

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

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

Plaintiff,

Civil Action No. 16-CV-00410-KEW

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.

**CLASS REPRESENTATIVE'S MOTION FOR APPROVAL OF ATTORNEYS'
FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND
CASE CONTRIBUTION AWARD**

Class Representative John Cecil respectfully moves this Court for entry of an Order approving (1) Class Counsel's attorneys' fees in the amount of \$58,800,000.00, which represents 26.6% of the Gross Settlement Fund; (2) reimbursement of Class Counsel's Litigation Expenses in an amount not to exceed \$1,600,000; and, (3) a Case Contribution Award for himself, the three named plaintiffs in *Chockley v. BP*, and the named plaintiff in *Chieftain Royalty Company v. BP*, both of which putative class actions will be resolved if the Court finally approves the Settlement in this case.

Class Representative bases this Motion on: (1) the Memorandum of Law in Support of this Motion; (2) the Memorandum of Law in Support of Class Representative's Motion for Final Approval; (3) the exhibits attached to the Combined

Index of Exhibits submitted in support of both Motions; and (4) 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.

Accordingly, Class Counsel respectfully requests the Court enter the Proposed Order granting the relief stated above and any further relief to which the Court finds Class Representative is entitled.

Respectfully submitted,

s/ Rex A. Sharp

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**PLAINTIFF'S COUNSEL AND
CO-LEAD COUNSEL FOR
THE SETTLEMENT CLASS**

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2018, 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.

s/ Rex A. Sharp
Rex A. Sharp