

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 MICHAEL BURRAGE IN SUPPORT OF
PLAINTIFF'S ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Michael Burrage, 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 Whitten Burrage to represent Plaintiff and the Settlement Class in this case and to provide the Court with the time that Whitten Burrage has invested in the prosecution of this action. The statements in this Declaration are based on my personal knowledge, the business records of Whitten Burrage, and my review of those records.

2. Attached hereto as **Exhibit 1** is the professional resume of Michael Burrage of Whitten Burrage identifying his extensive experience in oil and gas class actions. Whitten Burrage has been approved as class counsel/expert witness in the following royalty underpayment class actions:

Adkisson v. Kock Industries, et al
Chieftain v. Alta Mesa Holdings
Chieftain v. Apache
Chieftain v. BP Production Co
Chieftain v. BP (USND)
Chieftain v. Laredo Petroleum
Chieftain v. Marathon Oil
Chieftain v. Newfield exploration
Chieftain v. Pacer Energy
Chieftain v. QEP Energy Company
Chieftain v. SM Energy/EnerVest
Chieftain v. Unit Petroleum
Chieftain v. XTO Energy
Cline v. Sunco
Cockrell v. Unit Petroleum
Dasa v. EnerVest
Donald D. Miller revoc. Trust v. DCP
Frankhouser v. XTO Energy
Hill v. Kaiser-Francis Oil Company
Hill v. Marathon Oil Company
Hitch Enterprises, Inc. v. Cimarex Energy
Kernen v Citizen Energy II
Kernen v. Casillas Operating
McClintock v. Continuum
McClintock v. Exxon Enterprises
Reirdon v. Cimarex
Reirdon v. Cimarex Energy & Cimarex of CO (fuel gas case)
Reirdon v. XTO Energy
Rhea v. Apache

3. To date, Whitten Burrage has invested 11.0 hours in the prosecution of this Litigation and estimates it will expend another 2 to 3 hours in the future to fully implement the Settlement if finally approved.

4. To support the reasonableness of Whitten Burrage's 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”).

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

Executed on October 16, 2018.



MICHEAL BURRAGE

Michael Burrage
Whitten Burrage
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Oklahoma City, Oklahoma 73102
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Education

University of Oklahoma, Juris Doctorate 1974 (with honors)
Order of the Coif
Editor, Oklahoma Law Review

Oklahoma Bar Association

Outstanding Young Lawyer in Oklahoma, 1977
Member, Board of Governors 1984-86
President, Oklahoma Bar Association 1990
Neil E. Bogan Professionalism Award 1991
Trustee, Oklahoma Bar Foundation
Lectured at various Continuing Legal Education seminars
Member, Oklahoma Supreme Court Committee, Civil Jury Instructions

Law Practice

1974-1994: Partner in the law firm of Stamper & Burrage
Litigation in Federal and State Courts

2001-2007: Returned to private practice. senior partner in
the BURRAGE LAW FIRM.

2007-Present: Founding/Managing Partner in Whitten Burrage.

Professional Associations

American College of Trial Lawyers, inducted 1993 (State Chair 2008-2009)
Oklahoma Bar Association
American Bar Association
Fellow, American Bar Foundation
Inducted into the University of Oklahoma College of Law, Order of the Owl
Hall of Fame (2013)
Inducted into the Oklahoma Hall of Fame (2016)

Federal Judgeship

United States District Judge; Eastern, Northern and Western Districts of Oklahoma 1994-2001

Chief; United States District Judge, Eastern District of Oklahoma 1996-2001

United States Court of Appeals for the 10th Circuit; sat by designation of the Chief on approximately 40 cases

OIL & GAS CASES - CLASS ACTION/EXPERT WITNESS

Adkisson v. Kock Industries, et al

Chieftain v. Alta Mesa Holdings

Chieftain v. Apache

Chieftain v. BP Production Co

Chieftain v. BP (USND)

Chieftain v. Laredo Petroleum

Chieftain v. Marathon Oil

Chieftain v. Newfield exploration

Chieftain v. Pacer Energy

Chieftain v. QEP Energy Company

Chieftain v. SM Energy/EnerVest

Chieftain v. Unit Petroleum

Chieftain v. XTO Energy

Cline v. Sunco

Cockrell v. Unit Petroleum

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Kernen v Citizen Energy II

Kernen v. Casillas Operating

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Reirdon v. Cimarex

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Reirdon v. XTO Energy

Rhea v. Apache