

DISTRICT COURT, COUNTY OF GARFIELD, COLORADO 109 8th Street, Suite 104 Glenwood Springs, CO 81601	▲ COURT USE ONLY ▲
Plaintiff: JOLLEY POTTER RANCHES ENERGY CO., LLC, v. Defendant: TEP ROCKY MOUNTAIN LLC.	
<i>Attorneys for Plaintiff and the Class</i> Nathan A. Keever, Attorney Reg. No. 24630 DUFFORD WALDECK 744 Horizon Court, Suite 300 Grand Junction, CO 81506 Telephone: (970) 241-5500; Fax: (970) 243-7738 E-mail: keever@dwmk.com ; dwmk@dwmk.com G.R. Miller, #8406 G.R. MILLER, P.C. 1040 Main Avenue Durango, CO 81302 Telephone: (970) 247-1113 E-mail: bob@grmillerlaw.com	Case Number: 2025CV30027 Division:
CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES AND EXPENSES AND MEMORANDUM IN SUPPORT	

The undersigned Class Counsel respectfully move the Court for an award of attorney’s fees of one-third (1/3) of the net settlement (after subtraction of expenses and addition of accrued interest on the escrowed settlement funds) and for reimbursement of their expenses in the amount of \$1,775.55, pursuant to C.R.C.P. 121.

FACTUAL BACKGROUND

The relevant facts are contained in the Parties’ Joint Motion for Preliminary Approval of Settlement and the Parties’ Joint Motion for Final Approval of Settlement and will not be repeated in their entirety here. However, it is important to understand the relationship between this case and

two Jolley Potter cases that were filed in the U.S. District Court for the District of Colorado and in Garfield County, respectively.

The federal case was filed in February 2019, as *Jolley Potter Ranches Energy, Co., LLC v. TEP Rock Mountain, LLC*, Case No. 19-cv-495 case (the “Jolley Potter Federal Action”). In the *Jolley Potter* Federal Action, Jolley Potter, on behalf of itself and a class of similarly situated royalty owners, alleged TEP underpaid royalties on the production and sale of natural gas and liquid hydrocarbons from August 2011 through December 2020. The Court in the *Jolley Potter* Federal Action certified Jolley Potter’s claims as a class action pursuant to Fed. R. Civ. P. 23(b)(3). After further litigation, the parties entered into a settlement agreement resolving the case on a class-action basis (the “*Jolley Potter* Federal Settlement Agreement”).

Also in February 2019, Jolley Potter filed a class action complaint against TEP in the District Court of Garfield County, Colorado, in a case styled *Jolley Potter Ranches Energy Co., LLC v. TEP Rocky Mountain LLC*, Case No. 2019 CV 30036 (the “Jolley Potter 2019 State Action”). In the *Jolley Potter* 2019 State Action, Jolley Potter, on behalf of itself and a class of similarly situated royalty owners, alleged TEP underpaid royalties by deducting certain gathering costs when calculating royalties paid on the production and sale of natural gas under certain categories of leases from February 2013 through December 2020. TEP denied Jolley Potter’s claims. By stipulation of the parties, the Court in the *Jolley Potter* 2019 State Action certified Jolley Potter’s claims as a class action pursuant to C.R.C.P. 23(b)(3). After further litigation, the parties entered into a settlement agreement resolving the case on a class-action basis (the “*Jolley Potter* 2019 State Settlement Agreement”).

The Jolley Potter Federal Action is particularly important because the work performed in that case formed the basis for the parties to be able to reach a settlement in this case. In the *Jolley*

Potter Federal Action, the Parties engaged in extensive information discovery, document and data production (more than 100,000 documents), more than a dozen depositions, and significant third-party discovery relevant to TEP's payment of royalties on the production and sale of natural gas, as well as full briefing and oral argument of dispositive motions filed by each party. Class Counsel and TEP's attorneys retained experienced royalty accounting and marketing experts to analyze the data and determine the amounts at issue in each case. Given the size and complexity of the documents and data exchanged, the Parties spent significant time and resources examining the relevant royalty accounting information.

After six years of litigation, the Parties were able to resolve the *Jolley Potter* Federal Action on a class-action basis in February 2025 and resolve the *Jolley Potter* 2019 State Action on a class-action basis in May 2025. The terms of the settlements in these cases and, again, particularly the *Jolley Potter* Federal Action, formed the basis for the settlement here. In each case, Class Counsel requested and were awarded attorney fees of one-third of the monetary recovery on behalf of the respective classes.

This case is a continuation of the *Jolley Potter* Federal Action for the subsequent four-year period (January 1, 2021 to December 31, 2024). The evidence, legal research, and expert opinions developed in the *Jolley Potter* Federal Action were directly applicable to this case. The settlement in this case was achieved only a few months after suit was commenced. That efficient resolution was possible only as a result of the counsel's involvement in the *Jolley Potter* Federal Action. That experience provided extensive knowledge through which the facts of the present case could be efficiently marshaled and analyzed, so that an early settlement was possible. Counsel's involvement in the *Jolley Potter* Federal Action resulted in extensive discovery and rulings on class certification that were able to be used in this case. The swift resolution brought about by

counsel's experience, efficiency and expertise should be rewarded, not penalized. Indeed, if protracted litigation were a prerequisite for an award of attorney fees, there would be an incentive for delay and inefficiency, rendering early settlements on favorable terms unlikely. Further, this case was resolved on the same terms as those in the Jolley Potter Federal Action.

Following the Parties' resolution of the Jolley Potter Federal Action, the Parties exchanged and reviewed detailed accounting information concerning the calculation of royalties on the production and sale of natural gas between January 2021 and December 2024 for settlement purposes. Based on the Parties' and their counsel's knowledge and experience from over six years of litigating the Jolley Potter Federal Action, as well as the exchange of extensive additional royalty accounting data, counsel for Jolley Potter and the Class, together with TEP's attorneys, participated in settlement discussions to resolve Jolley Potter's claims in this case on a class-wide basis. It was only as a result of the work that was performed in the Jolley Potter Federal Action that the settlement and recovery by the Class in the present case was possible. Indeed, the settlement here extends the benefits of the Jolley Potter Federal Action to cover the subsequent four-year time period (2021-2024).

After six years of hard-fought litigation, the efforts of Class Counsel have resulted in the recovery of \$6,140,607.00 plus additional accrued interest, for the benefit of the Plaintiff Class in this case. Class Counsel are requesting reimbursement of their reasonable expenses of \$1,775.55 and a reasonable attorney's fee of one-third of the net recovery by the Class, including accrued interest on the escrowed funds.

ARGUMENT AND AUTHORITIES

I. THE STANDARDS GOVERNING APPLICATIONS FOR ATTORNEYS' FEES IN COMMON FUND CASES

The Common Fund Doctrine has been recognized and approved by the Colorado Supreme Court, particularly in class action cases:

The common fund doctrine has enjoyed long term and widespread use. In class action lawsuits where a fund is created for the benefit of the class, either through settlement or judgment on the merits, the common fund doctrine is widely adhered to as a method for proportionately spreading the attorneys fees among the class members. See 7B Charles A. Wright, Arthur R. Miller & Mary K. Kane, *Federal Practice & Procedure* § 1803 (1986), and cases cited therein; *County Workers Compensation Pool v. Davis*, 817 P.2d 521, 526 (Colo. 1991). In fact, adherence to the common fund doctrine is so prevalent that the justification for awarding interim fees after a fund has been created, in part, “lies in the certainty that counsel will ultimately receive a fee award The only unanswered question is the size of the award, not its propriety.” 3 Herbert Newberg, *Newberg on Class Actions* § 6975 at 1267 (1977).

Kuhn v. State, 924 P.2d 1053, 1060 (Colo. 1996).

The Common Fund Doctrine is based on fundamental principles of equity. *E.g.*, *Kuhn*, 924 P.2d at 1059 (“An attorney’s right to fees from the common fund derives from equitable principles of fairness that combine aspects of both unjust enrichment and *quantum meruit*.”); *Hawes v. Colorado Division of Insurance*, 65 P.3d 1008, 1015 (Colo. 2003) (“The common fund doctrine is an equitable remedy that affords fees to attorneys for their advocacy for the benefit of others.”). See also, *e.g.*, 1 ALBA CONTE, ATTORNEY FEE AWARDS §§2.1, 2.5, at 49-50, 66-68 (3d ed. 2004).

Consistent with the equitable foundations of the Common Fund Doctrine, fees are awarded from the common fund on the theory “that persons who obtain the benefit of a lawsuit without contributing to its costs are unjustly enriched at the successful litigant’s expense.” *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478, 62 L.Ed.2d 676, 682, 100 S.Ct. 745, 749 (1980).

As the Colorado Supreme Court explained in *Kuhn*:

The common fund doctrine applies where a suit involving an individual or representative plaintiff results in the creation of a monetary fund for a class of people situated similarly to the plaintiff. The common fund doctrine is considered

an exception to the American rule because the individual or representative plaintiff is not required to compensate his or her attorney out of pocket. Instead, the fees are paid out of the monetary fund that the litigation has produced. “Fees in common fund cases are extracted from the predetermined damage recovery rather than obtained from the losing party”

924 P.2d at 1057 (quoting *Brown v. Phillips Petroleum Co.*, 838 F.2d 451, 454 (10th Cir.), *cert. denied*, 488 U.S. 822 (1988)).

More recently, the Colorado Court of Appeals approved an award of attorney fees of 30 percent of the common fund recovered in a class action that was settled prior to trial, noting:

Colorado recognizes the common fund doctrine. *Kuhn v. State*, 924 P.2d 1053, 1060 (Colo. 1996). In class actions lawsuits where a fund is created for the benefit of the class, either through settlement or judgment on the merits, the doctrine is widely adhered to as a method for proportionately spreading attorney fees among the class members. *Kuhn v. State*, *supra*, 924 P.2d at 1060 (citing 7B Charles A. Wright, Arthur R. Miller & Mary K. Kane, *Federal Practice & Procedure* § 1803 (1986)). Because a class action lawsuit benefits all class members, and because at least one class member contracts with an attorney to pursue this benefit, “the remaining class members should pay what the court determines to be the reasonable value of the services benefitting them.” *Kuhn v. State*, *supra*, 924 P.2d at 1058 (quoting *Lindy Bros Builders, Inc. v. Am. Radiator & Standard Sanitary Corp.*, 487 F.2d 161, 165 (3d Cir. 1973)).

Brody v. Hellman, 167 P.3d 192, 198 (Colo. App. 2007).

Thus, in contrast to “fee-shifting” statutes that require the losing party to pay the attorney fees of the prevailing party by means of a mathematical calculation based on hours and rates, fees in common fund cases are typically awarded as a percentage of the fund created and are therefore borne by the benefitted class.¹

¹ See, e.g., *Gisbrecht v. Barnhart*, 535 U.S.789, 806, 152 L.Ed.2d 996, 1010, 122 S.Ct. 1817, 1827 (2002)(“the lodestar method was designed to govern imposition of fees on the losing party,” not fees payable from the successful party’s recovery); *Blum v. Stenson*, 465 U.S. 886, 900 n.16, 79 L.Ed. 2d 891, at 903 n.16, 104 S.Ct. 1541, 1550 n.16 (1984)(“Unlike the calculation of attorney’s fees under the ‘common fund doctrine,’ where a reasonable fee is based on a percentage of the fund bestowed on the class, a reasonable fee under [42 U.S.C.] section 1988 reflects the amount of attorney time reasonably expended on the litigation.”); *Commonwealth of Puerto Rico v.*

In contrast to a statutory fee determination, payable by the defendant depending on the extent of success achieved, a **common fund is itself the measure of success**. While the common fund recovered may be more or less than demanded or expected, the common fund represents the benchmark from which a reasonable fee will be awarded. Thus, a reasonable fee will be largely based on a fair percentage of the common fund.

4 ALBA CONTE & HERBERT B. NEWBERG, NEWBERG ON CLASS ACTIONS §14.6, at 577-579 (4th ed. 2002) (emphasis added). “While other criteria in determining reasonable attorney fees are legitimate considerations, the amount of the recovery, and end result achieved, is of primary importance.” *Oppenlander v. Standard Oil Co. (Indiana)*, 64 F.R.D. 597, 605 (D. Colo. 1974).

The appellate courts of Colorado have consistently recognized the important differences between common fund percentage fees and statutory fee awards. *E.g.*, *Kuhn*, 924 P.2d at 1058 (holding that “statutory fee shifting arguments” are “inapposite” in a common fund class action); *Brody*, 167 P.3d at 204.

The percentage fee approach under the Common Fund Doctrine enables the Court to readily apportion the fees and expenses of litigation to each class member “in the exact proportion that the value of his claim bears to the total recovery.” *Van Gemert*, 444 U.S. at 479, 62 L. Ed. 2d at 682, 100 S. Ct. at 750. The flexibility and ease of application afforded by a percentage approach is especially advantageous in cases such as this, where the individual amounts recovered will vary substantially. Under a percentage approach to attorney fees, each recipient will bear a proportionate share of the fees. “Historically, the amount of a common fund fee award was determined in the exercise of the court’s discretion based on a standard of reasonableness under the circumstances involved.” 1 CONTE, *supra*, §2.2, at 58. The use of a percentage fee even without regard to hours

Heckler, 745 F.2d 709, 714 (D.C. Cir. 1984)(“[o]ther indicia of overall reasonableness . . . control ‘under the “common fund doctrine.”’”).

expended or hourly rates is reasonable in order to encourage counsel to obtain a successful result as quickly and economically as possible. *Id.*, §2.5 at 68.

Many commentators agree that the award of attorney fees on the basis of a percentage of the fund recovered is the only sensible method of awarding fees in common fund cases, because it relies on incentives rather than costly monitoring. *E.g.*, John C. Coffee, *Understanding the Plaintiffs' Attorney: The Implications of Economic Theory for Private Enforcement of the Law through Class and Derivative Actions*, 86 COLUM. L. REV. 669, 724-25 (1986); Charles Silver, *Class Actions in the Gulf South Symposium: Due Process and the Lodestar Method: You Can't Get There From Here*, 74 TUL. L. REV. 1809, 1820 (2000) (“The consensus that the contingent percentage approach creates a closer harmony of interests between class counsel and absent plaintiffs than the lodestar method is strikingly broad.”). “[T]he more recent trend has been toward using the percentage method in common fund cases.” *Brody*, 167 P.3d at 201.²

As former Chief Judge Sherman Finesilver of the U. S. District Court for the District of Colorado explained:

The practice of compensating class counsel in Common Fund cases on a percentage of the recovery basis makes sense. It is consistent with practices in the private marketplace; when an attorneys' fees is [sic] entirely contingent upon the recovery achieved, a percentage fee is customary if not universal.

Consumers Gas & Oil, Inc. v. Farmland Industries, 863 F. Supp. 1357, 1361 (D. Colo. 1993).

² Although the Court of Appeals in *Brody* also observed that some courts use the percentage method and then perform a “lodestar” calculation of hours times rate times multiplier as a “cross-check,” 167 P.3d at 201, the Colorado Supreme Court has not mandated consideration of a lodestar calculation in common fund cases. Indeed, the use of a mechanical calculation in this case would necessarily be incapable of recognizing the benefits that resulted directly from counsel’s unique experience and expertise. In any event, “there is no requirement that the plaintiffs or the court scrutinize billing records.” *Brody*, 167 P.3d at 204.

It has been observed that “courts have traditionally awarded fees in the 20% to 50% range in class actions.” *Gigot v. Cities Service Oil Co.*, 241 Kan. 304, 319, 737 P.2d 18, 28 (1987) (citing *Warner Communications Sec. Litig.*, 618 F. Supp. 735, 749 (S.D.N.Y. 1985)). “Although courts have granted fee awards ranging between 15 and 50 percent of the entire settlement fund in class actions, 30 percent of the fund is often seen as presumptively reasonable, subject to adjustment upward or downward in extraordinary circumstances.” 5 J. Moore, MOORE’S FEDERAL PRACTICE §23.85[7], at 23-358 (3d ed. 2002). “[M]any courts have awarded between 20% and 30%, with very few awarding more than 50%.” *Brody*, 167 P.3d at 202. “[A]ttorney fees in the range of 25-33% have been routinely awarded in class actions.” *Id.*, at 203 (citing *Shaw v. Toshiba Am. Info Sys., Inc.*, 91 F. Supp. 2d 942, 972 (E.D. Tex. 2000)). Only in cases involving “megafunds,” such as those in excess of \$300 million, are percentage fees in a lower range prevalent. *Brody*, 167 P.3d at 202.

Quantitative studies of attorney fees in class actions have demonstrated that “fees in class actions have recently ranged from twenty to forty percent of the total recovery and averaged around thirty-two percent.” Silver, *supra*, at 1840. “Empirical studies show that . . . fee awards in class actions average around one-third of the recovery.” 4 CONTE & NEWBERG, *supra*, §14.6, at 551. *See also*, e.g., Fred Misko & Frank E. Goodrich, *Managing Complex Litigation: Class Actions and Mass Torts*, 48 BAYLOR L. REV. 1001, 1059-62 (1996) (citing Frederick C. Dunbar, *Recent Trends III: What Explains Settlements in Shareholder Class Actions?* (National Economic Research Associates 1995) (mean or average class action fee was 31.71 percent, and median or middle fee was 33.3 percent)).

In the prior Jolley Potter Federal Action, Judge Dominico determined that Class Counsel’s request for a fee award of one-third (1/3) was reasonable. Similarly, in the Jolley Potter 2019 State

Action, this Court determined that Class Counsel's request for a fee award of one-third (1/3) was reasonable.

II. THE REQUESTED FEE IS REASONABLE

In this case, Class Counsel seek an allowance for attorney fees equal to one-third (1/3) of the net recovery after expenses, which is squarely within the range of what courts in Colorado have awarded and what the two prior judges have awarded in the related Jolley Potter Federal Action and Jolley Potter 2019 State Action. At the hearing on their application, petitioners will present evidence which places such a request in the context of the relevant factors which generally govern the reasonableness of attorney fees in Colorado, as recited in *Mau v. E.P.H. Corp.*, 638 P.2d 777, 779 (Colo. 1981), and now codified in Rule 1.5 of the Colorado Rules of Professional Conduct:

- (1) The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly.
- (2) The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer.
- (3) The fee customarily charged in the locality for similar legal services.
- (4) The amount involved and the results obtained.
- (5) The time limitations imposed by the client or by the circumstances.
- (6) The nature and length of the professional relationship with the client.
- (7) The experience, reputation, and ability of the lawyer or lawyers performing the services.
- (8) Whether the fee is fixed or contingent.

Mau, 638 P.2d at 779. For the reasons that follow, under all of these factors, the requested fee is reasonable.

1. The Time and Labor Required, the Novelty and Difficulty of the Questions Involved, and the Skill Requisite to Perform the Legal Service Properly.

Class Counsel are requesting an award of attorney fees of one-third (1/3) of the common fund of \$6,140,607.00 million plus additional accrued interest, after reimbursement of reasonable expenses in the amount of \$1,775.55. This information has been clearly communicated to all class members in the mailed and publication notices. Following the preliminary approval hearing, the anticipated gross distribution amount for each class member before addition of accrued interest and subtraction of attorney fees and reimbursed expenses (listed by owner number rather than name) has been posted on Mr. Keever's firm's website www.dwmk.com/tep-class-action. Subsequently, the anticipated net distribution amounts (after attorney fees and expenses and accrued interest) will be posted. If the requested expenses are allowed, the requested one-third fee will amount to approximately \$2,000,000.00.

It is obvious that the litigation involved in this action and the Jolley Potter Federal Action and Jolley Potter 2019 State Action did not involve a "file suit and then quickly settle" scenario. From the very outset, Defendant TEP fought at every stage, seeking dismissal, asserting counterclaims, opposing discovery, opposing class certification (which culminated in a three-day evidentiary hearing), appealing from the Court's order granting class certification, and opposing discovery after class certification. Class Counsel invested years of hard work and logged over 17,000 hours of recorded time in the Jolley Potter Federal Case. Exhibits A to Mr. Seely's Declaration, Exhibit A to Mr. Keever's Declaration, and Exhibit A to Mr. Miller's Declaration itemize the time expended by Class Counsel in this highly contested, protracted, and complex litigation against TEP. Exhibit B to Mr. Seely's Declaration, Exhibit B to Mr. Keever's Declaration, and Exhibit B to Mr. Miller's Declaration itemize the time expended by Class Counsel in this case. This case was a continuation of the Jolley Potter Federal Action that involved a separate, four-year

period (January 1, 2021 to December 31, 2024). The time expended by Class Counsel in the Jolley Potter Federal Action is directly applicable to this case. The settlement in this case was achieved only a few months after suit was commenced. That efficient resolution was possible only as a result of the counsel's involvement in the Jolley Potter Federal Action.

This case, like the Jolley Potter Federal Action, involved difficult and novel issues, including matters of arguably first impression in the state of Colorado. As explained by the court in *Johnson*:

Cases of first impression generally require more time and effort on the attorney's part. Although this greater expenditure of time in research and preparation is an investment by counsel in obtaining knowledge which can be used in similar later cases, he should not be penalized for undertaking a case which may "make new law." Instead, he should be appropriately compensated for accepting the challenge.

Johnson, 488 F.2d at 717-19.

There is a lack of reported Colorado decisions which have awarded damages to oil and gas royalty owners based on a claim that the amount of gathering, processing or transportation was unreasonable – Defendant TEP argued there are no such cases. Therefore, each of the Class Claims asserted in this case arguably raised an issue of “first” impression in Colorado:

1. Unreasonable Gathering and Processing Costs: The primary class claims related to both gathering and processing costs is that TEP's deductions of gathering and processing costs had recovered more than the proportionate royalty owner share of the capital and operating costs incurred to construct and operate the applicable gathering and processing facilities, and that deduction of more than the actual, direct cost incurred to gather and process produced gas is unreasonable.
2. Unreasonable Transportation Costs: The Class asserted that TEP's deduction of NWPL transportation costs was unreasonable because: i) TEP deducted transportation costs TEP

did not incur, ii) TEP could market its residue gas at White River Hub without incurring NWPL transportation costs on better terms, and iii) TEP deducted NWPL transportation costs from royalty owners whose leases expressly precluded deduction of transportation costs.

3. Other Issues: In addition, TEP asserted defenses based on the applicable statutes of limitation, terms of prior settlement agreements, variations in lease language, and other grounds, and the Class asserted claims for prejudgment interest based on the amount TEP gained on wrongfully-detained funds.

Given the novelty and difficulty of the issues involved, a high level of skill, experience, determination, and creativity was required. *In re Qwest Communs. Int'l, Inc.*, 625 F. Supp. 2d 1143, 1150 (D. Colo. 2009) (“If the issues in a case are complex and difficult then obviously it will take great skill to address those issues successfully.”). This factor weighs in favor of the requested fee award.

4. The Likelihood, if Apparent to the Client, that the Acceptance of the Particular Employment Will Preclude other Employment by the Lawyer.

The acceptance of this case (and the Jolley Potter Federal Action and Jolley Potter 2019 State Action) did not preclude Class Counsel from representing other clients in cases that pre-dated the filing of the Jolley Potter Federal Action. However, because of the significant amount of time that case required, Class Counsel declined representation in some matters that would have generated hourly fees. (Seely Declaration, 10b; Keever Declaration, ¶13b). As such, this factor further supports the reasonableness of the award.

5. The Fee Customarily Charged in the Locality for Similar Legal Services.

As is explained in the attached Declarations of Class Counsel, the customary fee in class action royalty cases is one-third or more. *See also Johnston v. Camino Natural Res., LLC*, Civil

Action No. 19-cv-02742-CMA-SKC, 2021 U.S. Dist. LEXIS 115890, at *3-4 (D. Colo. June 22, 2021) (citing cases and noting that 40% of the gross settlement value falls “within the normal range for a contingent fee award” and is reasonable as a matter of law).

The Jolley Potter Federal Action and the Jolley Potter 2019 State Action have been in litigation for six years, and Class Counsel have spent thousands of hours working on this litigation to get to the point where the subsequent time period (2021-2024) could now be properly addressed in this case. The requested fee of one-third falls within what is customary, and there is no reason here to award less than the customary fee.

6. The Amount Involved and the Results Obtained.

The amount involved and the results obtained are entitled to greater weight, especially where, as here, the fee is entirely contingent on recovery. *Brown*, 838 F.2d at 456. The settlement amount here is approximately 85% of the total estimated damages together with prejudgment interest. This far exceeds the norm and represents “an excellent result.” *Shaw*, 2015 U.S. Dist. LEXIS 52783, at *20.

7. The Time Limitations Imposed by the Client or by the Circumstances.

This factor is not applicable here.

8. The Nature and Length of the Professional Relationship with the Client.

Although this factor is not usually of great significance in a class action, where class members have virtually no relationship with Class Counsel, it should be noted that Mr. Kever and his firm have represented named plaintiff Jolley Potter Ranches Energy Co., LLC for over a decade (Kever Declaration, ¶13g). Mr. Kever has represented other Class Members for several decades. (Kever Declaration, ¶13g).

9. The Experience, Reputation, and Ability of the Lawyer or Lawyers Performing the Services.

As is more fully explained in the attached Declaration of David G. Seely, ([Exhibit 1]) he and his law firm, Fleeson, Gooing, Coulson & Kitch, L.L.C., have many decades of experience representing royalty owners in class action litigation such as this, and have previously worked with Nathan A. Keever and G. R. Miller on other royalty class actions in Colorado. As is also explained in the Declarations of Mr. Keever and Mr. Miller ([Exhibit 3]), each of them, along with Mr. Keever's firm (Dufford, Waldeck, Milburn & Krohn, LLP), have vast experience representing Colorado royalty owners, and their efforts have significantly shaped the development of Colorado law regarding oil and gas royalties.

10. Whether the Fee Is Fixed or Contingent.

Perhaps most importantly, the fees of Class Counsel were entirely contingent upon achieving a successful recovery on behalf of the Plaintiff Class.

Courts have recognized the importance of such arrangements, noting that many workers "cannot afford to retain counsel at fixed hourly rates . . . yet they are willing to pay a portion of any recovery they may receive in return for successful representation." *Wells v. Sullivan*, 907 F.2d 367, 371 (2nd Cir. 1990). Thus, "contingency fees provide access to counsel for individuals who would otherwise have difficulty obtaining representation . . . and transfer a significant portion of the risk of loss to the attorneys taking a case." *In re Abrams & Abrams, P.A.*, 605 F.3d 238, 245-46 (4th Cir. 2010). "Access to the courts would be difficult to achieve without compensating attorneys for that risk." *Id.*

Shaw v. Interthinx, Inc., No. 13-cv-01229-REB-NYW, 2015 U.S. Dist. LEXIS 52783, at *19 (D. Colo. Apr. 21, 2015). The same rationale applies in a case such as this, where a single royalty owner's potential recovery would not economically justify hiring an attorney on an hourly basis. "A contingent fee, and the potential for a relatively high fee, is designed to reward counsel for taking the risk of prosecuting a case without payment during the litigation, and the risk that the litigation may be unsuccessful." *In re Qwest*, 625 F. Supp. 2d at 1151.

Counsel not only shared the risk of loss with the representative plaintiff and the Class, but also completely assumed the risk that they would receive no fee—and no reimbursement of expenses—in the absence of a successful outcome. This factor weighs heavily in favor of the requested fee. *See Vaszlavik v. Storage Tech. Corp.*, No. 95-B-2525, 2000 U.S. Dist. LEXIS 21140, at *10 (D. Colo. Mar. 9, 2000); *Aragon v. Clear Water Prods. LLC*, No. 15-cv-02821-PAB-STV, 2018 U.S. Dist. LEXIS 212825, at *16 (D. Colo. Dec. 18, 2018).

III. A “CROSS-CHECK” USING A LODESTAR CALCULATION ALSO SHOWS THAT THE REQUESTED FEE IS REASONABLE

Although not required in Colorado, courts may “cross-check” the reasonableness of attorney fees determined under the percentage-of-the-fund method against a “lodestar” calculation more commonly used in cases involving attorney fees under fee-shifting statutes. *See Brody v. Hellman*, 167 P.3 192, 201 (Colo. Ct. App. 2007). Under the lodestar method, “the court multiplies the number of hours the attorneys reasonably worked by the reasonable hourly rate for that work to determine the lodestar.” *Id.* The Tenth Circuit has described the two elements of the lodestar analysis as follows:

To determine what constitutes a reasonable hourly rate for each person who worked on the case, the district court considers the prevailing market rate for similar services by lawyers of reasonably comparable skill, experience, and reputation in the relevant community including experience in . . . analogous litigation.

To evaluate the number of hours reasonably expended on the litigation, the district court considers whether the attorney’s hours were necessary under the circumstances. Counsel for the prevailing party must exercise billing judgment and should make a good faith effort to exclude from a fee request hours that are excessive, redundant, or otherwise unnecessary.

Valdez v. Macdonald, 66 F.4th 796, 836 (10th Cir. 2023) (cleaned up). Because the relevant standard for hourly rates is what is “reasonable” in the relevant market, the requesting attorneys’ own normal hourly rates are not necessarily relevant. *See Snyder v. Saul*, No. 16-cv-01227-RM, 2020 U.S. Dist. LEXIS 71643, at *3 (D. Colo. April 23, 2020) (despite plaintiff’s counsel not

providing her normal hourly rate, requested fees were reasonable upon review of all relevant factors).

The “relevant community” for determining what constitutes a “reasonable rate” is not the lawyers’ homebase—rather, it is “the area in which the litigation occurs.” *Ramos v. Lamm*, 713 F.2d 546, 555 (10th Cir. 1983), *overruled on other grounds by Pennsylvania v. Del. Valley Citizens’ Council for Clean Air*, 483 U.S. 711 (1987); *accord Eighth Dist. Elec. Pension Fund v. Force Elec., LLC*, No. 23-cv-01070-GPG-KAS, 2024 U.S. Dist. LEXIS 196730, at *3 (D. Colo. Sep. 19, 2024).

Although this litigation is situated in Garfield County, because of the complexity of this matter and Class Counsel’s expertise in this field, Denver rates are reasonable. (Declaration of Grant Stiefel [attached as Exhibit 4], ¶ 63 and n. 5). Accordingly, Denver rates should be used for any lodestar calculation.

Tenth Circuit panels and district courts have routinely approved of the attorney fee award when the percentage-of-the-fund represents “two to three times the lodestar or more to compensate for risk and to reflect the quality of the work performed.” *Lanham v. Katz*, No. 23-cv-00507-NYW-NRN, 2024 U.S. Dist. LEXIS 73027, at *14-15 (D. Colo. Apr. 22, 2024) (summarizing caselaw); *see also In re Qwest Commc’ns Int l, Inc. Sec. Litig.*, No. 01-1451-REB-CBS, 2006 U.S. Dist. LEXIS 71267, at *21 (D. Colo. Sept. 29, 2006) (“[L]ead counsel who create a common fund for the benefit of a class are rewarded with fees that often are at least two times the reasonable lodestar figure, and in some cases reach as high as five to ten times the lodestar figure.”).

Attached hereto as Exhibit 4 is the Affidavit of Grant Stiefel, an expert on attorney fees. Mr. Stiefel’s affidavit contains his opinions regarding the reasonableness of the requested fees and expenses, and includes his own lodestar analysis, which results in a base lodestar of \$7,357,208

and a multiplier of 2.14 both of which he finds to be reasonable and conservative, and to confirm the reasonableness of the requested fee. (Exhibit 4, ¶¶ 79-86).

IV. THE EXPENSES FOR WHICH REIMBURSEMENT IS REQUESTED ARE REASONABLE

Class Counsel's out-of-pocket expenses are compiled and described in Exhibits C and D attached to Mr. Seely's Declaration. These expenses were actually paid and were necessarily incurred in the course of prosecuting this action on behalf of the Plaintiff Class, and they reflect the actual expenses incurred by Class Counsel in this case. They were reasonably incurred and are reasonable in amount and should therefore be reimbursed from the common fund. (Seely Declaration, ¶ 12).

CONCLUSION

Consistent with the foregoing law and ethical considerations, Class Counsel will present the following testimony at the hearing:

- (1) The request for one-third (1/3) of the net Settlement Fund is reasonable.
- (2) The expenses sought are reasonable.
- (2) Class Counsel assumed the risks of this litigation against TEP based on the expectation that such a fee would be awarded in the event of a successful resolution of this case and in the related cases against TEP.
- (3) The Plaintiff Class herein benefitted from the experience, reputation and ability of Class Counsel, and from counsel's efforts in this case and in the related cases.
- (4) Class Counsel possessed the skills necessary to deal efficiently and effectively with the novel and complex issues that were litigated to conclusion in this case and the related cases.

Class Counsel respectfully submit that the risks they assumed in the litigation against TEP and the benefits they achieved for the class members here leave no doubt that the fee they seek here is reasonable. For all the reasons set forth above, Class Counsel hereby request that this Court enter an order awarding them attorneys' fees consisting of one-third (1/3) of the amount that TEP has agreed to pay to the Plaintiff Class, after reimbursement of Class Counsel's reasonable expenses in the total amount of \$1,775.55.

Respectfully submitted this 14th day of November 2025.

DUFFORD WALDECK

By: /s/ Nathan A. Keever

Nathan A. Keever, #24630
744 Horizon Court, Suite 300
Grand Junction, CO 81506
(970) 241-5500
Attorney for Plaintiffs

G.R. Miller, P.C.
G.R. Miller, #8406
1040 Main Avenue
Durango, CO 81302
(970) 247-1113
Attorney for Plaintiffs

FLEESON, GOOING, COULSON & KITCH, L.L.C.

/s/ David G. Seely

David G. Seely, KS State Reg. #11397
Ryan K. Meyer, KS State Reg. #24340
301 N. Main Suite 1900
Wichita, KS 67202
(316) 267-7361
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served this 14th day of November 2025, via the Colorado Courts E-Filing:

John F. Shepherd, P.C.
Christopher A. Chrisman
HOLLAND & HART LLP
555 Seventeenth St., Suite 3200
Post Office Box 8749
Denver, CO 80201-8749
Attorneys for Defendant TEP Rocky Mountain LLC

/s/ Becky Winegard
Becky Winegard, Paralegal

I.

DISTRICT COURT, COUNTY OF GARFIELD, COLORADO 109 8th Street, Suite 104 Glenwood Springs, CO 81601	▲ COURT USE ONLY ▲			
Plaintiff: JOLLEY POTTER RANCHES ENERGY CO., LLC, v. Defendant: TEP ROCKY MOUNTAIN LLC.			Case Number: 2025-CV-30027 Div.: A Ctrm.:	
Nathan A. Keever, #24630 DUFFORD WALDECK 744 Horizon Court, Suite 300 Grand Junction, CO 81506 Tel: (970) 241-5500 keever@dwmk.com G.R. Miller, #8406 G.R. MILLER, P.C. 1040 Main Avenue Durango, CO 81302 Tel: (970) 247-1113 bob@grmillerlaw.com <i>Attorneys for Plaintiff and the Class</i>				
DECLARATION OF DAVID G. SEELY				

DECLARATION OF DAVID G. SEELY

I, David G. Seely, declare as follows.

1. My name is David G. Seely. I am over twenty-one years of age and am competent to give make this declaration under penalty of perjury.

2. I am submitting this declaration in support of Class Counsel's Motion for Attorney Fees and Expenses. I have personal knowledge of the facts set forth in this affidavit, and if called as a witness, I could and would testify to such facts.

3. I graduated from the University of Kansas in 1979 and then received a J.D. degree from the same institution in 1982. I then served as law clerk to the Honorable Earl E. O'Connor, Chief Judge of the United States District Court for the District of Kansas, from 1982–1984. Since 1984, I have been an attorney in the law firm of Fleeson, Gooing, Coulson & Kitch, L.L.C. in Wichita, Kansas ("the Fleeson Firm"). I am personally familiar with the history of the Fleeson Firm's participation in the relevant class actions and oil and gas litigation, including administrative proceedings

4. Since 1989, I have been actively involved in more than twenty oil and gas royalty class action lawsuits.

5. In this case (the "Jolley Potter 2025 State Action") our firm—along with our Colorado co-counsel G.R. Miller and Nathan A. Keever—has represented the Plaintiff and the Plaintiff Class as co-counsel. Together over the past six years, in this case and in the Jolley Potter Federal Action (collectively "the Jolley Potter Actions") we have: (1) engaged in extensive fact discovery, document and data production (more than 100,000 documents), multiple depositions in three states, and significant third-party discovery relevant to TEP's payment of royalties on the production and sale of natural gas between August 1, 2011, and December 31, 2024; (2) retained experienced royalty accounting, marketing, economic, and forensic accounting experts to analyze

the data and determine the amounts at issue in the case; (3) participated in continuous settlement discussions and formal mediation in order to resolve the claims of the Plaintiffs and the Class; and (4) engaged in voluminous legal research and briefing, including responding to TEP's attempted appeal to the Tenth Circuit from the Court's order certifying the proposed class.

6. It is important to note that TEP vigorously opposed class certification in the Jolley Potter Federal Action, which necessitated extensive discovery and preparation, including the review, analysis, and categorization of over 1,200 individual oil and gas leases and the preparation of a massive lease categorization spreadsheet that organized the leases into a manageable structure that made any variations in lease language readily identifiable and understandable. Litigation over class certification culminated in a three-day evidentiary hearing before then-U.S. Magistrate Judge Gordon P. Gallagher in January of 2023. This was, for all intents and purposes, a full-blown trial on the issue of whether this complex lawsuit could proceed as a class action under the requirements of Rule 23 of the Federal Rules of Civil Procedure. I served as lead counsel for the Plaintiff at the hearing, and I presented our opening and closing arguments, as well as the direct examinations of our expert witnesses and cross-examination of all of TEP's witnesses, with assistance and support from Mr. Meyer, Mr. Miller, and Mr. Keever (who also examined our client representative, Sam Potter). Judge Gallagher then issued a recommendation to the District Court Judge that a class be certified, but only on certain claims. We filed objections to that recommendation, as did TEP, and additional briefing ensued. Finally, on September 21, 2023, U.S. District Court Judge Daniel D. Domenico adopted the recommendation in part and modified it in part, to grant our request for class certification on all claims. TEP then petitioned for permission to take an immediate appeal to the U. S. Court of Appeals for the Tenth Circuit, which we successfully opposed. We then proceeded to conduct full discovery on the merits of the case, including significant discovery from

several third parties who provided gathering or transportation services for the gas at issue. We were in the final stages of discovery when the Jolley Potter Federal Action was settled.

7. Attached hereto as Exhibit A is a print-out of the Fleeson Firm's contemporaneous time entries for work done on the Jolley Potter Federal Action from March 29, 2019, through April 11, 2025, in the Jolley Potter Federal Action. Exhibit A does not include the significant amounts of additional time we spent in the investigation, planning, and preparation of the case prior to its filing on February 19, 2019.

8. Attached hereto as Exhibit B is a print-out of the Fleeson Firm's contemporaneous time entries for work done in the Jolley Potter 2025 State Action.

9. The lawyers and staff of the Fleeson Firm who have recorded time on the Jolley Potter Federal Action and the Jolley Potter 2025 State Action are shown in Exhibits A and B. They are: lawyers David G. Seely, Ryan K. Meyer, Lyndon W. Vix, Emily K. Arida, Audrey D. Koehler, Daniel E. Lawrence, John W. Ralston, Gregory J. Stucky, and Thomas D. Kitch; paralegals Cheryl Clark, Tammy West, and Kathy Brown; and summer law clerks (law students) Anna Hedstrom and Jack Hamilton. The positions of each individual and their experience with the Fleeson Firm are also shown on Exhibits A and B.

10. With regard to the factors set forth in *Johnson v. Railway Express/Mau v. EPH Corp*, concerning the reasonableness of attorney fees, I understand that not every factor may apply in this case. See, e.g., *Gudenkauf v. Stauffer Communs.*, 158 F.3d 1074, 1083 (10th Cir. 1998) ("We have never held that a district court abuses its discretion by failing to specifically address each *Johnson* factor. To the contrary, we have stated that not all of them need be considered."). Nevertheless, I represent to the Court as follows:

- a. *The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly* - Exhibits A and B itemize the time required from Plaintiffs' counsel in the Jolley Potter Actions. As noted above, class certification was vigorously contested and fully litigated, effectively creating a case-within-a-case that had to be won before the merits of the main case could be addressed. Moreover, several of the issues raised in these cases were novel—or at least not so common as to be encountered routinely. These included difficult issues such as the question of first impression in Colorado of whether an oil and gas lessee's implied covenant to market includes the duty to obtain the best price reasonably available for the produced gas, and the proper application and scope of the identical factual predicate test regarding the preclusive effect of prior class action settlements and judgments. Because of the lack of reported Colorado cases awarding awarded damages to royalty owners based on an underpricing claim or on a claim that the amount of gathering, processing or transportation was unreasonable, each of the Class Claims arguably raised an issue of "first impression" in Colorado. In any event, there was no "roadmap" for how to litigate these claims, which proved to be difficult and challenging. The facts were also complex, as reflected by the number of class members in the case and the considerable amount of discovery from defendant TEP and from third-party companies and witnesses.
- b. *The preclusion of other employment by the attorneys due to the acceptance of the case* - The significant amounts of time that the Jolley Potter Actions required of me

and many other attorneys and staff at my firm precluded us from working on other matters that would have generated hourly fees.

