

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

Henry Price Trust, successor co-trustees  
Henry Price Bradley and Patricia Bradley  
Scott, on behalf of itself and all others  
similarly situated,

Plaintiff,

v.

Plains Marketing, L.P.,

Defendant.

Case No. 19-cv-390-KEW

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**SUPPLEMENT TO  
CLASS REPRESENTATIVE’S MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

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Class Representative Henry Price Trust (“Class Representative”) submits this Supplement to Class Representative’s Motion for Final Approval of Class Action Settlement (“Final Approval Motion,” Doc. 68). As is common, Class Representative’s Final Approval Motion was due prior to the request for exclusion deadline (March 5, 2021) and the objection deadline (March 12, 2021). *Id.* at 3, n. 4. As a result, Class Representative submits this supplement to address any requests for exclusion (eleven) and objections (none).

**1. Objections**

Class Representative is pleased to report that there were no objections submitted to the Settlement as of the objection deadline (March 12, 2021), nor have any objections been received as of the time of this filing.

**2. Requests for Exclusion**

Nine requests for exclusions were submitted on or before the request for exclusion deadline (March 12, 2021), and two additional requests for exclusion were received after the deadline. Class Representative provides the chart attached as **Exhibit 1** (unredacted version filed

under seal) to detail the requests for exclusion and whether they comply with the terms of the Settlement Agreement (“SA,” Doc. 60-1 at 26–27). The associated requests for exclusion are attached as **Exhibits 2–9**, which exhibits are filed under seal contemporaneously with this filing.

Despite several deficiencies, Class Representative recommends approving requests for exclusion numbers 1–7, as detailed in **Exhibit 1**.

Respectfully Submitted,

/s/Reagan E. Bradford

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**CLASS COUNSEL**

### **CERTIFICATE OF SERVICE**

I hereby certify that, on March 22, 2021, I caused to be electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/Reagan E. Bradford

Reagan E. Bradford

	Person Requesting Exclusion	Details of Submission	Compliant with SA?	Class Representative Comments	Share of Plan of Allocation
1.	Harry and Lisa Bennett (Ex. 2)	required information provided	✓	Class Representative recommends approval	████
2.	Kathleen Birmingham (Ex. 3)	required information provided	✓	████████████████████ Class Representative recommends approval	████
3.	Territory Resources LLC (Ex. 4)	no owner number listed	✗	an owner number which appears associated with this request was identified Class Representative recommends approval	████████
4.	Merit Energy Company, LLC (Ex. 5)	no owner numbers listed no wells identified untimely (3/12/2021)	✗	owner numbers which appear associated with this request were identified ████████████████████ Class Representative recommends approval	████████
5.	Gay Nell Spigner (Ex. 6)	case not identified not notarized insufficient well identification not served on all required parties	✗	an owner number which appears associated with this request was identified Class Representative recommends approval	████████
6.	Mary L. Eve (Ex. 7)	no owner number listed no wells identified	✗	an owner number which appears associated with this request was identified Class Representative recommends approval	████████
7.	Anita A. Ennis (Ex. 8)	case not identified no owner number listed no wells identified untimely (3/8/2021)	✗	an owner number which appears associated with this request was identified, ██████████ ████████████████████ Class Representative recommends approval	████

8.	Little Bear Resources, LLC (Ex. 4)	no owner number listed	✘	not a class member Class Representative recommends denial	—
9.	Gallegos Land & Cattle, L.L.C. (Ex. 4)	no owner number listed	✘	not a class member Class Representative recommends denial	—
10.	Bounty Transfer LLC (Ex. 4)	no owner number listed	✘	not a class member Class Representative recommends denial	—
11.	Citation Oil & Gas Corp. (Ex. 9)	required information provided, but identified owner numbers are not class members	✘	Citation Oil & Gas Corp. was expressly excluded from the Class (Doc. 60-1 at 75) and only received notice as a purported lien holder for other class members Class Representative recommends denial	—

**Exhibit 2**  
(filed under seal)

**Exhibit 3**  
(filed under seal)

**Exhibit 4**  
(filed under seal)

**Exhibit 5**  
(filed under seal)



**Exhibit 6**  
(filed under seal)

**Exhibit 7**  
(filed under seal)

**Exhibit 8**  
(filed under seal)

**Exhibit 9**  
(filed under seal)