

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

JOHN CECIL,  
on behalf of himself and all others similarly  
situated,

Plaintiff,

vs.

BP AMERICA PRODUCTION COMPANY  
(f/k/a Amoco Production Company)  
(including BP Amoco Corporation, ARCO,  
BP Exploration, Inc., BP Corporation North  
America, Inc., and BP Energy Company),

Defendant.

Civil Action No. 16-CV-00410-KEW

**DECLARATION OF ROBERT J. KEE IN SUPPORT OF  
PLAINTIFF'S ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, ROBERT J. KEE, under penalty of perjury, declare as follows:

1. I am an attorney for Plaintiff in the above-referenced case. I submit this Declaration regarding the qualifications of TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. to represent Plaintiff and the Settlement Class in this case and to provide the Court with the time and expenses that TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. has invested in the prosecution of this action. The statements in this Declaration are based on my personal knowledge, the contemporaneously maintained business records of TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C., and my review of those records.

2. Attached hereto as **Exhibit 1** is the professional resume of TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C., identifying its extensive experience in oil and gas class

actions. Within the past year (2018) TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. has been approved as class counsel in the following royalty underpayment class actions:

NONE, although the firm has been class attorney in several class actions in previous years.

3. To date, TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. has invested 221.6 hours in the prosecution of this Litigation and estimates it will expend another 20.0 hours in the future to fully implement the Settlement if finally approved.

4. To support the reasonableness of TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. fee request, it incorporates the analysis of the *Johnson* factors in the Joint Declaration of Plaintiff's Counsel in Support of Plaintiff's Application for Plaintiff's Attorneys' Fees, Litigation Expenses, Case Contribution Award, and Administration, Notice and Distribution Costs and the exhibits thereto ("Joint Declaration"). However, TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. did not charge copying or travel expense; and litigation expenses were incurred by other counsel in the Chockley case. Therefore, TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. seeks reimbursement only for court costs advanced as herein shown.

5. The books and records of TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. itemize the expenses TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. has paid to prosecute this case to date. It is the policy and practice of the TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. law firm to prepare such records from expense vouchers, check records, credit card records, and other source materials, if same are to be charged. Based

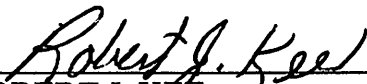
on my oversight of the work in connection with this Litigation and my review of these records, the below table accurately records the expenses TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. actually incurred to prosecute this Litigation. All expenses shown were reasonable and necessary to the successful conclusion of this case.

	<b>Total Category Expense</b>
<b>Administrative Expenses</b>	
Fedex/UPS/Postage	
Copy Expenses	
Court Fees/Filing	\$121.00
<b>Expert/Consulting Expenses</b>	0.00
<b>Research and Investigation</b>	0.00
<b>Travel Expenses</b>	
Lodging, Meals and Transportation	0.00
	<b>\$121.00</b>
<b>TOTAL SUBMITTED EXPENSES</b>	

The total expenses paid by TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C to date are approximately \$121.00. TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C. may present additional expenses incurred at the Final Fairness Hearing.

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

**Executed on October 5, 2018.**

  
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 ROBERT J. KEE  
 OBA # 4903  
 TRIPPET, KEE, TRIPPET &  
 PARSONS, P.L.L.C.  
 P.O. Box 728  
 Beaver, Oklahoma 73932  
 (580) 625-4597

## **FIRM RESUME**

**TRIPPET, KEE, TRIPPET & PARSONS, P.L.L.C.**, is a law firm currently composed of four (4) lawyers, engaged in the general practice of law in Beaver and Texas Counties of the Oklahoma Panhandle. Firm members are Richard P. Trippet, Robert J. Kee, Todd Trippet and Thad Parsons.

The law firm was established in 1969 as a partnership between Dwight Leonard and Richard P. Trippet. In 1971, Timothy D. Leonard joined the firm. Robert J. Kee joined the firm in 1975. In 1976, upon the retirement of Dwight Leonard, the firm became Trippet, Leonard & Kee. Timothy D. Leonard was in the Oklahoma State Senate from 1979 to 1988 and remained with the firm until 1988, at which time he was engaged in private practice and public service. He became a United States District judge for the Western District of Oklahoma in 1992, from which position he recently retired.

Richard P. Trippet was active in the firm until 2017 and was engaged primarily in the practice of probate, trust and estate law throughout his career. Trippet was admitted to the Oklahoma bar in 1962 and is a member of the American College of Trust and Estate Counsel. He is currently "of counsel" with the firm.

Robert J. Kee is primarily engaged in the practice of oil and gas law and has been so involved through out his career, but he also practices real estate law and general litigation. He was involved in several class action lawsuits in Oklahoma State Court commencing in 1992 with the filing of Bridenstine v. Kaiser-Francis, etal., a Beaver County case which proceeded to trial and judgment. Kee was involved in several other class action cases from 1999 through the current date, most often serving as local counsel. Kee graduated from the University of Oklahoma school of law in 1975.

Todd Trippet joined the firm in 1999 after graduation from Oklahoma City University law school and has a general practice with emphasis on real estate law. His undergraduate education was at Southwestern Oklahoma State University, where he graduated with a B.S. degree in 1986.

Thad B. Parsons joined the firm in 2003, upon graduation from Texas Tech University law school, summa cum laude. He practices in Hooker, Oklahoma at the firm's Hooker, Oklahoma office. He graduated in 1994 from Texas Tech University, summa cum laude, with a B.S. degree and from Oklahoma State University in 1996 with a M.S. degree. Parsons is the managing attorney in the Hooker, Oklahoma office.

The law firm holds an "A" rating from Martindale-Hubbell.