- c. *The customary fee* – In my experience, the customary attorneys’ fee in a royalty class action that results in the creation of a common fund for the benefit of the class is a percentage contingency fee of not less than one-third of the net recovery, after reimbursement of counsel’s out-of-pocket litigation expenses, unless the case is settled very early after filing and prior to the expenditure of significant time, effort, and money. Higher percentages may be warranted if the case proceeds through trial and judgment, and especially in the event of an appeal, where the risks of losing are multiplied. The requested fee of one-third is also consistent with our written fee agreement in this case with our client Jolley Potter Ranches Energy Co, LLC
- d. *Whether the fee is fixed or contingent* – These cases were handled entirely on a contingent fee basis, with no assurance that any fees would ever be received. Receipt of compensation for our work was wholly dependent upon achieving a favorable result for the Class. The three law firms here incurred significant risk in pursuing this litigation. By taking these cases on a contingent fee basis, we not only shared in the risk of loss with the Class, but we also fully assumed the risk that we would be paid nothing for our services even after having invested not only a total of over 17,000 hours (and effort), but the cash outlay of over \$450,000.00 for out-of- pocket expenses to date. In my opinion, the fact that we worked diligently on the Jolley Potter cases for six years without any compensation from hourly fees, retainer, or any other source, weighs heavily in favor of the percentage fee of one-third (1/3) of the net recovery, that we are requesting.

- e. *Any time limitations imposed by the client or the circumstances* - There were no unusual time limitations imposed in this matter.
- f. *The amount involved and the results obtained* – As was explained in the Settlement Agreement, each of the class claims was separately valued and negotiated based on its own merits. The portion of the settlement amount allocated to each claim was different, and reflects the varying strengths, weaknesses, and risks of each claim. The total payment by TEP in this case is \$6,140,607, which is more than eighty-five percent of the damages which were supported by the evidence in the JPRS 2025 Case (this case) together with prejudgment interest thereon at eight percent (8%) per annum compounded annually from the date of the deduction. The result obtained is, very simply, the \$6,140,607.00 payment by TEP plus additional accrued interest on that sum since it was deposited into escrow. The District Court of Colorado has previously acknowledged, and the Tenth Circuit affirmed, that the median settlement amount for common fund class actions was 7.6%. *See Voulgaris v. Array Biopharma*, Civil Action No. 17-cv-02789-KLM, 2021 U.S. Dist. LEXIS 249646, at *21 (D. Colo. Dec. 3, 2021) affirmed *Voulgaris v. Array Biopharma, Inc.*, 60 F.4th 1259 (10th Cir. 2023). Given the inherent uncertainties of litigation and the risks presented here, especially with claims involving questions of first impression under Colorado law, the recovery here is an excellent result for the Class.
- g. *The experience, reputation, and ability of the attorneys* - Fleeson, Gooing, Coulson & Kitch, L.L.C. is one of the oldest law firms in the State of Kansas, having been founded in 1886. During my 41 years with the firm, I have learned that the firm

enjoys a strong reputation throughout the state of Kansas and the region. I am familiar with the experience, reputations, and abilities of each of the lawyers and staff members who have worked on these cases. With regard to the individual attorneys:

- i. My education and professional experience are summarized in paragraph 3, above. In addition, I received an AV rating in the Judicial Edition of Martindale-Hubbell and am listed in Best Lawyers in America in the categories of Oil & Gas, and Employment Law. I am also listed in Super Lawyers for Missouri and Kansas in the area of Civil Litigation. I have served as General Counsel for the Eastern Kansas Royalty Owners Association since 2006. In approximately 2015, I succeeded Greg Stucky as General Counsel for the Southwest Kansas Royalty Owners Association and continue to serve in that capacity. In addition, I have served as President of the Wichita Bar Association (2017-2018), as President of the Wesley E. Brown American Inn of Court (2011-2012), and on the Bench-Bar Committee (1999-2003) and the Civil Justice Reform Act Advisory Group (1998-1999) of The United States District for the District of Kansas, and on the Tenth Circuit Advisory Committee (2004-2007). I also chaired the District of Kansas Committee for Evaluation and Recommendation Regarding Reappointment of U.S. Magistrate Judge in 2018.
- ii. Mr. Kitch has been in practice for 56 years, with experience in civil litigation, class actions, complex business litigation, banking, commercial, and corporate law. In 1990, Mr. Kitch's peers elected him to membership

in The Best Lawyers in America in the areas of Natural Resources Law and Oil & Gas Law.

- iii. Mr. Stucky has been in practice for 48 years in the areas of natural resources law—especially oil and gas law—as well as in class action litigation. For much of that time, he served as General Counsel for the Southwest Kansas Royalty Owners Association. Mr. Stucky is presently listed in The Best Lawyers in America under the areas of Natural Resources Law and Oil & Gas Law and in Missouri & Kansas Super Lawyers in the area of Energy and Natural Resources.
- iv. Mr. Meyer has been in practice for 11 years, including two years as a judicial law clerk to the Honorable Thomas M. Marten, former Chief Judge of the United States District Court for the District of Kansas. Mr. Meyer is a graduate of Wichita State University and Washburn Law School and is the former Managing Editor of the Washburn Law Journal.
- v. Ms. Arida graduated first in her class from Washburn Law School, having also served as Managing Editor for the Washburn Law Journal. After being admitted to the Kansas Bar in 2021, she is now in the fourth year of practice as an associate at Fleeson, Gooing, Coulson & Kitch, L.L.C.
- vi. Mr. Ralston likewise graduated first in his class from Washburn Law School, having served as a Notes Editor on Washburn Law Journal. After being admitted to the Kansas Bar in 2022, Mr. Ralston spent two years working as a judicial law clerk for Chief Judge Eric F. Melgren of the

District of Kansas. He is now in his first year of private practice as an associate at Fleeson, Gooing, Coulson & Kitch, L.L.C.

- vii. G.R. “Bob” Miller is a uniquely experienced oil and gas lawyer, having served as in-house counsel for two oil and gas companies, Monsanto Oil Company and BHP Petroleum Group, Limited (most recently as Legal and Negotiations Manager, Asia/Pacific Region for BHP Petroleum, Melbourne, Australia), and as a practicing oil and gas lawyer in the Denver law firm of Clanahan, Tanner, Downing & Knowlton, before focusing his private practice on the representation of landowners, mineral owners, and royalty owners. Since 1993, those of us at the Fleeson Firm have had the privilege and the pleasure of serving as co-counsel with Mr. Miller in various royalty class action cases in Colorado and New Mexico, including *Parry v. Amoco*, 2003 WL 2306663 (Dist. Ct. La Plata County, Colorado) and *Lindauer v. Williams Prod. Co.*, 381 P.3d 378 (Colo. App. 2016).
- viii. Nathan A. Keever, also an experienced Colorado oil and gas lawyer with Dufford Waldeck in Grand Junction, has been associated with the Fleeson Firm as co-counsel since 2006 in connection with several Colorado royalty class action lawsuits, including *Lindauer*. Before that, Mr. Keever had already distinguished himself as lead trial counsel in the reported royalty lawsuits in Garfield County, Colorado of *Savage v. Williams Production RMT Co.*, 140 P.3d 67 (Colo. App. 2005) and *Clough v. Williams Production RMT Co.*, 179 P.3d 32 (Colo. App. 2007). Mr. Keever has also

been lead counsel in lawsuits on behalf of royalty owners in Colorado against EnCana, Antero, URSA, and OXY.

- h. *The nature and length of the professional relationship with the client* – Although the Jolley Potter Actions are the first cases in which my firm has represented the named plaintiff, Jolley Potter Ranches Energy Co., LLC, over the past six years, we have developed a good and effective working relationship which has endured throughout the entirety of this case.
- i. *Awards in similar cases*- The Tenth Circuit has “not adopted a benchmark percentage for attorneys’ fees from common fund settlements.” *Voulgaris v. Array Biopharma, Inc.*, 60 F.4th 1259, 1263 (10th Cir. 2023). Instead, the Tenth Circuit and District of Colorado cases regularly affirm that “a reasonable fee is based on a percentage of the fund bestowed on the class.” *In re Syngenta AG MIR 162 Corn Litig.*, 61 F.4th 1126, 1191 (10th Cir. 2023) (quoting *Blum v. Stenson*, 465 U.S. 886, 900 n.16 (1984)). Here, the requested fee of one-third is well within the range of what the Tenth Circuit has recently identified as reasonable in common fund cases. *Voulgaris v. Array Biopharma, Inc.*, 60 F.4th 1259, 1263-64 (10th Cir. 2023) (“[W]e reiterate our prior recognition that awards across a range of percentages [22% to 37.3%] may be reasonable.”). As I mentioned previously, a percentage fee award of at least one-third of the net recovery (after expenses) in contested cases is the standard in cases of this type.

11. I believe the amount of time expended in this matter by me and the other lawyers and staff in our law firm in connection with the successful settlement of this case is reasonable and that the requested fee of one-third of the net recovery is fair and reasonable.

12. As explained above, in addition to the investment of their time, effort, and expertise, Class Counsel have also incurred and invested out-of-pocket expenses in the total amount of \$1,775.55. These expenses are identified in Exhibits C and D which contains the expense records from the two law firms that incurred expenses in this case. Each of these expenses was actually paid and was necessarily incurred in the course of prosecuting this action on behalf of the Plaintiff Class, and Exhibit C reflects the actual expenses incurred by Class Counsel. In my opinion, these expenses were reasonably and necessarily incurred and are reasonable in amount, and Class Counsel should be reimbursed for them.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of November 2025.

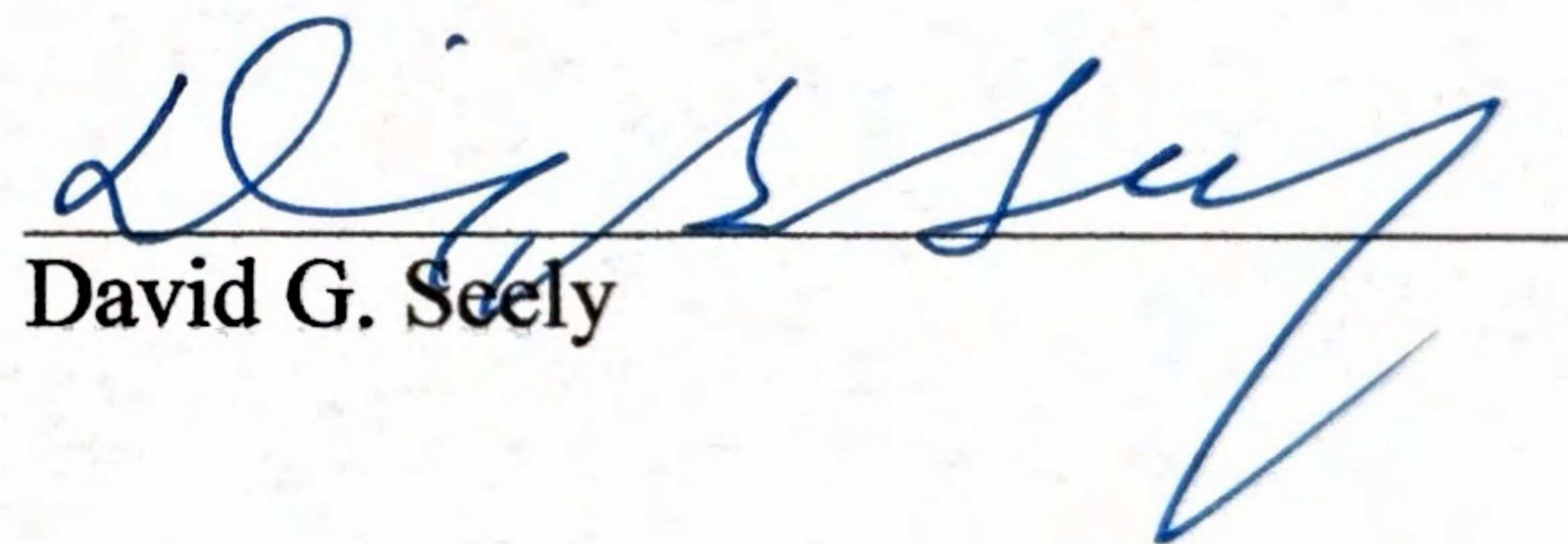

David G. Seely

EXHIBIT A
ATTORNEY TIME RECORDS

EXHIBIT A-1
SUMMARY FOR ALL TIME KEEPERS

Name	Position	Firm	Time at Firm	Total Hours
Anna C. Hedstrom	Law Clerk	Fleeson, Gooing	3 months	9.60
Audrey D. Koehler	Associate	Fleeson, Gooing	1 year	135.50
Cheryl L. Clark	Paralegal	Fleeson, Gooing	28 years	72.30
Daniel E. Lawrence	Member	Fleeson, Gooing	12 years	1.50
David G. Seely	Member	Fleeson, Gooing	41 years	1725.00
Emily K. Arida	Associate	Fleeson, Gooing	4 years	190.60
Elizabeth M. Raehpour	Law Clerk	Fleeson, Gooing	3 months	12.90
Gregory J. Stucky	Member	Fleeson, Gooing	48 years	747.00
George R. ("Bob") Miller	Member	G.R. Miller, P.C.	35 years	4880.65
Jack D. Hamilton	Law Clerk	Fleeson, Gooing	3 months	14.60
John W. Ralston	Associate	Fleeson, Gooing	1 year	26.70
Kathy R. Davis (k/n/a Katherine R. Brown)	Paralegal	Fleeson, Gooing	3 years	59.30
Lyndon W. Vix	Member	Fleeson, Gooing	40 years	10.90
Nathan A. Keever	Partner	Dufford Waldeck	30 years	1506.90
Ryan K. Meyer	Member	Fleeson, Gooing	13 years	985.50
Thomas D. Kitch	Member	Fleeson, Gooing	56 years	29.40
Tammy S. West	Paralegal	Fleeson, Gooing	19 years	145.40
Total Hours				10553.75

EXHIBIT A-2
FLEESON TIME RECORDS

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/29/2019	BT-152167-570	DGS	1.30	0.00	1.30	Receive and review correspondence from Bob Miller, Gregory J. Stucky; correspondence to Nate Keever; receive and review correspondence from Nate.
4/1/2019	BT-152167-570	DGS	2.00	0.00	2.00	Review, research, work on memo
4/2/2019	BT-152167-570	DGS	2.00	0.00	2.00	Receive and review correspondence from counsel; work on memo
4/3/2019	BT-152167-570	DGS	2.10	0.00	2.10	Receive and review correspondence; review of file; work on memo.
4/4/2019	BT-152167-570	DGS	0.40	0.00	0.40	Receive and review correspondence from Nate Keever; correspondence to Nate.
4/4/2019	BT-152167-570	DGS	1.50	0.00	1.50	Review of file; work on memo
4/6/2019	BT-152167-570	GJS	3.00	0.00	3.00	Revision of memo to EC and emails regarding the same.
4/7/2019	BT-152167-570	GJS	1.00	0.00	1.00	Emails regarding memo to EC.
4/7/2019	BT-152167-570	RKM	0.80	0.00	0.8	Review Memo to Executive Committee and email communication between counsel regarding same.
4/10/2019	BT-152167-570	GJS	3.00	0.00	3.00	Review of federal complaint; work on questions for Bob; emails regarding the same.
4/13/2019	BT-152167-570	GJS	1.00	0.00	1.00	Emails regarding memo to EC.
4/22/2019	BT-152167-570	DGS	1.00	0.00	1.00	Revise memo to Executive Committee.
4/22/2019	BT-152167-570	DGS	2.00	0.00	2.00	Review of file; receive and review correspondence from counsel; work on memo.
4/23/2019	BT-152167-570	DGS	2.00	0.00	2.00	Receive and review correspondence from counsel; review of file; law study; work on memo.
4/24/2019	BT-152167-570	DGS	1.80	0.00	1.80	Work on memo.
5/13/2019	BT-152167-570	DGS	1.00	0.00	1.00	Review of file.
5/14/2019	BT-152167-570	DGS	3.00	0.00	3.00	Receive and review correspondence from counsel regarding brief; correspondence to counsel; review of file and prepare for members' meeting; present new Colorado cases to members.
6/13/2019	BT-152167-570	DGS	1.00	0.00	1.00	Review of file; draft agreement with counsel regarding new Colorado class actions.
6/26/2019	T-43870-10	GJS	1.00	0.00	1.00	Participation in conference call
6/26/2019	T-43870-12	GJS	3.00	0.00	3.00	Participation in conference call, review of Intervenor's opening appellate brief
6/26/2019	T-43870-2	GJS	1.00	0.00	1.00	Review of counsel agreement and email regarding same

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/26/2019	T-43870-4	GJS	1.00	0.00	1.00	Review of Bob's memo remotion to dismiss
6/26/2019	T-43870-6	GJS	3.00	0.00	3.00	Review of draft of objectors' opening brief
6/26/2019	T-43870-8	GJS	1.00	0.00	1.00	Review of proposed settlement offer and emails regarding same
7/2/2019	T-43982-20	GJS	3.00	0.00	3.00	Legal research and emails regarding motion to dismiss.
7/3/2019	T-43982-18	GJS	2.00	0.00	2.00	Legal research and emails regarding motion to dismiss.
7/7/2019	T-43982-17	GJS	3.00	0.00	3.00	Legal research and emails regarding motion to dismiss.
7/8/2019	T-43982-16	GJS	1.00	0.00	1.00	Legal research and emails regarding motion to dismiss.
7/9/2019	T-44027-66	DGS	0.40	0.00	0.40	Review of file; correspondence to Nate Keever; receive and review correspondence from Nate Keever.
7/10/2019	T-43885-18	RKM	1.00	0.00	1.00	Review and analyze TEP's Motion to Dismiss.
7/11/2019	T-44027-57	DGS	4.60	0.00	4.60	Review of file and work on response to motion to partially dismiss.
7/12/2019	T-44027-54	DGS	4.00	0.00	4.00	Work on response to motion to dismiss
7/16/2019	T-44027-48	DGS	2.60	0.00	2.60	Work on response, research cases.
7/17/2019	T-44027-46	DGS	8.20	0.00	8.20	Work on response to motion to dismiss; telephone conference with Bob Miller; receive and review correspondence from Bob Miller; correspondence to counsel.
7/17/2019	T-43925-4	RKM	0.20	0.00	0.20	Conference with Mr. Seely regarding Response to Motion to Dismiss.
7/18/2019	T-44027-45	DGS	1.60	0.00	1.60	Receive and review correspondence from counsel; review of revisions to response to MD; correspondence to Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer.
7/18/2019	T-43982-12	GJS	4.00	0.00	4.00	Work on response to Motion to Dismiss and emails related thereto.
7/18/2019	T-43950-10	RKM	1.70	0.00	1.70	Review and revise Response to Motion to Dismiss.
7/18/2019	T-43925-1	RKM	1.60	0.00	1.60	Review and revise Response to TEP's Motion to Dismiss; email communication with counsel regarding same.
7/19/2019	T-44027-42	DGS	1.50	0.00	1.50	Receive and review correspondence from counsel; correspondence to Ryan K. Meyer; conference with Ryan K. Meyer; correspondence to Ryan K. Meyer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/19/2019	T-43982-10	GJS	2.00	0.00	2.00	Work on motion to dismiss.
7/19/2019	T-43950-1	RKM	0.30	0.00	0.30	Conference with Mr. Seely regarding response to Motion to Dismiss.
7/19/2019	T-43950-8	RKM	2.50	0.00	2.50	Review and revise Response to Motion to Dismiss and email communication with counsel regarding same.
7/22/2019	T-43979-32	CLC	0.30	0.00	0.30	Preparation of exhibits for brief.
7/22/2019	T-44027-36	DGS	3.50	0.00	3.50	Receive and review correspondence from counsel regarding motion to dismiss; revise same; conference with Ryan K. Meyer .
7/22/2019	T-44036-13	RKM	0.40	0.00	0.40	Conferences with Ms. Clark regarding exhibits to Response to Motion to Dismiss.
7/22/2019	T-44036-16	RKM	2.60	0.00	2.60	Review and revise Response to Motion to Dismiss.
7/23/2019	T-44027-35	DGS	1.80	0.00	1.80	Receive and review correspondence from counsel; correspondence to counsel; revisions to motion to dismiss.
7/23/2019	T-43982-5	GJS	5.00	0.00	5.00	Revisions to response to motion to dismiss.
7/23/2019	T-43988-11	RKM	2.50	0.00	2.50	Review and revise response to Motion to Dismiss; conferences with Mr. Seely regarding same; conference call with Mr. Seely, Mr. Miller, and Mr. Keever regarding same.
7/24/2019	T-44027-25	DGS	0.80	0.00	0.80	Receive and review correspondence from counsel; correspondence to counsel.
7/24/2019	T-43982-4	GJS	1.00	0.00	1.00	Emails regarding response to motion to dismiss.
8/20/2019	T-44245-38	DGS	1.00	0.00	1.00	Correspondence to counsel; receive and review correspondence from Nate Keever, Gregory J. Stucky; receive and review TEP's reply to motion to dismiss; correspondence to counsel.
8/20/2019	T-44153-1	RKM	0.20	0.00	0.20	Email communication with Ms. West regarding filing Entry of Appearance.
8/20/2019	T-44201-31	RKM	1.70	0.00	1.70	Review TEP's reply and email communication with counsel regarding same.
8/20/2019	T-44183-2	TDK	3.50	0.00	3.50	Review briefs and analyzed issues

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
8/21/2019	T-44245-31	DGS	1.30	0.00	1.30	Receive and review correspondence from Gregory J. Stucky ; correspondence to Gregory J. Stucky and other counsel; receive and review correspondence from Thomas D. Kitch , Gregory J. Stucky, Nate Keever; telephone conference with Ryan K. Meyer, Thomas D. Kitch , Gregory J. Stucky , Nate Keever; receive and review correspondence from Nate Keever.
8/21/2019	T-44201-26	RKM	1.60	0.00	1.60	Review TEP's Reply; email communication with counsel about whether to file a surreply; conference call with counsel to discuss same.
8/21/2019	T-44172-5	RKM	1.60	0.00	1.60	Review TEP's Reply; conference call with counsel regarding same and regarding case to-do-list.
8/22/2019	T-44245-22	DGS	0.80	0.00	0.80	Receive and review correspondence from Gregory J. Stucky ; conference with Ryan K. Meyer ; conference with Mary E. Turner, Amanda Gorney, Kathy Davis & Ryan K. Meyer; review of lease classification spreadsheets; correspondence to Mary, Amanda, Kathy & Ryan.
8/22/2019	T-44245-23	DGS	1.50	0.00	1.50	Review of TEP's pleadings; correspondence to counsel regarding possible reply brief; receive and review correspondence from Gregory J. Stucky; conference with Ryan K. Meyer ; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch ; correspondence to Gregory J. Stucky
8/22/2019	T-44250-4	KRD	0.80	0.00	0.80	Conference with David G. Seely, Ryan K. Meyer, Mary E. Turner and Amanda Gorney; emails from Mary E. Turner and David G. Seely.
8/23/2019	T-44245-19	DGS	0.30	0.00	0.30	Receive and review correspondence from Bob Miller and Nate Keever.
8/26/2019	T-44201-3	RKM	1.00	0.00	1.00	Review email communication between counsel discussing whether to file a surreply; review TEP's Reply.
8/26/2019	T-44275-9	DGS	0.60	0.00	0.60	Receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky ; conference with Ryan K. Meyer .

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
8/27/2019	T-44253-7	RKM	1.50	0.00	1.50	Conferences with Mr. Seely, Mr. Millsap, and Mr. Reusser regarding file-sharing software; email communication with counsel regarding same.
8/27/2019	T-44275-8	DGS	0.80	0.00	0.80	Correspondence to Gregory J. Stucky , Thomas D. Kitch, conference with Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer , Bob Miller, Nate Kever.
8/29/2019	T-44287-7	RKM	1.00	0.00	1.00	Conference with Mr. Reusser regarding Microsoft Teams; email communication with counsel regarding same.
8/30/2019	T-44287-3	RKM	2.00	0.00	2.00	Set up Microsoft Teams account and begin saving documents; conferences with Mr. Reusser regarding same; email communication with counsel regarding same.
8/30/2019	T-44275-1	DGS	0.30	0.00	0.30	Receive and review correspondence from Ryan Meyer, Nate Kever.
9/4/2019	T-44426-11	GJS	2.00	0.00	2.00	Work on discovery
9/4/2019	T-44403-2	KRD	1.00	0.00	1.00	Conference with David G. Seely, Ryan K. Meyer, Eric A. Reusser, Amanda A. Gorney, and Tammy S. West regarding Jolly Potter class action case and Microsoft Teams communication and organization.
9/4/2019	T-44322-40	RKM	0.50	0.00	0.50	Email communication with counsel regarding requests for admission; email communication with Mr. Kever regarding Microsoft Teams.
9/5/2019	T-44426-10	GJS	3.00	0.00	3.00	Review of file relating to counterclaims and various emails regarding same
9/6/2019	T-44426-9	GJS	2.00	0.00	2.00	Legal research and emails regarding same
9/9/2019	T-44472-92	DGS	1.50	0.00	1.50	Receive and review correspondence from counsel; revise requests for admission.
9/9/2019	T-44426-7	GJS	1.00	0.00	1.00	Emails regarding discovery
9/10/2019	T-44472-81	DGS	0.30	0.00	0.30	Receive and review correspondence from counsel; correspondence to counsel.
9/10/2019	T-44322-14	RKM	1.00	0.00	1.00	Conference calls with Greg regarding Teams site and regarding leases; email communication with Mr. Kever regarding same
9/11/2019	T-44472-78	DGS	0.30	0.00	0.30	Conference with Ryan K. Meyer; receive and review correspondence from counsel.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/11/2019	T-44322-6	RKM	0.30	0.00	0.30	Conference call with Mr. Stucky regarding leases downloaded to Teams site; conference call with Ms. Himes regarding same.
9/12/2019	T-44472-73	DGS	0.30	0.00	0.30	Receive and review correspondence from counsel.
9/13/2019	T-44472-66	DGS	0.40	0.00	0.40	Receive and review correspondence from Gregory J. Stucky, Thomas D. Kitch, Ryan K. Meyer; conferences with Ryan K. Meyer.
9/13/2019	T-44426-3	GJS	4.00	0.00	4.00	Review of produced leases and various spreadsheets and conference call with Ryan Meyer regarding lease classification
9/13/2019	T-44480-26	RKM	1.50	0.00	1.50	Review and analyze Lindauer spreadsheets; conference call with Mr. Stucky to discuss how to go about checking and categorizing new leases.
9/13/2019	T-44480-29	RKM	0.20	0.00	0.20	Email communication with Mr. Kitch regarding implied covenant research.
9/16/2019	T-44353-6	RKM	0.20	0.00	0.20	Email communication with Mr. Seely and Mr. Stucky regarding downloading of leases into Teams.
9/18/2019	T-44426-1	GJS	1.00	0.00	1.00	Various emails regarding discovery
10/3/2019	T-44513-15	ADK	0.20	0.00	0.20	Discussing research needs of case with Ryan K. Meyer and DGS.
10/3/2019	T-44499-8	RKM	0.40	0.00	0.40	Conference with Mr. Seely and Ms. Koehler regarding implied covenant of fair dealing research; research Law v. Law cases regarding same.
10/8/2019	T-44595-35	ADK	0.30	0.00	0.30	Reading Kansas case law regarding covenant of good faith and fair dealing in context of royalty obligations in preparation for research of Colorado law.
10/8/2019	T-44731-59	DGS	0.60	0.00	0.60	Telephone conference with Thomas D. Kitch and Gregory J. Stucky.
10/8/2019	T-44707-18	GJS	1.00	0.00	1.00	Preparation for and participation in conference call.
10/9/2019	T-44595-29	ADK	1.00	0.00	1.00	Reading Kansas case law regarding covenant of good faith and fair dealing in context of royalty obligations in preparation for research of Colorado law.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/10/2019	T-44595-25	ADK	5.50	0.00	5.50	Researching Colorado law regarding the implied covenant of good faith and fair dealing in the context of implied covenants to market.
10/14/2019	T-44595-18	ADK	3.50	0.00	3.50	Researching Colorado law regarding implied covenant to market and duty of good faith and fair dealing; drafting memorandum summarizing law and relevant cases.
10/15/2019	T-44595-13	ADK	2.70	0.00	2.70	Drafting memorandum regarding duty of good faith and fair dealing and the implied covenant to market.
10/17/2019	T-44595-2	ADK	3.00	0.00	3.00	Completing additional research; revising memorandum regarding duty of good faith and fair dealing.
10/18/2019	T-44699-31	ADK	0.90	0.00	0.90	Drafting and revising memorandum regarding the duty of good faith and fair dealing.
10/20/2019	T-44656-22	RKM	0.40	0.00	0.40	Email communication between counsel regarding the implied covenant of good faith and fair dealing.
10/28/2019	T-44633-2	RKM	0.20	0.00	0.20	Email communication with Mr. Stucky to discuss setting up a time to begin lease categorization.
10/28/2019	T-44633-3	RKM	0.20	0.00	0.20	Email communication with Greg, Kathy, and Amanda to set up video conference to discuss lease categorization.
10/30/2019	T-44696-2	RKM	0.50	0.00	0.50	Email communication with Mr. Stucky, Mr. Keever, and Ms. Himes about leases and categorization of leases.
10/31/2019	T-44741-23	KRD	2.50	0.00	2.50	Conference with Ryan K. Meyer, Gregory J. Stucky and and Amanda A. Gorney regarding categorizing leases, further review of royalty clauses and categories.
10/31/2019	T-44719-2	RKM	1.80	0.00	1.80	Conference call with Mr. Stucky, Ms. Davis, and Ms. Gorney to discuss lease categorization; review TEP spreadsheet and leases in preparation for same.
10/31/2019	T-44727-8	RKM	1.60	0.00	1.60	Conference call with Mr. Keever to discuss lease categorization; conference with Ms. Gorney and Ms. Davis to discuss same; email communication with Mr. Keever regarding pdf lease files.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/4/2019	T-44783-21	ADK	1.40	0.00	1.40	Completing statutory research regarding course of performance in lease agreements.
11/4/2019	T-44749-2	RKM	0.30	0.00	0.30	Email communication with counsel and within firm regarding lease categorization.
11/4/2019	T-44749-3	RKM	0.30	0.00	0.30	Conference with Ms. Gorney to discuss lease categorization; email communication with Mr. Stucky regarding same.
11/5/2019	T-44865-9	KRD	1.00	0.00	1.00	Conference with Ryan K. Meyer, Gregory J. Stucky and and Amanda A. Gorney regarding categorizing leases, further review of royalty clauses and categories.
11/5/2019	T-44782-31	RKM	0.50	0.00	0.50	Conference call with Mr. Stucky, Ms. Davis, and Ms. Gorney regarding lease categorization.
11/5/2019	T-44782-32	RKM	0.10	0.00	0.10	Email communication with Ms. Gorney regarding conference call to discuss lease categorization.
11/6/2019	T-44782-25	RKM	0.50	0.00	0.50	Conference call with Mr. Gorney regarding lease categorization; email communication with Jenny and Mr. Keever regarding same.
11/7/2019	T-44782-20	RKM	0.60	0.00	0.60	Conferences with Mr. Seely, Ms. Gorney, and Ms. Koehler regarding lease categorization.
11/8/2019	T-44865-8	KRD	5.00	0.00	5.00	Jolly Potter gas lease categorization.
11/8/2019	T-44782-15	RKM	0.70	0.00	0.70	Conferences and email communication with Ms. Gorney and Ms. Davis regarding lease categorization.
11/11/2019	T-44865-7	KRD	5.00	0.00	5.00	Jolly Potter gas lease categorization.
11/11/2019	T-44797-5	RKM	1.30	0.00	1.30	Review Appellants' Opening Brief and Appellees' Joint Answer Brief.
11/12/2019	T-44865-6	KRD	5.00	0.00	5.00	Jolly Potter gas lease categorization.
11/12/2019	T-44805-2	RKM	0.20	0.00	0.20	Conference with Ms. Gorney regarding lease categorization.
11/13/2019	T-44865-5	KRD	7.00	0.00	7.00	Jolly Potter gas lease categorization.
11/14/2019	T-44865-4	KRD	6.00	0.00	6.00	Jolly Potter gas lease categorization.
11/15/2019	T-44949-11	GJS	2.00	0.00	2.00	Preparation for and participation in conference call regarding categorization
11/15/2019	T-44865-3	KRD	8.00	0.00	8.00	Jolly Potter gas lease categorization.
11/15/2019	T-44845-7	RKM	0.30	0.00	0.30	Conference call with Ms. Gorney, Ms. Davis, and Mr. Stucky to discuss lease categorization.
11/18/2019	T-44870-17	ADK	2.80	0.00	2.80	Lease categorization.
11/18/2019	T-44865-2	KRD	6.00	0.00	6.00	Jolly Potter gas lease categorization.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/18/2019	T-44874-18	RKM	0.20	0.00	0.20	Email communication with Ms. Gorney and Ms. Koehler regarding lease categorization.
11/19/2019	T-44870-9	ADK	4.90	0.00	4.90	Lease categorization.
11/19/2019	T-44874-15	RKM	0.30	0.00	0.30	Email communication with Mr. Davis, Ms. Koehler, and Ms. Gorney regarding lease categorization.
11/20/2019	T-44870-5	ADK	2.60	0.00	2.60	Lease categorization.
11/20/2019	T-44872-4	KRD	8.00	0.00	8.00	Jolly Potter gas lease categorization.
11/20/2019	T-44865-1	KRD	4.00	0.00	4.00	Jolly Potter gas lease categorization.
11/20/2019	T-44874-5	RKM	0.20	0.00	0.20	Conference with Ms. Koehler regarding lease categorization.
11/22/2019	T-44892-4	ADK	2.20	0.00	2.20	Lease categorization.
11/25/2019	T-44919-8	ADK	5.90	0.00	5.90	Lease categorization.
11/25/2019	T-44949-3	GJS	3.00	0.00	3.00	Work on categorization
11/26/2019	T-44919-4	ADK	1.00	0.00	1.00	Meeting to discuss lease categorization.
11/26/2019	T-44949-2	GJS	2.00	0.00	2.00	Work on categorization
11/28/2019	T-44967-2	GJS	3.00	0.00	3.00	Review categorization spreadsheet and prepaton of memo regarding same
11/28/2019	T-44957-1	RKM	0.20	0.00	0.20	Receive email communication from Mr. Stucky regarding lease categorization and claims and review same.
12/3/2019	T-45185-11	GJS	1.00	0.00	1.00	Research and emails
12/3/2019	T-44995-7	RKM	0.20	0.00	0.20	Receive email communication from Mr. Stucky regarding progress of Jolley cases and review and analyze same.
12/9/2019	T-45207-3	GJS	3.00	0.00	3.00	Legal research and classification of leases at issue.
12/9/2019	T-45026-7	RKM	0.80	0.00	0.80	Gather articles and send to Mr. Stucky.
12/11/2019	T-45173-28	DGS	1.00	0.00	1.00	Conference with Ryan K. Meyer; receive and review correspondence from Thomas D. Kitch; correspondence to Thomas D. Kitch.
12/11/2019	T-45064-11	RKM	0.70	0.00	0.70	Review and revise Interrogatory Requests and Requests for Admission and email communication with counsel regarding same.
12/11/2019	T-45064-12	RKM	0.50	0.00	0.50	Conference with Mr. Seely regarding status of case and plan for moving forward with class certification phase.
12/12/2019	T-45073-14	RKM	0.60	0.00	0.60	Review and revise requests for production of documents and email communication with counsel regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/17/2019	T-45173-18	DGS	0.60	0.00	0.60	Telephone conference with Thomas D. Kitch, Gregory J. Stucky, Ryan K. Meyer regarding plan for class action, especially class certification.
12/17/2019	T-45221-1	GJS	1.00	0.00	1.00	Preparation for and participation in conference call.
12/19/2019	T-45111-5	ADK	0.50	0.00	0.50	Researching whether the implied duty of good faith includes a duty by a lessee to read the lease before paying royalties.
12/20/2019	T-45111-2	ADK	0.20	0.00	0.20	Researching case law to determine whether the implied duty of good faith and fair dealing requires lessees to read the provisions of the lease before paying royalties.
12/20/2019	T-45198-13	DGS	0.60	0.00	0.60	Receive and review correspondence from Bob Miller, Gregory J. Stucky; conference with Gregory J. Stucky
12/23/2019	T-45143-7	ADK	0.20	0.00	0.20	Researching case law regarding whether the implied duty of good faith includes reading a royalty provision before paying royalties.
12/23/2019	T-45138-4	RKM	0.30	0.00	0.30	Email communication with counsel regarding discovery requests.
12/26/2019	T-45198-10	DGS	0.50	0.00	0.50	Receive and review correspondence from Nate Keever's office; review of discovery requests; correspondence to Mr. Keever's office.
12/26/2019	T-45185-3	GJS	1.00	0.00	1.00	Review of lease categorization spreadsheet and emails
12/27/2019	T-45169-7	ADK	0.30	0.00	0.30	Researching whether there is a duty to read the lease in the implied duty of good faith and fair dealing.
12/27/2019	T-45185-1	GJS	2.00	0.00	2.00	Review of RFA and Interrogatories and emails regarding same
12/27/2019	T-45185-2	GJS	2.00	0.00	2.00	Research and emails regarding status
12/30/2019	T-45198-7	DGS	0.30	0.00	0.30	Receive and review correspondence from Nate Keever & Chris Chrisman.
1/2/2020	T-45394-24	GJS	1.00	0.00	1.00	emails regarding fees
1/2/2020	T-45236-28	RKM	0.20	0.00	0.20	Email communication with Mr. Keever's assistant regarding discovery requests.
1/8/2020	T-45247-13	ADK	0.20	0.00	0.20	Reviewing duty of good faith research and notifying Ryan K. Meyer of results.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/8/2020	T-45255-6	RKM	1.80	0.00	1.80	Review and analyze Amended Complaint and Scheduling Order in preparation for conference with Mr. Seely; research class certifications cases in the Tenth Circuit.
1/9/2020	T-45247-6	ADK	0.20	0.00	0.20	Completing additional research regarding duty to read a lease; communicating research results to RKM.
1/9/2020	T-45394-20	GJS	1.00	0.00	1.00	various emails regarding preparation for conference call
1/9/2020	T-45255-2	RKM	0.20	0.00	0.20	Email communication with Ms. Koehler regarding duty to read contract or lease.
1/9/2020	T-45255-4	RKM	1.70	0.00	1.70	Conference with Mr. Seely to discuss strategy of Jolley federal and state cases and to discuss to-do list; email communication with counsel regarding same and to set up a conference call to discuss same; review and analyze claims asserted in the Amended Petition.
1/10/2020	T-45394-18	GJS	2.00	0.00	2.00	review of discovery requests and email regarding same
1/13/2020	T-45317-26	ADK	0.10	0.00	0.10	Conferencing with Ryan K. Meyer regarding categorization to be completed.
1/13/2020	T-45418-54	DGS	1.30	0.00	1.30	Conference call with Bob Miller, Nate Keever, Thomas D. Kitch, Gregory J. Stucky, Ryan K. Meyer.
1/13/2020	T-45398-8	GJS	3.00	0.00	3.00	Legal research and emails regarding "market value" and its relationship to the implied covenant to market.
1/13/2020	T-45269-11	RKM	1.50	0.00	1.50	Conference call with counsel to discuss things to do and strategy; review complaint, scheduling order, and Mr. Miller's memo in preparation for same.
1/13/2020	T-45269-8	RKM	0.40	0.00	0.40	Conference with Ms. Koehler and Ms. Gorney regarding lease categorization and determining how many Category 2 and 3 leases are in Rio Blanco County.
1/14/2020	T-45317-21	ADK	6.60	0.00	6.60	Sorting leases by county.
1/14/2020	T-45445-8	DGS	0.40	0.00	0.40	Receive and review correspondence from Bob Miller.
1/14/2020	T-45398-10	GJS	2.00	0.00	2.00	Legal research and emails regarding "market value" and its relationship to the implied covenant to market.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/14/2020	T-45282-5	RKM	0.20	0.00	0.20	Conference with Ms. Koehler regarding lease location by county.
1/14/2020	T-45269-1	RKM	0.20	0.00	0.20	Email communication with counsel regarding "market value" research.
1/15/2020	T-45445-5	DGS	0.50	0.00	0.50	Receive and review correspondence from counsel.
1/15/2020	T-45398-4	GJS	1.00	0.00	1.00	Emails regarding "market value".
1/17/2020	T-45394-11	GJS	1.00	0.00	1.00	emails regarding implied covenant
1/21/2020	T-45394-8	GJS	2.00	0.00	2.00	review of Bob's memo regarding future course of litigation and emails regarding same
1/22/2020	T-45394-6	GJS	2.00	0.00	2.00	review of categorization and conference with REM regarding same
1/22/2020	T-45342-18	RKM	0.20	0.00	0.20	Email communication with Mr. Stucky regarding Jolley Potter lease categorization.
1/23/2020	T-45338-7	ADK	1.10	0.00	1.10	Sorting leases by lease form; phone call with Gregory J. Stucky regarding leases.
1/23/2020	T-45385-33	CLC	2.80	0.00	2.80	Worked on downloaded and uploaded leases and combining into groups so OCR leases.
1/23/2020	T-45394-4	GJS	2.00	0.00	2.00	emails regarding market value
1/24/2020	T-45443-1	DGS	0.50	0.00	0.50	Receive and review correspondence from counsel.
1/24/2020	T-45394-3	GJS	2.00	0.00	2.00	legal research and emails regarding Owen Anderson
1/27/2020	T-45385-26	CLC	0.40	0.00	0.40	Completed work on federal leases.
1/27/2020	T-45419-6	GJS	1.00	0.00	1.00	Telephone conference with Thomas D. Kitch and Bob Miller
1/27/2020	T-45371-9	RKM	0.20	0.00	0.20	Email communication with Ms. Clark and Mr. Stucky regarding conversion of leases into searchable pdf format.
1/28/2020	T-45419-4	GJS	2.00	0.00	2.00	Review of leases to determine abrogation of implied covenant
1/29/2020	T-45391-8	RKM	0.50	0.00	0.50	Receive email communication from Mr. Stucky regarding searching Jolley leases; conduct brief searches of leases and respond to Mr. Stucky's email.
1/29/2020	T-45393-1	TDK	9.80	0.00	9.80	Document review, research, memos and conferences
1/30/2020	T-45396-4	RKM	0.20	0.00	0.20	Conference call with Mr. Stucky regarding searching the leases to determine whether the leases expressly limit or abrogate the implied covenant to market.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/31/2020	T-45419-1	GJS	2.00	0.00	2.00	Review of leases for determination of whether implied covenant is abrogated
1/31/2020	T-45431-4	RKM	0.20	0.00	0.20	Receive and review email communication from Mr. Stucky regarding his review of the leases to determine whether the leases expressly abrogate the implied covenant to market.
2/1/2020	T-45575-64	DGS	0.40	0.00	0.40	Receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Bob Miller; receive and review correspondence from Thomas D. Kitch.
2/1/2020	T-45460-20	RKM	0.30	0.00	0.30	Receive email communication from Mr. Miller and review same.
2/2/2020	T-45544-18	GJS	2.00	0.00	2.00	review of Bob's memo and email regarding questions
2/3/2020	T-45575-60	DGS	0.40	0.00	0.40	Receive and review correspondence from Gregory J. Stucky, Bob Miller.
2/4/2020	T-45575-52	DGS	0.80	0.00	0.80	Receive and analyze correspondence from Linda Whipple, Gregory J. Stucky, Chris Chrisman and Ryan K. Meyer.
2/4/2020	T-45544-15	GJS	2.00	0.00	2.00	review of memo regarding leases and conference with Ryan K. Meyer
2/4/2020	T-45460-10	RKM	2.60	0.00	2.60	Review leases for the term "implied" to determine whether any of the leases expressly abrogate the implied covenant to market; email communication with Mr. Stucky regarding same.
2/4/2020	T-45460-3	RKM	0.50	0.00	0.50	Conference call with Mr. Stucky regarding lease review to determine whether any of the leases expressly abrogate the implied covenant to market; email communication with counsel regarding same.
2/10/2020	T-45575-37	DGS	2.00	0.00	2.00	Receive and review correspondence from Katherine Bell; review and analysis of TEP's objections and responses to discovery requests; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob Miller; receive and review correspondence from Thomas D. Kitch.
2/10/2020	T-45544-13	GJS	2.00	0.00	2.00	review of Conrod remittance and emails regarding same

