(Beckworth, Bradley\)](#)**

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