

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

MCKNIGHT REALTY CO.,
on behalf of itself and all others similarly
situated,

Plaintiff,

v.

BRAVO ARKOMA, LLC, and
BRAVO NATURAL RESOURCES,

Defendants.

Case No. 17-CV-00308-KEW

**CLASS REPRESENTATIVE'S MOTION FOR APPROVAL OF
CLASS COUNSEL FEES AND EXPENSES AND ADMINISTRATION EXPENSES**

Plaintiff, as Class Representative for the Settlement Class, respectfully moves this Court for entry of an Order approving the following, in accord with the parties' Settlement Agreement [Dkt. No. 50-1] and Section IV of the Class Notice [Dkt. No. 53-1 at ECF 11]:

- (1) Class Counsel Fees in the amount of \$519,954.46, which represents forty percent of the Settlement Proceeds;
- (2) Reimbursement of Class Counsel's litigation expenses in the amount of \$87,483.73 and a reserve of \$11,000.00 for future litigation expenses as actually incurred;
and
- (3) Class Representative Award in an amount of \$25,997.72, which represents two percent of the Settlement Proceeds.

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 Exhibit Index 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
REX A. SHARP
OBA No. 011990
BARBARA C. FRANKLAND
OBA No. 033102
RYAN C. HUDSON
OBA No. 33104
Rex. A. Sharp, P.A.
5301 W. 75th Street
Prairie Village, KS 66208
(913) 901-0505
(913) 901-0419 fax
rsharp@midwest-law.com
bfrankland@midwest-law.com
rhudson@midwest-law.com

AND

REAGAN E. BRADFORD
OBA No. 22072
W. MARK LANIER, *Pro Hac Vice*
Texas State Bar No. 11934600
The Lanier Law Firm
Houston Office:
6810 FM 1960 West
Houston, Texas 77069
Telephone: (713) 659-5200
Oklahoma Office:
100 E. California Ave., Suite 200
Oklahoma City, OK 73104
WML@LanierLawFirm.com
Reagan.Bradford@LanierLawFirm.com

AND

Tod S. Mercer
OBA No. 14157
Mercer Law Firm, P.C.
500 East Choctaw Avenue
McAlester, OK 74501

CLASS COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record via the Court's electronic filing system.

/s/Rex A. Sharp

Rex A. Sharp