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/11/2020	T-45575-35	DGS	1.00	0.00	1.00	Receive and review correspondence from Katherine Bell, Gregory J. Stucky, Bob Miller, Thomas D. Kitch; correspondence to counsel; telephone conference with Gregory J. Stucky.
2/11/2020	T-45544-12	GJS	3.00	0.00	3.00	emails regarding Vela and statute of limitations issues
2/12/2020	T-45575-31	DGS	1.00	0.00	1.00	Receive and review correspondence from Gregory J. Stucky, Thomas D. Kitch, Linda Whipple, Bob Miller, Ryan K. Meyer; conference with Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer; correspondence to Linda Whipple.
2/12/2020	T-45544-10	GJS	3.00	0.00	3.00	emails regarding statute of limitations review of TEP's discovery responses and emails regarding same
2/13/2020	T-45575-21	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel.
2/13/2020	T-45544-8	GJS	1.00	0.00	1.00	emails regarding statute of limitations issues
2/13/2020	T-45506-8	RKM	0.20	0.00	0.20	Email communication with Mr. Keever's assistants regarding TEP's document production.
2/14/2020	T-45575-14	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel.
2/14/2020	T-45537-61	RKM	0.30	0.00	0.30	Email communication with counsel regarding TEP's discovery responses and potential for filing a motion to compel; receive thumb drive from Linda.
2/15/2020	T-45575-12	DGS	0.70	0.00	0.70	Receive and review correspondence from Gregory J. Stucky, Thomas D. Kitch, Bob Miller.
2/15/2020	T-45544-7	GJS	2.00	0.00	2.00	legal research and emails regarding statute of limitations
2/17/2020	T-45575-9	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller.
2/17/2020	T-45610-39	DGS	0.50	0.00	0.50	Receive and review correspondence from Bob Miller; receive and review correspondence from counsel.
2/17/2020	T-45537-35	RKM	0.20	0.00	0.20	Email communication with counsel regarding open accounts/statute of limitations argument.
2/18/2020	T-45546-20	CLC	2.10	0.00	2.10	Worked on copying and preparing a set of documents requested by attorney.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/18/2020	T-45575-5	DGS	1.40	0.00	1.40	Receive and review correspondence from Gregory J. Stucky, Bob Miller, Thomas D. Kitch, Ryan K. Meyer; telephone conference with Gregory J. Stucky correspondence to counsel; conference with Ryan K. Meyer.
2/18/2020	T-45544-5	GJS	4.00	0.00	4.00	review of discovery responses and emails regarding same
2/18/2020	T-45537-32	RKM	0.70	0.00	0.70	Email communication with counsel regarding statute of limitations issue; research and review case law regarding same.
2/18/2020	T-45537-34	RKM	0.50	0.00	0.50	Review email communication between counsel regarding documents received from TEP and regarding statute of limitations issues.
2/19/2020	T-45610-28	DGS	0.60	0.00	0.60	Correspondence to counsel; receive and review correspondence from Bob Miller, Ryan K. Meyer, Nate Keever; correspondence to Bob Miller.
2/19/2020	T-45544-4	GJS	3.00	0.00	3.00	review of Concord remittance statements and emails regarding same
2/19/2020	T-45537-12	RKM	0.20	0.00	0.20	Email communication with Mr. Stucky regarding status of gathering bates numbered documents for review.
2/19/2020	T-45537-20	RKM	1.00	0.00	1.00	Research issue of whether TEP can object to discovery requests as being outside the statute of limitations and what the legal effect of that objection is on TEP's potential ability to introduce evidence about events outside the statute of limitations.
2/19/2020	T-45537-21	RKM	0.20	0.00	0.20	Conference call with Ms. Clark regarding categorizing bates numbered documents.
2/20/2020	T-45546-11	CLC	3.90	0.00	3.90	Continued review of documents and preparation of file with images for review by attorney.
2/20/2020	T-45610-19	DGS	1.00	0.00	1.00	Receive and review correspondence from Gregory J. Stucky, Bob Miller, Nate Keever; review of motion to enforce; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Thomas D. Kitch.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/20/2020	T-45537-4	RKM	1.30	0.00	1.30	Review and analyze claims in Amended Complaint; begin to draft memorandum on class certification.
2/21/2020	T-45546-7	CLC	1.90	0.00	1.90	Continued review of documents and preparation of list of images and native documents.
2/21/2020	T-45544-2	GJS	2.00	0.00	2.00	review of file and emails regarding statute of limitations
2/21/2020	T-45585-18	RKM	0.20	0.00	0.20	Email communication with Mr. Stucky.
2/23/2020	T-45544-1	GJS	1.00	0.00	1.00	emails regarding further actions
2/24/2020	T-45551-9	RKM	3.60	0.00	3.60	Draft class certification memo; conference with Mr. Seely regarding same; email communication with counsel regarding statute of limitations issues and estoppel; review TEP's discovery responses.
2/25/2020	T-45610-15	DGS	3.50	0.00	3.50	Review of correspondence; telephone conference with Bob Miller, Nate Keever, Gregory J. Stucky, Thomas D. Kitch, Ryan K. Meyer; receive and review correspondence from counsel.
2/25/2020	T-45576-5	GJS	2.00	0.00	2.00	Preparation for and prettification in a conference call and various emails regarding scheduling order
2/25/2020	T-45602-11	RKM	1.20	0.00	1.20	Draft class certification memorandum.
2/25/2020	T-45602-15	RKM	3.20	0.00	3.20	Conference call with counsel to discuss case and strategy; review discover responses; prepare class certification memorandum.
2/26/2020	T-45610-9	DGS	1.50	0.00	1.50	Receive and review correspondence from counsel; review of file; correspondence to counsel.
2/26/2020	T-45576-4	GJS	5.00	0.00	5.00	Prepation of memo regarding implied covenant and class certification and various emails related thereto
2/26/2020	T-45602-6	RKM	0.90	0.00	0.90	Conference call with Mr. Miller regarding documents and TEPs document production.
2/26/2020	T-45585-14	RKM	0.20	0.00	0.20	Email communication with Mr. Stucky regarding class certification.
2/27/2020	T-45573-10	CLC	1.00	0.00	1.00	Continued work with reviewing documents and downloading documents to Microsoft teams.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/27/2020	T-45610-7	DGS	1.50	0.00	1.50	Receive and review correspondence from counsel; receive and review draft of requests for admission; telephone conference with Gregory J. Stucky.
2/27/2020	T-45576-2	GJS	4.00	0.00	4.00	Draft of request for admissions and various emails related thereto and various emails regarding to the claims for relief.
2/27/2020	T-45585-4	RKM	0.50	0.00	0.50	Review emails exchanged between counsel regarding class certification.
2/27/2020	T-45585-6	RKM	1.50	0.00	1.50	Draft Motion for Class Certification; email communication with Mr. Seely regarding same.
2/28/2020	T-45610-1	DGS	1.10	0.00	1.10	Receive and review correspondence from counsel; correspondence to Gregory J. Stucky regarding possible RFA ; receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky.
2/28/2020	T-45576-1	GJS	6.00	0.00	6.00	Revision of requests for admission, legal research, and numerous emails regarding questions regarding claims for relief.
2/28/2020	T-45602-4	RKM	0.50	0.00	0.50	Review and analyze emails between counsel.
2/28/2020	T-45590-1	TDK	6.00	0.00	6.00	Working on various matters
2/28/2020	T-45590-3	TDK	6.30	0.00	6.30	Working on various matters
3/2/2020	T-45783-71	DGS	0.60	0.00	0.60	Receive and review correspondence from Gregory J. Stucky, Bob Miller, Thomas D. Kitch.
3/2/2020	T-45773-24	GJS	4.00	0.00	4.00	Work on RFA and emails regarding discovery and FAC.
3/3/2020	T-45783-69	DGS	5.20	0.00	5.20	Work on certification brief.
3/3/2020	T-45621-26	RKM	0.20	0.00	0.20	Conference with Mr. Seely regarding class certification memo.
3/4/2020	T-45644-14	ADK	1.40	0.00	1.40	Researching marketable condition rule as applied to second marketable products.
3/4/2020	T-45783-59	DGS	0.60	0.00	0.60	Receive and review correspondence from counsel.
3/5/2020	T-45644-12	ADK	5.40	0.00	5.40	Researching marketable condition rule as applied to processing costs for NGLs.
3/6/2020	T-45644-10	ADK	2.40	0.00	2.40	Researching cases involving costs of processing and marketing of NGLs.
3/6/2020	T-45783-51	DGS	2.80	0.00	2.80	Work on motion for class certification; receive and review correspondence from counsel.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/6/2020	T-45622-14	RKM	0.20	0.00	0.20	Conference with Mr. Seely regarding class certification memo.
3/7/2020	T-45644-9	ADK	0.10	0.00	0.10	Review and respond to email from David G. Seely regarding cases addressing allocation of costs associated with producing second marketable product.
3/9/2020	T-45783-49	DGS	0.40	0.00	0.40	Receive and review correspondence.
3/9/2020	T-45773-20	GJS	4.00	0.00	4.00	Legal research, review of various memos regarding class certification and substantive issues and emails regarding class certification.
3/9/2020	T-45639-2	RKM	0.70	0.00	0.70	Revise class certification motion.
3/9/2020	T-45639-5	RKM	1.20	0.00	1.20	Review Rhea case; review additions to class certification motion made by Mr. Seely; email communication with Mr. Stucky regarding class certification.
3/9/2020	T-45639-7	RKM	1.90	0.00	1.90	Review and analyze Mr. Seely's revisions to class certification motion; review and analyze email communications with counsel regarding same.
3/10/2020	T-45644-5	ADK	2.80	0.00	2.80	Conferring with Ryan K. Meyer regarding research to be completed regarding best available price rule; researching best available price rule.
3/10/2020	T-45783-48	DGS	0.60	0.00	0.60	Receive and review correspondence from counsel.
3/10/2020	T-45773-19	GJS	3.00	0.00	3.00	Emails regarding "market value" leases and various other emails.
3/10/2020	T-45652-5	RKM	2.20	0.00	2.20	Review and analyze motion for class certification and make revisions to same.
3/10/2020	T-45652-6	RKM	0.40	0.00	0.40	Email communication with Mr. Stuckey regarding best available price research; conference with Ms. Koehler regarding same.
3/10/2020	T-45639-1	RKM	0.20	0.00	0.20	Email communication with counsel regarding burden of proof and commonality at class certification stage.
3/11/2020	T-45783-47	DGS	0.50	0.00	0.50	Receive and review correspondence from counsel.
3/11/2020	T-45773-18	GJS	3.00	0.00	3.00	Emails regarding "market value" leases.
3/11/2020	T-45652-1	RKM	0.90	0.00	0.90	Review and analyze email correspondence between counsel related to claims asserted and class certification.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/11/2020	T-45662-1	RKM	0.80	0.00	0.80	Review federal Colorado district court cases on class certification.
3/11/2020	T-45662-2	RKM	3.40	0.00	3.40	Review and revise Motion for Class Certification; research issues related to same; email communication with counsel regarding claims asserted in First Amended Complaint.
3/12/2020	T-45673-13	RKM	0.20	0.00	0.20	Conference call with Mr. Stucky to discuss class certification motion.
3/12/2020	T-45673-17	RKM	4.50	0.00	4.50	Review and revise Motion for Class Certification; research related to same.
3/12/2020	T-45673-20	RKM	0.30	0.00	0.30	Conference with Mr. Seely to discuss class certification motion.
3/13/2020	T-45821-17	DGS	1.50	0.00	1.50	Receive and review correspondence from Bob Miller; review of memo; review of file.
3/14/2020	T-45773-14	GJS	2.00	0.00	2.00	Review of memo and emails regarding same.
3/16/2020	T-45821-14	DGS	2.80	0.00	2.80	Receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Ryan K. Meyer; review of motion for class certification; work on discovery.
3/16/2020	T-45773-13	GJS	2.00	0.00	2.00	Various emails regarding status of discovery.
3/16/2020	T-45709-11	RKM	1.00	0.00	1.00	Review and revise Motion for Class Certification and research related to same.
3/16/2020	T-45692-1	RKM	2.90	0.00	2.90	Conference with Mr. Seely to discuss common questions of fact and law; email communication with counsel regarding draft discovery responses; conference with Mr. Seely regarding same; review and revise Motion to Certify with respect to identifying common issues of law and fact.
3/17/2020	T-45709-7	RKM	1.20	0.00	1.20	Review memos prepared by counsel regarding claims for relief; research case law regarding prudent operator standard.
3/17/2020	T-45692-3	RKM	1.50	0.00	1.50	Review and analyze email communication between counsel related to claims asserted; review memos prepared by counsel.
3/17/2020	T-45692-4	RKM	0.60	0.00	0.60	Email communication and conferences with Mr. Seely and Mr. Reusser regarding discovery documents; email communication with co-counsel regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/18/2020	T-45783-28	DGS	2.60	0.00	2.60	Review of file; draft answers and objections to interrogatories.
3/19/2020	T-45728-5	ADK	4.20	0.00	4.20	Researching for additional cases relating to costs of extracting NGLS and drafting memorandum.
3/19/2020	T-45783-24	DGS	1.60	0.00	1.60	Review of answers to interrogatories.
3/19/2020	T-45773-10	GJS	2.00	0.00	2.00	Review of Audrey's memo and email regarding same.
3/19/2020	T-45773-11	GJS	2.00	0.00	2.00	Review of CA opinions and emails regarding same.
3/19/2020	T-45735-16	RKM	0.50	0.00	0.50	Email communication with counsel regarding the differences between the prudent operator standard and the best available price rule.
3/20/2020	T-45821-9	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel; receive and review correspondence from Katherine Bell regarding TEP documents.
3/20/2020	T-45773-9	GJS	2.00	0.00	2.00	Various emails regarding opinion.
3/21/2020	T-45773-8	GJS	3.00	0.00	3.00	Review and comment regarding draft of discovery responses.
3/22/2020	T-45773-7	GJS	3.00	0.00	3.00	Legal research and review of Bob's memo and email regarding same.
3/23/2020	T-45781-12	ADK	0.10	0.00	0.10	Reviewing emails addressing research to be completed regarding the best available price rule.
3/23/2020	T-45773-6	GJS	2.00	0.00	2.00	Various emails regarding discussion regarding motion for rehearing.
3/24/2020	T-45781-8	ADK	4.60	0.00	4.60	Researching best price available rule across jurisdictions and drafting memorandum regarding research.
3/24/2020	T-45773-5	GJS	3.00	0.00	3.00	Review of memos and various emails regarding rehearing.
3/25/2020	T-45781-5	ADK	6.80	0.00	6.80	Continuing best available price rule research and memo drafting; reviewing secondary sources addressing best available price rule.
3/25/2020	T-45783-6	DGS	2.00	0.00	2.00	Conference call with Thomas D. Kitch, Gregory J. Stucky, Bob Miller, Ryan Myer, Nate Keever; work on class certificate motion.
3/25/2020	T-45773-3	GJS	3.00	0.00	3.00	Various emails regarding rehearing and conference call.
3/25/2020	T-45778-7	RKM	0.40	0.00	0.40	Conference call with counsel to discuss discovery issues and deadlines and class certification motion.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/26/2020	T-45781-3	ADK	0.20	0.00	0.20	Phone call with Ryan K. Meyer regarding research to be completed and reviewing emails regarding memo.
3/26/2020	T-45783-3	DGS	3.40	0.00	3.40	Receipt and review of Audrey D. Koehler memo regarding best available price; work on class certificate motion; telephone conference with Ryan K. Meyer.
3/26/2020	T-45773-2	GJS	2.00	0.00	2.00	Review of memo regarding best possible price and conference with Tom Kitch.
3/27/2020	T-45798-1	DGS	0.50	0.00	0.50	Work on class certification motion.
3/27/2020	T-45778-1	RKM	0.50	0.00	0.50	Review Ms. Koehler's email regarding the best available price rule; email communication with counsel regarding same; email communication and conference call with Ms. Koehler regarding research into the prudent operator rule.
3/27/2020	T-45778-3	RKM	0.20	0.00	0.20	Email communication with Ms. Clark and Ms. Whipple regarding discovery received from TEP and how we need to organize and create an index of all the documents we have.
3/29/2020	T-45821-3	DGS	2.00	0.00	2.00	Work on motion for class certification.
3/29/2020	T-45800-3	RKM	0.20	0.00	0.20	Receive updated draft of class certification motion from Mr. Seely and briefly review same.
3/30/2020	T-45808-2	DEL	0.20	0.00	0.20	Correspondence with Mr. Seely and Mr. Meyer.
3/30/2020	T-45849-6	DGS	2.00	0.00	2.00	Correspondence to Dan E. Lawrence regarding database issue; correspondence to Ryan K. Meyer; receive and review correspondence from Dan E. Lawrence; receive and review correspondence from Bob; correspondence to counsel; receive and review correspondence from Nate Kever; review of discovery responses; work on motion for class certification.
3/30/2020	T-45854-12	RKM	0.20	0.00	0.20	Email communication with counsel regarding discovery and seeking an extension of time to respond to TEP's discovery requests.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/31/2020	T-45849-3	DGS	2.70	0.00	2.70	Receive and review correspondence from Gregory J. Stucky; review of comments regarding discovery responses; telephone conference with Dan E. Lawrence and Ryan K. Meyer; telephone conference with Ryan K. Meyer; work on motion for class certification.
3/31/2020	T-45854-2	RKM	0.50	0.00	0.50	Conference call with Mr. Lawrence and Mr. Seely to discuss discovery issues.
4/2/2020	T-45890-1	RKM	0.20	0.00	0.20	Email communication with counsel regarding extension of deadlines.
4/3/2020	T-45919-13	ADK	3.50	0.00	3.50	Researching the prudent operator rule.
4/3/2020	T-45904-17	RKM	0.20	0.00	0.20	Email communication with counsel regarding extension of time to respond to discovery.
4/6/2020	T-46060-67	DGS	2.40	0.00	2.40	Receive and review correspondence from Nate, Bob, Gregory J. Stucky; correspondence to Ryan K. Meyer ; receive and review correspondence from Ryan K. Meyer; work on motion for class certification; correspondence to Ryan K. Meyer.
4/6/2020	T-45904-7	RKM	1.60	0.00	1.60	Draft Motion for Class Certification.
4/7/2020	T-46060-63	DGS	2.80	0.00	2.80	Receive and review correspondence from Ryan K. Meyer; review and revise motion for class certification; correspondence to Ryan K. Meyer; receive and review correspondence from Bob Miller; receive and review correspondence from Nate Keever.
4/7/2020	T-45904-2	RKM	0.20	0.00	0.20	Review Motion to Extend Case Deadlines and Proposed Order; email communication with counsel regarding same.
4/7/2020	T-45904-3	RKM	4.90	0.00	4.90	Draft Motion for Class Certification; send revised draft to Mr. Seely.
4/8/2020	T-46060-55	DGS	2.00	0.00	2.00	Telephone conference with Ryan K. Meyer; review and revise motion for class certification; receive and review correspondence from Bob Miller and Chris Chrisman; receive and review correspondence from Gregory J. Stucky; telephone conference with Gregory J. Stucky.
4/8/2020	T-46063-15	GJS	3.00	0.00	3.00	Review of Motion for Class Certification

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/8/2020	T-45917-3	RKM	0.20	0.00	0.20	Receive email communication from Mr. Miller summarizing his phone call with Mr. Chrisman regarding discovery; respond to same.
4/8/2020	T-45917-7	RKM	1.80	0.00	1.80	Review and revise Motion for Class Certification; conference call and email communication with Mr. Seely regarding same.
4/9/2020	T-45974-30	ADK	2.30	0.00	2.30	Researching whether cost deductions for processing costs in affiliated transactions must be limited to actual costs.
4/9/2020	T-46063-13	GJS	3.00	0.00	3.00	Revision of Motion for Class Certification
4/9/2020	T-45959-32	RKM	0.70	0.00	0.70	Review and revise motion for class certification.
4/9/2020	T-45959-33	RKM	0.50	0.00	0.50	Email communication with counsel regarding motion for class certification.
4/10/2020	T-45974-27	ADK	2.40	0.00	2.40	Researching adequacy of representation factors for class certification and researching prudent operator rule.
4/10/2020	T-46063-12	GJS	2.00	0.00	2.00	Work on discovery regarding class certification
4/10/2020	T-45959-23	RKM	1.80	0.00	1.80	Review and revise Motion for Class Certification and send same to counsel.
4/10/2020	T-45959-26	RKM	0.30	0.00	0.30	Receive prudent operator memo from Ms. Koehler and review same; send same to counsel.
4/10/2020	T-45959-27	RKM	0.70	0.00	0.70	Conference with Mr. Seely regarding class certification motion.
4/10/2020	T-45959-28	RKM	0.20	0.00	0.20	Email communication with counsel regarding sending out additional RFAs to TEP.
4/10/2020	T-45959-30	RKM	0.20	0.00	0.20	Email communication with Mr. Stucky regarding "actual cost" deduction issue.
4/11/2020	T-46063-10	GJS	4.00	0.00	4.00	Work on class certification motion
4/17/2020	T-46063-5	GJS	5.00	0.00	5.00	Work on class certification motion and emails regarding same
4/17/2020	T-46078-4	TDK	3.80	0.00	3.80	Work on motion for Class Certification
4/20/2020	T-46304-37	DEL	0.50	0.00	0.50	Call with DGS; correspondence with David G. Seely and Ryan K. Meyer (multiple).
5/4/2020	T-46286-18	GJS	2.00	0.00	2.00	emails regarding status
5/4/2020	T-46154-22	RKM	0.20	0.00	0.20	Email communication with counsel to discuss a plan of strategy and who will work on what tasks.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
5/5/2020	T-46154-11	RKM	0.20	0.00	0.20	Email communication with counsel to set up conference call to discuss the Jolley Cases and what needs to be done.
5/6/2020	T-46154-2	RKM	0.30	0.00	0.30	Email communication with Mr. Keever, Ms. Whipple, Mr. Seely, Ms. Clark, and Mr. Lawrence regarding documents received from TEP.
5/7/2020	T-46304-2	DEL	0.80	0.00	0.80	Call with David G. Seely and Ryan K. Meyer; further review of materials following call.
5/7/2020	T-46268-69	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; review of RFAs; telephone conference with Dan E. Lawrence and Ryan K. Meyer; review correspondence; correspondence to Mary Ellen Denomy regarding SQL files.
5/7/2020	T-46171-29	RKM	0.90	0.00	0.90	Conference call with Mr. Seely and Mr. Lawrence regarding TEP's produced documents to discuss how to manage the documents and open the documents that are currently in a format that we cannot access or read.
5/7/2020	T-46171-31	RKM	0.50	0.00	0.50	Review Mr. Miller's to-do-list.
5/8/2020	T-46268-60	DGS	2.50	0.00	2.50	Review of correspondence; conference call with Bob Miller, Nate Keever, Gregory J. Stucky, Thomas D. Kitch, and Ryan K. Meyer.
5/8/2020	T-46286-17	GJS	3.00	0.00	3.00	telephone call regarding status and emails regarding same
5/8/2020	T-46171-18	RKM	0.30	0.00	0.30	Email communication with Ms. Clark regarding Ricoh on demand product.
5/8/2020	T-46171-22	RKM	2.80	0.00	2.80	Review Bob's memo on tasks that need to be completed; conference call with counsel to discuss same and to discuss strategy moving forward.
5/9/2020	T-46171-15	RKM	0.30	0.00	0.30	Email communication with Mr. Seely, Mr. Kitch, and Mr. Stucky regarding conference call with counsel and of tasks to complete.
5/9/2020	T-46171-16	RKM	0.70	0.00	0.70	Draft and send index of documents produced by TEP to Mr. Keever.
5/12/2020	T-46268-47	DGS	1.40	0.00	1.40	Conference with Ryan K. Meyer; review of lease categorization spreadsheet; conference with Amanda Gorney; brief review of leases.
5/12/2020	T-46188-9	RKM	0.40	0.00	0.40	Conference with Mr. Seely to discuss lease categorization stipulation.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
5/13/2020	T-46200-8	RKM	0.50	0.00	0.50	Email communication with Mr. Keever's assistant regarding scheduling a meeting to discuss TEP's produced discovery; email communication with Ms. Koehler regarding her research into different discovery software.
5/14/2020	T-46268-37	DGS	4.00	0.00	4.00	Review and analysis of unique leases; recategorize leases; correspondence to Gregory J. Stucky; telephone conference with Gregory J. Stucky.
5/15/2020	T-46268-32	DGS	2.50	0.00	2.50	Conference with Amanda Gorney regarding lease spreadsheet; work on revisions; correspondence to Amanda; telephone conference with Amanda.
5/15/2020	T-46312-46	RKM	0.20	0.00	0.20	Receive orders denying Petitions for Rehearing and review same.
5/16/2020	T-46268-28	DGS	0.30	0.00	0.30	Receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Nate Keever; receive and review correspondence from Bob Miller.
5/16/2020	T-46312-44	RKM	0.20	0.00	0.20	Email communication with counsel regarding Certioari petition.
5/18/2020	T-46268-21	DGS	0.50	0.00	0.50	Correspondence to Gregory J. Stucky; review of correspondence; receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky.
5/20/2020	T-46268-14	DGS	1.00	0.00	1.00	Work on lease categorization; telephone conference with Amanda Gorney; receipt and review of revised docs; correspondence to Gregory J. Stucky; receive and review correspondence from Gregory J. Stucky.
5/21/2020	T-46268-10	DGS	2.60	0.00	2.60	Telephone conference with Gregory J. Stucky regarding lease categorization; telephone conference with Amanda Gorney; correspondence to Amanda Gorney.
5/21/2020	T-46286-9	GJS	3.00	0.00	3.00	review of lease categorization and telephone conference with David G. Seely
5/22/2020	T-46305-21	DGS	1.00	0.00	1.00	Review of leases with addenda; work on recategorization.
6/4/2020	T-46537-98	DGS	0.40	0.00	0.40	Receive and review correspondence from Nate, Bob, Ryan K. Meyer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/8/2020	T-46537-95	DGS	2.20	0.00	2.20	Review of Amendments to Leases; receive and review correspondence from Bob Miller; review of outline of Petition for certificate by Ob objectors.
6/8/2020	T-46372-5	RKM	0.20	0.00	0.20	Email communication with Mr. Keever and his assistant regarding TEP's produced documents.
6/8/2020	T-46479-45	RKM	0.20	0.00	0.20	Email communication with Mr. Seely regarding lease chart.
6/9/2020	T-46421-7	ADK	0.40	0.00	0.40	Phone conference with Ryan K. Meyer and Nate Keever regarding next steps in doc review.
6/9/2020	T-46537-92	DGS	2.00	0.00	2.00	Conference with Ryan K. Meyer; receive and review correspondence from Thomas D. Kitch; conference call with Bob Miller, Gregory J. Stucky, Ryan K. Meyer, Nate Keever; conference with Ryan K. Meyer; correspondence to Gregory J. Stucky regarding lease categorization; receive and review correspondence from Gregory J. Stucky.
6/9/2020	T-46538-14	GJS	1.00	0.00	1.00	Preparation for and participation in telephone conference.
6/9/2020	T-46479-37	RKM	0.30	0.00	0.30	Conference with Mr. Seely to discuss the remaining items that were discussed during the conference call.
6/9/2020	T-46479-38	RKM	1.50	0.00	1.50	Conference call with counsel to discuss strategy and tasks that need to be completed.
6/9/2020	T-46479-44	RKM	0.20	0.00	0.20	Send draft Requests for Admission to Mr. Stucky.
6/10/2020	T-46537-91	DGS	2.50	0.00	2.50	Telephone conference with Gregory J. Stucky regarding lease addenda and amendments; conference with Amanda Gorney; work on categorization.
6/10/2020	T-46538-13	GJS	3.00	0.00	3.00	Work on lease categorization and conference with Dave; review of Bob's memo.
6/10/2020	T-46429-36	RKM	0.20	0.00	0.20	Email communication with Ms. Himes regarding organizing documents on Teams.
6/11/2020	T-46537-87	DGS	1.00	0.00	1.00	Telephone conference with Gregory J. Stucky regarding lease categorization; conference with Amanda A. Gorney regarding changes to spreadsheet.
6/15/2020	T-46537-73	DGS	1.00	0.00	1.00	Work on discovery requests.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/15/2020	T-46537-74	DGS	1.00	0.00	1.00	Conference with Ryan K. Meyer receive and review correspondence from Ryan K. Meyer; review and revise RFAs.
6/15/2020	T-46538-12	GJS	1.00	0.00	1.00	Review of RFA.
6/15/2020	T-46429-6	RKM	1.50	0.00	1.50	Review lease spreadsheet and email communication with counsel regarding same; review and revise draft set of Requests for Admission to TEP and email communication with counsel regarding same.
6/15/2020	T-46429-3	RKM	0.20	0.00	0.20	Email communication with Ms. Himes regarding organizing documents on Teams.
6/16/2020	T-46537-66	DGS	0.30	0.00	0.30	Receive and review correspondence from Gregory J. Stucky; review of changes to RFAs.
6/16/2020	T-46538-11	GJS	3.00	0.00	3.00	Redraft of RFAs.
6/17/2020	T-46537-60	DGS	0.40	0.00	0.40	Receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Bob Miller; correspondence to Bob Miller.
6/17/2020	T-46449-3	RKM	0.20	0.00	0.20	Email communication with Himes regarding organization of documents on Teams.
6/18/2020	T-46537-56	DGS	0.30	0.00	0.30	Review of Gregory J. Stucky revisions to RFAs; receive and review correspondence from Ryan K. Meyer.
6/19/2020	T-46538-10	GJS	1.00	0.00	1.00	Review of RFAs.
6/22/2020	T-46537-43	DGS	0.20	0.00	0.20	Conference with Ryan K. Meyer.
6/22/2020	T-46479-12	RKM	0.50	0.00	0.50	Conference call with Ms. Himes regarding organizing documents on Teams; email communication with Ms. Himes regarding same.
6/23/2020	T-46537-35	DGS	0.40	0.00	0.40	Conference with Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Bob Miller.
6/23/2020	T-46479-8	RKM	0.40	0.00	0.40	Conference call with Bob Miller regarding identical factual predicate issue and document review.
6/23/2020	T-46479-9	RKM	0.20	0.00	0.20	Email communication with Mr. Keever regarding RFAs to TEP and lease categorization chart.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/24/2020	T-46496-7	ADK	2.40	0.00	2.40	Conference with Ryan K. Meyer regarding research to be completed regarding collateral attack and identical factual predicates, and beginning research on those topics.
6/24/2020	T-46537-29	DGS	0.30	0.00	0.30	Receive and review correspondence from Nate Keever; conference with Ryan K. Meyer.
6/24/2020	T-46493-23	RKM	0.80	0.00	0.80	Conference with Ms. Koehler regarding identical factual predicate research; review and analyze Mr. Miller's emails and memos regarding same.
6/25/2020	T-46496-3	ADK	8.10	0.00	8.10	Researching collateral attack of a class action judgment.
6/25/2020	T-46493-11	RKM	0.20	0.00	0.20	Email communication with Mr. Keever regarding Requests for Admission.
6/26/2020	T-46496-1	ADK	6.00	0.00	6.00	Researching collateral attacks on a class action judgment and drafting memorandum.
6/26/2020	T-46537-22	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; conference call with Bob, Nate Keever, Gregory J. Stucky and Ryan K. Meyer.
6/26/2020	T-46493-6	RKM	1.00	0.00	1.00	Conference call with counsel to discuss tasks to complete.
6/29/2020	T-46531-5	ADK	5.40	0.00	5.40	Drafting memorandum regarding collateral attack of a class action settlement.
6/30/2020	T-46531-3	ADK	4.40	0.00	4.40	Researching and drafting memorandum regarding the "identical factual predicate" rule.
6/30/2020	T-46537-5	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; review of analysis of facts; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob.
6/30/2020	T-46538-2	GJS	1.00	0.00	1.00	Review of Bob's memo regarding evidence related to claims and email response thereto.
6/30/2020	T-46538-3	GJS	1.00	0.00	1.00	Preparation for and participation in conference call.
6/30/2020	T-46544-6	RKM	0.20	0.00	0.20	Email communication with Jenny Himes regarding organization of documents on Teams.
7/1/2020	T-46594-12	ADK	4.10	0.00	4.10	Researching law regarding identical factual predicate rule and drafting memorandum.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/1/2020	T-46679-41	RKM	0.20	0.00	0.20	Email communication with Ms. Himes regarding document reorganization on Teams.
7/2/2020	T-46594-11	ADK	5.40	0.00	5.40	Researching and drafting memorandum regarding identical factual predicate rule.
7/6/2020	T-46594-10	ADK	5.00	0.00	5.00	Drafting and revising collateral attack and identical factual predicate memorandum and completing additional research.
7/6/2020	T-46791-20	RKM	0.20	0.00	0.20	Email communication with Ms. Himes regarding status of document reorganization on Teams.
7/7/2020	T-46594-6	ADK	2.10	0.00	2.10	Revising memorandum regarding collateral attack and the identical factual predicate rule.
7/7/2020	T-46791-18	RKM	0.90	0.00	0.90	Review and analyze Ms. Koehler's memorandum regarding the collateral attack issues related to the Sefcovic Settlement Agreement.
7/7/2020	T-46583-7	RKM	0.20	0.00	0.20	Email communication with Ms. Himes regarding TEP's discovery documents.
7/9/2020	T-46649-19	ADK	0.30	0.00	0.30	Conferencing with Ryan K. Meyer regarding memo regarding collateral attack and the factual predicate rule and additional research to be completed; completing additional research and revising memo.
7/9/2020	T-46791-3	RKM	1.00	0.00	1.00	Conference call to discuss status of task to be completed.
7/10/2020	T-46649-17	ADK	5.20	0.00	5.20	Completing additional research and revising memo regarding collateral attack and the factual predicate rule.
7/11/2020	T-46752-12	GJS	3.00	0.00	3.00	legal research and various emails regarding collateral attack
7/13/2020	T-46649-16	ADK	0.20	0.00	0.20	Receipt and review of questions from supervising attorneys regarding collateral attack memorandum.
7/13/2020	T-46732-28	DGS	0.80	0.00	0.80	Receive and review correspondence from Gregory J. Stucky and Bob Miller regarding collateral attack; correspondence to Gregory J. Stucky; brief research regarding collateral attack.
7/13/2020	T-46752-11	GJS	2.00	0.00	2.00	legal research and emails regarding collateral estoppel

