

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

IN RE ANADARKO BASIN OIL AND GAS  
LEASE ANTITRUST LITIGATION

Case No. CIV-16-209-HE

**PLAINTIFFS' NOTICE OF, AND MOTION FOR, PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AND CLASS CERTIFICATION FOR  
SETTLEMENT PURPOSES**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

1. PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Western District of Oklahoma, 200 N.W. 4th St. Oklahoma City, OK 73102 in the Courtroom of the Honorable Chief Judge Joe Heaton, Rm 3301, Courtroom 301, Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order to 1) appoint Settlement Class Counsel; 2) certify the proposed settlement class; 3) preliminarily approve the proposed settlement agreement; 4) approve the form and manner of providing notice of the settlement to the settlement class; (5) issue a stay of all proceedings against Defendants except those proceedings provided for or required by the settlement agreement; and (6) set a hearing date for final approval of the settlement.

2. Submitted herewith in support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants are (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants, (ii) the Declaration of Warren T. Burns in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants the exhibits thereto, and (iii) the [Proposed] Order Preliminarily Approving Settlement.

Dated: September 5, 2018

/s/ Warren T. Burns

Warren T. Burns  
Daniel H. Charest  
Will Thompson  
BURNS CHAREST LLP  
900 Jackson Street, Suite 500  
Dallas, Texas 75201  
Tel: (469) 904-4550  
wburns@burnscharest.com  
dcharrest@burnscharest.com  
wthompson@burnscharest.com

/s/ Terrell W. Oxford

Terrell W. Oxford  
Shawn Raymond  
SUSMAN GODFREY LLP  
1000 Louisiana, Suite 5100  
Houston, Texas 77002-5096  
Tel: (713) 651-9366  
toxford@susmangodfrey.com

William C. Carmody  
Arun Subramanian  
SUSMAN GODFREY LLP  
560 Lexington Avenue, 5th Floor  
New York, NY 1002-6828  
Tel: (212) 336-8330  
bcarmody@susmangodfrey.com  
asubramanian@susmangodfrey.com

/s/ Christopher J. Cormier

Christopher J. Cormier  
COHEN MILSTEIN SELLERS &  
TOLL, PLLC  
5290 Denver Tech Center Parkway  
Greenwood Village, Colorado 80111  
Tel: (720) 630-2092  
ccormier@cohenmilstein.com

Richard A. Koffman  
Robert W. Cobbs  
COHEN MILSTEIN SELLERS &  
TOLL, PLLC  
1100 New York Avenue, NW, Suite 500  
Washington, D.C. 20005 Tel: (202) 408-  
4600  
rkoffman@cohenmilstein.com  
rcobbs@cohenmilstein.com

/s/ Todd M. Schneider

Todd M. Schneider  
Jason Kim  
Kyle G. Bates  
SCHNEIDER WALLACE COTTRELL  
KONECKY WOTKYNS, LLP  
2000 Powell Street, Suite 1400  
Emeryville, California 94608  
Tel: (415) 421-7100  
TSchneider@schneiderwallace.com  
jkim@schneiderwallace.com  
kbates@schneiderwallace.com

***Interim Co-Lead Counsel for the Proposed Class***

/s/ Larry D. Lahman

Larry D. Lahman  
Michael E. Kelly  
Carol Hambrick Lahman  
MITCHELL DECLERCK  
202 West Broadway Avenue  
Enid, Oklahoma 73701  
Tel: (800) 287-5144  
Fax: (580) 234-8890

***Interim Liason Counsel for the Proposed Class***

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document was duly served electronically on all known counsel of record through the Court's Electronic Filing System on September 5, 2018.

By: /s/ Warren Burns  
Warren Burns

**CERTIFICATE OF CONFERENCE**

This is to certify that counsel of record conferred via e-mail and phone conference on June 28, 2018, and August 24-30, 2018 regarding this motion.

By: /s/ Warren Burns  
Warren Burns