

**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,
et al.,

Defendants.

Civil Action No. 16-CV-00410-KEW

JOINT DECLARATION OF PLAINTIFFS IN *CHOCKLEY v. BP*

We are the named plaintiffs in *Chockley, et al. v. BP America Production Co.*, No. CJ-2002-84 pending in the District Court for Beaver County, State of Oklahoma. We, Anne Chockley, Dwayne Sager, and Johnita Foster, are of lawful age and jointly declare upon personal knowledge and under penalty of perjury, as follows:

1. We are residents of the State of Oklahoma. We own oil and gas royalty interests in wells operated by Defendant BP America Production Company.
2. We are members of the Settlement Class in the above-described lawsuit.
3. We have had an opportunity to review the Settlement Agreement in this case and other relevant documents posted on the website related to this Settlement. We support all aspects of the Settlement, including: the cash settlement amount of \$147 million; BP's implementation of procedures and policies for calculating and paying royalty, as a result of this lawsuit that Plaintiff estimates, and BP does not contest, resulted in no less than \$38 million already paid to Class Members; BP's agreement to continue certain procedures and policies for royalty payments, which Plaintiff estimates has a value of an additional \$36,216,351.00 over the next seven years; Class Counsel's request for attorneys' fees of \$58,800,000, which I understand to be

approximately 26.6% of the overall settlement value of over \$221 million; Class Counsel's reimbursement of litigation expenses in an amount not to exceed \$1.6 million; and the case contribution awards, in an amount up to \$450,000, which I understand to be approximately 0.2% of the overall settlement value.

4. First, I believe the Settlement is fair and reasonable and that it provides a great result for the Settlement Class.

5. Second, I support Class Counsel's request for attorneys' fees. Many Oklahoma royalty owners in BP's wells are unaware of BP's deductions and reductions from their royalty and would likely never have recovered their underpaid royalty without the efforts of Plaintiff's Counsel, particularly because prior attorneys previously tried to pursue litigation against BP but failed on at least four occasions.

6. Third, I support the request for the Class Representative, John Cecil, and us as named plaintiffs in the additional litigation against BP, to receive up to \$450,000 for the contributions to this case. If entities or individuals did not take on the responsibility of representing classes of royalty owners, the benefits of a class recovery like this Settlement would not be possible for Oklahoma royalty owners.

7. Lastly, we support reimbursement of the requested expenses of Class Counsel not to exceed \$1.6 million. We believe that these amounts are fair and should be awarded.

DECLARATION UNDER PENALTY OF PERJURY UNDER 28 U.S.C. § 1746

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

By: *Anne Chockley*
ANNE CHOCKLEY

Executed on: October 3, 2018

By: *Dwayne Sager*
DWAYNE SAGER

Executed on: October 3, 2018

By: *Johnita L. Foster*
JOHNITA L. FOSTER

Executed on: October 3, 2018