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/14/2020	T-46649-10	ADK	3.00	0.00	3.00	Conferencing with David G. Seely regarding collateral attack memorandum and remaining questions; reviewing secondary sources regarding collateral attack; reviewing and analyzing emailed questions regarding collateral attack issues.
7/14/2020	T-46732-19	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller and Gregory J. Stucky; conference with Audrey D. Koehler.
7/14/2020	T-46752-10	GJS	2.00	0.00	2.00	legal research and emails regarding collateral attack
7/16/2020	T-46732-13	DGS	0.70	0.00	0.70	Receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Nate Keever; conference call with Gregory J. Stucky, Ryan K. Meyer, Bob Miller, and Nate Keever; conference with Ryan K. Meyer.
7/16/2020	T-46679-23	RKM	0.30	0.00	0.30	Email communication with Ms. Himes and Mr. Keever regarding status of document reorganization on Teams.
7/16/2020	T-46679-31	RKM	1.00	0.00	1.00	Conference call with counsel to discuss status of matter and to-do-list.
7/17/2020	T-46679-17	RKM	1.30	0.00	1.30	Conference call with Mr. Keever, Mr. Miller, and Mr. Keever's paralegals to discuss reorganization of documents on Teams.
7/20/2020	T-46679-12	RKM	0.20	0.00	0.20	Send email communication to Mr. Keever regarding plaintiff's responses to TEP's discovery and drafting a letter to Mr. Chrisman regarding TEP's discovery responses.
7/22/2020	T-46771-44	DGS	1.30	0.00	1.30	Conferences with Ryan K. Meyer regarding cert. petitions; conference with Daniel Sloan regarding cite checking of petition.
7/23/2020	T-46771-41	DGS	0.60	0.00	0.60	Conference with Ryan K. Meyer; telephone conference with Bob Miller; Zoom meeting with Nate, Bob, Ryan K. Meyer, Gregory J. Stucky.
7/23/2020	T-46752-6	GJS	1.00	0.00	1.00	preparation for and participation in conference call among counsel
7/23/2020	T-46721-16	RKM	1.00	0.00	1.00	Conference call with attorneys to discuss status of case and tasks to complete.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/24/2020	T-46721-13	RKM	0.50	0.00	0.50	Receive TEPs responses to first set of requests for admission and review and analyze same; email communication with counsel regarding same.
7/25/2020	T-46752-5	GJS	2.00	0.00	2.00	review of TEP response to RFA
7/25/2020	T-46721-9	RKM	0.10	0.00	0.10	Email communication with counsel regarding second set of discovery requests to TEP.
7/27/2020	T-46752-4	GJS	2.00	0.00	2.00	review of proposed RFA and comments thereto
7/27/2020	T-46721-3	RKM	1.10	0.00	1.10	Review and revise second set of interrogatories and requests for admission and send same to counsel.
7/27/2020	T-46721-6	RKM	0.80	0.00	0.80	Begin drafting second set of requests for admission and interrogatories to serve on TEP.
7/28/2020	T-46771-25	DGS	1.50	0.00	1.50	Receive and review correspondence from Gregory J. Stucky; review of changes to discovery requests; review of TEP's responses to 1st RFAs draft 30b6 notice; receive and review correspondence from Gregory J. Stucky; correspondence to counsel.
7/28/2020	T-46777-10	RKM	0.30	0.00	0.30	Email communication with counsel regarding second set of discovery requests to TEP.
7/29/2020	T-46771-19	DGS	2.40	0.00	2.40	Receive and review correspondence from Gregory J. Stucky; correspondence to Mr. Stucky; correspondence to Ryan Meyer; review of revised discovery requests and 30b6 notice; conference call with Bob Miller, Gregory J. Stucky, Ryan K. Meyer; receive and review correspondence from Bob Miller; receive and review changes; revise 30b6 notice; finalize discovery requests; correspondence to Chris Chrisman.
7/29/2020	T-46752-2	GJS	3.00	0.00	3.00	conference call and work on discovery requests
7/29/2020	T-46752-3	GJS	1.00	0.00	1.00	review of proposed interrogatories subjects
7/29/2020	T-46759-14	RKM	0.50	0.00	0.50	Conference call with Mr. Stucky, Mr. Seely, and Mr. Miller to discuss second discovery requests to TEP and 30(b)(6) deposition.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/30/2020	T-46771-4	DGS	0.70	0.00	0.70	Telephone conference with Chris Chrisman; correspondence to counsel; receive and review correspondence from Bob Miller; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Mr. Chrisman.
7/30/2020	T-46759-7	RKM	0.20	0.00	0.20	Email communication with counsel regarding Mr. Chrisman's proposed extension to the scheduling order.
7/31/2020	T-46771-2	DGS	1.80	0.00	1.80	Receive and review correspondence from Nate, Bob, Ryan; telephone conference with counsel.
7/31/2020	T-46759-3	RKM	0.20	0.00	0.20	Email communication with counsel regarding Mr. Chrisman's proposal to extend discovery deadline by 45 days.
7/31/2020	T-46785-2	RKM	0.70	0.00	0.70	Conference call with counsel to discuss extension of time for discovery and status of current tasks.
7/31/2020	T-46791-1	RKM	0.10	0.00	0.10	Email communication with Ms. West regarding Notice of Service.
8/4/2020	T-46986-8	GJS	2.00	0.00	2.00	Work on certification motion; emails.
8/4/2020	T-46897-89	RKM	0.40	0.00	0.40	Receive email communication from Mr. Stucky regarding motion for class certification; review same.
8/5/2020	T-46986-7	GJS	2.00	0.00	2.00	Work on certification motion, and related emails.
8/5/2020	T-46850-15	RKM	0.50	0.00	0.50	Receive draft of Class Certification Motion from Mr. Miller and review comments regarding same; email communication with counsel regarding same.
8/6/2020	T-46986-6	GJS	1.00	0.00	1.00	Work on certification motion.
8/6/2020	T-46850-8	RKM	0.20	0.00	0.20	Email communication with counsel regarding class certification motion.
8/7/2020	T-46986-5	GJS	1.00	0.00	1.00	Work related to certification motion and related emails.
8/7/2020	T-46897-78	RKM	0.40	0.00	0.40	Email communication between counsel regarding lease chart and class certification and briefly review same.
8/9/2020	T-46897-70	RKM	0.50	0.00	0.50	Receive email from Mr. Miller regarding lease chart and respond to same.
8/10/2020	T-46986-4	GJS	3.00	0.00	3.00	Work on lease categorization and emails related thereto.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
8/10/2020	T-46897-65	RKM	0.20	0.00	0.20	Email communication with counsel regarding lease chart.
8/11/2020	T-46986-3	GJS	1.00	0.00	1.00	Work on lease categorization.
8/13/2020	T-46986-2	GJS	2.00	0.00	2.00	Work on lease categorization.
8/24/2020	T-46942-6	RKM	0.70	0.00	0.70	Review answers to TEP's first set of discovery requests; review and revise task list and send same to counsel.
8/31/2020	T-47001-3	DGS	1.00	0.00	1.00	Receive and review Order to Show Cause; correspondence to counsel; law study.
8/31/2020	T-46999-7	RKM	0.30	0.00	0.30	Receive the Court's Order to Show Cause regarding jurisdiction and review and analyze same.
9/1/2020	T-47007-40	RKM	0.80	0.00	0.80	Research corporate information about TEP.
9/1/2020	T-47007-42	RKM	0.40	0.00	0.40	Email communication with counsel regarding the court's show cause order.
9/2/2020	T-47007-31	RKM	1.80	0.00	1.80	Draft response to the Court's Order to Show Cause; research pleading requirements for jurisdiction involving LLC's under CAFA; email communication with counsel regarding same.
9/3/2020	T-47007-17	RKM	0.30	0.00	0.30	Review Mr. Seely's revised draft of Response to Court's Show Cause Order and email communication with counsel regarding same.
9/8/2020	T-47007-10	RKM	0.10	0.00	0.10	Email communication with counsel regarding Response to Order to Show Cause.
9/9/2020	T-47017-39	RKM	0.30	0.00	0.30	Review final draft of Response to Show Cause Order and email communication with counsel regarding saem.
9/11/2020	T-47018-8	RKM	0.10	0.00	0.10	Receive Court's Order ruling on subject matter jurisdiction and review same.
9/16/2020	T-47038-4	RKM	0.40	0.00	0.40	Review and revise task list and email communication with counsel regarding same and to schedule conference call to discuss same.
9/19/2020	T-47075-60	GJS	1.00	0.00	1.00	Emails regarding status of case.
9/21/2020	T-47075-59	GJS	1.00	0.00	1.00	Ppreparation for and participation in telephone call.
9/21/2020	T-47047-7	RKM	1.40	0.00	1.40	Review and analyze Mr. Miller's memo on significant documents.
9/21/2020	T-47049-18	RKM	1.00	0.00	1.00	Conference call with Mr. Miller, Mr. Seely, Mr. Keever, and Mr. Stucky regarding status of tasks needed to be completed and further strategy.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/22/2020	T-47052-12	RKM	0.20	0.00	0.20	Receive email communication from Mr. Miller regarding key documents and review same.
9/23/2020	T-47052-4	RKM	1.70	0.00	1.70	Review TEP produced documents and begin labeling the Concord Remittance Statements.
9/23/2020	T-47052-7	RKM	3.00	0.00	3.00	Review memo regarding TEP produced documents; review and revise class certification motion.
9/23/2020	T-47052-8	RKM	1.20	0.00	1.20	Conference call with Mr. Miller regarding class certification motion and organization of documents produced by TEP.
9/24/2020	T-47069-71	RKM	2.80	0.00	2.80	Review and identify Concord remittance statements.
9/24/2020	T-47052-1	RKM	1.00	0.00	1.00	Rename Concord remittance statements.
9/25/2020	T-47069-63	RKM	0.60	0.00	0.60	Label and organize Concord remittance statements.
9/25/2020	T-47069-67	RKM	0.80	0.00	0.80	Communication with Ms. Himes regarding organization of documents on Teams; label Concord remittance statements.
9/29/2020	T-47072-45	RKM	0.80	0.00	0.80	Conference call with Mr. Miller and Ms. Himes regarding organization of documents; conference with Ms. Gorney regarding same.
9/30/2020	T-47077-37	RKM	0.50	0.00	0.50	Conference with Ms. Clark, Ms. Gorney, and Ms. Winter regarding organization of documents in Teams.
9/30/2020	T-47077-39	RKM	1.00	0.00	1.00	Conference call with counsel regarding responses to TEP's discovery requests and other matters.
10/2/2020	T-47136-49	GJS	3.00	0.00	3.00	Review TEP's discovery responses and emails regarding same.
10/3/2020	T-47136-47	GJS	2.00	0.00	2.00	Review TEP's discovery responses and emails regarding same.
10/4/2020	T-47136-45	GJS	3.00	0.00	3.00	Legal research and emails regarding scope of(30(b)(6).
10/5/2020	T-47093-33	RKM	0.20	0.00	0.20	Email communication from Mr. Stucky asking if we could send additional RFAs to TEP and respond to same.
10/6/2020	T-47144-97	DGS	2.00	0.00	2.00	Review of 30b6 notice; review of correspondence; start work on outline.
10/6/2020	T-47093-20	RKM	1.00	0.00	1.00	Review Bob's memo on organization of TEP's produced documents; conference with Ms. Winter regarding same.
10/7/2020	T-47144-95	DGS	1.30	0.00	1.30	Work on outline.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/7/2020	T-47136-43	GJS	1.00	0.00	1.00	Review and revise 30(b)(6) notice.
10/7/2020	T-47093-4	RKM	0.30	0.00	0.30	Email communication with Mr. Miller and Ms. Winter regarding TEP document production and organization of documents in Teams.
10/8/2020	T-47144-90	DGS	2.00	0.00	2.00	Telephone conference with Chris Chrisman regarding 30b6; revise notice; correspondence to Mr. Chrisman; receive and review correspondence from Mr. Chrisman; work on outline; correspondence with Bob Miller.
10/9/2020	T-47144-87	DGS	0.50	0.00	0.50	Correspondence to counsel regarding conference call; receive and review correspondence from counsel.
10/12/2020	T-47144-78	DGS	0.20	0.00	0.20	Receive and review correspondence from counsel.
10/13/2020	T-47144-73	DGS	3.30	0.00	3.30	Receive and review correspondence from counsel; telephone conference with Bob, Nate, Gregory J. Stucky, Ryan K. Meyer ; work on outline.
10/13/2020	T-47104-8	RKM	1.00	0.00	1.00	Conference call with counsel to discuss 30(b)(6) depositions of TEP and Jolley and Plaintiff's responses to TEP's first set of discovery requests.
10/14/2020	T-47149-117	DGS	7.20	0.00	7.20	Review of file; work on outline.
10/15/2020	T-47117-27	RKM	0.10	0.00	0.10	Email communication with Ms. Winter regarding organization of TEP's produced documents.
10/15/2020	T-47117-28	RKM	0.20	0.00	0.20	Review email communication sent by Mr. Chrisman regarding 30(b)(6) depositions.
10/16/2020	T-47136-41	GJS	2.00	0.00	2.00	Review and revise deposition questions.
10/16/2020	T-47117-25	RKM	0.90	0.00	0.90	Conference call with Mr. Seely regarding TEP produced documents; look for documents; email communication with Ms. Himes regarding same.
10/21/2020	T-47144-34	DGS	0.60	0.00	0.60	Receive and review message from Chris Chrisman; telephone call to Mr. Chrisman (left message); receive and review correspondence from Bob Miller.
10/22/2020	T-47144-29	DGS	1.40	0.00	1.40	Telephone conference with Michelle Seares; review of Bob's revisions to outline.
10/23/2020	T-47149-115	DGS	2.70	0.00	2.70	Revise and comment on outline; correspondence to Bob Miller.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/26/2020	T-47144-24	DGS	2.00	0.00	2.00	Receive and review correspondence from Bob Miller; review of 30b6 outline; review of correspondence; correspondence to Bob and Nate; correspondence to Chris Chrisman; receive and review correspondence from Chrisman; telephone conference with Mr. Chrisman.
10/28/2020	T-47149-111	DGS	1.00	0.00	1.00	Receipt and review of correspondence from Bob; review of index of TEP documents.
10/28/2020	T-47136-33	GJS	1.00	0.00	1.00	Review of index of documents produces and email regarding same.
10/29/2020	T-47149-107	DGS	1.00	0.00	1.00	Receive and review correspondence from Chris Chrisman regarding 30b6; receive and review correspondence from Nate Keever; correspondence to Nate; receive and review correspondence from Michelle; correspondence to Michelle; receive and review correspondence from Michelle.
10/29/2020	T-47147-65	RKM	0.20	0.00	0.20	Email communication with counsel regarding proposed extension to scheduling order.
10/30/2020	T-47149-104	DGS	0.40	0.00	0.40	Receipt and review of pleadings regarding extension of discovery cutoff; review of court's order approving extension.
11/2/2020	T-47197-92	DGS	2.50	0.00	2.50	Correspondence to Bob Miller; telephone conference with Bob; receive and review correspondence from Bob; review of memo; revise notice; telephone conference with Chris Chrisman; correspondence to counsel; telephone conference with Bob.
11/2/2020	T-47160-25	RKM	0.20	0.00	0.20	Review Third Amended Scheduling Order and email communication with Ms. West regarding same.
11/3/2020	T-47187-33	RKM	0.50	0.00	0.50	Conference call and email communication with Mr. Seely regarding 30(b)(6) deposition of TEP.
11/9/2020	T-47197-66	DGS	2.20	0.00	2.20	Telephone conference with Bob Miller; review of file; correspondence to Mary Ellen Denomy regarding SQL files.
11/9/2020	T-47169-16	RKM	0.20	0.00	0.20	Conference with Mr. Seely regarding SQL files.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/11/2020	T-47214-8	DGS	4.00	0.00	4.00	Receive and review correspondence from Chris Chrisman; correspondence to Bob Miller and Nate Keever regarding Chrisman's objections and comments regarding 30b6 depo.; start work on reply.
11/11/2020	T-47174-88	RKM	0.50	0.00	0.50	Send various TEP produced documents to Mary Ellen.
11/12/2020	T-47178-55	RKM	0.70	0.00	0.70	Review and analyze the Court's order denying TEP's Motion to Dismiss.
11/13/2020	T-47197-48	DGS	1.00	0.00	1.00	Receive and review correspondence from court regarding motion to dismiss; correspondence to counsel; correspondence to Ryan K. Meyer; correspondence to Cheryl L. Clark; review of court's opinion denying TEP's motion for partial dismissal; receive and review correspondence from Gregory J. Stucky; telephone conference with Gregory J. Stucky.
11/13/2020	T-47197-49	DGS	2.00	0.00	2.00	Receive and review correspondence from Nate Keever, Ryan K. Meyer, Gregory J. Stucky regarding order on motion to dismiss; telephone conference with Bob Miller; receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Bob Miller; receive and review correspondence from Mary Ellen; correspondence to Chris Chrisman.
11/13/2020	T-47198-4	GJS	2.00	0.00	2.00	Review of Court's Order Denying Motion to Dismiss and emails regarding same.
11/13/2020	T-47178-51	RKM	0.30	0.00	0.30	Email communication with counsel regarding the Court's order denying TEP's Motion to Dismiss.
11/16/2020	T-47197-44	DGS	6.00	0.00	6.00	Review of file; law study regarding TEP objections; draft reply to Chrisman's letter regarding 30b6 objections.
11/17/2020	T-47197-39	DGS	3.00	0.00	3.00	Revise correspondence to Chrisman regarding 30b6; receive and review correspondence from Bob Miller; correspondence to Bob; receive and review correspondence from Ryan Meyer; receive and review correspondence from Nate Keever.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/18/2020	T-47198-3	GJS	3.00	0.00	3.00	Review of materials regarding TEP Component Cost Deductions.
11/19/2020	T-47198-2	GJS	4.00	0.00	4.00	Review of letter to Chrisman regarding discovery and emails regarding same; emails regarding Component Cost Deductions.
11/20/2020	T-47197-22	DGS	3.00	0.00	3.00	Receive and review correspondence from Bob, Gregory J. Stucky, Mary Ellen Denomy; telephone conference with Bob Miller; telephone conference with Bob Miller, Nate Keever, revise correspondence to Chrisman; find emails from Ms. Denomy; review of motion to dismiss Barton appeal; correspondence to Bob and Nate and Gregory J. Stucky; receive and review correspondence from Bob; receive and review correspondence from Gregory J. Stucky.
11/23/2020	T-47197-16	DGS	1.40	0.00	1.40	Correspondence to Bob Miller; receive and review correspondence from Bob Miller; receive and review correspondence from Bob Miller; receive and review Bob's outline regarding Wiseman and Benacquista.
11/24/2020	T-47197-13	DGS	6.30	0.00	6.30	Review of file; work on 30b6 outline; revise Bob's outline for Wiseman and Benacquista; correspondence with Bob.
11/25/2020	T-47207-13	RKM	0.20	0.00	0.20	Receive Answer to Amended Complaint and email communication with counsel regarding same.
11/30/2020	T-47214-4	DGS	2.20	0.00	2.20	Review of file; correspondence to Bob Miller; review of TEP's new Answer & Counterclaim; compare counterclaim and affirmative defenses conference with Ryan K. Meyer; receive and review correspondence from Bob Miller; correspondence to Bob; review of correspondence.
11/30/2020	T-47207-1	RKM	0.20	0.00	0.20	Conference with Mr. Seely regarding TEP's 30(b)(6) deposition.
12/1/2020	T-47274-90	DGS	2.50	0.00	2.50	Telephone conference with Bob Miller; correspondence to Bob Miller; correspondence to Chris Chrisman; review of outline; prepare for depositions.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/2/2020	T-47274-82	DGS	3.40	0.00	3.40	Prepare for depositions; receive and review correspondence from Chris Chrisman; correspondence to Mr. Chrisman; receive and review correspondence from Mr. Chrisman; correspondence to Mr. Chrisman.
12/3/2020	T-47299-2	DGS	4.00	0.00	4.00	Conference with Ryan K. Meyer; correspondence to Chris Chrisman; receive and review correspondence from Mr. Chrisman; telephone conference with Bob Miller; telephone conference with Bob Miller and Chris Chrisman.
12/4/2020	T-47299-4	DGS	3.60	0.00	3.60	Prepare for depositions.
12/4/2020	T-47256-130	RKM	4.20	0.00	4.20	Prepare exhibits for 30(b)(6) deposition.
12/5/2020	T-47274-68	DGS	4.00	0.00	4.00	Prepare for depositions; prepare exhibits.
12/5/2020	T-47256-126	RKM	0.20	0.00	0.20	Email communication with Mr. Miller and Mr. Seely regarding deposition exhibits.
12/6/2020	T-47274-67	DGS	1.40	0.00	1.40	Prepare for deposition; review exhibits.
12/7/2020	T-47253-27	CLC	3.10	0.00	3.10	Preparation of 8 sets of exhibits to be sent to all parties for upcoming depositions.
12/7/2020	T-47274-63	DGS	7.00	0.00	7.00	Prepare for depositions; work on exhibits; conferences with Ryan K. Meyer; conferences with Cheryl L. Clark; conferences with Tammy S. West; correspondence to Bob Miller; revise exhibit list.
12/7/2020	T-47228-6	RKM	5.90	0.00	5.90	Gather, organize, and compile exhibits for 30(b)(6) deposition of TEP; conferences with Mr. Seely, Ms. Clark, and Ms. West regarding same.
12/7/2020	T-47228-9	RKM	0.30	0.00	0.30	Send TEP deposition exhibits to Mr. Chrisman and Mr. Miller via sharepoint.
12/8/2020	T-47253-24	CLC	1.40	0.00	1.40	Continued work preparing sets of exhibits for upcoming depositions.
12/8/2020	T-47296-86	DGS	8.00	0.00	8.00	Prep for depositions.
12/8/2020	T-47243-51	RKM	0.60	0.00	0.60	Conference call with counsel to discuss TEP's 30(b)(6) deposition and plaintiff's answers to discovery.
12/8/2020	T-47228-15	RKM	0.20	0.00	0.20	Conference with Ms. Clark regarding TEP deposition exhibits.
12/8/2020	T-47256-122	RKM	0.20	0.00	0.20	Send link to exhibits to Mr. Miller.
12/8/2020	T-47256-124	RKM	1.50	0.00	1.50	Review 30(b)(6) deposition outline.
12/9/2020	T-47296-85	DGS	10.00	0.00	10.00	Telephone conference with Gregory J. Stucky. 30b6 depo.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/9/2020	T-47251-14	RKM	9.30	0.00	9.30	Attend TEP's 30(b)(6) deposition; conferences with Mr. Seely and Mr. Miller regarding same.
12/9/2020	T-47243-50	RKM	0.20	0.00	0.20	Send additional spreadsheet to Mr. Chrisman.
12/10/2020	T-47296-84	DGS	9.00	0.00	9.00	Telephone conference with Gregory J. Stucky. 30b6 depos.
12/10/2020	T-47251-13	RKM	9.10	0.00	9.10	Attend TEP's 30(B)(6) deposition; review deposition outline; review Motion for Class Certification; conferences with Mr. Seely and Mr. Miller regarding deposition.
12/11/2020	T-47296-83	DGS	5.20	0.00	5.20	Telephone conference with Gregory J. Stucky. 30B6 Depo.
12/11/2020	T-47251-12	RKM	4.40	0.00	4.40	Attend TEP's 30(b)(6) deposition; conferences with Mr. Seely and Mr. Miller regarding same.
12/14/2020	T-47274-52	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; review of memo; correspondence to Bob.
12/15/2020	T-47274-46	DGS	1.00	0.00	1.00	Receipt and review of correspondence.
12/15/2020	T-47256-107	RKM	0.40	0.00	0.40	Review Answer to TEP's counterclaim.
12/15/2020	T-47256-108	RKM	0.50	0.00	0.50	Review Mr. Miller's notes of 30(b)(6) deposition and comment on same; email communication with Mr. Seely and Mr. Miller regarding same.
12/15/2020	T-47256-109	RKM	1.00	0.00	1.00	Conference call with counsel to discuss 30(b)(6) depositions and tasks that need to be completed.
12/15/2020	T-47256-111	RKM	0.60	0.00	0.60	Conferences with Ms. Winter regarding updating lease spreadsheet to reflect TEP's response to Interrogatory No. 7 and TEP's position that some leases abrogate the implied covenant to market.
12/16/2020	T-47274-45	DGS	0.50	0.00	0.50	Receive and review correspondence from Gregory J. Stucky, Bob Miller, Ryan K. Meyer, Chris Chrisman.
12/16/2020	T-47294-9	GJS	1.00	0.00	1.00	Participation in conference call.
12/17/2020	T-47274-38	DGS	0.30	0.00	0.30	Receive and review correspondence.
12/19/2020	T-47274-29	DGS	0.80	0.00	0.80	Receive and review correspondence from Thomas D. Kitch, Gregory J. Stucky, Bob Miller; review of exhibits; correspondence to Gregory J. Stucky and Thomas D. Kitch.
12/20/2020	T-47274-26	DGS	0.50	0.00	0.50	Receive and review correspondence from Bob Miller, Gregory J. Stucky, Bob Miller.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/21/2020	T-47274-18	DGS	1.00	0.00	1.00	Receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Bob Miller; receive and review correspondence from Chris Chrisman.
12/22/2020	T-47296-82	DGS	0.40	0.00	0.40	Receive and review correspondence.
12/22/2020	T-47294-57	RKM	1.00	0.00	1.00	Conference call with Mr. Miller regarding Class Certification Motion and changes that need to be made in light of 30(b)(6) deposition.
12/23/2020	T-47274-7	DGS	1.20	0.00	1.20	Receive and review correspondence from Bob Miller; receive and review correspondence from Ryan K. Meyer; review of revised motion.
12/23/2020	T-47294-55	RKM	2.90	0.00	2.90	Review and revise Motion for Class Certification and send same to counsel.
12/24/2020	T-47274-4	DGS	0.20	0.00	0.20	Receive and review correspondence from Gregory J. Stucky.
12/29/2020	T-47274-1	DGS	0.30	0.00	0.30	Receive and review correspondence from Ryan K. Meyer; correspondence to Ryan K. Meyer.
1/1/2021	T-47294-3	GJS	2.00	0.00	2.00	Review of Williams affiliate and email regarding same.
1/1/2021	T-47294-4	GJS	2.00	0.00	2.00	Review of enhancement spreadsheet and email regarding same.
1/1/2021	T-47294-5	GJS	3.00	0.00	3.00	Review of memo and emails regarding same.
1/1/2021	T-47294-8	GJS	2.00	0.00	2.00	Review of pool chart and email regarding same.
1/4/2021	T-47353-83	DGS	2.20	0.00	2.20	Receive and review correspondence from Nate Kever regarding discovery responses; receive and review correspondence from Chris Chrisman regarding lease categorization; correspondence to Mr. Chrisman; receive and review correspondence from Mr. Chrisman; correspondence to Mr. Chrisman; telephone conference with Bob Miller; receive and review correspondence from Gregory J. Stucky.
1/4/2021	T-47368-41	GJS	4.00	0.00	4.00	Review of TEP's comments to spreadsheet and email regarding same.
1/4/2021	T-47309-23	RKM	0.20	0.00	0.20	Receive, review, and analyze, email communication from Mr. Stucky regarding Mr. Chrisman's revisions to our lease spreadsheet.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/5/2021	T-47353-78	DGS	1.40	0.00	1.40	Receive and review correspondence from Michelle Sears; receive and review correspondence from Nate Keever; receive and review correspondence from Bob Miller; telephone conference with Gregory J. Stucky; review of lease categorization spreadsheet.
1/6/2021	T-47353-77	DGS	0.80	0.00	0.80	Receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Ryan K. Meyer; telephone conference with Ryan K. Meyer.
1/6/2021	T-47309-5	RKM	0.50	0.00	0.50	Conference call with Mr. Seely to discuss Chrisman's revised spreadsheet and further work that needs to be done; review Mr. Stucky's emails regarding same.
1/7/2021	T-47353-75	DGS	1.00	0.00	1.00	Receive and review correspondence from Nate Keever; review of discovery responses; receive and review correspondence from Gregory J. Stucky telephone conference with Gregory J. Stucky; receive and review correspondence from Nate Keever.
1/8/2021	T-47294-2	GJS	4.00	0.00	4.00	Participation in conference call; review of answer to counterclaim; and various emails.
1/9/2021	T-47353-73	DGS	0.30	0.00	0.30	Receive and review correspondence from Mary Ellen Denomy.
1/11/2021	T-47317-173	RKM	0.40	0.00	0.40	Send spreadsheets requested by Mr. Miller to Ms. Denomy; send Exhibits to Court Reporter.
1/12/2021	T-47353-60	DGS	0.30	0.00	0.30	Review of correspondence; correspondence to Nate Keever regarding discovery responses.
1/13/2021	T-47325-73	RKM	1.20	0.00	1.20	Review and analyze Chrisman's lease chart changes and comments.
1/13/2021	T-47322-20	RKM	0.70	0.00	0.70	Email communication with counsel regarding lease chart and Chrisman's alterations to same and regarding standard of review the Court will use to evaluate Plaintiff's factual allegations. Conference with Mr. Seely regarding same.
1/14/2021	T-47322-15	RKM	0.20	0.00	0.20	Email communication with counsel regarding standard of review of the facts plead in the Complaint and whether the Court accepts those allegations as true even if denied in the Answer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/14/2021	T-47325-68	RKM	0.90	0.00	0.90	Review and analyze changes made to lease chart by Mr. Chrisman.
1/15/2021	T-47294-1	GJS	1.00	0.00	1.00	Participation in conference call.
1/18/2021	T-47353-51	DGS	0.30	0.00	0.30	Conference with Ryan K. Meyer regarding lease categorization.
1/19/2021	T-47353-48	DGS	4.00	0.00	4.00	Review of leases & categorization.
1/19/2021	T-47333-26	RKM	0.60	0.00	0.60	Review Mr. Chrisman's comments to lease categorization spreadsheet with Mr. Seely.
1/20/2021	T-47353-44	DGS	3.50	0.00	3.50	Review of leases & categorization.
1/20/2021	T-47350-147	RKM	0.30	0.00	0.30	Send requested deposition exhibits to court reporter.
1/21/2021	T-47353-43	DGS	3.80	0.00	3.80	Telephone conference with Chris Chrisman regarding discovery, lease categorization; correspondence to counsel; review of leases & categorization.
1/22/2021	T-47353-38	DGS	0.50	0.00	0.50	Conference with Ryan K. Meyer regarding categorization.
1/25/2021	T-47353-32	DGS	1.00	0.00	1.00	Receive and review correspondence from Ryan K. Meyer; review of categorization.
1/25/2021	T-47350-129	RKM	3.80	0.00	3.80	Review and analyze Chrisman's lease spreadsheet to determine whether i agree with his comments regarding our initial categorization.
1/26/2021	T-47353-23	DGS	3.00	0.00	3.00	Conference with Ryan K. Meyer regarding categorization; review of lease categorization; correspondence to counsel; telephone conference with Bob Miller.
1/27/2021	T-47353-20	DGS	1.00	0.00	1.00	Conference with Ryan K. Meyer regarding categorization; receive and review correspondence from Ryan K. Meyer; correspondence to counsel; correspondence to Michelle Sears regarding extension; receive and review correspondence from Robin Steed regarding depo exhibits; review of file; correspondence to Ryan K. Meyer regarding same.
1/27/2021	T-47354-12	RKM	0.20	0.00	0.20	Email communication with Mr. Seely and Mr. Chrisman to schedule a time to review the disputed leases.
1/27/2021	T-47353-101	RKM	1.00	0.00	1.00	Review leases reviewed by Mr. Seely and conference with Mr. Seely regarding same; send revised lease categorization to counsel.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/28/2021	T-47369-49	DGS	0.50	0.00	0.50	Receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Chris Chrisman.
1/30/2021	T-47368-35	GJS	3.00	0.00	3.00	Work on spreadsheet analysis and email regarding same.
1/30/2021	T-47368-38	GJS	2.00	0.00	2.00	Review of our comments to TEP's comments and emails regarding same.
1/30/2021	T-47368-39	GJS	1.00	0.00	1.00	Miscellaneous emails.
1/30/2021	T-47368-40	GJS	2.00	0.00	2.00	Review of plaintiffs' discovery responses and emails regarding same.
2/1/2021	T-47434-184	DGS	1.40	0.00	1.40	Review of file; correspondence to Gregory J. Stucky; receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky.
2/1/2021	T-47426-12	GJS	1.00	0.00	1.00	Review of lease spreadsheet and email regarding same.
2/2/2021	T-47434-174	DGS	1.20	0.00	1.20	Review of file; Zoom conference with Chris Chrisman and Ryan K. Meyer regarding lease categorizations; conference with Ryan K. Meyer.
2/2/2021	T-47426-11	GJS	4.00	0.00	4.00	Review of Bob' memo and emails resume; revision of class definition.
2/2/2021	T-47385-32	RKM	1.00	0.00	1.00	Brief zoom conference with Mr. Chrisman to discuss disputes with lease spreadsheet; review Mr. Chrisman's further comments to same.
2/2/2021	T-47385-44	RKM	0.50	0.00	0.50	Send documents requested by Mr. Miller to Mary Ellen.
2/3/2021	T-47434-169	DGS	2.60	0.00	2.60	Receive and review correspondence from Robin Steed; Review of spreadsheet; receive and review correspondence from Ryan K. Meyer receive and review correspondence from Chris Chrisman; correspondence to Mr. Chrisman; receive and review correspondence from Gregory J. Stucky , Nate Keever, Gregory J. Stucky, Chris Chrisman, Gregory J. Stucky, and Gregory J. Stucky.
2/3/2021	T-47385-30	RKM	0.20	0.00	0.20	Receive updated spreadsheet from Mr. Chrisman and email communication with Mr. Chrisman regarding same.
2/4/2021	T-47434-166	DGS	0.20	0.00	0.20	Correspondence to counsel.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/5/2021	T-47434-161	DGS	1.00	0.00	1.00	Receive and review correspondence from Michelle Sears; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Ms. Seares; correspondence to Ms. Seares.
2/5/2021	T-47426-10	GJS	1.00	0.00	1.00	Research regarding class representative and emails regarding same.
2/6/2021	T-47434-157	DGS	1.00	0.00	1.00	Receive and review correspondence from Nate Keever; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Nate Keever; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Ryan K. Meyer.
2/6/2021	T-47426-9	GJS	1.00	0.00	1.00	Work on class definition and emails regarding same.
2/7/2021	T-47434-153	DGS	1.60	0.00	1.60	Receive and review correspondence from Nate Keever; receive and review correspondence from Gregory J. Stucky correspondence to Nate Keever; correspondence to Eric Reusser regarding blocked file; correspondence to Eric; receive and review correspondence from Bob Miller.
2/7/2021	T-47426-8	GJS	2.00	0.00	2.00	Research regarding class representative and emails regarding same.
2/8/2021	T-47434-151	DGS	1.80	0.00	1.80	Receive and review correspondence from Robin Steed; correspondence to counsel; receive and review correspondence from Chris Chrisman; correspondence to counsel; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Nate Keever.
2/8/2021	T-47426-7	GJS	2.00	0.00	2.00	Review of Bob's memo and emails regarding same.
2/8/2021	T-47390-57	RKM	0.50	0.00	0.50	Review Mr Millers memo regarding lease categorization; email communication with counsel regarding lease categorization.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/8/2021	T-47390-66	RKM	2.50	0.00	2.50	Review merged spreadsheet prior to conference with Mr. Chrisman; conference with Mr. Chrisman to review merged spreadsheet of remaining disputed leases.
2/9/2021	T-47434-144	DGS	1.50	0.00	1.50	Receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Nate Keever; receive and review correspondence from Katherine Bell regarding TEP's supplemental disclosures; receive and review correspondence from Michelle Sears regarding 30b6 notice; receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky.
2/9/2021	T-47394-70	RKM	0.20	0.00	0.20	Receive draft 30(b)(6) notice of Jolley Potter and briefly review same.
2/9/2021	T-47390-51	RKM	0.70	0.00	0.70	Review Mr. Miller's comments regarding leases to be categorized and add same to lease spreadsheet.
2/10/2021	T-47434-138	DGS	2.60	0.00	2.60	Receive and review correspondence from Bob Miller; receive and review correspondence from Nate Keever; receive and review correspondence from Michelle Sears regarding new spreadsheet; receive and review correspondence from Ryan K. Meyer; correspondence to Ms. Sears; receive and review correspondence from Chris Chrisman.
2/10/2021	T-47426-6	GJS	2.00	0.00	2.00	Emails regarding lease categorization and conference call.
2/10/2021	T-47394-65	RKM	1.50	0.00	1.50	Review Mr. Miller's memo regarding class certification and Mr. Stucky's comments to same; conference call with counsel to discuss Jolley 30(b)(6) depo, amending class definition, and continued work on lease categorization.
2/11/2021	T-47396-17	CLC	0.30	0.00	0.30	Preparation of spreadsheet received for use by attorney.
2/11/2021	T-47408-37	RKM	0.20	0.00	0.20	Email communication with defense counsel to reschedule conference call.
2/12/2021	T-47434-115	DGS	3.00	0.00	3.00	Conference with Ryan K. Meyer regarding lease categorization.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/12/2021	T-47405-13	RKM	3.00	0.00	3.00	Conference with Mr. Seely to review Mr. Chrisman's most recent changes to lease chart.
2/15/2021	T-47434-106	DGS	0.30	0.00	0.30	Correspondence to Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer.
2/15/2021	T-47405-2	RKM	1.00	0.00	1.00	Conference call with Mr. Chrisman, Ms. Soares, and Mr. Seely to discuss lease categorization.
2/15/2021	T-47405-6	RKM	0.50	0.00	0.50	Add Mr. Miller's comments to lease chart.
2/16/2021	T-47434-102	DGS	0.20	0.00	0.20	Correspondence to counsel.
2/17/2021	T-47434-91	DGS	0.20	0.00	0.20	Receive and review correspondence from Michelle Sears.
2/23/2021	T-47434-55	DGS	1.00	0.00	1.00	Receive and review correspondence from Michelle Sears regarding new spreadsheet; correspondence to Ms. Sears; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Ms. Seares.
2/25/2021	T-47434-37	DGS	0.30	0.00	0.30	Receive and review correspondence from Nate Keever regarding discovery responses; receive and review correspondence from Michelle Seares.
2/25/2021	T-47429-36	RKM	0.30	0.00	0.30	Brief review of amended lease spreadsheet in preparation for conference call.
2/26/2021	T-47434-30	DGS	2.00	0.00	2.00	Review of TEP's latest additions to categorization spreadsheet; receive and review correspondence from Ryan K. Meyer; Zoom conference with Chris Chrisman, Michelle Seares, and Ryan K. Meyer; conference with Ryan K. Meyer; receive and review correspondence from Nate Keever regarding disclosures; receive and review correspondence from Ryan K. Meyer.
2/26/2021	T-47429-32	RKM	1.50	0.00	1.50	Review and analyze most recent lease spreadsheet provided by Mr. Chrisman; Zoom conference with Mr. Chrisman regarding same; email communication with counsel regarding same.
3/2/2021	T-47449-103	RKM	0.20	0.00	0.20	Email communication with Mr. Keever regarding lease spreadsheets.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/6/2021	T-47504-127	DGS	0.50	0.00	0.50	Receive and review correspondence from Gregory J. Stucky, Nate Kever.
3/6/2021	T-47494-38	GJS	2.00	0.00	2.00	Emails regarding class reps deposition.
3/10/2021	T-47504-115	DGS	0.40	0.00	0.40	Receive and review correspondence from Robin Steed; correspondence to Counsel; receive and review correspondence from Michelle Sears; correspondence to Nate Kever and Michelle Sears regarding meet and Confer.
3/11/2021	T-47504-111	DGS	0.80	0.00	0.80	Receive and review correspondence from Nate Kever, Michelle Sears; correspondence to Nate Kever; telephone conference with Bob Miller.
3/12/2021	T-47504-107	DGS	0.30	0.00	0.30	Receive and review correspondence from Michelle Seares; receive and review correspondence from Nate Kever.
3/12/2021	T-47504-108	DGS	0.70	0.00	0.70	Receive and review correspondence from Michelle Sears; receive and review correspondence from Bob Miller; receive and review memo from Bob Miller regarding JP 30b6 depo.
3/13/2021	T-47504-104	DGS	0.60	0.00	0.60	Receive and review correspondence from Nate Kever; correspondence to Mr. Kever; receive and review correspondence from Nate, Bob and Ryan.
3/14/2021	T-47504-102	DGS	1.20	0.00	1.20	Review of 30b6 notice; telephone conference with Nate Kever, Bob Miller, Ryan K. Meyer regarding preparation for 30b6 depo of Jolley Potter RANCHES energy llc.
3/14/2021	T-47494-36	GJS	1.00	0.00	1.00	Review of Bob's email and email regarding same.
3/14/2021	T-47470-87	RKM	1.00	0.00	1.00	Conference call to discuss deposition of Jolley Potter.
3/15/2021	T-47504-94	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; conference with Ryan K. Meyer; receive and review correspondence from Gregory J. Stucky ; receive and review correspondence from Bob Miller.
3/15/2021	T-47494-35	GJS	2.00	0.00	2.00	Review of lease spreadsheet and email regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/16/2021	T-47504-82	DGS	1.30	0.00	1.30	Receive and review correspondence from Nate Keever; receive and review correspondence from Michelle Seares; receive and review correspondence from Chris Chrisman; receive and review correspondence from Bob; receive and review correspondence from Gregory J. Stucky; telephone conference with Gregory J. Stucky.
3/16/2021	T-47494-33	GJS	4.00	0.00	4.00	Memo regarding class definition emails regarding same.
3/17/2021	T-47504-75	DGS	2.00	0.00	2.00	Review of file; telephone conference with Nate Keever, Chris Chrisman, Michelle Seares regarding 30b6 notice, logistics, lease classification; correspondence to counsel regarding same.
3/18/2021	T-47504-71	DGS	0.50	0.00	0.50	Telephone conference with Gregory J. Stucky regarding deposition; conference with Ryan K. Meyer regarding same.
3/19/2021	T-47504-58	DGS	1.00	0.00	1.00	Review of file; find documents for deposition prep; correspondence to counsel regarding lease with WASP provision.
3/19/2021	T-47494-31	GJS	2.00	0.00	2.00	Various emails re "proceeds" leases other matters.
3/20/2021	T-47504-52	DGS	0.80	0.00	0.80	Receive and review correspondence from Bob Miller, Gregory J. Stucky; correspondence to Bob Miller; receive and review correspondence from Gregory J. Stucky.
3/21/2021	T-47504-51	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller, Gregory J. Stucky; review of Bob's outline of claims and evidence.
3/21/2021	T-47494-30	GJS	2.00	0.00	2.00	Emails regarding prima facia case and best available price standard.
3/22/2021	T-47504-45	DGS	2.90	0.00	2.90	Conference with Ryan K. Meyer; receive and review correspondence from Nate Keever; receive and review correspondence from Katherine Bell; review of file; review of exhibits for depo.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/23/2021	T-47504-39	DGS	3.20	0.00	3.20	Receive and review correspondence from Bob Miller; correspondence to Robin Steed; correspondence to Bob Miller; receive and review correspondence from Nate Keever; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Bob Miller; correspondence to Bob Miller; conference with Ryan K. Meyer; receive and review correspondence from Bob Miller; correspondence to Bob Miller; receive and review correspondence from Robin Steed; participate in depo prep session for Sam Potter, with Ryan K. Meyer and Nate Keever.
3/23/2021	T-47499-45	RKM	3.00	0.00	3.00	Prepare Sam Potter for deposition; conference call with Mr. Miller regarding same.
3/24/2021	T-47504-34	DGS	6.20	0.00	6.20	Prepare for and attend Zoom depo of Sam Potter as 30b6 witness.
3/24/2021	T-47498-92	RKM	1.00	0.00	1.00	Appear by video to observe deposition of Jolley Potter.
3/26/2021	T-47504-16	DGS	2.10	0.00	2.10	Review of file; conference with Gregory J. Stucky, Ryan K. Meyer, Thomas D. Kitch, Bob Miller and Nate Keever.
3/26/2021	T-47495-111	RKM	1.50	0.00	1.50	Conference call with counsel to discuss strategy and next tasks to be completed.
3/28/2021	T-47504-12	DGS	0.50	0.00	0.50	Correspondence to Ryan K. Meyer; telephone conference with Bob Miller regarding Phyllis Bourque; correspondence to Ryan K. Meyer, Gregory J. Stucky, Thomas D. Kitch; receive and review correspondence from Gregory J. Stucky, Ryan K. Meyer.
3/29/2021	T-47504-9	DGS	3.80	0.00	3.80	Review of Pollock deposition and errata; draft interrogatories; correspondence to counsel regarding interrogatories; review of correspondence regarding Bourque Agreement; correspondence to Gregory J. Stucky, Thomas D. Kitch, Ryan K. Meyer; receive and review correspondence from Thomas D. Kitch; telephone conference with Gregory J. Stucky; conference with Ryan K. Meyer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/29/2021	T-47490-200	RKM	0.50	0.00	0.50	Conferences with Mr. Seely to discuss expert engagement and updated lease spreadsheet.
3/30/2021	T-47504-4	DGS	4.10	0.00	4.10	Receive and review correspondence from Chris Chrisman; review of Platt's subscription agreement; correspondence to Mr. Chrisman; receive and review correspondence from Nate Keever; correspondence to Mr. Keever; receive and review correspondence from Gregory J. Stucky; conference with Ryan K. Meyer; revise interrogatories; draft requests for admission.
3/30/2021	T-47494-28	GJS	2.00	0.00	2.00	Review of draft interrogatories, call to Dave, and work on class definition, and emails regarding same.
3/30/2021	T-47494-29	GJS	1.00	0.00	1.00	Participation in conference.
3/31/2021	T-47518-1	DGS	3.50	0.00	3.50	Receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky; receive and review correspondence from Gregory J. Stucky; review of TEP deposition transcripts; draft additional interrogatory and revise prior interrogatory; conference with Gregory J. Stucky.
4/1/2021	T-47551-25	DGS	3.20	0.00	3.20	Review of deposition transcripts; correspondence to Gregory J. Stucky correspondence with counsel; Zoom conference with Thomas D. Kitch, Gregory J. Stucky, Bob Miller, Nate Keever; revise discovery request; correspondence to counsel.
4/1/2021	T-47554-60	GJS	1.00	0.00	1.00	Preparation for and participation in conference call.
4/2/2021	T-47551-24	DGS	3.40	0.00	3.40	Receive and review correspondence from Ryan K. Meyer; correspondence to Ryan K. Meyer; receive and review correspondence from Nate Keever; draft additional interrogatories; correspondence to counsel.
4/2/2021	T-47515-81	RKM	0.50	0.00	0.50	Review interrogatories and request for admission to send to TEP.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/5/2021	T-47551-20	DGS	2.00	0.00	2.00	Telephone conference with Chris Chrisman; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Ryan K. Meyer; conference with Ryan K. Meyer regarding uncategorized leases; receive and review correspondence from Nate Keever; receive and review correspondence from Bob Miller; receive and review correspondence from Michelle Seares; correspondence to Chris Chrisman.
4/5/2021	T-47526-132	RKM	1.50	0.00	1.50	Review updated lease spreadsheet provided by Mr. Chrisman and identify all unique leases and send same to counsel; conference with Mr. Seely regarding same.
4/7/2021	T-47554-59	GJS	1.00	0.00	1.00	Review of Tom's draft of certification memo and email regarding same.
4/8/2021	T-47551-1	DGS	1.00	0.00	1.00	Receive and review correspondence from Gregory J. Stucky, Bob Miller, Tom Kitch.
4/8/2021	T-47554-58	GJS	2.00	0.00	2.00	Review of comments regarding best available price and emails regarding same.
4/9/2021	T-47550-198	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob, Tom, and Greg.
4/9/2021	T-47554-57	GJS	2.00	0.00	2.00	Emails regarding commercial marketplace.
4/10/2021	T-47550-194	DGS	0.40	0.00	0.40	Receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch.
4/12/2021	T-47550-188	DGS	0.80	0.00	0.80	Receive and review correspondence from Bob Miller; receive and review correspondence from Thomas D. Kitch; correspondence to Bob and Tom, and other counsel.
4/14/2021	T-47563-108	DGS	2.00	0.00	2.00	Receive and review correspondence from Bob Miller regarding Bourque; correspondence to Thomas D. Kitch; receive and review correspondence from Thomas D. Kitch; revise agreement; correspondence to Bob Miller; telephone conference with Chris Chrisman; review of Platts' subscription agreement; receive and review correspondence from Mr. Chrisman.
4/16/2021	T-47563-102	DGS	0.30	0.00	0.30	Receive and review correspondence between Bob Miller and Phyllis Bourque.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/21/2021	T-47550-156	DGS	0.40	0.00	0.40	Telephone conference with Bob Miller.
4/26/2021	T-47563-93	DGS	2.60	0.00	2.60	Receive and review correspondence from Bob Miller; review of outline and list of documents for expert review; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Thomas D. Kitch; correspondence to Thomas D. Kitch; conference with Ryan K. Meyer; receive and review correspondence from Bob Miller; receive and review correspondence from Ryan K. Meyer and Brittney Winter; receive and review correspondence from Bob Miller.
4/27/2021	T-47563-85	DGS	1.00	0.00	1.00	Receive and review correspondence from Chris Chrisman; review of joint motion to amend schedule order; correspondence to Mr. Chrisman; receive and review correspondence between Ryan K. Meyer and Phyllis Bourque; receive and review correspondence from Ryan K. Meyer regarding protective order; receive and review filing notice regarding joint motion to amend scheduling order.
4/27/2021	T-47547-58	RKM	1.30	0.00	1.30	Compile initial set of documents to send to Ms. Bourque; conferences with Ms. Winter regarding same; email communication with Ms. Bourque regarding same; send protective order and acknowledgment to Ms. Bourque.
4/28/2021	T-47563-79	DGS	0.10	0.00	0.10	Receipt and review of order referring motion to modify to Magistrate.
4/28/2021	T-47554-51	GJS	2.00	0.00	2.00	Review of Bob's memo regarding lease categorization and emails.
4/28/2021	T-47554-53	GJS	2.00	0.00	2.00	Emails regarding elements of best available price claim.
4/29/2021	T-47563-73	DGS	0.60	0.00	0.60	Receive and review notice and order from Court modifying schedule; receive and review correspondence from Ryan K. Meyer and Phyllis Bourque.
4/29/2021	T-47557-132	RKM	0.90	0.00	0.90	Finish gathering initial documents to send to Bourque and send same to her via OneDrive.
4/30/2021	T-47563-67	DGS	0.20	0.00	0.20	Receive and review correspondence from Chris Chrisman.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
5/3/2021	T-47626-118	DGS	0.20	0.00	0.20	Telephone conference with Michelle Seares; correspondence to Nate Keever.
5/7/2021	T-47626-95	DGS	2.10	0.00	2.10	Receive and review correspondence from Bob Miller; correspondence to Bob Miller; correspondence to Mr. Miller and Phyllis Bourque; review of file; Zoom conference with Phyllis Bourque and Bob Miller; Zoom conference with Mr. Miller.
5/18/2021	T-47626-47	DGS	0.60	0.00	0.60	Receipt and review of TEP's responses to Third interrogatories and Third RFAs; correspondence to Gregory J. Stucky and Thomas D. Kitch regarding same.
5/20/2021	T-47626-36	DGS	1.00	0.00	1.00	Telephone conference with Gregory J. Stucky; telephone conference with Thomas D. Kitch; review of file.
5/25/2021	T-47626-23	DGS	1.30	0.00	1.30	Review of file; review of Bob's recent memo; review of TEP discovery responses.
5/26/2021	T-47626-13	DGS	6.80	0.00	6.80	Review of file; draft memo regarding facts and issues for expert Phyllis Bourque's report/affidavit; correspondence to Ryan K. Meyer.
5/27/2021	T-47624-66	GJS	2.00	0.00	2.00	Review of memo regarding Borque testimony.
6/2/2021	T-47670-155	DGS	0.40	0.00	0.40	Telephone conference with Chris Chrisman.
6/3/2021	T-47670-150	DGS	1.80	0.00	1.80	Telephone conference with Chris Chrisman; correspondence to counsel; receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky; review of Bob's revision to expert outline.
6/3/2021	T-47685-177	GJS	4.00	0.00	4.00	Review of Bourque proposed testimony and comments thereto; work on class definition.
6/4/2021	T-47670-144	DGS	0.50	0.00	0.50	Receive and review correspondence from Michelle Seares; review of documents; correspondence to counsel.
6/5/2021	T-47685-176	GJS	2.00	0.00	2.00	Work on class definition, including URSA issue.
6/8/2021	T-47685-175	GJS	2.00	0.00	2.00	Review of lease spreadsheet emails regarding lease classification.
6/9/2021	T-47670-120	DGS	2.00	0.00	2.00	Review of TEP's discovery responses; review of spreadsheets; receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/9/2021	T-47685-174	GJS	3.00	0.00	3.00	Work on class definition and various emails related thereto.
6/10/2021	T-47670-108	DGS	1.50	0.00	1.50	Receive and review correspondence from Chris Chrisman; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Nate Keever; correspondence to Gregory J. Stucky; correspondence to Nate Keever; review of spreadsheets; review of list of lease groupings from categorization process.
6/10/2021	T-47685-173	GJS	1.00	0.00	1.00	Work on class definition and emails related thereto.
6/11/2021	T-47685-172	GJS	3.00	0.00	3.00	Work on class certification issues; identification of producer/lessor issue on GVGS.
6/12/2021	T-47685-171	GJS	2.00	0.00	2.00	Identification of producer/lessors; various emails regarding same.
6/14/2021	T-47685-170	GJS	4.00	0.00	4.00	Work on class definition, and various emails related thereto.
6/15/2021	T-47670-86	DGS	2.20	0.00	2.20	Receive and review correspondence from Bob Miller, Gregory J. Stucky; review of file to locate leases; revise class definition; receive and review correspondence from Gregory J. Stucky.
6/15/2021	T-47685-168	GJS	5.00	0.00	5.00	Work on class definition; review of Miller's memo regarding BAP and email response thereto.
6/15/2021	T-47685-169	GJS	3.00	0.00	3.00	Work on class definition and emails related thereto.
6/16/2021	T-47670-76	DGS	2.00	0.00	2.00	Review of TEP's latest production; correspondence to counsel regarding spreadsheet; receive and review correspondence from Bob Miller regarding same; receive and review correspondence from Gregory J. Stucky regarding same; correspondence to Bob Miller; correspondence to counsel regarding Platts data.
6/16/2021	T-47685-167	GJS	2.00	0.00	2.00	Work on certification issues and emails related thereto.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/17/2021	T-47670-25	CLC	0.40	0.00	0.40	Receipt of jump drive with documents - downloaded and organized. Preparation of 2 jump drives and sent to our experts.
6/17/2021	T-47670-66	DGS	2.50	0.00	2.50	Receive and review correspondence from Nate Keever; receive and review correspondence from Nate Keever; correspondence to Chris Chrisman; review of file; conference with Ryan K. Meyer.
6/18/2021	T-47670-59	DGS	2.40	0.00	2.40	Receive and review correspondence from Nate Keever, Gregory J. Stucky, Bob Miller; telephone conference with Gregory J. Stucky; conference with Ryan K. Meyer; review of memos; receive and review correspondence from Bob Miller and Gregory J. Stucky; receive and review correspondence from Bob Miller.
6/18/2021	T-47685-166	GJS	2.00	0.00	2.00	Research regarding BAP rule and emails regarding same.
6/21/2021	T-47670-52	DGS	1.80	0.00	1.80	Review of file; telephone conference with Bob Miller; correspondence to Phyllis Bourque; receive and review correspondence from Ms. Bourque; correspondence to Ms. Bourque; receive and review correspondence from Bob Miller; receive and review correspondence from Holland & Hart regarding additional production; receive and review correspondence from Ryan K. Meyer regarding same.
6/22/2021	T-47685-157	DGS	3.00	0.00	3.00	Receive and review correspondence from Bob Miller, Gregory J. Stucky, Thomas D. Kitch, Nate Keever, Phyllis Bourque, Ryan K. Meyer; review of file; correspondence to Bob Miller; correspondence to Ms. Bourque; telephone conference with Michelle Seares; receive and review correspondence from Michelle Seares; correspondence to Ms. Seares.
6/22/2021	T-47685-165	GJS	2.00	0.00	2.00	Work on class definition and email related thereto.
6/23/2021	T-47670-191	RKM	0.20	0.00	0.20	Send documents to Ms. Bourque.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/24/2021	T-47685-139	DGS	4.20	0.00	4.20	Receipt and review of Phyllis Bourque's draft report; make comments, edits to report; review of file; Zoom meeting with Bob Miller, Phyllis Bourque, Thomas D. Kitch, and Nate Keever (and Gregory J. Stucky briefly); correspondence to Bob Miller; telephone conference with Chris Chrisman.
6/25/2021	T-47685-130	DGS	1.40	0.00	1.40	Receive and review correspondence from Bob Miller, Thomas D. Kitch, Nate Keever; conferences with Ryan K. Meyer; review of Platt's records; correspondence to Bob Miller; receive and review correspondence from Phyllis Bourque; correspondence to Gregory J. Stucky and Ryan K. Meyer regarding same.
6/28/2021	T-47685-125	DGS	2.20	0.00	2.20	Correspondence to counsel; receive and review correspondence from Nate Keever, Bob Miller, Thomas D. Kitch; correspondence to Bob Miller; review of correspondence; telephone conference with Chris Chrisman.
6/29/2021	T-47745-190	DGS	0.80	0.00	0.80	Receive and review correspondence from Bob Miller; receive and review correspondence from Nate Keever; receive and review correspondence from Ryan K. Meyer; correspondence to Chris Chrisman.
6/30/2021	T-47745-187	DGS	1.00	0.00	1.00	Receive and review correspondence from Nate Keever; receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Ryan K. Meyer; review of file; correspondence to Ryan K. Meyer.
7/1/2021	T-47745-180	DGS	0.10	0.00	0.10	Receipt and review of court's order referring motion for extension of deadlines to magistrate.
7/2/2021	T-47745-166	DGS	0.50	0.00	0.50	Receipt and review of minute order granting extension of deadlines; correspondence to Bob Miller and Nate Keever regarding same; conference with Ryan K. Meyer regarding same and regarding deposition testimony.
7/2/2021	T-47708-38	RKM	1.50	0.00	1.50	Review and analyze deposition transcripts and send Wiseman's deposition transcript to Ms. Denomy; conference call with Mr. Miller regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/7/2021	T-47713-31	CLC	0.30	0.00	0.30	Review file for production of jump drive and prepared and produced jump drive again.
7/14/2021	T-47745-119	DGS	0.50	0.00	0.50	Receive and review correspondence from Nate Keever and Mary Ellen Denomy regarding Platts info; correspondence to Mr. Keever; receive and review correspondence from Bob Milller; correspondence to Mr. Miller; correspondence to Chris Chrisman regarding missing Platts info.
7/15/2021	T-47745-116	DGS	0.50	0.00	0.50	Telephone conference with Chris Chrisman; correspondence to counsel; receive and review correspondence from Bob Miller.
7/16/2021	T-47745-102	DGS	0.50	0.00	0.50	Receive and review correspondence from Michelle Seares; review of additional Platt's data; correspondence to Mary Ellen Denomy and Phyllis Bourque.
7/18/2021	T-47746-5	GJS	3.00	0.00	3.00	Review of Bourquet expert report and email regarding same.
7/19/2021	T-47745-93	DGS	4.50	0.00	4.50	Receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky; review and analysis of Phyllis Bourque's report; receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Phyllis Bourque; receive and review correspondence from Bob Miller.
7/19/2021	T-47746-4	GJS	1.00	0.00	1.00	Various emails regarding Bourquet's expert report.
7/20/2021	T-47745-86	DGS	3.50	0.00	3.50	Review of expert report; receive and review correspondence from Bob Miller, Gregory J. Stucky , Nate Keever, Ryan K. Meyer; telephone conference with Gregory J. Stucky , Bob Miller, & Nate Keever; receive and review correspondence from Bob Miller; receive and review correspondence from Mary Ellen Denomy; correspondence to Bob Miller; correspondence to Chris Chrisman.
7/20/2021	T-47746-3	GJS	2.00	0.00	2.00	Preparation for and participation in conference call regarding expert report.
