

**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

**CLASS REPRESENTATIVE’S MOTION FOR FINAL APPROVAL**

Plaintiff and Class Representative, John Cecil (“Class Representative” or “Cecil”), on behalf of himself and all others similarly situated, respectfully files this Motion for Final Approval, and hereby moves the Court for final approval of the:

1. Proposed class action Settlement;<sup>1</sup>
2. Notice of Settlement and Plan of Notice; and
3. Proposed Initial Plan of Allocation.

Class Representative bases this Motion on the Settlement Agreement, the applicable law, and all pleadings and records on file in this matter, which are respectfully incorporated by reference as if set forth fully herein. Class Representative also bases this Motion on its Memorandum of Law in Support of the Motion and the Combined Exhibit

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meaning given to them in the Settlement Agreement [Doc. No. 171-1].

Index to which all exhibits referenced in the Memorandum are attached. Both the Memorandum and Exhibit Index are filed contemporaneously with this Motion.

Class Representative's Proposed Order Approving Class Action Settlement and Final Judgment is attached as Exhibit 1. Class Representative's Proposed Initial Plan of Allocation Order is attached hereto as Exhibit 2.

Class Representative respectfully requests the Court grant the relief listed above by entering the proposed Final Approval Order and the proposed Initial Plan of Allocation Order and grant any further relief to which the Court finds Class Representative and the Settlement Class entitled.

Respectfully submitted,

s/ Rex A. Sharp

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-AND-

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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