

IN THE DISTRICT COURT OF HUGHES COUNTY
STATE OF OKLAHOMA

FILED
HUGHES COUNTY

MAY 17 2019

ASHLEY SANFORD, Court Clerk
By BB
DEPUTY

DAVID LANDON SPEED, on behalf of)
himself and all others similarly situated,)

Plaintiff,)

v.)

Case No. CJ-2016-59
Judge Timothy Olsen

JMA ENERGY COMPANY, L.L.C.,)

Defendant.)

**PLAINTIFF'S MOTION FOR ATTORNEY FEES, CASE CONTRIBUTION
AWARD, AND LITIGATION COSTS FROM THE COMMON FUND
AND INITIAL BRIEF IN SUPPORT**

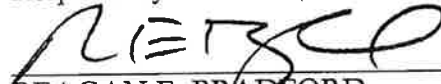
Plaintiff moves this Court for an order under 12 O.S. § 2023(G), which provides that, “[i]n a certified class action, the court may award reasonable attorney fees and nontaxable costs that are authorized by law or by the parties’ agreement.” Specifically, Plaintiff requests that the Court issue an order:

1. awarding Class Counsel an attorney fee of forty percent of the Gross Settlement Fund, *see* Ex. A, Decl. of Reagan E. Bradford;
2. awarding Class Representative compensation in the amount of \$25,000 for his contribution to this Settlement;
3. awarding Plaintiff litigation costs, including expert and consultant fees, administrative expenses, and the Settlement Administrator expenses, with the total amount of litigation costs not to exceed \$30,000.

Plaintiff and Class Counsel represent to the Court that the amounts requested in this Motion are reasonable and well within the range routinely approved by Oklahoma district courts in similar common-fund cases.

Plaintiff and Class Counsel have provided the Class notice of the amounts sought in this Motion and have posted all relevant documents on the settlement website: www.speed-jma.com. To the extent necessary, Plaintiff will supplement this Motion with additional authority and documentation in his reply brief.

Respectfully submitted,



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**CLASS COUNSEL AND
ATTORNEYS FOR PLAINTIFF**

CERTIFICATE OF SERVICE

This is to certify that on May 14th, 2019, a true and correct copy of the above and foregoing was mailed, postage prepaid, to:

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Attorney for Defendant JMA Energy, L.L.C.


Reagan E. Bradford