7/22/2021	T-47746-2	GJS	2.00	0.00	2.00	Review and comment on expert report.
7/23/2021	T-47746-1	GJS	1.00	0.00	1.00	Review of expert report and email same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/29/2021	T-47748-103	RKM	3.30	0.00	3.30	Review and analyze Ms. Bourque's draft report.
7/30/2021	T-47755-2	DGS	1.00	0.00	1.00	Receive and review correspondence; review of Ryan K. Meyer comments to Phyllis Bourque's report.
7/30/2021	T-47748-98	RKM	2.40	0.00	2.40	Review and analyze Ms. Bourque's draft report.
8/2/2021	T-47806-14	DGS	3.00	0.00	3.00	Review of file; telephone conference with Michelle Seares regarding Platts pricing data.
8/3/2021	T-47795-110	DGS	0.50	0.00	0.50	Review of correspondence; telephone conference with Bob Miller; correspondence to Phyllis Bourque and Bob Miller.
8/5/2021	T-47795-97	DGS	2.00	0.00	2.00	Telephone conference with Chris Chrisman; receive and review correspondence from Bob Miller; receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Chris Chrisman; correspondence to counsel.
8/6/2021	T-47795-94	DGS	2.30	0.00	2.30	Review of file; conference call with Bob Miller, Phyllis Bourque, and Mary Ellen Denomy; receive and review correspondence from Ms. Bourque; receive and review correspondence from Bob Miller; telephone conference with Bob Miller; receive and review correspondence from Bob Miller.
8/8/2021	T-47765-62	RKM	0.20	0.00	0.20	Send Concord Remittance Statement to Ms. Bourque.
8/9/2021	T-47777-135	RKM	0.50	0.00	0.50	Review and analyze Mr. Miller's memo to Ms. Bourque and email communication with Mr. Miller regarding same.
8/13/2021	T-47795-84	DGS	2.60	0.00	2.60	Review of Phyllis Bourque's second draft of expert report; review of file; telephone conference with Chris Chrisman; correspondence to counsel.
8/16/2021	T-47795-82	DGS	2.60	0.00	2.60	Review of Phyllis Bourque's revised report; conference with Ryan K. Meyer; review of file; telephone conference with Bob Miller and Ryan K. Meyer; receive and review correspondence from Michelle Seares; correspondence to counsel.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
8/16/2021	T-47777-124	RKM	0.90	0.00	0.90	Conference call with Mr. Seely and Mr. Miller to discuss Ms. Bourque's revised draft of expert report; conference with Ms. Winter to discuss documents to send to Ms. Bourque.
8/17/2021	T-47777-121	RKM	0.20	0.00	0.20	Send additional documents to Ms. Bourque.
8/27/2021	T-47806-7	DGS	1.20	0.00	1.20	Receive and review correspondence.
8/30/2021	T-47806-5	DGS	1.00	0.00	1.00	Receive and review correspondence from Phyllis Bourque; review of invoices; receive and review correspondence from Bob Miller; correspondence to Phyllis Bourque.
8/31/2021	T-47806-2	DGS	1.20	0.00	1.20	Correspondence to counsel regarding data; receive and review correspondence from Nate Kever; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch; receive and review correspondence from Bob Miller.
9/1/2021	T-47856-10	DGS	1.00	0.00	1.00	Review of data and correspondence from Michelle Seares; receive and review correspondence from Bob Miller; telephone conference with Bob Miller regarding data, experts.
9/6/2021	T-47853-16	GJS	3.00	0.00	3.00	Review of Demony's draft report and email regarding same.
9/7/2021	T-47855-184	DGS	0.50	0.00	0.50	Receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob Miller; telephone conference with Bob Miller.
9/8/2021	T-47855-174	DGS	0.90	0.00	0.90	Zoom meeting with Bob Miller and Phyllis Bourque.
9/14/2021	T-47853-15	GJS	2.00	0.00	2.00	Review of Bob's comments regarding Demony's draft report and email regarding same.
9/14/2021	T-47856-43	RKM	1.70	0.00	1.70	Gather and send documents to experts.
9/15/2021	T-47855-158	DGS	1.70	0.00	1.70	Receive and review correspondence from counsel; correspondence to Bob Miller; revisions and comments to draft report of Mary Ellen Denomy.
9/16/2021	T-47855-150	DGS	1.50	0.00	1.50	Further revisions and comments to Denomy draft report; correspondence to counsel.
9/16/2021	T-47853-13	GJS	1.00	0.00	1.00	Emails regarding lease spreadsheet.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/21/2021	T-47855-139	DGS	1.50	0.00	1.50	Receive and review correspondence from Mary Ellen Denomy; correspondence to Gregory J. Stucky and Thomas D. Kitch; receive and review correspondence from Thomas D. Kitch; Zoom conference with Phyllis Bourque, Bob Miller, Nate Keever, Gregory J. Stucky.
9/21/2021	T-47853-12	GJS	2.00	0.00	2.00	Preparation for and participation in Zoom meeting with Phyllis.
9/22/2021	T-47855-138	DGS	1.40	0.00	1.40	Receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky; Zoom conference with Mary Ellen Denomy, Bob Miller, Nate Keever, Ryan K. Meyer; conference with Ryan K. Meyer; receive and review correspondence from Ms. Denomy; receive and review correspondence from Ryan K. Meyer.
9/22/2021	T-47853-11	GJS	1.00	0.00	1.00	Various emails regarding reflections on meeting with Phyllis.
9/22/2021	T-47854-13	RKM	0.20	0.00	0.20	Send documents to Ms. Bourque.
9/22/2021	T-47854-15	RKM	0.50	0.00	0.50	Conference with Mr. Seely to discuss documents that need to be sent to experts.
9/22/2021	T-47854-16	RKM	1.00	0.00	1.00	Attend conference call to discuss draft report with Mary Ellen Denomy.
9/23/2021	T-47855-130	DGS	1.00	0.00	1.00	Receive and review correspondence from Mary Ellen Denomy, Nate Keever, Bob Miller, Gregory J. Stucky.
9/23/2021	T-47853-10	GJS	2.00	0.00	2.00	Various emails regarding theme of lawsuit.
9/24/2021	T-47855-124	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky.
9/24/2021	T-47853-9	GJS	3.00	0.00	3.00	Emails regarding theme of lawsuit and class definition.
9/27/2021	T-47855-117	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel regarding class definition; review of file.
9/27/2021	T-47853-8	GJS	1.00	0.00	1.00	Emails regarding class definition.
9/28/2021	T-47855-111	DGS	1.00	0.00	1.00	Receive and review correspondence from class definition, experts.
9/28/2021	T-47853-7	GJS	1.00	0.00	1.00	Work on class definition and email regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/28/2021	T-47844-129	RKM	0.20	0.00	0.20	Email communication with Mr. Seely regarding class definition and lease spreadsheet.
9/28/2021	T-47854-11	RKM	1.50	0.00	1.50	Review and analyze lease spreadsheet to determine which leases are index leases that need to be excluded from the class definition; conference with Mr. Seely regarding same; email communication to counsel regarding same.
9/30/2021	T-47855-97	DGS	2.10	0.00	2.10	Correspondence to Michelle Seares regarding documents; receive and review correspondence from Ms. Seares; review of spreadsheets; receive and review correspondence from Bob Miller; correspondence to Ms. Seares; receive and review correspondence from Ms. Seares; review of additional spreadsheets; receive and review correspondence from Bob Miller; receive and review correspondence from counsel regarding class definition; correspondence to counsel.
10/1/2021	T-47907-27	DGS	0.60	0.00	0.60	Receive and review correspondence from Bob Miller, Gregory J. Stucky, Mary Ellen Denomy.
10/4/2021	T-47907-22	DGS	0.60	0.00	0.60	Receive and review correspondence from counsel regarding MED report, class definition, Zoom meeting; correspondence to counsel.
10/4/2021	T-47868-46	RKM	0.50	0.00	0.50	Download NGL revenue spreadsheets to Teams and email communication with counsel and Ms. Denomy regarding same.
10/5/2021	T-47908-102	DGS	1.50	0.00	1.50	Review of comments on MED report; Zoom conference with Bob Miller, Mary Ellen Denomy; Nat Keever; Gregory J. Stucky; receive and review correspondence from Nate Keever.
10/14/2021	T-47908-110	GJS	1.00	0.00	1.00	Emails re "proceeds" and BAP.
10/18/2021	T-47881-64	RKM	0.30	0.00	0.30	Conference call with Mr. Miller regarding Benaquista spreadsheets and send spreadsheets to Ms. Bourque.
10/21/2021	T-47908-109	GJS	3.00	0.00	3.00	Research re successor liability; emails re same and "best efforts" leases.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/22/2021	T-47895-127	RKM	1.00	0.00	1.00	Review and analyze Ms. Denomy's draft report and make changes to same.
10/26/2021	T-47908-40	DGS	2.00	0.00	2.00	Work on Denomy revisions; receive and review correspondence from counsel; correspondence to counsel.
10/26/2021	T-47904-62	GJS	3.00	0.00	3.00	Work on class definition and various emails and review of expert report.
10/26/2021	T-47904-63	GJS	1.00	0.00	1.00	Work on class definition.
10/26/2021	T-47904-64	GJS	1.00	0.00	1.00	Work on class definition and related emails.
10/26/2021	T-47904-65	GJS	3.00	0.00	3.00	Review of lease spreadsheet and email regarding same; work on class definition.
10/26/2021	T-47904-66	GJS	2.00	0.00	2.00	Work on class definition and review of lease spreadsheet.
10/26/2021	T-47904-67	GJS	2.00	0.00	2.00	Work on class definition and related emails.
10/26/2021	T-47904-68	GJS	2.00	0.00	2.00	E-mails regarding implied covenant and BAP.
10/26/2021	T-47904-69	GJS	3.00	0.00	3.00	Legal research and analysis of Diehl.
10/26/2021	T-47904-70	GJS	1.00	0.00	1.00	Review of expert report and email regarding same.
10/26/2021	T-47904-71	GJS	2.00	0.00	2.00	Participation in Zoom conference and work on class definition.
10/27/2021	T-47908-35	DGS	2.00	0.00	2.00	Work on revisions to expert report of Mary Ellen Denomy; receive and review correspondence from counsel; correspondence to counsel; telephone conference with Bob Miller.
10/27/2021	T-47899-56	RKM	0.20	0.00	0.20	Conference with Mr. Seely regarding Ms. Denomy's report and email communication with counsel regarding same.
10/28/2021	T-47908-30	DGS	1.30	0.00	1.30	Receive and review correspondence; review of file; correspondence to Phyllis Bourque.
10/29/2021	T-47908-24	DGS	4.30	0.00	4.30	Review and revise Bourque's expert report; telephone conferences with Bob Miller; correspondence to Bob Miller; correspondence to counsel; receive and review correspondence from Thomas D. Kitch; receive and review correspondence from Gregory J. Stucky; review of Gregory J. Stucky revisions; receipt and review of Bob Miller's revisions to discussion of claims; further revision to claims section; receive and review correspondence from Nate Keever; correspondence to Mr. Keever.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/30/2021	T-47908-21	DGS	2.80	0.00	2.80	Receive and review correspondence from Bob Miller; review and revise expert Phyllis Bourque's report; telephone conference with Bob Miller; correspondence to Bob Miller and counsel.
10/31/2021	T-47908-18	DGS	0.50	0.00	0.50	Receive and review correspondence from Mary Ellen Denomy; receive and review correspondence from Bob Miller.
10/31/2021	T-47908-19	DGS	1.70	0.00	1.70	Receive and review correspondence from counsel; work on Denomy report; correspondence to counsel.
11/1/2021	T-47969-110	DGS	4.40	0.00	4.40	Receive and review correspondence from Phyllis Bourque; review of latest draft; receive and review correspondence from Gregory J. Stucky; review of Gregory J. Stucky revisions; telephone conference with Bob Miller; Zoom meeting with Gregory J. Stucky, Bob Miller, and Nate Keever; receive and review correspondence from Nate Keever; review of Mr. Keever's revisions; receive and review correspondence from Bob Miller; telephone conference with Ms. Bourque and Mr. Miller; revise report; correspondence to Ms. Bourque.
11/6/2021	T-47965-114	GJS	3.00	0.00	3.00	Review and revise lease spreadsheet stipulation and emails re same and "liquids claim".
11/8/2021	T-47965-115	GJS	1.00	0.00	1.00	Fact research and emails regarding stipulation.
11/9/2021	T-47969-102	DGS	2.00	0.00	2.00	Receive and review correspondence from Bob Miller; correspondence to Bob Miller; work on stipulation regarding spreadsheet.
11/9/2021	T-47965-116	GJS	3.00	0.00	3.00	Review of Bob's memo and emails regarding same; work on stipulation.
11/9/2021	T-47944-40	RKM	2.00	0.00	2.00	Review and analyze expert reports in and begin determining how to incorporate the reports into the Motion for Class Certification.
11/10/2021	T-47965-117	GJS	2.00	0.00	2.00	Legal research re "relational contracts".
11/11/2021	T-47965-118	GJS	2.00	0.00	2.00	Legal research and emails re requirement of "wrongdoing".
11/12/2021	T-47965-119	GJS	3.00	0.00	3.00	Legal research and emails regarding affiliate transactions.
11/14/2021	T-47965-120	GJS	1.00	0.00	1.00	Emails regarding affiliate transactions.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/15/2021	T-47969-41	DGS	0.50	0.00	0.50	Telephone conference with Bob Miller regarding stipulation.
11/17/2021	T-47965-121	GJS	2.00	0.00	2.00	Legal research and emails regarding affiliate contracts.
11/18/2021	T-47965-122	GJS	2.00	0.00	2.00	Email exchanges re "good faith".
11/19/2021	T-47965-123	GJS	3.00	0.00	3.00	Legal research and emails re "affiliate transactions".
11/22/2021	T-47971-30	EKA	2.60	0.00	2.60	Legal research regarding affiliate contracts and whether a non-affiliate successor affects the affiliate nature of the contract.
11/23/2021	T-47971-31	EKA	2.10	0.00	2.10	Legal research regarding affiliate contracts and whether a non-affiliate successor affects the affiliate nature of the contract.
11/24/2021	T-47971-32	EKA	2.90	0.00	2.90	Legal research regarding affiliate contracts and whether a non-affiliate successor affects the affiliate nature of the contract.
11/29/2021	T-47971-33	EKA	2.00	0.00	2.00	Legal research regarding affiliate contracts and whether a non-affiliate successor affects the affiliate nature of the contract.
11/30/2021	T-47969-44	DGS	0.60	0.00	0.60	Review of correspondence; correspondence to Nate Keever and Bob Miller regarding CAERUS; receive and review correspondence from Bob; receive and review correspondence from Nate; receive and review correspondence and voice messages from Bob Miller; telephone conference with Bob Miller.
11/30/2021	T-47971-34	EKA	6.70	0.00	6.70	Legal research regarding affiliate contracts and whether a non-affiliate successor affects the affiliate nature of the contract.
12/1/2021	T-48037-112	EKA	0.70	0.00	0.70	Legal research regarding affiliate contracts and whether a non-affiliate successor affects the affiliate nature of the contract.
12/1/2021	T-48041-87	GJS	1.00	0.00	1.00	Review of memo regarding affiliate contracts and related emails.
12/2/2021	T-48037-113	EKA	2.00	0.00	2.00	Legal research regarding effect of affiliate contract on calculation of royalty and federal regulations regarding arm's length transaction formation.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/3/2021	T-48040-2	EKA	1.40	0.00	1.40	Legal research regarding effect of affiliate contract on calculation of royalty and federal regulations regarding arm's length transaction formation.
12/5/2021	T-48041-86	GJS	2.00	0.00	2.00	Legal research regarding affiliate transactions and related emails.
12/6/2021	T-48046-176	DGS	0.50	0.00	0.50	Receive and review check from Bob Miller regarding reimbursement of expenses; correspondence to Bob Miller regarding same; receive and review correspondence from counsel regarding affiliate transactions.
12/7/2021	T-48046-172	DGS	0.70	0.00	0.70	Telephone conference with Bob Miller regarding reimbursed expenses; conference with Becky Robertson regarding reimbursement of expenses; receive and review correspondence from Bob Miller, Gregory J. Stucky, Nate Keever affiliate transactions..
12/7/2021	T-48041-84	GJS	1.00	0.00	1.00	Review pf Bob's memo and related emails.
12/7/2021	T-48041-85	GJS	1.00	0.00	1.00	Review of Keever's email regarding settlement and email related thereto.
12/8/2021	T-48046-167	DGS	0.20	0.00	0.20	Conference with Becky Robertson regarding expenses.
12/8/2021	T-48041-78	GJS	2.00	0.00	2.00	Review pf Bob's email and response hereto.
12/8/2021	T-48041-79	GJS	2.00	0.00	2.00	Preparation for participation in conference call regarding settlement.
12/9/2021	T-48041-72	GJS	2.00	0.00	2.00	Legal research regarding unjust enrichment and email related thereto.
12/10/2021	T-48041-67	GJS	2.00	0.00	2.00	Legal research regarding unjust research.
12/10/2021	T-48041-68	GJS	1.00	0.00	1.00	Review of Bob's memo and email response.
12/13/2021	T-48046-155	DGS	0.40	0.00	0.40	Telephone conference with Bob Miller; receive and review correspondence from Bob Miller regarding rebuttal expert reports.
12/14/2021	T-48046-150	DGS	0.20	0.00	0.20	Receive and review correspondence from Phyllis Bourque; correspondence to Ms. Bourque.
12/17/2021	T-48039-87	EKA	0.30	0.00	0.30	Legal research regarding whether the statute of limitations tolls during pendency as punitive class members.
12/20/2021	T-48041-43	GJS	4.00	0.00	4.00	Review of TEP's expert reports.
12/21/2021	T-48046-132	DGS	0.20	0.00	0.20	Correspondence to Gregory J. Stucky and Thomas D. Kitch regarding TEP expert reports.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/21/2021	T-48031-30	RKM	0.20	0.00	0.20	Email communication with Mr. Seely and Mr. Miller regarding defendant's expert reports.
12/22/2021	T-48041-34	GJS	2.00	0.00	2.00	Review of expert reports and various emails related thereto.
12/23/2021	T-48041-33	GJS	1.00	0.00	1.00	Various emails regarding expert reports.
12/24/2021	T-48046-127	DGS	3.00	0.00	3.00	Receive and review correspondence from Ryan K. Meyer; correspondence to Ryan K. Meyer; review and analysis of Walls report; correspondence to Phyllis Bourque; correspondence to Mary Ellen Denomy.
12/24/2021	T-48041-32	GJS	1.00	0.00	1.00	Email regarding expert report.
12/27/2021	T-48046-124	DGS	2.50	0.00	2.50	Receive and review correspondence from Gregory J. Stucky regarding expert reports; correspondence to Gregory J. Stucky; receive and review correspondence from Bob Miller; review and analysis of Simpson and Posner expert reports; receive and review correspondence from Bob Miller; correspondence to Ryan K. Meyer; correspondence to Chris Chrisman regarding stipulation; receive and review correspondence from Mr. Chrisman.
12/27/2021	T-48040-65	EKA	3.50	0.00	3.50	Legal research regarding the viability of an unjust enrichment claim against Williams.
12/29/2021	T-48046-117	DGS	2.30	0.00	2.30	Review of correspondence and documents regarding lease categorization spreadsheet and stipulation; conference with Ryan K. Meyer; Zoom meeting with Chris Chrisman and Ryan K. Meyer regarding spreadsheet and stipulation; conference with Ryan K. Meyer; review of Bob Miller's memo regarding TEP expert reports.
12/29/2021	T-48049-64	RKM	1.40	0.00	1.40	Conference call with Mr. Seely and Mr. Chrisman to discuss lease categorization stipulation and preparation for same.
12/30/2021	T-48046-114	DGS	0.20	0.00	0.20	Receive and review correspondence from Gregory J. Stucky regarding spreadsheet and stipulation.
12/30/2021	T-48049-56	RKM	0.70	0.00	0.70	Conferences and email communication with Ms. Winter regarding transportation contracts in Posner Exhibit 14. Send transportation contracts to Ms. Bourque.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/1/2022	T-48099-179	GJS	1.00	0.00	1.00	Review of Bob's expert memo and email same.
1/2/2022	T-48130-42	DGS	1.00	0.00	1.00	Correspondence with Bob Miller regarding lawyers conference call and Zoom meetings with experts; review of memos.
1/3/2022	T-48153-21	DGS	6.00	0.00	6.00	Review of file; telephone conference with Bob Miller, Mate Keever, Gregory J. Stucky; Zoom meeting with Phyllis Bourque; Zoom meeting with Mary Ellen Denomy.
1/3/2022	T-48099-178	GJS	1.00	0.00	1.00	Conference call regarding experts.
1/4/2022	T-48058-32	CLC	0.30	0.00	0.30	Preparation of final documents to be attached to our expert report.
1/4/2022	T-48153-17	DGS	2.50	0.00	2.50	Conference with Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Mary Ellen Denomy; correspondence to Ms. Denomy; correspondence to Chris Chrisman; receive and review correspondence from Mr. Chrisman.
1/4/2022	T-48100-23	GJS	2.00	0.00	2.00	Legal research and memo regarding NGL enhancement claim.
1/5/2022	T-48130-59	DGS	3.00	0.00	3.00	Telephone conference with Chris Chrisman; receive and review correspondence from Mary Ellen, Bob Miller, Gregory J. Stucky; review of spreadsheets.
1/5/2022	T-48100-22	GJS	2.00	0.00	2.00	Review of spreadsheet regarding NGL enhancement claim and email regarding same.
1/5/2022	T-48120-37	RKM	0.50	0.00	0.50	Email communication with Ms. Denomy regarding spreadsheets prepared by Paul Benaquista.
1/6/2022	T-48130-60	DGS	3.20	0.00	3.20	Review and analysis of correspondence and spreadsheets; telephone conference with Gregory J. Stucky; draft email analyzing NGL enhancement claim; correspondence to Gregory J. Stucky; telephone conference with Gregory J. Stucky; revise email; send email to counsel; receive and review correspondence from Nate Keever; receive and review correspondence from Thomas D. Kitch; correspondence to Thomas D. Kitch.
1/6/2022	T-48100-21	GJS	2.00	0.00	2.00	Review of Tom's email and response thereto.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/8/2022	T-48100-20	GJS	2.00	0.00	2.00	Email re "wrongdoing" as element of implied covenant claim, and legal research.
1/9/2022	T-48100-36	GJS	3.00	0.00	3.00	Legal research and emails regarding common questions.
1/10/2022	T-48130-27	DGS	0.60	0.00	0.60	Correspondence to Phyllis Bourque and counsel; receive and review correspondence from Ms. Bourque regarding rescheduling Zoom; correspondence to Ms. Bourque; receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky.
1/10/2022	T-48099-177	GJS	1.00	0.00	1.00	Various emails re "wrongdoing".
1/11/2022	T-48130-25	DGS	0.60	0.00	0.60	Telephone conferences with Bob Miller; review of Bob's memo regarding common issues.
1/12/2022	T-48130-52	DGS	2.20	0.00	2.20	Review of file; Zoom meeting with Phyllis Bourque, Bob Miller, Nate Keever; telephone conference with Gregory J. Stucky.
1/13/2022	T-48153-8	DGS	0.50	0.00	0.50	Telephone conference with Bob Miller.
1/14/2022	T-48130-61	DGS	3.50	0.00	3.50	Receive and review correspondence and draft from Phyllis Bourque; receive and review correspondence and memo from Bob Miller; Zoom meeting with Phyllis, Bob, Nate Keever, Gregory J. Stucky, and Ryan K. Meyer; later Zoom meeting with Bob, Nate, Greg and Ryan; draft points for Mary Ellen; correspondence to counsel; receive and review correspondence from Nate; correspondence to Bob Miller; receive and review correspondence from Bob; correspondence to Bob.
1/14/2022	T-48099-176	GJS	1.00	0.00	1.00	Conference with Phyllis Bourque.
1/14/2022	T-48120-23	RKM	1.00	0.00	1.00	Attend conference call with counsel to discuss settlement offer from TEP regarding state case.
1/14/2022	T-48120-26	RKM	0.50	0.00	0.50	Send documents to Ms. Bourque.
1/17/2022	T-48109-31	EKA	0.90	0.00	0.90	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/18/2022	T-48109-30	EKA	6.10	0.00	6.10	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/18/2022	T-48100-35	GJS	3.00	0.00	3.00	Review of Demony's draft reply and email regarding legal research.
1/19/2022	T-48109-25	EKA	4.50	0.00	4.50	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/20/2022	T-48109-23	EKA	5.50	0.00	5.50	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/20/2022	T-48100-19	GJS	2.00	0.00	2.00	Review of Bob's memo and email response.
1/20/2022	T-48120-20	RKM	0.40	0.00	0.40	Send additional documents to Ms. Bourque.
1/20/2022	T-48082-39	RKM	0.20	0.00	0.20	Email communication with Mr. Kitch and Ms. Arida regarding possible unjust enrichment claim.
1/21/2022	T-48153-20	DGS	3.60	0.00	3.60	Review and analysis of Phyllis Bourque's draft rebuttal report; telephone conference with Bob Miller; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob Miller.
1/21/2022	T-48109-20	EKA	5.90	0.00	5.90	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/21/2022	T-48099-174	GJS	1.00	0.00	1.00	Review of Demony's rebuttal report and email response.
1/22/2022	T-48130-46	DGS	1.50	0.00	1.50	Telephone conference with Bob Miller; review of Bob's revisions and comments to Bourque's rebuttal report; work on further changes and comments.
1/23/2022	T-48130-35	DGS	1.00	0.00	1.00	Work on revisions and comments to Phyllis Bourque's report.
1/23/2022	T-48100-18	GJS	2.00	0.00	2.00	Review of Bourque's rebuttal report and email regarding same.
1/24/2022	T-48153-19	DGS	3.50	0.00	3.50	Receive and review correspondence from Bob Miller and Gregory J. Stucky ; correspondence to Gregory J. Stucky receive and review correspondence from Gregory J. Stucky ; telephone conference with Bob Miller; revise Denomy draft; correspondence to experts.
1/24/2022	T-48109-18	EKA	6.90	0.00	6.90	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/24/2022	T-48099-173	GJS	1.00	0.00	1.00	Email and conference with Bob.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/25/2022	T-48153-14	DGS	1.00	0.00	1.00	Receive and review correspondence from Chris Chrisman; review of changes to stipulation; correspondence to counsel.
1/25/2022	T-48109-17	EKA	3.60	0.00	3.60	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/25/2022	T-48099-172	GJS	1.00	0.00	1.00	Review of stipulation and email regarding same.
1/26/2022	T-48109-14	EKA	2.70	0.00	2.70	Legal research regarding viability of an unjust enrichment claim or piercing the corporate veil against Williams.
1/26/2022	T-48099-171	GJS	1.00	0.00	1.00	Review of stipulation and email regarding same.
1/27/2022	T-48153-13	DGS	1.00	0.00	1.00	Telephone conference with Bob Miller. Telephone conference with Bob Miller and Gregory J. Stucky.
1/29/2022	T-48153-7	DGS	0.50	0.00	0.50	Receive and review correspondence from Bob Miller; correspondence to Bob Miller.
1/31/2022	T-48153-16	DGS	2.00	0.00	2.00	Receive and review correspondence from Bob Miller; correspondence to Nate Keever; telephone conference with Michelle Seares regarding briefing schedule; correspondence to counsel regarding same; receive and review correspondence from Bob Miller; receive and review correspondence from Nate Keever; receive and review correspondence from Gregory J. Stucky ; correspondence to Gregory J. Stucky ; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Thomas D. Kitch.
2/1/2022	T-48284-46	DGS	1.00	0.00	1.00	Correspondence with counsel regarding briefing schedule, conflicts.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/2/2022	T-48284-45	DGS	2.80	0.00	2.80	Correspondence with counsel regarding changes to stipulation; revise stipulation; receive and review correspondence from Ryan K. Meyer regarding Judge Domenico; review of Judge's opinions regarding class certification; telephone conference with Michelle Seares regarding briefing schedule and page limits; correspondence to counsel regarding same; receive and review proposed motion to modify scheduling order; correspondence from receive and review correspondence from counsel.
2/4/2022	T-48305-58	EKA	2.40	0.00	2.40	Review and update legal standards in motion for class certification.
2/4/2022	T-48162-19	RKM	0.80	0.00	0.80	Conference with Ms. Arida and email communication with Mr. Miller and Mr. Seely to discuss class certification motion.
2/7/2022	T-48305-54	EKA	2.40	0.00	2.40	Review and update legal standards in motion for class certification; Legal research regarding other class certification opinions by Judge Domenico.
2/8/2022	T-48284-37	DGS	0.40	0.00	0.40	Receive and review correspondence from Michelle Seares regarding draft of motion to extend deadline and page limits for class certificate briefs; correspondence to counsel.
2/8/2022	T-48305-53	EKA	3.70	0.00	3.70	Review and update legal standards in motion for class certification; Legal research regarding other class certification opinions by Judge Domenico.
2/9/2022	T-48305-50	EKA	5.40	0.00	5.40	Legal research regarding use of categorization charts in class actions.
2/10/2022	T-48284-32	DGS	0.60	0.00	0.60	Receive and review court's ruling regarding limited page extension; correspondence with counsel regarding same.
2/10/2022	T-48305-47	EKA	4.20	0.00	4.20	Legal research regarding use of categorization charts in class actions; review of legal standards in class certification motion.
2/10/2022	T-48285-6	GJS	2.00	0.00	2.00	Emails regarding Williams/BP contract.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/11/2022	T-48284-29	DGS	3.20	0.00	3.20	Review of file; revise stipulation; correspondence to Chris Chrisman regarding revised stipulation; review and analysis of previous draft of motion for class certification; develop plan to reduce in order to meet page limits; correspondence to counsel regarding same; receive and review correspondence from counsel.
2/11/2022	T-48305-45	EKA	1.90	0.00	1.90	Review of legal standards in motion for class certification.
2/11/2022	T-48285-5	GJS	1.00	0.00	1.00	Review of court's scheduling order and emails regarding same.
2/11/2022	T-48202-17	RKM	0.30	0.00	0.30	Email communication with counsel regarding class certification motion and conference with Mr. Seely regarding same.
2/15/2022	T-48202-1	RKM	0.50	0.00	0.50	Conference call with Mr. Seely and Mr. Miller to discuss class certification motion.
2/21/2022	T-48284-11	DGS	3.00	0.00	3.00	Receive and review correspondence from Bob Miller with draft of statement of facts; review of draft; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch; correspondence to Bob Miller; receive and review correspondence from Michelle Seares regarding stipulation..
2/22/2022	T-48284-10	DGS	3.60	0.00	3.60	Further review of statement of facts; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob Miller; telephone conference with Bob Miller; correspondence to counsel regarding next draft.
2/23/2022	T-48304-10	DGS	3.00	0.00	3.00	Receive and review correspondence from Thomas D. Kitch; further revisions to statement of facts; receive and review correspondence from Bob Miller; correspondence to counsel regarding revised draft.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/24/2022	T-48284-6	DGS	4.50	0.00	4.50	Receive and review correspondence from Bob Miller; revise draft; correspondence to counsel; receive and review correspondence from Thomas D. Kitch; correspondence to Thomas D. Kitch; receipt and review of Thomas D. Kitch draft; revise same; correspondence to counsel.
2/25/2022	T-48304-7	DGS	2.00	0.00	2.00	Receive and review correspondence from Gregory J. Stucky, Bob Miller, Thomas D. Kitch; correspondence to Gregory J. Stucky regarding outline; receive and review correspondence from Ryan K. Meyer; review of prior draft of legal arguments.
2/25/2022	T-48285-4	GJS	3.00	0.00	3.00	Work on class certification brief.
2/26/2022	T-48285-3	GJS	1.00	0.00	1.00	Work on class certification brief.
2/27/2022	T-48285-2	GJS	4.00	0.00	4.00	Work on class certification brief.
2/28/2022	T-48304-1	DGS	2.40	0.00	2.40	Receive and review correspondence from Gregory J. Stucky, Thomas D. Kitch; review of draft of certification brief; correspondence to Gregory J. Stucky and Thomas D. Kitch; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch; correspondence to Gregory J. Stucky; conference with Ryan K. Meyer.
2/28/2022	T-48285-1	GJS	1.00	0.00	1.00	Emails regarding class certification brief.
2/28/2022	T-48294-1	RKM	0.50	0.00	0.50	Begin revising Motion for Class Certification.
3/1/2022	T-48630-12	GJS	1.00	0.00	1.00	Email exchanges regarding overrides.
3/1/2022	T-48339-12	RKM	2.50	0.00	2.50	Draft Motion for Class Certification and conference with Mr. Seely regarding same.
3/2/2022	T-48630-11	GJS	2.00	0.00	2.00	Emails regarding overrides.
3/2/2022	T-48339-4	RKM	5.00	0.00	5.00	Draft and revise Motion for Class Certification.
3/3/2022	T-48630-10	GJS	2.00	0.00	2.00	Legal research and emails regarding overrides.
3/3/2022	T-48367-12	RKM	5.80	0.00	5.80	Draft Motion for Class Certification. Email communication with counsel regarding same.
3/4/2022	T-48367-11	RKM	6.00	0.00	6.00	Draft Motion for Class Certification.
3/5/2022	T-48630-9	GJS	1.00	0.00	1.00	Work on class certification motion.
3/6/2022	T-48630-8	GJS	2.00	0.00	2.00	Work on class certification motion.
3/7/2022	T-48630-7	GJS	1.00	0.00	1.00	Emails regarding class certification brief.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/8/2022	T-48601-31	DGS	1.50	0.00	1.50	Telephone conference with Gregory J. Stucky; correspondence to Bob Miller; conference with Ryan K. Meyer; telephone conference with Chris Christian, Michelle Seares and Ryan K. Meyer regarding stipulation.
3/9/2022	T-48601-23	DGS	1.00	0.00	1.00	Review of Gregory J. Stucky's revisions to facts; receive and review correspondence from Bob Miller regarding Phylilis' affidavit.
3/10/2022	T-48601-33	DGS	2.50	0.00	2.50	Review of Ryan K. Meyer's draft of class certificate brief.
3/11/2022	T-48601-37	DGS	7.00	0.00	7.00	Receive and review correspondence from Bob Miller; correspondence to Bob Miller; revisions to Bob's draft of class certificate brief.
3/11/2022	T-48429-5	RKM	0.50	0.00	0.50	Draft stipulation of dismissal.
3/14/2022	T-48609-32	DGS	2.80	0.00	2.80	Receive and review correspondence; work on class cert. motion.
3/15/2022	T-48609-31	DGS	3.00	0.00	3.00	Work on class certificate motion.
3/16/2022	T-48609-24	DGS	4.00	0.00	4.00	Work on class cert.
3/16/2022	T-48630-6	GJS	5.00	0.00	5.00	Work on class certification brief.
3/17/2022	T-48609-21	DGS	3.40	0.00	3.40	Class certification motion.
3/17/2022	T-48630-5	GJS	2.00	0.00	2.00	Work on class certification brief.
3/17/2022	T-48475-2	RKM	0.60	0.00	0.60	Review and revise class certification motion and send same to counsel.
3/18/2022	T-48609-18	DGS	4.00	0.00	4.00	Work on class motion.
3/18/2022	T-48490-7	RKM	0.50	0.00	0.50	Review and revise draft motion for class certification.
3/21/2022	T-48609-13	DGS	3.60	0.00	3.60	Receive and review correspondence; work on class cert.
3/22/2022	T-48609-10	DGS	3.00	0.00	3.00	Work on class cert.
3/23/2022	T-48609-9	DGS	4.10	0.00	4.10	Receive and review correspondence; work on class cert.
3/24/2022	T-48609-8	DGS	3.00	0.00	3.00	Work on draft of class cert. motion; telephone conference with Bob Miller; telephone conference with Ryan K. Meyer regarding stipulation and spreadsheet.
3/24/2022	T-48630-4	GJS	1.00	0.00	1.00	Work on brief.
3/24/2022	T-48551-9	RKM	1.00	0.00	1.00	Conference call with defense counsel to discuss lease stipulation spreadsheet.
3/28/2022	T-48609-7	DGS	1.00	0.00	1.00	Receive and review correspondence and drafts.
3/28/2022	T-48630-3	GJS	1.00	0.00	1.00	Work on class brief.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/29/2022	T-48609-5	DGS	0.80	0.00	0.80	Receipt and review of correspondence and drafts.
3/29/2022	T-48630-2	GJS	2.00	0.00	2.00	Review and revise stipulation and review lease spreadsheet and emails regarding same.
3/29/2022	T-48596-19	RKM	2.00	0.00	2.00	Review and revise class certification motion.
3/30/2022	T-48609-1	DGS	1.00	0.00	1.00	Receipt and review of correspondence and documents.
3/30/2022	T-48630-1	GJS	4.00	0.00	4.00	Various emails regarding class certification and review and revise /demony Declaration.
3/30/2022	T-48596-7	RKM	1.30	0.00	1.30	Conference call with Mr. Miller to discuss class certification motion and declarations. Revise declarations.
4/1/2022	T-48851-17	GJS	4.00	0.00	4.00	Work on Demony and Seeley affidavits.
4/1/2022	T-48656-14	RKM	1.70	0.00	1.70	Review and revise class certification brief and Seely affidavit.
4/2/2022	T-48851-16	GJS	2.00	0.00	2.00	Work on Borque affidavit and motion.
4/3/2022	T-48850-6	DGS	0.40	0.00	0.40	Receive and review correspondence from Ryan K. Meyer, Gregory J. Stucky, Bob Miller, Thomas D. Kitch.
4/3/2022	T-48656-8	RKM	0.80	0.00	0.80	Review and revise Seely Affidavit.
4/4/2022	T-48850-4	DGS	1.20	0.00	1.20	Receive and review correspondence from Bob Miller; review of Bourque expert affidavit; receive and review correspondence from Phyllis, Bob, Ryan K. Meyer, Thomas D. Kitch, Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch; review of Thomas D. Kitch changes to brief.
4/4/2022	T-48851-15	GJS	3.00	0.00	3.00	Emails regarding scheduling order and work on motion and affidavits.
4/4/2022	T-48656-6	RKM	2.00	0.00	2.00	Review and revise Motion for Class Certification.
4/4/2022	T-48656-7	RKM	1.40	0.00	1.40	Conference calls with Mr. Seely and Mr. Chrisman to discuss lease spreadsheet and stipulation. Email communication with counsel regarding same.
4/5/2022	T-48850-3	DGS	0.60	0.00	0.60	Receive and review correspondence from Thomas D. Kitch, Bob Miller, Gregory J. Stucky, Nate Keever, Ryan K. Meyer.
4/5/2022	T-48851-14	GJS	1.00	0.00	1.00	Work on motion and affidavits.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/5/2022	T-48705-66	RKM	6.40	0.00	6.40	Review and revise Bourque affidavit and Motion for Class Certification. Email communication with counsel regarding same.
4/6/2022	T-48693-15	CLC	0.80	0.00	0.80	Preparation of exhibits for brief.
4/6/2022	T-48868-2	DGS	2.20	0.00	2.20	Revise class cert. brief; receive and review correspondence from Ryan K. Meyer, Bob Miller, Michelle Seares, Gregory J. Stucky, and Mary Ellen Denomy.
4/6/2022	T-48851-13	GJS	1.00	0.00	1.00	Work on Dave's affidavit.
4/6/2022	T-48705-51	RKM	0.30	0.00	0.30	Conference call with Ms. Seares regarding lease spreadsheet and stipulation.
4/6/2022	T-48705-65	RKM	4.50	0.00	4.50	Review and revise motion for class certification. Email communication with counsel regarding same.
4/7/2022	T-48693-8	CLC	0.70	0.00	0.70	Continued work on preparing and amending exhibits for brief.
4/7/2022	T-48868-1	DGS	1.40	0.00	1.40	Receive and review correspondence from Nate Keever, Ryan K. Meyer, Gregory J. Stucky regarding motion for class cert; receive and review correspondence from Chrisman and Ryan K. Meyer regarding stipulation; revise affidavit; correspondence to Ryan K. Meyer; conference with Ryan K. Meyer sign affidavit.
4/7/2022	T-48851-12	GJS	3.00	0.00	3.00	Review of motion and affidavits--final form.
4/7/2022	T-48705-64	RKM	4.40	0.00	4.40	Review and revise Motion for Class Certification and email communication with counsel regarding same.
4/7/2022	T-48705-53	RKM	0.40	0.00	0.40	Conference call with Mr. Chrisman regarding number of members in the class and regarding scheduling class certification hearing.
4/7/2022	T-48705-54	RKM	0.50	0.00	0.50	Meet Mr. Seely for him to execute affidavit.
4/7/2022	T-48705-47	RKM	0.20	0.00	0.20	Email communication with Mr. Chrisman regarding lease stipulation.
4/8/2022	T-48849-51	DGS	0.80	0.00	0.80	Receive and review correspondence from Ryan K. Meyer; review of final draft of motion for class cert.
4/8/2022	T-48851-11	GJS	1.00	0.00	1.00	Review of final motion and affidavits.
4/8/2022	T-48705-63	RKM	2.50	0.00	2.50	Final review and revisions to class certification motion, email communication with counsel regarding same, and send to Mr. Keever for filing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/11/2022	T-48851-10	GJS	2.00	0.00	2.00	Emails re "next steps".
4/11/2022	T-48712-8	RKM	0.30	0.00	0.30	Email communication with counsel regarding work to be done before class certification hearing.
4/12/2022	T-48849-45	DGS	0.60	0.00	0.60	Receive and review correspondence from Ryan K. Meyer, Nate Keever, Bob Miller regarding additional issues to address regarding class certification.
4/12/2022	T-48825-57	EKA	1.80	0.00	1.80	Legal research regarding the effect of differing royalty language on commonality.
4/12/2022	T-48851-9	GJS	2.00	0.00	2.00	Emails regarding SOL.
4/12/2022	T-48712-3	RKM	0.50	0.00	0.50	Email communication with counsel regarding questions that we need to research. Conference with Ms. Arida regarding same.
4/13/2022	T-48849-41	DGS	0.50	0.00	0.50	Receive and review correspondence from Phyllis Bourque; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky.
4/13/2022	T-48825-51	EKA	0.70	0.00	0.70	Legal research regarding effect of differing royalty language on commonality.
4/13/2022	T-48851-8	GJS	3.00	0.00	3.00	Legal research and emails regarding predominance.
4/14/2022	T-48849-39	DGS	0.40	0.00	0.40	Receive and review correspondence from Gregory J. Stucky and Bob Miller.
4/14/2022	T-48825-48	EKA	2.80	0.00	2.80	Legal research regarding effect of differing royalty language and defenses on commonality.
4/14/2022	T-48851-7	GJS	1.00	0.00	1.00	Emails regarding SOL issue.
4/15/2022	T-48825-44	EKA	2.20	0.00	2.20	Legal research regarding effect of differing royalty language and defenses on commonality.
4/15/2022	T-48851-6	GJS	2.00	0.00	2.00	Review of Bob's memo regarding moratory interest and emails regarding same.
4/16/2022	T-48851-5	GJS	1.00	0.00	1.00	Emails regarding bifurcation.
4/18/2022	T-48825-42	EKA	3.30	0.00	3.30	Legal research regarding effect of differing royalty language and defenses on commonality.
4/19/2022	T-48825-35	EKA	1.90	0.00	1.90	Legal research regarding effect of differing royalty language and defenses on commonality.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/20/2022	T-48849-26	DGS	0.30	0.00	0.30	Receive and review correspondence from Ryan K. Meyer regarding joint request for scheduling order.
4/20/2022	T-48825-32	EKA	1.50	0.00	1.50	Legal research regarding effect of differing royalty language and defenses on commonality.
4/20/2022	T-48775-2	RKM	0.50	0.00	0.50	Conference call with Mr. Chrisman regarding parties' Joint Request for hearing on class certification motion and district judge's referral of the motion to the magistrate judge.
4/21/2022	T-48849-23	DGS	0.40	0.00	0.40	Receive and review correspondence from Gregory J. Stucky, Thomas D. Kitch, Nate Keever and Bob Miller.
4/21/2022	T-48851-4	GJS	2.00	0.00	2.00	Review of scheduling order and legal research.
4/22/2022	T-48849-18	DGS	0.30	0.00	0.30	Receive and review correspondence from Bob Miller.
4/23/2022	T-48849-17	DGS	0.20	0.00	0.20	Receive and review correspondence from Thomas D. Kitch.
4/25/2022	T-48849-13	DGS	0.50	0.00	0.50	Receive and review correspondence from Thomas D. Kitch, Nate Keever, Bob Miller regarding stipulation.
4/25/2022	T-48851-3	GJS	2.00	0.00	2.00	Legal research regarding SOL and open accounts.
4/26/2022	T-48849-10	DGS	0.80	0.00	0.80	Receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Michelle Seares; review of joint proposal regarding scheduling order; receive and review correspondence from Bob Miller, Thomas D. Kitch, Gregory J. Stucky, Nate Keever; conference with Ryan K. Meyer.
4/27/2022	T-48849-1	DGS	0.30	0.00	0.30	Receive and review correspondence from Michelle Seares; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Gregory J. Stucky.
4/27/2022	T-48851-2	GJS	1.00	0.00	1.00	Review of Emily's memo regarding possible issues covered in Reply and email regarding same.
4/28/2022	T-48888-3	DGS	0.20	0.00	0.20	Receive and review correspondence from counsel regarding scheduling conf.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/28/2022	T-48851-1	GJS	1.00	0.00	1.00	Legal search and emails regarding open accounts and retroactive adjustments.
4/29/2022	T-48888-1	DGS	0.30	0.00	0.30	Receive and review correspondence from counsel and Judge Gallagher's assistant regarding scheduling conference.
4/29/2022	T-48893-2	RKM	0.40	0.00	0.40	Email communication with counsel regarding status conference.
5/9/2022	T-49032-8	GJS	3.00	0.00	3.00	Legal research and review of Miller's memo.
5/11/2022	T-49032-7	GJS	3.00	0.00	3.00	Legal research and memos.
5/13/2022	T-49088-2	EKA	0.50	0.00	0.50	Legal research regarding Judge Gallagher's prior class certification decisions.
5/13/2022	T-49032-6	GJS	2.00	0.00	2.00	Various emails re "burden of proof".
5/16/2022	T-48998-5	RKM	0.60	0.00	0.60	Conference call with defense counsel to discuss status conference. Email communication with Mr.Seely regarding same.
5/18/2022	T-49136-22	DGS	2.00	0.00	2.00	Receive and review correspondence from Thomas D. Kitch regarding Gagnon case; correspondence to Thomas D. Kitch; further review of TEP's response; telephone conference with Nate Keever, Gregory J. Stucky, Ryan K. Meyer, Thomas D. Kitch regarding response and our reply; receive and review correspondence from Gregory J. Stucky regarding outline of reply brief.
5/23/2022	T-49136-17	DGS	1.20	0.00	1.20	Receive and review TEP's response.
5/23/2022	T-49105-5	GJS	3.00	0.00	3.00	Email re "burden" and review of Response to class certification motion.
5/23/2022	T-49058-1	RKM	0.70	0.00	0.70	Conference and email communication with counsel and Mr. Seely regarding response brief. Begin reviewing and analyzing response brief.
5/24/2022	T-49103-17	CLC	0.20	0.00	0.20	Preparation of spreadsheet for counsel.
5/24/2022	T-49136-16	DGS	3.00	0.00	3.00	Further review of TEP's response to motion for class cert; review of exhibits; read some cases cited by TEP; correspondence to counsel regarding Gagnon case.
5/24/2022	T-49126-7	EKA	1.20	0.00	1.20	Review response to class certification motion.
5/24/2022	T-49105-4	GJS	3.00	0.00	3.00	Review of Response and exhibits.
5/24/2022	T-49070-3	RKM	1.40	0.00	1.40	Review and analyze TEP's Response Brief.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
5/25/2022	T-49126-8	EKA	6.00	0.00	6.00	Legal research regarding whether establishing the abrogation of implied covenant to market entails a burden of proof or contract construction; conference call with plaintiff's counsel regarding defendant's response to class certification motion.
5/25/2022	T-49105-3	GJS	4.00	0.00	4.00	Work on outline of reply and participation in conference call; various emails.
5/25/2022	T-49075-6	RKM	1.80	0.00	1.80	Conference call with counsel to discuss reply brief. Review and analyze TEP's Response brief and cases cited therein.
5/26/2022	T-49136-12	DGS	1.60	0.00	1.60	Receive and review correspondence from counsel regarding response and reply; correspondence to counsel; further review of TEP's response.
5/26/2022	T-49126-12	EKA	0.10	0.00	0.10	Email correspondence with plaintiffs' counsel.
5/26/2022	T-49105-2	GJS	4.00	0.00	4.00	Various emails regarding issues raised in Response.
5/26/2022	T-49075-10	RKM	0.30	0.00	0.30	Send TEP's Response to Class Certification Motion to Ms. Bourque and Mr. Denomy and ask that they identify factual misstatements contained therein.
5/26/2022	T-49090-1	RKM	2.30	0.00	2.30	Review and analyze TEPs Response.
5/27/2022	T-49136-9	DGS	2.80	0.00	2.80	Receive and review correspondence from Gregory J. Stucky, Ryan K. Meyer, Thomas D. Kitch, Nate Keever; work on reply.
5/27/2022	T-49126-13	EKA	3.90	0.00	3.90	Legal research regarding whether establishing the abrogation of implied covenant to market entails a burden of proof or contract construction; Email correspondence between plaintiff's counsel.
5/27/2022	T-49105-1	GJS	2.00	0.00	2.00	Emails regarding issues raised in Response.
5/27/2022	T-49113-10	RKM	1.40	0.00	1.40	Review and analyze lease spreadsheet to determine how many leases are proceeds leases versus net proceeds leases.
5/28/2022	T-49136-6	DGS	1.20	0.00	1.20	Work on reply; receive and review correspondence from Gregory J. Stucky, Thomas D. Kitch.
5/31/2022	T-49136-1	DGS	3.00	0.00	3.00	Receive and review correspondence from Ryan K. Meyer, Nate Keever; work on reply.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/1/2022	T-49366-41	DGS	5.30	0.00	5.30	Receive and review correspondence from Thomas D. Kitch and Gregory J. Stucky; correspondence to Kitch and Stucky; work on reply.
6/1/2022	T-49324-19	GJS	1.00	0.00	1.00	Various emails regarding Reply.
6/2/2022	T-49366-40	DGS	2.50	0.00	2.50	Receipt and review of memo from Bob Miller; telephone conference with Gregory J. Stucky, Ryan K. Meyer, Bob Miller, and Nate Keever; conference with Ryan K. Meyer.
6/2/2022	T-49324-18	GJS	2.00	0.00	2.00	Preparation for and participation in conference call regarding Reply.
6/2/2022	T-49163-26	RKM	1.30	0.00	1.30	Conference call with counsel to discuss Reply strategy.
6/3/2022	T-49172-6	ACH	2.70	0.00	2.70	Research on class action plaintiff representative.
6/3/2022	T-49163-15	RKM	1.60	0.00	1.60	Review and analyze TEP's Response and begin formulating Reply.
6/3/2022	T-49163-17	RKM	0.50	0.00	0.50	Conference call with Mr. Seely to discuss Reply.
6/4/2022	T-49324-16	GJS	2.00	0.00	2.00	Review of Bob's memo regarding Reply and emails regarding same.
6/5/2022	T-49366-38	DGS	2.00	0.00	2.00	Work on reply brief.
6/6/2022	T-49172-4	ACH	3.30	0.00	3.30	Researching and drafting memo on class representative adequacy.
6/6/2022	T-49366-37	DGS	3.60	0.00	3.60	Work on reply brief.
6/7/2022	T-49172-3	ACH	2.30	0.00	2.30	Revising memo on class plaintiff adequacy of representation.
6/7/2022	T-49366-36	DGS	3.00	0.00	3.00	Work on reply brief.
6/8/2022	T-49183-2	ACH	1.30	0.00	1.30	Revising memo on class representative adequacy.
6/9/2022	T-49366-30	DGS	3.00	0.00	3.00	Work on reply brief.
6/9/2022	T-49218-5	EKA	2.50	0.00	2.50	Legal research regarding effect of damages on predominance; Draft, review and revise reply to class certification regarding the same.
6/9/2022	T-49324-14	GJS	3.00	0.00	3.00	Review of Bob's partial redraft of Reply and various emails regarding same.
6/9/2022	T-49324-15	GJS	1.00	0.00	1.00	Emails regarding Reply.
6/9/2022	T-49210-14	RKM	0.80	0.00	0.80	Email communication with Mr. Stucky regarding Reply.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/10/2022	T-49366-29	DGS	4.00	0.00	4.00	Work on reply brief; telephone conference with Gregory J. Stucky, Nate Keever, Bob Miller, Ryan K. Meyer; receive and review correspondence from counsel.
6/10/2022	T-49218-2	EKA	5.90	0.00	5.90	Zoom conference with class counsel (.3); Legal research regarding effect of individual damages calculations on predominance; Draft, review and revise reply section regarding the same.
6/10/2022	T-49210-10	RKM	0.40	0.00	0.40	Conference call with Mr. Seely to discuss Reply brief.
6/10/2022	T-49210-6	RKM	3.60	0.00	3.60	Review and analyze TEP's response. Review and analyze draft Reply. Research case law relating to standard required at class certification in relation to the implied covenant to market.
6/10/2022	T-49210-7	RKM	0.60	0.00	0.60	Conference call with counsel to discuss Reply.
6/11/2022	T-49324-12	GJS	1.00	0.00	1.00	Legal research regarding Anderson and various emails regarding same.
6/12/2022	T-49366-27	DGS	3.80	0.00	3.80	Work on reply brief.
6/12/2022	T-49324-11	GJS	3.00	0.00	3.00	Emails regarding Reply and redraft of Reply.
6/13/2022	T-49431-3	DGS	4.00	0.00	4.00	Work on reply brief.
6/13/2022	T-49332-8	EKA	0.20	0.00	0.20	Review of email correspondence between class counsel.
6/14/2022	T-49366-24	DGS	2.00	0.00	2.00	Work on reply brief; correspondence to counsel; receive and review correspondence from counsel.
6/14/2022	T-49324-10	GJS	1.00	0.00	1.00	Emails regarding Reply.
6/15/2022	T-49366-22	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel.
6/15/2022	T-49324-9	GJS	1.00	0.00	1.00	Emails regarding Reply.
6/15/2022	T-49265-9	RKM	2.00	0.00	2.00	Review and analyze draft Reply. Research Supreme Court case law relating to class actions from Walmart and after.
6/16/2022	T-49366-19	DGS	3.20	0.00	3.20	Conference with Ryan K. Meyer regarding reply brief; conference with Gregory J. Stucky, Ryan K. Meyer, and Emily K. Arida; telephone conference with Bob Miller; review and analysis of Bob Miller's draft argument.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/16/2022	T-49422-45	EKA	3.30	0.00	3.30	Review of class certification reply draft; conference with Gregory J. Stucky, David G. Seely, and Ryan K. Meyer; Legal research regarding whether a model is required to establish predominance.
6/16/2022	T-49324-8	GJS	1.00	0.00	1.00	Preparation for and participation in conference with DGS, RKM, Bob and Emily.
6/16/2022	T-49265-4	RKM	1.00	0.00	1.00	Conference with Mr. Seely, Mr. Stucky, and Ms. Arida regarding Reply. Conference with Mr. Miller regarding Reply.
6/16/2022	T-49265-5	RKM	1.60	0.00	1.60	Review and analyze TEP's Response and draft and revise Reply.
6/17/2022	T-49366-18	DGS	3.00	0.00	3.00	Receive and review correspondence from counsel; work on reply brief.
6/17/2022	T-49422-37	EKA	2.10	0.00	2.10	Legal research regarding creation of subclasses for class certification; review of email correspondence between class counsel.
6/17/2022	T-49274-1	RKM	1.70	0.00	1.70	Review and revise Reply.
6/20/2022	T-49366-16	DGS	7.20	0.00	7.20	Conference with Ryan K. Meyer; work on reply brief; receive and review correspondence from Bob Miller; receive and review correspondence from Gregory J. Stucky.
6/20/2022	T-49324-7	GJS	1.00	0.00	1.00	Emails regarding Reply.
6/20/2022	T-49339-23	RKM	6.00	0.00	6.00	Review and revise Reply and conference with Mr. Seely regarding same.
6/21/2022	T-49366-15	DGS	1.50	0.00	1.50	Receive and review correspondence from Ryan K. Meyer; review of comments; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob Miller; receive and review correspondence from Thomas D. Kitch.
6/21/2022	T-49422-26	EKA	0.60	0.00	0.60	Phone call with Gregory J. Stucky; Draft, review and revise class certification reply.
6/21/2022	T-49324-6	GJS	4.00	0.00	4.00	Redraft of Reply and emails regarding same.
6/21/2022	T-49339-20	RKM	5.90	0.00	5.90	Review and revise Reply.
6/22/2022	T-49366-12	DGS	1.00	0.00	1.00	Receive and review correspondence from Gregory J. Stucky, Bob Miller; review of draft.
6/22/2022	T-49324-5	GJS	7.00	0.00	7.00	Redraft of Reply.
6/23/2022	T-49366-10	DGS	1.00	0.00	1.00	Receive and review correspondence from Ryan K. Meyer; Gregory J. Stucky, Bob Miller; review of draft.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/23/2022	T-49339-11	RKM	6.50	0.00	6.50	Review and revise Reply brief.
6/24/2022	T-49366-4	DGS	1.00	0.00	1.00	Telephone conference with Bob Miller; work on reply brief.
6/26/2022	T-49423-5	GJS	1.00	0.00	1.00	Review of Bob's redraft of Reply.
6/27/2022	T-49366-2	DGS	5.80	0.00	5.80	Work on reply brief; telephone conference with Bob Miller and Phyllis Bourque; telephone conference with Bob Miller.
6/27/2022	T-49423-4	GJS	2.00	0.00	2.00	Various emails regarding Reply.
6/28/2022	T-49401-3	DGS	5.50	0.00	5.50	Conference with Ryan K. Meyer; receive and review correspondence from Gregory J. Stucky; correspondence to Gregory J. Stucky; receive and review correspondence from Thomas D. Kitch; receive and review correspondence from Gregory J. Stucky; receive and review correspondence from Bob Miller; correspondence to Bob Miller; review of Thomas D. Kitch draft of reply brief.
6/28/2022	T-49422-7	EKA	0.30	0.00	0.30	Draft, review and revise class certification reply.
6/28/2022	T-49423-3	GJS	4.00	0.00	4.00	Redraft of Reply.
6/28/2022	T-49392-2	RKM	4.00	0.00	4.00	Review and revise Reply and conferences with Mr. Seely and Mr. Stucky regarding same.
6/29/2022	T-49401-2	DGS	6.00	0.00	6.00	Work on reply brief; telephone conference with Gregory J. Stucky, Ryan K. Meyer, Emily K. Arida; receive and review correspondence from Thomas D. Kitch and Gregory J. Stucky; telephone conference with Bob Miller regarding pricing sheets; receive and review correspondence from Nate Keever.
6/29/2022	T-49422-4	EKA	1.30	0.00	1.30	Review class certification reply draft; conference with Ryan K. Meyer, David G. Seely, and Gregory J. Stucky.
6/29/2022	T-49423-2	GJS	3.00	0.00	3.00	Emails and conference regarding Reply and review of redraft of Reply.
6/29/2022	T-49392-6	RKM	1.50	0.00	1.50	Review and revise Reply brief and conference call with Mr. Seely and Mr. Stucky regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/30/2022	T-49431-2	DGS	5.80	0.00	5.80	Work on reply brief; telephone conference with Thomas D. Kitch , Gregory J. Stucky, Ryan K. Meyer, Bob Miller, Nate Keever, Emily K. Arida; receive and review correspondence from Phyllis Bourque; review and revise Bourque declaration; receive and review correspondence from Bob Miller and Gregory J. Stucky regarding Bourque Affidavit; telephone conference with Bob Miller.
6/30/2022	T-49422-1	EKA	1.70	0.00	1.70	Review of class certification reply draft; Zoom conference with class counsel.
6/30/2022	T-49423-1	GJS	3.00	0.00	3.00	Participation in conference; review of Bourque declaration, and emails regarding same.
6/30/2022	T-49413-1	RKM	2.40	0.00	2.40	Conference call with counsel to discuss Reply. Review and revise same.
7/1/2022	T-49476-3	EKA	1.50	0.00	1.50	Legal research regarding whether lease provision permitting transportation deductions affects the implied covenant to market.
7/2/2022	T-49517-29	DGS	0.30	0.00	0.30	Receive and review correspondence from Thomas D. Kitch.
7/2/2022	T-49476-2	EKA	2.00	0.00	2.00	Legal research regarding whether lease provision permitting transportation deductions affects the implied covenant to market.
7/2/2022	T-49518-9	GJS	2.00	0.00	2.00	Review and revise Reply.
7/3/2022	T-49517-28	DGS	1.40	0.00	1.40	Work on reply brief; receive and review correspondence from Ryan K. Meye, Nate Keever, Thomas D. Kitch , Bob Miller; receive and review correspondence from Nate Keever; correspondence to Bob Miller; review of Bourque affidavit; correspondence to Bob Miller.
7/4/2022	T-49517-27	DGS	1.20	0.00	1.20	Revise Bourque declaration; correspondence to Bob Miller; receive and review correspondence from Bob Miller; receive and review correspondence from Bob; receive and review correspondence from Emily K. Arida regarding research.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/4/2022	T-49476-1	EKA	1.10	0.00	1.10	Legal research regarding whether lease provision permitting transportation deductions affects the implied covenant to market.
7/4/2022	T-49518-8	GJS	1.00	0.00	1.00	Work on Reply.
7/5/2022	T-49517-25	DGS	5.50	0.00	5.50	Revise reply brief; receive and review correspondence from Phyllis Bourque regarding declaration.
