

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 REPRESENTATIVE'S MOTION FOR APPROVAL OF
CASE CONTRIBUTION AWARD**

Class Representative¹, Wake Energy, LLC, on behalf of themselves and the Settlement Class preliminarily certified by the Court in its November 25, 2024 *Order Granting Approval of Class Action Settlement, Certifying the Class for Settlement Purposes, Approving Form and Manner of Notice, and Setting Date for Final Fairness Hearing*, respectfully file this *Motion for Approval of Case Contribution Award*, respectfully move this Court for entry of an Order approving Class Representative's request for a Case Contribution Award of \$40,000.00.

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.

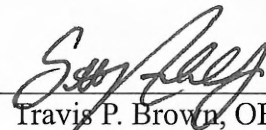
applicable law; and (7) all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if set forth fully herein.

Accordingly, Class Representative respectfully requests the Court enter an order granting the relief stated above and any further relief deemed equitable and just.

Respectfully submitted,

Dated: December 17, 2024.

By:



Travis P. Brown, OBA #20636

J. Matt Hill, OBA #33532

Scott R. Verplank, Jr., OBA #34041

MAHAFFEY & GORE, P.C.

300 N.E. 1st Street

Oklahoma City, OK 73104-4004

Telephone: (405) 236-0478

Facsimile: (405) 236-1840

tbrown@mahaffeygore.com

mhill@mahaffeygore.com

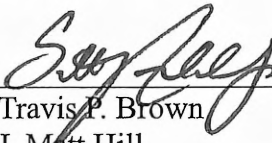
sverplank@mahaffeygore.com

**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:

Timothy J. Bomhoff, OBA #13172
Patrick L. Stein, OBA #30737
MCAFEE & TAFT, a professional corporation
8th Floor, Two Leadership Square
211 North Robinson
Oklahoma City, OK 73102
Telephone: (405) 235-9621
Facsimile: (405) 235-0439
tim.bomhoff@mcafeetaft.com
patrick.stein@mcafeetaft.com
**ATTORNEYS FOR DEFENDANT DEVON
ENERGY PRODUCTION COMPANY, LP**



Travis P. Brown
J. Matt Hill
Scott R. Verplank, Jr.