7/5/2022	T-49517-104	EKA	1.30	0.00	1.30	Review of class certification reply draft; Zoom meeting with class counsel.
7/5/2022	T-49483-76	RKM	3.60	0.00	3.60	Review and revise Reply Brief.
7/5/2022	T-49483-82	RKM	0.50	0.00	0.50	Conference call with counsel to discuss Reply.
7/6/2022	T-49441-75	CLC	0.40	0.00	0.40	Preparation of exhibit for reply brief.
7/6/2022	T-49517-101	EKA	2.50	0.00	2.50	Review and edit class certification reply draft; Zoom meeting with class counsel.
7/6/2022	T-49518-7	GJS	3.00	0.00	3.00	Work on Reply.
7/6/2022	T-49483-74	RKM	4.10	0.00	4.10	Review and revise Reply and conference call with counsel regarding same.
7/6/2022	T-49483-75	RKM	3.20	0.00	3.20	Review and revise Reply brief.
7/7/2022	T-49441-65	CLC	0.10	0.00	0.10	Finalized exhibits for brief.
7/7/2022	T-49517-96	EKA	0.70	0.00	0.70	Review and edit class certification reply.
7/7/2022	T-49483-70	RKM	5.80	0.00	5.80	Review and revise Reply brief, conferences with counsel regarding same. File same.
7/8/2022	T-49518-5	GJS	1.00	0.00	1.00	Emails regarding next steps.
7/11/2022	T-49517-91	EKA	0.10	0.00	0.10	Review email correspondence with class counsel.
7/12/2022	T-49469-132	CLC	0.90	0.00	0.90	Preparation of several people reports to locate current addresses.
7/12/2022	T-49517-80	EKA	0.20	0.00	0.20	Review email correspondence with class counsel.
7/13/2022	T-49517-18	DGS	1.00	0.00	1.00	Receive and review correspondence from Gregory J. Stucky , Thomas D. Kitch , Nate Keeer, correspondence to Bob Miller; receive and review correspondence from Bob; correspondence to Bob;receive and review correspondence from Bob.
7/13/2022	T-49517-76	EKA	0.10	0.00	0.10	Review of email correspondence with class counsel.
7/19/2022	T-49506-50	DGS	1.00	0.00	1.00	Review of correspondence regarding gathering vs. transportation; review of caselaw.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/20/2022	T-49506-37	DGS	1.20	0.00	1.20	Telephone conference with Phyllis Bourque, Bob Miller, and Nate Keever regarding lease construction issue.
7/26/2022	T-49517-12	DGS	0.30	0.00	0.30	Receive and review correspondence from Nate Keever.
8/5/2022	T-49645-170	DGS	1.40	0.00	1.40	Review of correspondence; Zoom meeting with Bob, Nate, & Ryan.
8/5/2022	T-49645-165	EKA	1.00	0.00	1.00	Zoom meeting with class counsel to discuss plan for preparation for class certification hearing.
8/15/2022	T-49638-170	DGS	3.80	0.00	3.80	Review of file; begin working on outlines for class certification hearing.
8/16/2022	T-49647-23	DGS	5.80	0.00	5.80	Prep for class certificate hearing.
8/17/2022	T-49647-58	DGS	5.00	0.00	5.00	Review of file; prepare for class certification hearing.
8/18/2022	T-49647-101	DGS	4.30	0.00	4.30	Review and prep for hearing; correspondence to Chris Chrisman and Michelle Seares regarding stipulations; receive and review correspondence from Mr. Chrisman.
8/19/2022	T-49647-141	DGS	5.00	0.00	5.00	Prep for hearing.
8/22/2022	T-49647-177	DGS	4.00	0.00	4.00	Prep for hearing.
8/24/2022	T-49648-75	DGS	4.20	0.00	4.20	Revise order of proof; correspondence to counsel.
8/25/2022	T-49648-109	DGS	0.50	0.00	0.50	Receive and review correspondence from Gregory J. Stucky regarding order of proof; correspondence to Gregory J. Stucky; receive and review correspondence from Gregory J. Stucky.
8/29/2022	T-49648-179	DGS	0.50	0.00	0.50	Telephone conference with Bob; review of order of proof.
8/30/2022	T-49649-39	DGS	0.60	0.00	0.60	Conference with Ryan K. Meyer regarding class certificate hearing prep; telephone conference with Gregory J. Stucky regarding class cert.
8/30/2022	T-49649-40	DGS	2.50	0.00	2.50	Review of file; prep for hearing; draft order of proof.
8/31/2022	T-49649-140	DGS	1.00	0.00	1.00	Review of correspondence.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/1/2022	T-49708-7	DGS	5.00	0.00	5.00	Receive and review correspondence from Bob Miller; review of Bob's revisions to Order of Proof; receive and review correspondence from Gregory J. Stucky regarding Order of Proof; correspondence to Bob Miller; receive and review correspondence from Ryan K. Meyer; receive and review correspondence from Nate Keever; review of Phyllis Bourque's Report, Rebuttal Report, and declaration in support of Motion for Class Certification.
9/2/2022	T-49708-8	DGS	4.50	0.00	4.50	Receive and review correspondence from Nate Keever and Ryan K. Meyer; correspondence to Bob Miller; telephone conference with Bob Miller; review of file; telephone conference with Bob Miller, Nate Keever, Ryan K. Meyer, Gregory J. Stucky; conference with Ryan K. Meyer.
9/2/2022	T-49731-38	GJS	2.00	0.00	2.00	Preparation for and participation in conference call.
9/2/2022	T-49663-189	RKM	1.00	0.00	1.00	Conference call to discuss class certification hearing.
9/6/2022	T-49708-9	DGS	5.50	0.00	5.50	Receive and review correspondence from Bob Miller regarding lease issue; correspondence to Bob; telephone conference with Chris Chrisman regarding exhibits, hearing items; correspondence to counsel; work on Order of Proof.
9/7/2022	T-49708-10	DGS	5.00	0.00	5.00	Review of file; prepare for hearing.
9/7/2022	T-49664-1	RKM	2.00	0.00	2.00	Review and revise Order of Proof with Mr. Seely.
9/8/2022	T-49708-11	DGS	5.00	0.00	5.00	Review and prepare for hearing.
9/9/2022	T-49708-12	DGS	4.50	0.00	4.50	Review and prepare for hearing.
9/9/2022	T-49664-14	RKM	0.70	0.00	0.70	Further revisions to Order of Proof.
9/12/2022	T-49669-31	RKM	1.50	0.00	1.50	Preparation for class certification hearing.
9/13/2022	T-49676-11	RKM	1.00	0.00	1.00	Review and analyze Ms Bourque's expert report.
9/13/2022	T-49677-103	TSW	2.80	0.00	2.80	Locate and prepare exhibits for Order of Proof for Class Certification Hearing.
9/14/2022	T-49677-59	RKM	1.20	0.00	1.20	Review and revise order of proof.
9/14/2022	T-49676-15	RKM	0.40	0.00	0.40	Conference call with Mr. Seely to discuss order of proof.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/15/2022	T-49708-13	DGS	1.50	0.00	1.50	Receive and review correspondence from Thomas D. Kitch, Gregory J. Stucky, Ryan K. Meyer; conferences with Ryan K. Meyer; telephone conference with Michelle Seares and Ryan K. Meyer; receive and review correspondence from Ms. Seares; receive and review correspondence from Ryan K. Meyer.
9/15/2022	T-49682-59	RKM	0.80	0.00	0.80	Conferences with Mr. Seely regarding hearing. Conference call with TEP's counsel regarding hearing.
9/16/2022	T-49708-15	DGS	3.50	0.00	3.50	Review of Bob's revisions to order of proof; telephone conference with Bob Miller; receive and review correspondence from Michelle Seares, Ryan K. Meyer, and Angela Barnes; receive and review correspondence from Thomas D. Kitch receive and review correspondence from Bob Miller; conference with Ryan K. Meyer; receive and review correspondence from Ryan K. Meyer; correspondence to Michelle Seares.
9/16/2022	T-49686-176	RKM	1.00	0.00	1.00	Conferences with Mr. Seely regarding Order of Proof and hearing. Email communication with TEP's counsel regarding hearing. Email communication with court regarding same.
9/18/2022	T-49708-16	DGS	1.00	0.00	1.00	Review of expert reports.
9/19/2022	T-49708-17	DGS	5.00	0.00	5.00	Receive and review correspondence from Thomas D. Kitch; review of revisions to order of proof; telephone conference with Bob Miller; correspondence to Ryan K. Meyer; review of expert reports.
9/20/2022	T-49708-18	DGS	5.00	0.00	5.00	Review of file, prepare for hearing; review of expert reports.
9/20/2022	T-49731-41	GJS	2.00	0.00	2.00	Review of Tom's comments regarding Order of Proof.
9/21/2022	T-49708-20	DGS	2.00	0.00	2.00	Review of our experts' rebuttal reports; make notes regarding TEP's experts review of briefs.
9/21/2022	T-49731-42	GJS	1.00	0.00	1.00	Review of Tom's revisions and email regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/22/2022	T-49708-21	DGS	6.00	0.00	6.00	Review of Bob Miller's changes to Thomas D. Kitch opening and comments; revise same; correspondence to counsel; conference call with Thomas D. Kitch, Bob Miller, Nate Keever, Ryan K. Meyer, Emily K. Arida; review and prep for hearing.
9/22/2022	T-49738-132	EKA	1.60	0.00	1.60	Review of order of proof; conference with class counsel.
9/22/2022	T-49731-43	GJS	2.00	0.00	2.00	Review of Bob's comments regarding Tom's revisions.
9/22/2022	T-49708-52	RKM	1.40	0.00	1.40	Conference call with counsel to discuss hearing and exhibits.
9/23/2022	T-49708-22	DGS	5.60	0.00	5.60	Review, prep for hearing, revise Order of Proof; telephone conference with Ryan K. Meyer and Michelle Seares; conferences with Ryan K. Meyer.
9/23/2022	T-49731-44	GJS	2.00	0.00	2.00	Review of our exhibit list and emails regarding same.
9/23/2022	T-49708-54	RKM	6.60	0.00	6.60	Preparation of witness and exhibit list. Conferences with Mr. Seely regarding same. Conference call with Mr. Miller regarding same.
9/23/2022	T-49708-55	RKM	0.50	0.00	0.50	Conference call with Ms. Seares regarding exhibits and hearing.
9/26/2022	T-49737-133	EKA	0.20	0.00	0.20	Review witness and exhibit list for class certification hearing.
9/26/2022	T-49731-45	GJS	2.00	0.00	2.00	Review of TEP's exhibit list and emails regarding same.
9/26/2022	T-49727-55	RKM	7.20	0.00	7.20	Compile class certification exhibits and conferences with Mr. Miller regarding same.
9/27/2022	T-49731-11	CLC	4.10	0.00	4.10	Preparation of set of exhibits and revised witness and exhibit list.
9/27/2022	T-49722-32	RKM	5.80	0.00	5.80	Prepare class certification exhibits. Conferences with Ms. Clark regarding same. Conferences with Mr. Miller regarding same.
9/28/2022	T-49731-19	CLC	0.70	0.00	0.70	Preparation of revised exhibit list per judge's requirements.
9/28/2022	T-49731-20	CLC	2.90	0.00	2.90	Continued work on exhibits for upcoming hearing.
9/28/2022	T-49737-121	EKA	0.20	0.00	0.20	Review TEP's witness and exhibit list for class certification hearing and class counsel emails regarding the same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/28/2022	T-49731-46	GJS	2.00	0.00	2.00	Review of Exhibit N leases and email regarding same.
9/28/2022	T-49727-59	RKM	2.40	0.00	2.40	Review and analyze TEPs class certification exhibits.
9/28/2022	T-49722-34	RKM	0.80	0.00	0.80	Additional work on class certification exhibits.
9/29/2022	T-49731-25	CLC	1.10	0.00	1.10	Preparation of loading exhibits to software program for use in upcoming class certification hearing.
9/29/2022	T-49732-130	RKM	0.80	0.00	0.80	Conference call with TEP's counsel to discuss objections and stipulations to exhibits.
9/29/2022	T-49732-131	RKM	1.20	0.00	1.20	Work on class certification exhibits.
9/30/2022	T-49732-137	RKM	0.40	0.00	0.40	Conference call with Mr. Chrisman regarding hearing.
10/3/2022	T-49810-153	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel; correspondence to Ryan K. Meyer.
10/3/2022	T-49750-30	RKM	2.70	0.00	2.70	Review and revise Order of Proof.
10/3/2022	T-49750-31	RKM	0.50	0.00	0.50	Conference calls with Ms. Seares regarding exhibits.
10/3/2022	T-49750-32	RKM	0.80	0.00	0.80	Email communication with counsel regarding tasks to complete regarding class certification hearing.
10/3/2022	T-49750-35	RKM	1.30	0.00	1.30	Review exhibits and analyze which exhibits we should use in our direct examination.
10/4/2022	T-49807-64	EKA	0.30	0.00	0.30	Review email correspondence between class counsel.
10/4/2022	T-49750-38	RKM	0.50	0.00	0.50	Review and analyze Killion testimony. Email communication with counsel regarding potential motion in limine.
10/4/2022	T-49756-23	RKM	0.80	0.00	0.80	Email communication with defense counsel regarding exhibits and courtroom technology.
10/4/2022	T-49756-25	RKM	0.60	0.00	0.60	Conference call with Bob and Nate regarding exhibits.
10/4/2022	T-49756-26	RKM	1.80	0.00	1.80	Work on exhibits for class certification hearing.
10/5/2022	T-49810-154	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel; receive and review correspondence from Angela Barnes.
10/6/2022	T-49756-34	RKM	0.50	0.00	0.50	Email communication with Mr. Seely regarding order of proof. Email communication with experts regarding testimony.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/6/2022	T-49756-35	RKM	0.50	0.00	0.50	Receive email communication from court regarding exhibits. Email communication with plaintiff's counsel regarding same.
10/6/2022	T-49756-37	RKM	1.40	0.00	1.40	Review and revise order of proof.
10/6/2022	T-49761-61	TSW	0.40	0.00	0.40	Work on hearing exhibits.
10/7/2022	T-49810-156	DGS	1.00	0.00	1.00	Receive and review correspondence from Ryan K. Meyer; review of revised Order of Proof; receive and review correspondence from Angela Barnes; receive and review correspondence from Chris Chrisman; receive and review correspondence from Bob Miller.
10/7/2022	T-49750-42	RKM	2.40	0.00	2.40	Prepare and review demonstrative exhibits. Review and revise Order of Proof.
10/8/2022	T-49810-158	DGS	1.00	0.00	1.00	Receive and review correspondence from counsel; review of demonstratives; correspondence to Bob Miller.
10/8/2022	T-49756-40	RKM	2.80	0.00	2.80	Prepare revised exhibit list and revise demonstrative exhibits. Email communication with counsel regarding same.
10/10/2022	T-49807-80	EKA	0.70	0.00	0.70	Review draft of order of proof.
10/10/2022	T-49797-28	RKM	0.80	0.00	0.80	Receive demonstratives from Mr. Miller and review and analyze same.
10/10/2022	T-49797-29	RKM	0.30	0.00	0.30	Email communication with Mr. Chrisman regarding JPR well locations.
10/10/2022	T-49797-30	RKM	0.40	0.00	0.40	Email communication with Mr. Chrisman and Ms. Seares regarding demonstrative exhibits.
10/10/2022	T-49797-31	RKM	1.80	0.00	1.80	Finalize exhibits and send same to defense counsel.
10/10/2022	T-49756-42	RKM	0.60	0.00	0.60	Conference call with Mr. Miller regarding Exhibits. Email communication with defense counsel regarding same.
10/11/2022	T-49771-20	CLC	4.30	0.00	4.30	Preparation of defendant's exhibits to be used for upcoming certification hearing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/11/2022	T-49810-159	DGS	6.00	0.00	6.00	Receive and review correspondence from Ryan K. Meyer, Bob Miller; regarding conference call; correspondence to Bob Miller; review of Bob's Rebuttal order of proof; review of order of Proof; review of exhibits; Review of TEP Demonstratives; review of Bob's revised demonstratives; receive and review correspondence from Bob Miller; telephone conference with Bob Miller, Nate Keever, and Ryan K. Meyer; correspondence to Bob Miller; correspondence to Chris Chrisman; correspondence to Thomas D. Kitch and Gregory J. Stucky.
10/11/2022	T-49807-133	GJS	3.00	0.00	3.00	Review of TEP's demonstrative exhibits and emails related thereto.
10/11/2022	T-49797-33	RKM	0.40	0.00	0.40	Conference call with Ms. Seares regarding exhibits.
10/11/2022	T-49797-35	RKM	1.00	0.00	1.00	Conference call with Mr. Keever, Mr. Miller, and Mr. Seely to discuss hearing.
10/11/2022	T-49797-36	RKM	0.70	0.00	0.70	Email communication with Ms. Seares regarding witness examination times. Review and revise witness lists.
10/11/2022	T-49797-37	RKM	1.10	0.00	1.10	Conference call and email communication with Ms. Seares regarding exhibits. Conferences with Ms. West and Ms. Clark regarding exhibits.
10/11/2022	T-49797-38	RKM	0.60	0.00	0.60	Receive TEP's exhibits and briefly review same. Send same to counsel.
10/11/2022	T-49797-39	RKM	0.50	0.00	0.50	Review and revise letter to court. Email communication with defense counsel and Mr. Keever regarding exhibits to be sent to the court.
10/11/2022	T-49797-42	RKM	0.40	0.00	0.40	Receive edits to ICM demonstrative from Mr. Miller and review and analyze same. Email communication with Mr. Miller regarding same.
10/11/2022	T-49761-62	TSW	4.00	0.00	4.00	Prepare exhibit notebooks for hearing.
10/12/2022	T-49771-29	CLC	5.80	0.00	5.80	Continued work on Preparatoin of 3 sets of our exhibits for upcoming hearing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/12/2022	T-49810-161	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller, Phyllis Bourque, Ryan K. Meyer, Angela Barnes; telephone conference with Ryan K. Meyer; correspondence to Ryan K. Meyer, Gregory J. Stucky, Thomas D. Kitch.
10/12/2022	T-49797-44	RKM	1.80	0.00	1.80	Conference calls and email communication with counsel and defense counsel regarding continuing the class certification hearing. Email communication with the Court regarding same.
10/12/2022	T-49797-46	RKM	0.60	0.00	0.60	Conference call with defense counsel to discuss continuance.
10/12/2022	T-49811-181	RKM	1.80	0.00	1.80	Review and analyze TEP's exhibits.
10/12/2022	T-49761-64	TSW	1.40	0.00	1.40	Prepare exhibit notebooks for hearing.
10/13/2022	T-49810-163	DGS	1.00	0.00	1.00	Receive and review correspondence from Ryan K. Meyer, Bob Miller, Phyllis Bourque, Mary Ellen Denomy; telephone conference with Ryan K. Meyer; telephone conference with Chris Chrisman and Michelle Seares and Ryan K. Meyer.
10/13/2022	T-49811-182	RKM	0.50	0.00	0.50	Conference call with defense counsel to discuss rescheduling the class certification hearing.
10/13/2022	T-49811-188	RKM	0.20	0.00	0.20	Notify experts of rescheduled hearing date.
10/13/2022	T-49797-47	RKM	0.50	0.00	0.50	Conference call with court to reschedule class certification hearing.
10/14/2022	T-49810-165	DGS	1.00	0.00	1.00	Correspondence with Ryan K. Meyer; receive and review correspondence from Bob Miller; Status Conference with Judge Gallagher, Ryan K. Meyer, and opposing counsel regarding rescheduling of hearing.
10/17/2022	T-49810-167	DGS	0.50	0.00	0.50	Receive and review correspondence from Bob Miller. Receive and review correspondence from Ryan K. Meyer. Receive and review correspondence from Gregory J. Stucky.
10/17/2022	T-49811-190	RKM	0.80	0.00	0.80	Review and analyze Mr. Miler and Mr. Stucky's comments regarding TEP's exhibits.
11/1/2022	T-49903-67	DGS	4.80	0.00	4.80	Review of file; work on hearing prep.
11/2/2022	T-49903-69	DGS	5.00	0.00	5.00	Receive and review correspondence from Bob Miller; correspondence to Bob Miller; review of file.
11/3/2022	T-49903-70	DGS	6.00	0.00	6.00	Review of file, prepare for hearing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/4/2022	T-49903-72	DGS	6.00	0.00	6.00	Review and prep for hearing.
11/7/2022	T-49903-73	DGS	6.00	0.00	6.00	Review of file.
11/8/2022	T-49903-74	DGS	5.60	0.00	5.60	Review of file.
11/8/2022	T-49837-80	RKM	0.40	0.00	0.40	Conference with Mr. Seely to discuss Walls' expert opinion.
11/9/2022	T-49903-77	DGS	6.00	0.00	6.00	Review of file; prep for hearing.
11/10/2022	T-49903-78	DGS	5.50	0.00	5.50	Review of Bob's memo regarding rebuttal and exhibits; receive and review correspondence from Gregory J. Stucky; review of exhibits.
11/11/2022	T-49903-80	DGS	5.20	0.00	5.20	Review and prepare for hearing.
11/14/2022	T-49903-82	DGS	4.70	0.00	4.70	Review of file.
11/15/2022	T-49903-83	DGS	5.80	0.00	5.80	Review of exhibits and Bob's memos; conference call with Bob Miller and Ryan K. Meyer; correspondence to counsel.
11/15/2022	T-49899-67	RKM	2.00	0.00	2.00	Conference call with Mr. Seely and Mr. Miller to discuss class certification hearing.
11/16/2022	T-49903-86	DGS	3.00	0.00	3.00	Review of file.
11/17/2022	T-49903-91	DGS	4.20	0.00	4.20	Review.
11/21/2022	T-49902-168	DGS	2.00	0.00	2.00	Review of file; hearing prep.
11/28/2022	T-49902-33	DGS	0.40	0.00	0.40	Correspondence to Bob; re: discrepancy in count of lease types.
11/29/2022	T-49902-37	DGS	0.20	0.00	0.20	Receive and review correspondence from Bob Miller regarding lease count.
12/1/2022	T-50001-9	DGS	3.00	0.00	3.00	Review of of file.
12/2/2022	T-50001-12	DGS	3.20	0.00	3.20	Review, prepare for hearing.
12/5/2022	T-50001-13	DGS	1.80	0.00	1.80	Review of exhibits.
12/6/2022	T-50001-16	DGS	3.00	0.00	3.00	Conference with Bob Miller regarding exhibits.
12/7/2022	T-50001-21	DGS	4.00	0.00	4.00	Telephone conference with Bob regarding exhibits.
12/7/2022	T-49993-68	RKM	1.00	0.00	1.00	Email communication and conference calls with Mr. Miller regarding exhibits.
12/7/2022	T-49951-181	TSW	0.20	0.00	0.20	Prepare exhibits on USB to send to Bob Miller.
12/8/2022	T-50001-24	DGS	4.00	0.00	4.00	Telephone conference with Bob regarding exhibits.
12/12/2022	T-50001-30	DGS	3.00	0.00	3.00	Review of file.
12/12/2022	T-49949-19	RKM	0.50	0.00	0.50	Conference with Mr. Seely to discuss upcoming class certification hearing.
12/13/2022	T-50001-32	DGS	3.00	0.00	3.00	Review of file.
12/13/2022	T-49949-23	RKM	0.40	0.00	0.40	Conference call with TEP's counsel to discuss class certification hearing. Email communication with counsel regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/13/2022	T-49951-137	RKM	0.30	0.00	0.30	Conference call with Michelle Seares to discuss class certification hearing.
12/14/2022	T-50001-34	DGS	3.00	0.00	3.00	Review of file.
12/15/2022	T-50001-36	DGS	3.00	0.00	3.00	Review of file.
12/16/2022	T-50001-39	DGS	3.00	0.00	3.00	Review of file.
12/16/2022	T-49993-77	RKM	0.50	0.00	0.50	Email communication with TEP's counsel and the court to discuss courtroom layout and technology.
12/19/2022	T-50004-111	RKM	0.50	0.00	0.50	Review and analyze motion to allow remote testimony of certain TEP witnesses. Email communication with counsel and conference call with TEP's counsel regarding same.
12/23/2022	T-50001-50	DGS	2.00	0.00	2.00	Review of briefs and expert reports.
12/28/2022	T-50001-53	DGS	2.80	0.00	2.80	Work on annotations to TEP exhibit list.
12/29/2022	T-50001-57	DGS	3.30	0.00	3.30	Work on annotations to exhibit lists.
12/30/2022	T-50001-59	DGS	1.00	0.00	1.00	Work on annotations to exhibits.
1/2/2023	T-50061-138	DGS	1.50	0.00	1.50	Intraoffice conference with Ryan Meyer, review of file re preparing for hearing.
1/2/2023	T-50058-184	RKM	0.20	0.00	0.20	Email communication with court and defense counsel regarding class certification hearing.
1/3/2023	T-50059-78	DGS	5.00	0.00	5.00	Receive & review correspondence from Ryan Meyer, Bob Miller, Mary Ellen Denomy, Phyllis Bourque; correspondence to same; conference with Ryan Meyer; review of file.
1/3/2023	T-50058-193	RKM	0.60	0.00	0.60	Email communication with Mr. Seely and experts regarding class certification hearing.
1/4/2023	T-50059-82	DGS	4.30	0.00	4.30	Conference with Ryan Meyer; conference with Greg Stucky; work on chronology; prepare for hearing.
1/4/2023	T-50058-197	RKM	0.30	0.00	0.30	Conference with Mr. Seely regarding exhibits.
1/4/2023	T-50059-1	RKM	2.20	0.00	2.20	Work on annotations to exhibits lists and demonstrative exhibits.
1/4/2023	T-50077-51	TSW	1.30	0.00	1.30	Prepare exhibits for hearing.
1/6/2023	T-50059-9	RKM	1.20	0.00	1.20	Review order of proof.
1/6/2023	T-50059-8	RKM	4.80	0.00	4.80	Review substantive and demonstrative exhibits in preparation for hearing. Make changes to demonstrative exhibits. Conference with Mr. Seely regarding same.
1/9/2023	T-50059-84	DGS	7.80	0.00	7.80	Prepare for hearing: Zoom meeting with Mary Ellen Denomy, Bob Miller, Ryan Meyer.
1/9/2023	T-50059-12	RKM	3.50	0.00	3.50	Class certification preparation session with Ms. Denomy.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/9/2023	T-50059-13	RKM	4.30	0.00	4.30	Prepare for class certification hearing.
1/9/2023	T-50059-16	RKM	0.40	0.00	0.40	Email communication with TEP's counsel and the court regarding remote testimony of TEP's witnesses.
1/9/2023	T-50077-61	TSW	1.00	0.00	1.00	Prepare exhibits for hearing.
1/10/2023	T-50059-85	DGS	1.00	0.00	1.00	Review of exhibits; correspondence with Ryan Meyer and Bob Miller.
1/10/2023	T-50059-17	RKM	8.70	0.00	8.70	Preparation for Class Certification hearing, including review and revising demonstrative exhibits, revising substantive exhibits, and review and analysis of our experts' reports. Conferences with Mr. Seely and Mr. Miller regarding same.
1/10/2023	T-50077-66	TSW	1.10	0.00	1.10	Prepare hearing exhibits and demonstrative exhibits for hearing.
1/11/2023	T-50105-35	CLC	0.60	0.00	0.60	Continued work on setting on trial software for upcoming court hearing.
1/11/2023	T-50085-25	DGS	6.80	0.00	6.80	Review and revise exhibits; correspondence with Bob Miller; conferences with Ryan Meyer; prepare for hearing.
1/11/2023	T-50059-29	RKM	2.00	0.00	2.00	Review and revise Exhibits 14, 23, and 24.
1/11/2023	T-50059-30	RKM	4.80	0.00	4.80	Review and revise demonstrative exhibits and conferences with Mr. Seely regarding same. Email communication with Mr. Miller regarding same.
1/11/2023	T-50059-31	RKM	1.00	0.00	1.00	Prepare demonstrative exhibit on Rule 23.
1/11/2023	T-50061-21	TSW	0.90	0.00	0.90	Prepare exhibits for hearing.
1/12/2023	T-50085-26	DGS	10.00	0.00	10.00	Review; Zoom meeting with Phyllis Bourque, Bob Miller& Ryan Meyer; Prepare for hearing.
1/12/2023	T-50133-5	GJS	3.00	0.00	3.00	Legal research and review of Bob's memo.
1/12/2023	T-50059-38	RKM	8.00	0.00	8.00	Conference with Ms. Bourque to prepare her for the class certification hearing. And preparation for same.
1/13/2023	T-50085-27	DGS	9.00	0.00	9.00	Review and prepare for trial.
1/13/2023	T-50061-117	RKM	5.90	0.00	5.90	Preparation for class certification hearing.
1/14/2023	T-50085-28	DGS	9.30	0.00	9.30	Review and prepare for hearing.
1/14/2023	T-50061-118	RKM	3.10	0.00	3.10	Review and revise outline for Bourque direct testimony and conference with Mr. Seely regarding same. Conference with Mr. Seely and Mr. Miller regarding demonstrative exhibits.
1/15/2023	T-50061-119	RKM	3.00	0.00	3.00	Preparation for class certification hearing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/15/2023	T-50061-120	RKM	1.10	0.00	1.10	Email communication with counsel regarding exhibits and cross examination.
1/16/2023	T-50085-29	DGS	11.60	0.00	11.60	Prepare for hearing.
1/16/2023	T-50148-77	RKM	5.60	0.00	5.60	Preparation for class certification hearing and conferences with Mr. Seely regarding same. Conference calls with Mr. Miller regarding same.
1/16/2023	T-50148-79	RKM	3.30	0.00	3.30	Finalize demonstrative exhibits and send same to TEP's counsel and to the Court.
1/16/2023	T-50077-77	TSW	0.80	0.00	0.80	Prepare exhibits for hearing.
1/17/2023	T-50105-44	CLC	3.10	0.00	3.10	Continued work on preparing several sets of paper exhibits for upcoming hearing.
1/17/2023	T-50085-30	DGS	9.60	0.00	9.60	Prepare for hearing.
1/17/2023	T-50085-31	DGS	0.10	0.00	0.10	Zoom meeting with Phyllis Bourque 3.5 hour.
1/17/2023	T-50148-82	RKM	1.80	0.00	1.80	Conference call with Ms. Bourque to prepare for her hearing testimony.
1/17/2023	T-50148-84	RKM	0.80	0.00	0.80	Email communication with Judge Gallagher's assistant and with TEP's counsel regarding exhibits. Phone call to TEP's counsel regarding same.
1/17/2023	T-50148-85	RKM	2.20	0.00	2.20	Preparation for class certification hearing.
1/17/2023	T-50077-82	TSW	0.40	0.00	0.40	Prepare exhibits for hearing.
1/18/2023	T-50105-50	CLC	2.50	0.00	2.50	Continued work on preparation of exhibits for upcoming hearing.
1/18/2023	T-50085-34	DGS	8.70	0.00	8.70	Review and prepare for hearing.
1/18/2023	T-50148-86	RKM	0.50	0.00	0.50	Email communication with Judge Gallagher's assistant and with TEP's counsel regarding hearing.
1/18/2023	T-50148-90	RKM	6.40	0.00	6.40	Preparation for class certification hearing. Conferences with Mr. Seely regarding same.
1/19/2023	T-50105-56	CLC	0.80	0.00	0.80	Continued work preparing for hearing.
1/19/2023	T-50085-37	DGS	8.40	0.00	8.40	Review and prepare for hearing; conference with Ryan Meyer to review exhibits and select for opening statement; correspondence with Mary Ellen Denomy; correspondence with Phyllis Bourque.
1/19/2023	T-50085-38	DGS	0.10	0.00	0.10	Conference call with TEP counsel and Ryan Meyer regarding hearing details.
1/19/2023	T-50148-92	RKM	5.70	0.00	5.70	Preparation for class certification hearing.
1/19/2023	T-50088-11	TSW	0.20	0.00	0.20	Prepare demonstrative exhibits for opening statement and upload to trial pad.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/20/2023	T-50119-119	DGS	13.00	0.00	13.00	Travel to Grand Junction, CO; continue prep for hearing; receive and review correspondence from Phyllis Bourque.
1/20/2023	T-50088-64	RKM	12.00	0.00	12.00	Travel to Grand Junction.
1/21/2023	T-50113-26	DGS	14.00	0.00	14.00	Prepare for hearing; witness preparation.
1/21/2023	T-50088-65	RKM	10.90	0.00	10.90	Meet with Mary Ellen Denomy to prepare her for her direct testimony. Other preparation for class certification hearing and conferences with Mr. Miller, Mr. Seely, and Mr. Keever regarding same. Conference with Mr. Potter to prepare him for his deposition.
1/22/2023	T-50105-58	CLC	1.80	0.00	1.80	Continued work on exhibits for certification hearing.
1/22/2023	T-50119-120	DGS	17.00	0.00	17.00	Prepare for hearing; court appearance for hearing; review and prepare for next day.
1/22/2023	T-50129-146	RKM	12.70	0.00	12.70	Conference with Ms. Bourque to prepare her for her hearing testimony. Further preparation and conferences with Mr. Seely, Mr. Keever, and Mr. Miller regarding same.
1/22/2023	T-50095-1	TSW	0.20	0.00	0.20	Upload exhibits for hearing.
1/23/2023	T-50113-28	DGS	14.00	0.00	14.00	Witness preparation; prepare for hearing; prepare opening statement.
1/23/2023	T-50095-75	RKM	17.00	0.00	17.00	Attend class certification hearing and preparation for same.
1/24/2023	T-50119-121	DGS	18.00	0.00	18.00	Prepare for hearing; court appearance for hearing; review and prepare closing argument.
1/24/2023	T-50129-147	RKM	18.00	0.00	18.00	Attend second day of class certification hearing and preparation for day 3.
1/24/2023	T-50119-6	TSW	1.40	0.00	1.40	Prepare excel spreadsheets and documents for hearing.
1/25/2023	T-50119-122	DGS	11.50	0.00	11.50	Prepare for hearing; court appearance for hearing and closing argument; telephone conference with Greg Stucky and Ryan Meyer; prepare for closing argument; telephone conference with Ryan Meyer and Tom Kitch.
1/25/2023	T-50129-148	RKM	10.00	0.00	10.00	Attend day 3 of the class certification hearing.
1/26/2023	T-50113-29	DGS	13.00	0.00	13.00	Travel to Wichita.
1/26/2023	T-50129-149	RKM	11.00	0.00	11.00	Return travel from class certification hearing.
1/27/2023	T-50148-102	RKM	1.00	0.00	1.00	Email communications with counsel regarding class certification hearing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/28/2023	T-50119-127	DGS	0.90	0.00	0.90	Receive and review correspondence and memo from Bob Miller; receive and review correspondence from Nate Keever; correspondence to Mr. Keever regarding timeline.
1/31/2023	T-50148-105	RKM	0.30	0.00	0.30	Email communication with court reporter regarding transcript.
2/3/2023	T-50168-170	DGS	1.00	0.00	1.00	RECEIVE AND REVIEW CORRESPONDENCE AND MEMO FROM BOB MILLER, NATE KEEVER, GREG STUCKY.
2/3/2023	T-50261-1	GJS	2.00	0.00	2.00	Reading transcript of certification hearing.
2/4/2023	T-50168-173	DGS	1.00	0.00	1.00	RECEIVE AND REVIEW CORRESPONDENCE AND NEW MEMO FROM BOB MILLER, NATE KEEVER.
2/4/2023	T-50261-2	GJS	5.00	0.00	5.00	Reading transcript of certification hearing and email regarding the same.
2/5/2023	T-50168-175	DGS	1.00	0.00	1.00	RECEIVE AND REVIEW CORRESPONDENCE AND MEMOS FROM BOB MILLER, NATE KEEVER, TOM KITCH.
2/5/2023	T-50261-3	GJS	3.00	0.00	3.00	Reading transcript of certification hearing.
2/6/2023	T-50168-176	DGS	1.00	0.00	1.00	RECEIVE AND REVIEW CORRESPONDENCE FROM BOB MILLER & NATE KEEVER.
2/7/2023	T-50261-5	GJS	2.00	0.00	2.00	Reading transcript of certification hearing.
2/9/2023	T-50261-7	GJS	4.00	0.00	4.00	Reading transcript of certification hearing and composition of email regarding observations of hearing.
2/10/2023	T-50261-8	GJS	4.00	0.00	4.00	Reading transcript of certification hearing and composition of email regarding observations of hearing.
2/13/2023	T-50193-113	DGS	0.50	0.00	0.50	Receive and review correspondence from Greg Stucky and from Tom Kitch.
2/14/2023	T-50267-81	EKA	0.50	0.00	0.50	Review class certification order; review of email correspondence between class counsel.
2/14/2023	T-50261-10	GJS	3.00	0.00	3.00	Review of recommendation related to class certification.
2/14/2023	T-50265-190	RKM	2.80	0.00	2.80	Receive the Magistrate Judge's Recommendation and begin to review and analyze same.
2/15/2023	T-50267-87	EKA	0.40	0.00	0.40	Review email correspondence between class counsel.
2/15/2023	T-50261-11	GJS	3.00	0.00	3.00	Review of recommendation and various emails related to objections.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/15/2023	T-50265-199	RKM	1.30	0.00	1.30	Conference call with co-counsel to discuss magistrate's recommendation and strategy for filing objections.
2/15/2023	T-50265-200	RKM	3.10	0.00	3.10	Review and analyze Recommendation and email communication with counsel regarding same.
2/15/2023	T-50266-7	RKM	3.70	0.00	3.70	Research whether the 14-day objection time period can be extended or whether it is jurisdictional. Research whether parties may file a motion to reconsider in lieu of an objection to the magistrate's Recommendation.
2/16/2023	T-50267-97	EKA	2.00	0.00	2.00	Zoom meeting with class counsel; review of recommendation; Draft, review and revise objection to magistrate's recommendation.
2/16/2023	T-50261-12	GJS	2.00	0.00	2.00	Preparation for and participation in conference call regarding next steps.
2/16/2023	T-50266-10	RKM	1.40	0.00	1.40	Conference call with co-counsel to discuss objection to magistrate's recommendation.
2/17/2023	T-50267-99	EKA	1.20	0.00	1.20	Draft, review and revise objection to magistrate's recommendation.
2/17/2023	T-50261-13	GJS	2.00	0.00	2.00	Review of certification pleadings and recommendation; preparation for and participation in conference call.
2/18/2023	T-50261-15	GJS	1.00	0.00	1.00	Various emails regarding procedure and objections.
2/19/2023	T-50212-21	DGS	1.30	0.00	1.30	Review of hearing transcript; correspondence to counsel regarding excerpts potentially relevant to objection.
2/19/2023	T-50267-106	EKA	0.30	0.00	0.30	Review of class counsel email correspondence regarding objection to the magistrate's recommendation.
2/19/2023	T-50268-168	RKM	1.20	0.00	1.20	Draft, review, and revise, Objection to Magistrate's Recommendation.
2/20/2023	T-50226-19	DGS	7.40	0.00	7.40	Receive and review drafts of objection/motion from Bob Miller and Ryan Meyer work on additions and revisions to same; telephone conference with Bob Miller; correspondence to counsel; receive and review correspondence from Ryan Meyer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/20/2023	T-50267-110	EKA	3.40	0.00	3.40	Legal research regarding when creation of a subclass is appropriate; Draft, review and revise objection.
2/20/2023	T-50268-170	RKM	0.80	0.00	0.80	Email communication with counsel regarding number of category 12 leases.
2/21/2023	T-50261-16	GJS	1.00	0.00	1.00	Various emails regarding objection.
2/21/2023	T-50268-174	RKM	7.80	0.00	7.80	Draft, review, and revise Objection to Magistrate's Recommendation.
2/22/2023	T-50235-41	DGS	4.70	0.00	4.70	Receive and review correspondence from Bob Miller; review of revised draft; correspondence with Emily Arrida regarding citations and list of Cat.12 leases; correspondence to Greg Stucky; receive and review correspondence from Mr. Stucky; telephone conference with Mr. Miller; work on revisions to draft; receive and review correspondence between Emily Arrida and Bob Miller; correspondence with Ryan Meyer regarding revisions.
2/22/2023	T-50267-115	EKA	2.00	0.00	2.00	Draft, review and revise objection; prepare objection attachments.
2/22/2023	T-50261-17	GJS	2.00	0.00	2.00	Review of most recent draft of objection and various emails related thereto.
2/23/2023	T-50261-18	GJS	2.00	0.00	2.00	Review of latest draft of objection and comments related thereto.
2/23/2023	T-50268-181	RKM	4.20	0.00	4.20	Draft, review, and revise Objection to Magistrate's Recommendation.
2/24/2023	T-50244-33	DGS	3.50	0.00	3.50	Telephone conference with Greg Stucky; revise objection; correspondence to counsel; receive and review correspondence from Bob Miller, Greg Stucky, Tom Kitch. And Ryan Meyer and Emily Arrida.
2/24/2023	T-50267-121	EKA	1.00	0.00	1.00	Review objection draft and email correspondence regarding the same.
2/24/2023	T-50261-19	GJS	7.00	0.00	7.00	Review and revise objection and various emails and calls related thereto.
2/25/2023	T-50244-36	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; correspondence to Mr. Miller; draft/revise footnote regarding illustration; correspondence to Emily Arrida regarding same; receive and review correspondence from Greg Stucky and Bob Miller.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/25/2023	T-50267-122	EKA	1.50	0.00	1.50	Draft, review and revise objection draft.
2/25/2023	T-50261-20	GJS	1.00	0.00	1.00	Legal research and various emails regarding appropriateness of Newberg citation.
2/27/2023	T-50254-33	DGS	2.60	0.00	2.60	Review and revise draft of objection; correspondence to counsel; telephone conference with Chris Christian; receive and review correspondence from Tom Kitch, Greg Stucky, Ryan Meyer; correspondence to Greg Stucky; receive and review correspondence from Mr. Stucky.
2/27/2023	T-50267-128	EKA	1.30	0.00	1.30	Draft, review and revise objection to magistrate's recommendation.
2/27/2023	T-50261-21	GJS	3.00	0.00	3.00	Legal research and review and revise objection and exhibit thereto and various emails related thereto.
2/27/2023	T-50254-32	RKM	4.20	0.00	4.20	Draft, review, and revise Objection to Magistrate's report.
2/28/2023	T-50264-139	DGS	3.00	0.00	3.00	Receive and review underlying lease regarding partial release; correspondence to counsel regarding same; review and revise objection; correspondence to counsel regarding same; telephone conference with Bob Miller; correspondence to counsel; receive and review correspondence from Ryan Meyer and Bob Miller.
2/28/2023	T-50264-140	DGS	0.50	0.00	0.50	Receive and review TEP's objection to Magistrate's Recommendation.
2/28/2023	T-50268-183	RKM	1.20	0.00	1.20	Review and analyze TEP's Objections to Magistrate's Recommendation.
2/28/2023	T-50266-29	RKM	2.30	0.00	2.30	Draft and revise Objection and Exhibits. Conference with Mr. Miller regarding same.
3/1/2023	T-50290-92	DGS	2.30	0.00	2.30	Review and analysis of TEP's objection; receive and review correspondence from Ryan Meyer and Bob Miller and Nate Keever; correspondence to Ryan Meyer.
3/1/2023	T-50291-43	RKM	1.50	0.00	1.50	Review and analyze TEP's Objections to Magistrate's Recommendation.
3/2/2023	T-50290-93	DGS	4.10	0.00	4.10	Zoom meeting with Bob Miller, Thomas D. Kitch, Gregory J. Stucky, Ryan K. Meyer, Emily Arrida, & Nate Keever; work on draft of response to TEP's Objection.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/2/2023	T-50429-146	EKA	2.40	0.00	2.40	Zoom meeting with class counsel; review of TEP's objection.
3/2/2023	T-50427-1	GJS	1.00	0.00	1.00	Review of TEP Objection.
3/2/2023	T-50436-163	RKM	2.30	0.00	2.30	Conference call with counsel to discuss TEP's objections to magistrate's report and recommendation. Review and analyze same.
3/2/2023	T-50436-167	RKM	1.00	0.00	1.00	Prepare initial draft outline of response to TEP's objections.
3/3/2023	T-50290-97	DGS	9.10	0.00	9.10	Draft, review and revise response to TEP's Objection.
3/3/2023	T-50427-2	GJS	3.00	0.00	3.00	Preparation for and participation in conference call.
3/4/2023	T-50290-98	DGS	7.80	0.00	7.80	Draft, review and revise response to TEP's Objection.
3/5/2023	T-50290-99	DGS	2.90	0.00	2.90	Draft, review and revise response to TEP's Objection, correspondence to counsel regarding same.
3/5/2023	T-50427-4	GJS	1.00	0.00	1.00	Review of draft of Response to TEP Objection.
3/7/2023	T-50290-110	DGS	1.10	0.00	1.10	Receive and review correspondence from Thomas D. Kitch, Ryan K. Meyer, Bob Miller; review of Thomas D. Kitch draft of response to objections.
3/7/2023	T-50427-5	GJS	1.00	0.00	1.00	Review of re-draft of Response to TEP Objection.
3/8/2023	T-50294-22	DGS	3.10	0.00	3.10	Review of Bob Miller's draft of response to objection; Zoom meeting with Tom Kitch and Nate Keever; Zoom meeting with Bob Miller, Nate Keever, Gregory J. Stucky, Ryan K. Meyer, and Emily Arida regarding briefing, scheduling; telephone conference with Chris Chrisman regarding extension to filing deadline.
3/8/2023	T-50429-164	EKA	1.20	0.00	1.20	Review of response to TEP's objection to the magistrate's recommendation; Zoom conference with class counsel.
3/8/2023	T-50427-6	GJS	2.00	0.00	2.00	Preparation for and participation in conference call and review of various memos and emails related thereto.
3/8/2023	T-50436-182	RKM	1.00	0.00	1.00	Conference call to discuss Response to TEP's Objections.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/9/2023	T-50300-40	DGS	2.00	0.00	2.00	Receive and review correspondence from Tom Kitch, Bob Miller, Greg Stucky, Ryan Meyer; receive and review joint motions and proposed orders regarding extensions; correspondence to counsel; receive and review correspondence from counsel.
3/10/2023	T-50436-188	RKM	2.80	0.00	2.80	Draft response to TEP's Objections.
3/13/2023	T-50429-184	EKA	0.10	0.00	0.10	Review email correspondence between class counsel.
3/13/2023	T-50329-37	RKM	6.80	0.00	6.80	Review and revise Response to TEP's Objections and conference call with Mr. Kitch regarding same.
3/14/2023	T-50329-25	DGS	0.40	0.00	0.40	Receive and review correspondence from Ryan K. Meyer; correspondence to Mr. Meyer; receive and review correspondence from Gregory J. Stucky, Bob Miller, Emily Arida.
3/14/2023	T-50429-192	EKA	2.10	0.00	2.10	Draft, review and revise response to TEP's objection.
3/14/2023	T-50427-7	GJS	2.00	0.00	2.00	Review of Ryan's draft and emails re same.
3/14/2023	T-50329-38	RKM	2.10	0.00	2.10	Review and revise Response to TEP's Objections.
3/15/2023	T-50337-23	DGS	0.30	0.00	0.30	Telephone conference with Bob Miller.
3/16/2023	T-50437-4	RKM	2.00	0.00	2.00	Draft, review, and revise Response to TEP's Objection.
3/17/2023	T-50437-7	RKM	3.00	0.00	3.00	Draft, review, and revise Response to TEP's Objections.
3/18/2023	T-50427-8	GJS	4.00	0.00	4.00	Review and revise draft of Response.
3/20/2023	T-50362-56	DGS	2.00	0.00	2.00	Review of Gregory J. Stucky's draft of response to TEP's Objection; revise draft; correspondence to counsel regarding same; receive and review correspondence from Ryan Meyer and Bob Miller.
3/20/2023	T-50427-9	GJS	2.00	0.00	2.00	Review of Dave's draft and review of Ryan's draft.
3/20/2023	T-50362-35	RKM	0.60	0.00	0.60	Review and analyze most recent draft of Response to TEP's objections.
3/21/2023	T-50384-30	DGS	2.40	0.00	2.40	Review and revise draft of response to TEP's objection; conference with Ryan K. Meyer; correspondence to counsel.
3/21/2023	T-50384-31	DGS	0.30	0.00	0.30	Receipt and review of correspondence regarding draft response to objection.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/21/2023	T-50427-10	GJS	2.00	0.00	2.00	Re-draft of Response; review of Bob's re-draft; review of Nate's re-draft, and emails re same.
3/22/2023	T-50384-36	DGS	0.40	0.00	0.40	Zoom conference with Nate Kever, Bob Miller, Gregory J. Stucky, and Ryan K. Meyer.
3/23/2023	T-50437-25	RKM	2.70	0.00	2.70	Draft, review, and revise Response to TEP's Objection.
3/24/2023	T-50437-28	RKM	3.90	0.00	3.90	Draft, review, and revise Response to TEP's Objection.
3/26/2023	T-50427-13	GJS	2.00	0.00	2.00	Review of final draft of response and emails related thereto.
3/26/2023	T-50437-30	RKM	1.10	0.00	1.10	Draft, review, and revise Response to TEP's Objection.
3/28/2023	T-50410-52	RKM	1.70	0.00	1.70	Final review and revisions of Response to TEP's Objection to Magistrate's Recommendation.
3/30/2023	T-50437-53	DGS	1.50	0.00	1.50	Review of TEP response to objection; receive and review correspondence from counsel.
3/31/2023	T-50437-57	DGS	0.80	0.00	0.80	Receive and review correspondence from counsel regarding possible reply.
4/6/2023	T-50455-64	DGS	2.30	0.00	2.30	Receive and review correspondence from Ryan K. Meyer regarding TEP's notice of supplemental authority; correspondence to Mr. Meyer; review of Order from D.N.M.; review of TEP's response to our objection to Magistrate's recommendation.; conference with Ryan K. Meyer.
4/6/2023	T-50479-72	RKM	2.50	0.00	2.50	Review and analyze TEP's notice of supplemental authority and Anderson Order. Email communication with counsel regarding same.
4/7/2023	T-50462-13	DGS	1.60	0.00	1.60	Conference with Ryan K. Meyer; review of pleadings; Zoom conference with Bob Miller, Nate Kever, aka, Ryan K. Meyer, Gregory J. Stucky , Thomas D. Kitch.
4/7/2023	T-50575-138	EKA	2.90	0.00	2.90	Review of state summary judgment motions; Zoom conference with class counsel.
4/7/2023	T-50567-2	GJS	2.00	0.00	2.00	Review of TEP's supplemental authority.
4/7/2023	T-50479-74	RKM	1.60	0.00	1.60	Conference call to discuss response to TEP's notice of supplemental authority. Review and analyze same.
4/10/2023	T-50479-22	DGS	4.40	0.00	4.40	Draft response to TEP's notice of supplemental authority.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/11/2023	T-50479-94	RKM	1.30	0.00	1.30	Revise response to Notice of Supplemental Authority.
4/11/2023	T-50491-47	RKM	2.40	0.00	2.40	Revise response to Notice of Supplemental Authority.
4/12/2023	T-50567-7	GJS	2.00	0.00	2.00	Review of Response to Supplemental Authority and emails relating thereto.
4/12/2023	T-50491-48	RKM	2.60	0.00	2.60	Draft and revise Response to Notice of Supplemental Authority.
4/13/2023	T-50491-56	DGS	1.40	0.00	1.40	Receive and review correspondence from counsel regarding response to notice of supplemental authority; review of NM case; law study regarding implied covenant to market in NM.supp.
4/15/2023	T-50567-11	GJS	5.00	0.00	5.00	Work one response to supplemental authority.
4/16/2023	T-50567-12	GJS	3.00	0.00	3.00	Revise response to supplemental authority.
4/17/2023	T-50522-24	DGS	4.00	0.00	4.00	Revise response to TEP's notice of supplemental authority.
4/17/2023	T-50577-65	RKM	1.60	0.00	1.60	Review and Revise Response to TEP's Supplemental Authority.
4/18/2023	T-50577-70	RKM	0.30	0.00	0.30	Conference call with Mr. Stucky to discuss changes to response to TEP's Supplemental Authority.
4/19/2023	T-50522-30	DGS	0.30	0.00	0.30	Review of filed response to supplemental authority.
4/19/2023	T-50522-31	DGS	1.00	0.00	1.00	Revise response to TEP's notice of supp. authority.
4/20/2023	T-50529-56	DGS	0.50	0.00	0.50	Receive and review correspondence from counsel.
6/16/2023	T-50872-147	EKA	1.00	0.00	1.00	Review memo from Bob regarding gathering and processing costs; review of emails regarding the same.
7/7/2023	T-51115-10	DGS	0.40	0.00	0.40	Receive and review correspondence from Mary Ellen Denomy; Receive and review correspondence from Bob Miller; Receive and review correspondence from Bob Miller.
7/10/2023	T-51115-18	DGS	0.50	0.00	0.50	Receive and review correspondence from Bob Miller; Receive and review correspondence from Nate Keever.
7/11/2023	T-51115-22	DGS	0.70	0.00	0.70	Receive and review correspondence from Mary Ellen Denomy, Bob Miller, Phyllis Bourque.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
8/10/2023	T-51460-28	DGS	0.50	0.00	0.50	Receive and review correspondence from Nate Keever re other TEP lawsuits.
8/14/2023	T-51460-38	DGS	1.00	0.00	1.00	Receive and review correspondence from Mary Ellen Denomy; review of spreadsheet re gathering and fuel deductions.
8/24/2023	T-51460-66	DGS	1.00	0.00	1.00	Receive and review correspondence from Chris Chrisman and Nate Keever re processing claim; Correspondence to counsel.
8/25/2023	T-51460-67	DGS	1.00	0.00	1.00	Receive and review correspondence from Chris Chrisman and Nate Keever re processing claim; Receive and review correspondence from Bob Miller.
9/21/2023	T-51647-37	DGS	1.00	0.00	1.00	Receive and review Judge Domenico's order certifying class; Conference with Ryan K. Meyer re same; Conference with Emily K. Arida re same.
9/21/2023	T-51645-63	EKA	0.70	0.00	0.70	Review of the court's order certifying the class.
9/21/2023	T-51648-73	RKM	3.00	0.00	3.00	Receive Class Certification Order and review and analyze same.
9/22/2023	T-51647-42	DGS	0.50	0.00	0.50	Receive and review correspondence from Gregory J. Stucky; Receive and review correspondence from Ryan K. Meyer.
9/28/2023	T-51647-51	DGS	1.50	0.00	1.50	Review of file; Zoom conference with Nate Keever, Bob Miller, Thomas D. Kitch, and Ryan K. Meyer.
9/28/2023	T-51647-52	DGS	1.50	0.00	1.50	Rceive and eview of correspondence from Mary Ellen Denomy.
9/28/2023	T-51638-14	RKM	1.60	0.00	1.60	Conference call with counsel to discuss strategy in light of favorable ruling on class certification. Prepare for same.
10/6/2023	T-51904-23	EKA	1.60	0.00	1.60	Review of interlocutory appeal pleading from TEP; Zoom conference with class counsel regarding response to TEP's appeal.
10/6/2023	T-51861-2	GJS	4.00	0.00	4.00	Review of response to motion to Release Judgment; review of Motion to Substitute, and various emails related thereto.
10/6/2023	T-51711-8	LWV	0.50	0.00	0.50	Legal research re: "death knell" argument in opposition to class certification.
10/6/2023	T-51843-30	RKM	1.20	0.00	1.20	Review and analyze TEP's petition for appeal of class cert opinion.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/6/2023	T-51843-32	RKM	1.00	0.00	1.00	Conference call with counsel to discuss TEP's Petition to appeal.
10/6/2023	T-51843-34	RKM	1.60	0.00	1.60	Research death knell argument.
10/10/2023	T-51914-20	DGS	2.50	0.00	2.50	Receive and review correspondence from Bob Miller; Receive and review correspondence from Ryan K. Meyer; review of Bob's outline/draft of answer to TEP's petition for permission to appeal.
10/10/2023	T-51861-6	GJS	3.00	0.00	3.00	Review of initial draft of Answer to edition, and email regarding same.
10/10/2023	T-51711-19	LWV	2.60	0.00	2.60	Conferences with Ryan Meyer; review relevant documents and prepare entry of appearance, disclosure of interested parties, and motion for extension of time to respond to petition for leave to appeal; review pertinent rules; telephone conference with appellate clerk's office.
10/10/2023	T-51843-45	RKM	0.50	0.00	0.50	Work on disclosure requirement for the Tenth Circuit.
10/11/2023	T-51860-13	RKM	4.10	0.00	4.10	Draft, review, and revise Response to Petition to Appeal Class Cert decision.
10/12/2023	T-51860-17	RKM	4.00	0.00	4.00	Draft, review, and revise Response to Petition to appeal Class Cert decision.
10/12/2023	T-51860-19	RKM	2.80	0.00	2.80	Draft, review, and revise response to Petition to appeal class cert opinion.
10/13/2023	T-51861-7	GJS	3.00	0.00	3.00	Redraft of Answer.
10/13/2023	T-51860-25	RKM	2.00	0.00	2.00	Draft, review, and revise Response to Petition for permission to appeal class cert decision.
10/15/2023	T-51861-8	GJS	4.00	0.00	4.00	Redraft of Answer.
10/16/2023	T-51860-30	RKM	0.50	0.00	0.50	Conference call with Mr. Chrisman regarding scheduling.
10/16/2023	T-51860-33	RKM	3.50	0.00	3.50	Draft, review, and revise Response to Petition for permission to appeal class cert decision.
10/16/2023	T-51895-22	RKM	3.40	0.00	3.40	Draft, review, and revise Response to Petition for permission to appeal class cert decision.
10/17/2023	T-51914-27	DGS	4.70	0.00	4.70	Work on revisions to Answer in Opposition to TEP's Petition for permission to appeal; Receive and review correspondence from Gregory J. Stucky; ct gjs ; Correspondence to counsel; correspondence with Ryan K. Meyer.
10/17/2023	T-51861-9	GJS	4.00	0.00	4.00	Redraft of Answer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/17/2023	T-51860-35	RKM	1.60	0.00	1.60	Draft, review, and revise Response to Petition for permission to appeal.
10/17/2023	T-51860-40	RKM	2.60	0.00	2.60	Draft, review, and revise response to Petition for permission to appeal.
10/18/2023	T-51914-35	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller; Receive and review correspondence from Gregory J. Stucky; Telephone conference with Gregory J. Stucky; Conference with Ryan K. Meyer.
10/18/2023	T-51861-10	GJS	3.00	0.00	3.00	Review and Redraft of final version of Answer.
10/18/2023	T-51860-43	RKM	4.20	0.00	4.20	Draft, review and revise Response to petition for permission to appeal.
10/19/2023	T-51775-1	LWV	6.50	0.00	6.50	Comprehensive review and revisions to Answer brief and prepare for filing; conference with Ryan Meyer; telephone conference with 10th Circuit Clerk's office.
10/24/2023	T-51832-28	CLC	0.10	0.00	0.10	Preparation of draft of class notice.
10/26/2023	T-51826-1	LWV	1.00	0.00	1.00	Review deficiency notice; telephone conference with 10th Circuit Clerk's office; email exchanges with other attorneys; prepare and file disclosure statement.
10/27/2023	T-51831-4	LWV	0.30	0.00	0.30	Revise and file disclosure statement.
10/30/2023	T-51914-59	DGS	1.50	0.00	1.50	Telephone conference with Bob Miller; Telephone conference with Nate Keever and Bob Miller; review of Bob's discovery memo.
11/2/2023	T-52142-8	DGS	1.00	0.00	1.00	Receipt and review of invoice from Mary Ellen Denomy, CPA; Receive and review correspondence from Nate Keever regarding proposed schedule; Receive and Review correspondence from Ryan K. Meyer regarding same; Correspondence to Mr. Keever.
11/3/2023	T-52142-10	DGS	0.50	0.00	0.50	Conference with Ryan K. Meyer re class notice; Receive and review correspondence from Ryan K. Meyer to Chris Crisman; Receive and review correspondence from Mr. Chrisman.
11/6/2023	T-52142-14	DGS	2.10	0.00	2.10	Receive and review correspondence from Ryan K. Meyer regarding Class Notice; Receive and review correspondence from Nate Keever; Revise Class Notice; Correspondence to counsel re same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/6/2023	T-51959-1	RKM	2.50	0.00	2.50	Draft Class Notice.
11/7/2023	T-52142-18	DGS	1.30	0.00	1.30	Correspondence with Ryan K. Meyer, Gregory J. Stucky, Bob Miller re notice; Revise class notice; Search for Lindauer notice; Search for opt-out forms.
11/7/2023	T-52148-11	RKM	2.20	0.00	2.20	Review and revise Class Notice and opt out form.
11/8/2023	T-52142-24	DGS	2.70	0.00	2.70	Receive and review correspondence from Ryan K. Meyer; Receive and review correspondence from Gregory J. Stucky; Receive and review correspondence from Ryan K. Meyer; Zoom meeting with Chris Chrisman, Ryan K. Meyer, and Nate Keever regarding notice and plan for notice.
11/8/2023	T-51957-1	RKM	2.40	0.00	2.40	Review and revise Class Notice. Conference calls with TEP's counsel regarding same.
11/8/2023	T-52152-1	RKM	1.50	0.00	1.50	Review and revise class notice and opt out form. Email communication with TEP's counsel regarding same.
11/9/2023	T-52142-25	DGS	2.00	0.00	2.00	Receive and review correspondence from Ryan K. Meyer; Receive and review correspondence from Gregory J. Stucky; Receive and review correspondence from Ryan K. Meyer; Zoom meeting with Chris Chrisman, Ryan K. Meyer, and Nate Keever regarding notice and plan for notice.
11/9/2023	T-52142-27	DGS	2.50	0.00	2.50	Receive and review correspondence from Chris Chrisman with plan for notice to class; Receive and review correspondence from Gregory J. Stucky; Receive and review correspondence from Ryan K. Meyer; Receive and review correspondence from Bob Miller; Receive and review correspondence from Nate Keever; review of pleadings filed; Correspondence to Mr. Keever; Review of TEP's proposed reply brief.
11/9/2023	T-52154-3	RKM	1.00	0.00	1.00	Review and revise class notice and opt out form.
11/10/2023	T-52154-5	RKM	1.00	0.00	1.00	Review and revise joint submission and email communication with TEP's counsel regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/1/2023	T-52223-6	DGS	0.50	0.00	0.50	Review of file re expenses; calculation of division with Bob Miller.
1/10/2024	001756	DGS	1.00	0.00	1.00	Conference call with rkm, Nate Keever, Bob Miller & GJS; ct Mary Ellen Denomy and Phyllis Bourque.
1/10/2024	002500	RKM	1.00	0.00	1.00	Conference call with Nate, Dave, and Bob to discuss status and next steps in merits phase of the case.
1/11/2024	002153	DGS	0.50	0.00	0.50	rrc1 Phyllis Bourque re schedule; ct Ms.Bourque; ct1 counsel..
1/12/2024	002152	DGS	1.00	0.00	1.00	RRC1 Nate Keever; ct Mr. Keever; rrc1 Chris Chrisman re disclosures.
1/25/2024	003797	DGS	0.50	0.00	0.50	RRC1 Bob Miller; correspondence to Bob Miller; RRC1 Bob Miller.
2/9/2024	006195	DGS	0.30	0.00	0.30	RRC1 Nate Keever; CT1 Mr. Keever.
2/21/2024	007677	DGS	0.50	0.00	0.50	Receive and review correspondence from TDK1 re claims; Receive and review correspondence from Bob Miller.
2/22/2024	007676	DGS	0.40	0.00	0.40	Receive and review correspondence from TDK1; Receive and review correspondence from Bob Miller.
2/23/2024	008692	DGS	1.00	0.00	1.00	Receive and review correspondence from GJS, TDK; CT GJS, TDK.
2/25/2024	008074	DGS	0.50	0.00	0.50	TCW1 Ryan K. Meyer; Correspondence to Gregory J. Stucky and TDK1.
2/26/2024	008075	DGS	2.20	0.00	2.20	Review of court's order; Review and revise documents re class notice; Correspondence to counsel; Receive and review correspondence from Nate Keever; revise documents; RRC1 Nate Keever; Correspondence to Chris Chrisman and Michelle Seares.
2/27/2024	008077	DGS	0.30	0.00	0.30	Receive and review correspondence from Chris Chrisman.
2/28/2024	008362	DGS	1.50	0.00	1.50	RRC1 Michelle Seares; Review edits to documents; Telephone conference with Ms.Seares re edits to class notice docs; Telephone conference with Chris Chrisman;Correspondence to Counsel;
2/28/2024	008356	TSW	0.60	0.00	0.60	Revise and finalize Second Joint Submission of Proposed Notice and Class Notice

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/7/2024	012624	DGS	2.00	0.00	2.00	RRC1 TTKD1 ; Receive and review correspondence from Bob Miller; REview of file.
3/8/2024	012628	DGS	1.40	0.00	1.40	Receive and review corresponde Phyllis Bourque; Receive and review correspondence from Bob Miller; review of file.
3/8/2024	009860	TSW	0.30	0.00	0.30	Emails to/from Bob Miller regarding documents received from Holland Hart; correspondence to Bob sending USB drive with documents received from Holland Hart.
3/18/2024	010718	DGS	0.60	0.00	0.60	TCW1 Bob miller; RRC1 Michele Seares; Telephone conference with Nate Keever; Correspondence to Ms. Seares.
3/19/2024	012660	DGS	1.40	0.00	1.40	Receive and review correspondence from Michelle Seares re conference call; Correspondence to MNate Keever re same; Conference call with Nate Keever , Chris Chrisman, and Michelle Seares; TCW1 Bob Miller and Nate Keever.
3/22/2024	012668	DGS	1.00	0.00	1.00	Receive and review correspondence from Nate Keever's office re production by TEP; review o ffile.
3/23/2024	012674	DGS	0.50	0.00	0.50	Receive and review correspondence Nate Keever re mailing of class notice.
3/28/2024	012397	DGS	1.00	0.00	1.00	Conference call with Chris Chrisman, Michelle Seares; John Shepherd, Bob Miller, Nate Keever re 408 info, cost of service, gathering data, all to be produced.
3/29/2024	012396	DGS	0.50	0.00	0.50	Receive and review correspondence from Chris Chrisman re Rule 408 damages info; CT1 Gregory J. Stucky , TDK1, Ryan K. Meyer
4/1/2024	012678	DGS	1.00	0.00	1.00	Receive and review correspondence Bob Miller ; review of spreadsheets; Receive and review correspondence from Bob Miller with damage estimates; TCW1 Bob Miller.
4/4/2024	013282	TSW	0.20	0.00	0.20	Review Firm Discounted Transportation Discount Rate Agreement documents and email same to Ryan Meyer.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/5/2024	013383	DGS	5.50	0.00	5.50	Review of discovery requests and 30b6 topics; zoom meeting with TDK, RKM, Bob Miller & Nate Keever re discovery and case strategy; tcw Bob Miller; Correspondence to Bob; Receive and review correspondence from Bob Miller and Nate Keever; Telephone Conference with Gregory J. Stucky..
4/5/2024	017327	RKM	1.30	0.00	1.30	Conference call with counsel to discuss strategy and to do list.
4/7/2024	013658	DGS	0.60	0.00	0.60	Receive and review correspondence from Bob Miller, Nate Keever, TDK1
4/8/2024	013657	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller, Nate Keever, TDK1
4/9/2024	016788	DGS	1.00	0.00	1.00	Receive and review correspondence Bob Miller; review of file.
4/11/2024	014386	DGS	0.60	0.00	0.60	Receive and review correspondence from TDK1 , Gregory J. Stucky, Nate Keever.
4/12/2024	016701	RKM	1.00	0.00	1.00	Conference call with counsel to discuss strategy.
4/15/2024	014979	RKM	0.80	0.00	0.80	Work on merits discovery and conference with Ms. West regarding same.
4/15/2024	014662	TSW	1.00	0.00	1.00	Review and revise discovery requests.
4/16/2024	016772	DGS	0.50	0.00	0.50	Receive and review correspondence Bob Miller re phone call with Chrisman; Receive and review correspondence from Bob Miller re phone call with Mary Ellen Denomy.
4/16/2024	014704	TSW	1.40	0.00	1.40	Continue reviewing and revising discovery requests.
4/17/2024	016759	DGS	1.50	0.00	1.50	Receive and review correspondence Nate Keever, Bob Miller, review of file.
4/17/2024	014936	TSW	0.70	0.00	0.70	Gather documents regarding TransColorado agreements requested by our expert, Phyllis Bourque; email Phyllis Bourque the requested documents.
4/18/2024	016755	DGS	1.40	0.00	1.40	Receive and review correspondence Bob Miller and Phyllis Bourque.
4/19/2024	015216	DGS	1.50	0.00	1.50	Zoom meeting with Nate Keever, Gregory J. Stucky, and Ryan K. Meyer; Correspondence to GJs1 and TDK1.
4/23/2024	016751	DGS	0.50	0.00	0.50	Receipt and review of opt-outs.
4/24/2024	016753	DGS	1.50	0.00	1.50	RRc1 Phyllis Bourque re schedule; review of file.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/26/2024	015942	DGS	0.50	0.00	0.50	Receive and review correspondence from Nate Keever; RRC1 Ryan K. Meyer; Review of draft motion for modification of scheduling order and proposed order; Correspondence to Mr. Keever.
4/26/2024	016713	RKM	0.40	0.00	0.40	Conference call with Mr. Keever to discuss discovery requests and strategy.
4/29/2024	016373	DGS	1.00	0.00	1.00	TCW1 Gregory J. Stucky; Receive and review correspondence` from TDK1; Receive and review filed motion to modify scheduling order; RRC1 court re referral to magistrate.
5/1/2024	016849	DGS	0.20	0.00	0.20	RRC1 order from magistrate re phone conference to discuss schedule.
5/2/2024	017011	DGS	0.50	0.00	0.50	TCW1 Bob Miller; Receive and review correspondence from Nate Keever; Correspondence to Mr. Keever.
5/6/2024	017537	DGS	0.60	0.00	0.60	Receive and review correspondence Nate Keever; Zoom meeting with Mr. Keever, Bob Miller, and RKM1 re settlement overture from TEP and possible mediation.
5/6/2024	017404	RKM	0.40	0.00	0.40	Conference call with counsel.
5/13/2024	018145	TSW	0.30	0.00	0.30	Electronic mail (4) to/from Bob Miller, Mr. Keever and Becky Winegard regarding discovery; revise footnote in Devon parachute request.
5/17/2024	020864	DGS	0.50	0.00	0.50	
5/17/2024	020868	DGS	0.50	0.00	0.50	REceipt and review of request for exclusions.
5/20/2024	018906	DGS	1.00	0.00	1.00	Telephone conference with Ryan K. Meyer; telephone conference with Magistrate Neufeld and counsel; Receive and review correspondence from Nate Keever; Correspondence to counsel; Receive and review correspondence TDK1; CT1 TDK1
5/22/2024	019251	DGS	0.50	0.00	0.50	Review of correspondence and schedule; CT1 Phyllis Bourque re schedule; rrc1 PHyllis; Correspondence to Phyllis..
5/24/2024	020869	DGS	0.50	0.00	0.50	Receive and review correspondence from Nate Keever; review of file.
5/29/2024	020162	DGS	0.30	0.00	0.30	Telephone conference with Bob Miller re discovery, status conference with Magistrate, mediation.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/3/2024	020976	EKA	1.60	0.00	1.60	Review of working case outline in preparation of 6/4/24 conference with class counsel.
6/4/2024	021137	EKA	0.90	0.00	0.90	Review of issues to research based on case outline; telephone call with Bob Miller and rkm regarding issues to research.
6/10/2024	021834	DGS	2.00	0.00	2.00	Review of correspondence; prepare for conference call; Zoom meeting with Bob Miller, Nate Keever, Gregory J. Stucky, RKM 1.
6/10/2024	021736	EKA	0.60	0.00	0.60	Legal research regarding moratory interest and third part liability.
6/10/2024	021725	EMR	2.00	0.00	2.00	Research regarding statute of limitations tolls in oil and gas class actions.
6/10/2024	021696	JDH	3.10	0.00	3.10	Research / Memo drafting
6/10/2024	021707	JDH	1.50	0.00	1.50	Memo drafting
6/11/2024	021836	DGS	1.00	0.00	1.00	Receipt and review of correspondence from Nate Keever re mediation; Receive and review correspondence and instructions from mediator's office; Receipt and review of advance invoice for mediation.
6/11/2024	021764	EMR	2.90	0.00	2.90	Research regarding tolling statutes of limitations in oil and gas class actions.
6/12/2024	022049	DGS	1.60	0.00	1.60	Review of MED spreadsheets; Zoom meeting with Bob, Nate & Mary Ellen to discuss missing data, additional tasks; rrc1 Bob; review of explanation of damages; Receive and review correspondence Nate ; Correspondence to Bob.
6/12/2024	022038	EKA	0.90	0.00	0.90	Legal research regarding moratory interest.
6/12/2024	022048	JDH	1.10	0.00	1.10	Research / Memo drafting
6/13/2024	022291	DGS	0.30	0.00	0.30	Receive and review correspondence from Mary Ellen Denomy; RRC1 Bob Miller;
6/13/2024	022149	EKA	1.70	0.00	1.70	Legal research regarding moratory interest.
6/13/2024	022145	JDH	0.90	0.00	0.90	Memo Drafting
6/13/2024	022286	JDH	5.40	0.00	5.40	Memo drafting
6/14/2024	022339	EMR	2.70	0.00	2.70	Research regarding tolling statutes of limitations in oil and gas class actions.
6/14/2024	022306	JDH	1.30	0.00	1.30	Memo drafting
6/17/2024	022414	EKA	1.80	0.00	1.80	Legal research regarding moratory interest and third party gain.
6/17/2024	022416	EMR	5.30	0.00	5.30	Drafting memo regarding tolling statutes of limitations in oil and gas class actions.
6/17/2024	022444	JDH	1.30	0.00	1.30	Completed Memo

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
6/19/2024	022842	DGS	1.00	0.00	1.00	Review of fiel; Zoom meeting with Bob Miller,Nate Keever, , Ryan K. Meyer re 30 discovery, discovery from TEP.
6/24/2024	023386	DGS	0.50	0.00	0.50	Receive and review correspondence from Gregory J. Stucky, TDK1, Bob Miller.
6/25/2024	023385	DGS	1.30	0.00	1.30	Zoom conference with Bob Miller, Nate Keever, and RKM1; Correspondence to Gregory J. Stucky; Review of Scout Petroleum file to find leases with disclaimers of implied covenants; Correspondence to Bob Miller..
6/25/2024	023413	RKM	0.70	0.00	0.70	Conference call to discuss responses to TEP's discovery.
6/26/2024	023796	DGS	1.70	0.00	1.70	REview of file; Work on 30b6 Topics.
6/26/2024	023700	RKM	1.70	0.00	1.70	Revise responses to TEP's discovery requests.
6/26/2024	023724	RKM	1.40	0.00	1.40	Review and revise responses to discovery.
6/27/2024	023845	DGS	1.00	0.00	1.00	Work on 30b6 Topics.
6/27/2024	023822	RKM	0.40	0.00	0.40	Conference call with Bob regarding discovery responses.
6/28/2024	023884	DGS	3.20	0.00	3.20	Work on 30b6 topics.
6/28/2024	023904	EKA	0.40	0.00	0.40	Telephone call with Bob Miller and rkm regarding research issues and discovery responses.
7/1/2024	024439	DGS	0.50	0.00	0.50	Review of invoices from Mary Ellen Denomy and PHyllis Bourque; Correspondence with TSW1.
7/1/2024	024213	EKA	1.20	0.00	1.20	Draft and revise discovery requests to Oxy.
7/2/2024	024797	DGS	1.00	0.00	1.00	Receive and review correspondence Bob Miller, Mary Ellen Denomy, Nate Keever,Chris Chrisman.
7/2/2024	024570	TSW	0.40	0.00	0.40	Review and revise TEP 30(B)(6) Merits Topics.
7/3/2024	024795	DGS	1.00	0.00	1.00	Telephone conference with Bob Miller; Receive and review correspondence from Bob Miller and Mary Ellen Denomy.
7/3/2024	024667	EKA	0.20	0.00	0.20	Email correspondence to class counsel regarding spreadsheet.
7/5/2024	024796	DGS	1.00	0.00	1.00	Telephone conference with GJS1; Receive and review correspondence Mary Ellen Denomy; receipt and review of spreadsheet.
7/8/2024	025025	DGS	0.30	0.00	0.30	Receive and review correspondence from Bob Miller and Nate Keever.
7/9/2024	024992	EKA	2.40	0.00	2.40	Legal research regarding relation back and adding new defendant.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
7/10/2024	025133	DGS	1.00	0.00	1.00	Receive and review correspondence from Becky Winegard;review of documents; Zoom conference with Nate, Bob, RKM1.
7/10/2024	025066	EKA	2.50	0.00	2.50	Legal research regarding relation back and adding new defendant.
7/10/2024	028306	RKM	1.00	0.00	1.00	Conference call to discuss strategy and to do list.
7/11/2024	025298	EKA	0.80	0.00	0.80	Legal research regarding relation back and adding new defendant.
7/12/2024	027937	DGS	2.00	0.00	2.00	Receive and review correspondence Mary Ellen Denomy; Review of spreadsheets; Receive and review correspondence Bob Miller; Receive and review correspondence Gregory J. Stucky re 30b6 topics.
7/12/2024	025365	EKA	2.10	0.00	2.10	Legal research regarding adding a defendant and relation back.
7/16/2024	027884	DGS	1.30	0.00	1.30	Conference call; work on 30b6 and contention interrogatories.
7/17/2024	027885	DGS	1.00	0.00	1.00	work on 30b6 and contention interrogatories.
7/17/2024	025823	TSW	0.10	0.00	0.10	Electronic mail to Bob Miller with discovery requests.
7/18/2024	025898	EKA	0.90	0.00	0.90	Legal research regarding adding a defendant and relation back.
7/19/2024	026332	DGS	1.00	0.00	1.00	Review of file; work on draft contention interrogatories
7/19/2024	026425	EKA	3.20	0.00	3.20	Telephone call with tdk and gjs regarding the duty of a producer to develop and whether firm transportation costs can be charged against the royalty owner; research regarding the same.
7/22/2024	026331	DGS	2.80	0.00	2.80	REview of file; work on contention interrogatories
7/22/2024	026318	EKA	0.70	0.00	0.70	Legal research regarding the duty of a producer to develop and whether firm transportation costs can be charged against the royalty owner.
7/24/2024	026574	DGS	0.50	0.00	0.50	Zoom meeting with Bob, nate, GJS1 , Ryan K. Meyer. re discovery.
7/25/2024	026734	EKA	0.40	0.00	0.40	Review of response drafts to OXY's discovery requests.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
8/8/2024	028756	EKA	1.60	0.00	1.60	Legal research regarding whether a producer can require royalty owners to bare a pro-rata share of the cost to secure firm transportation rights.
8/12/2024	029155	EKA	2.30	0.00	2.30	Legal research regarding whether a producer can require royalty owners to bare a pro-rata share of the cost to secure firm transportation rights.
8/23/2024	030541	DGS	3.40	0.00	3.40	Zoom meeting with Bob Miller, Nate Keever, Gregory J. Stucky, Ryan K. Meyer; Review and revise discovery responses;
8/23/2024	030369	TSW	0.30	0.00	0.30	Draft mediation submission letter.
8/26/2024	030510	DGS	0.50	0.00	0.50	Receive and review correspondence from Bob Miller; Correspondence to Bob..
8/26/2024	030542	DGS	1.00	0.00	1.00	Receive and review correspondence from Bob Miller, Nate Keever; CT1 Bob re discovery responses.
8/28/2024	031026	DGS	0.60	0.00	0.60	tcw1 Bob Miller and Ryan K. Meyer; review of file re Rule 45 requests.
8/28/2024	030952	RKM	3.60	0.00	3.60	Review and revise responses to discovery.
8/29/2024	031083	DGS	2.00	0.00	2.00	Review of file re Rule 45 requests; Correspondence to Becky Weingard; RRC1 Bob Miller, Nate Keever.
8/29/2024	031116	TSW	0.30	0.00	0.30	Telephone conference with Becky Winegard and Ryan Meyer regarding reviewing and indexing discovery documents.
8/30/2024	031298	RKM	3.50	0.00	3.50	Conference call with opposing counsel to discuss accounting data.
8/30/2024	031255	TSW	3.50	0.00	3.50	Review and index documents produced by TEP.
9/3/2024	031960	DGS	0.80	0.00	0.80	Receive and review correspondence from Bob Miller, Becky Winegard, Ryan K. Meyer.
9/3/2024	031569	EKA	0.30	0.00	0.30	Review of draft of third party discovery follow up letter.
9/3/2024	031900	RKM	0.80	0.00	0.80	Gather documents for Mary Ellen.
9/3/2024	031693	TSW	1.30	0.00	1.30	Review and index documents produced by TEP.
9/4/2024	031959	DGS	0.80	0.00	0.80	Receive and review correspondence Bob Miller' Correspondence to Bob Miller; RRC1 Nate Keever; RRc1 Becky Winegard; Conference with RKM1;
9/4/2024	035913	RKM	0.90	0.00	0.90	Gather and send document to Ms. Denomy.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/4/2024	031950	TSW	2.50	0.00	2.50	Review and index documents produced by TEP.
9/5/2024	032092	TSW	1.60	0.00	1.60	Review response status of third-party subpoena; research contact information for third-party; draft follow-up letters to third-party subpoena.
9/7/2024	032326	TSW	4.50	0.00	4.50	Review and index documents produced by TEP.
9/9/2024	032568	TSW	3.30	0.00	3.30	Review and index documents produced by TEP.
9/10/2024	032910	DGS	5.50	0.00	5.50	Receive and review correspondence from Paul Sculley of Kinder Morgan re third-party discovery requests; review of file. Review of Bob's draft of mediation letter; TCW1 GJS` and Ryan K. Meyer; Zoom call with Bob, GJ1 , and RKM1
9/10/2024	032720	TSW	0.30	0.00	0.30	Revise third party subpoena follow-up letters; electronic mail to Dave Seely; electronic mail to Ms. James regarding same.
9/11/2024	032863	CLC	5.20	0.00	5.20	Reviewed draft of brief and searched documents for copies of all cites to documents in brief and made copies of same.
9/11/2024	032911	DGS	5.50	0.00	5.50	Receive and review correspondence from Paul Sculley of Kinder Morgan re third-party discovery requests; review of file. Review of Bob's draft of mediation letter; TCW1 GJS` and Ryan K. Meyer; Zoom call with Bob, GJ1 , and RKM1
9/11/2024	036905	RKM	1.60	0.00	1.60	Conference call with counsel to discuss mediation submission.
9/11/2024	036896	RKM	0.80	0.00	0.80	Conference call with Mr. Seely and Mr. Stucky regarding mediation submission.
9/11/2024	032931	TSW	3.00	0.00	3.00	Review and index documents produced by TEP; electronic mail to Becky Winegard regarding missing documents.
9/12/2024	032985	CLC	1.60	0.00	1.60	Continued work on reviewing and searching for documents cited in brief.
9/12/2024	032915	DGS	1.20	0.00	1.20	Review of file; Correspondence to Paul Sculley; Receive and review correspondence from Mr. Sculley; Correspondence to Mr. Sculley.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/12/2024	032916	DGS	1.20	0.00	1.20	Review of file; Correspondence to Paul Sculley; Receive and review correspondence from Mr. Sculley; Correspondence to Mr. Sculley.
9/12/2024	036904	RKM	1.50	0.00	1.50	Draft and revise Sefcovic Settlement portion of mediation statement.
9/12/2024	033028	TSW	1.50	0.00	1.50	Review and index documents produced by TEP.
9/16/2024	033405	DGS	0.50	0.00	0.50	Receive and review correspondence from Kinder Morgan attorney Paul Sculley re subpoena to TransCo.
9/17/2024	033404	DGS	0.50	0.00	0.50	Receive and review correspondence Becky Winegard; CT Kinder Morgan attorney Paul Sculley.
9/17/2024	036932	RKM	2.80	0.00	2.80	Work on mediation submission exhibits and documents to send to Mary Ellen.
9/18/2024	034299	DGS	3.50	0.00	3.50	Work on mediation letter.
9/18/2024	036951	RKM	0.50	0.00	0.50	Provide documents to Mary Ellen.
9/18/2024	033630	TSW	1.30	0.00	1.30	Review and index documents produced by TEP.
9/19/2024	034300	DGS	2.00	0.00	2.00	Review of Phyllis Bourque's reports and affidavit.
9/19/2024	036969	RKM	3.80	0.00	3.80	Draft, review, and revise mediation submission.
9/19/2024	035076	TSW	0.20	0.00	0.20	Electronic mail (4) to Becky Winegard and mediator regarding mediation documents and payment.
9/20/2024	036912	RKM	1.10	0.00	1.10	Conference call with counsel to discuss mediation submission.
9/20/2024	035073	TSW	0.10	0.00	0.10	Electronic mail (3) to mediator, Ryan Meyer and Cori Anderson regarding mediation.
9/23/2024	034048	CLC	3.80	0.00	3.80	Worked on preparing exhibits to mediation submission,
9/23/2024	034277	DGS	1.00	0.00	1.00	REview of reports; TEAMS meeting with Gregory J. Stucky and Ryan K. Meyer re PHyllis Bourque; Receive and review correspondence from Nate Keever, Bob Miller. re mediation submission.
9/23/2024	037445	RKM	6.30	0.00	6.30	Draft, review, and revise mediation submission and exhibits thereto.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/24/2024	034236	CLC	7.40	0.00	7.40	Continued work exhibits, notebooks, checking cites and documents for mediation brief.
9/24/2024	034284	DGS	4.20	0.00	4.20	Correspondence to Kinder Morgan Attorney Paul Sculley; Correspondence to Mr. Sculley; Correspondence to Ryan K. Meyer RR1 Ryan K. Meyer; RView and revise mediation letter; Correspondence to counsel re same; Telephone Conferences with Bob Miller re third party discovery and Phyllis Bourque; Correspondence to Bob; Receive and review correspondence from Ryan, Bob, Nate Kever, Bob Miller. re mediation submission.
9/25/2024	034278	DGS	2.00	0.00	2.00	Correspondence from Kinder Morgan Attorney Paul Sculley; Correspondence to Mr. Sculley; Correspondence to Ryan K. Meyer RRc1 Ryan K. Meyer' tcw1 Bob Miller re 3rd party discovery responses; CT1 Chris Chrisman re mediation submission.
9/26/2024	034505	DGS	2.00	0.00	2.00	RRc1 Chris Chrisman; review of TEP spreadsheet; Correspondence to counsel; Receive and review correspondence from Gregory J. Stucky; RRC1 Bob Miller; Telephone conference with Bob Miller; Telephone conference with Tammy S. West, Telephone conference with Mary Giovanni at JAMS; CT counsel.
9/27/2024	034577	TSW	0.10	0.00	0.10	Electronic mails to/from Mary Giovanini with JAMS regarding mediation submission documents.
9/30/2024	035206	DGS	3.60	0.00	3.60	Revise Exhibit List; Zoom meeting with Chris Chrisman, John Shepherd, Michelle Seares, Bob, Nate, GJs, RKM; rrc1 Chris Chrisman, Bob Miller, RKM; tcw1 Kelly Ryan at REX; Telephone conference with Jim Henderson at Davis, Graham & Stubbs; receive and review TEP's mediation submission..
9/30/2024	037464	RKM	2.00	0.00	2.00	Conference with TEP's counsel regarding 30(b)(6) deposition topics.
9/30/2024	037470	RKM	1.50	0.00	1.50	Prepare index and index of exhibits and send same to mediator.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
9/30/2024	034936	TSW	0.20	0.00	0.20	Prepare an exhibit to supplement our mediation submission letter; electronic mail to mediator; electronic mail to Becky Winegard.
10/1/2024	035204	DGS	2.50	0.00	2.50	Zoom meeting with Bob, Nate, GJs, RKM; rrc1 RKM; tcw1 Kelly Ryan at REX; Telephone conference with Jim Henderson at Davis, Grahan & Stubbs.
10/1/2024	039001	RKM	0.90	0.00	0.90	Conference call with counsel to discuss mediation.
10/1/2024	039017	RKM	1.60	0.00	1.60	Review Sefcovic release case law and argument.
10/2/2024	035548	CLC	0.50	0.00	0.50	Receipt of TEP's exhibits and preparation of notebook containing their submission and exhibits for counsel.
10/2/2024	035846	DGS	3.40	0.00	3.40	Prepare for mediation.
10/2/2024	035503	EKA	0.60	0.00	0.60	Review mediation submissions of both parties.
10/2/2024	039020	RKM	4.40	0.00	4.40	Review and analyze TEP's mediation submission and other documents in preparation for mediation.
10/3/2024	035849	DGS	3.20	0.00	3.20	RRC RKM and Nate Keever re postponement of mediation due to illness of mediator; Zoom Conference with Nate Keever, Bob Miller, Ryan K. Meyer, Gregory J. Stucky; Receive and review correspondence Nate Keever; Receive and review correspondence from TDK1
10/3/2024	039026	RKM	1.00	0.00	1.00	Conference call with counsel to discuss forensic accountant among other things.
10/4/2024	035850	DGS	4.00	0.00	4.00	Review of file; Telephone conference with Jim Henderson of Davis, Graham & Stubbs re possible pipeline depositions; Telephone conference with attorney Paul Sculley of KN re possible pipeline depositions. Telephone call to Kelly Murphy of Tallgrass Energy re possible deposition of REX Pipeline; Correspondence to Mr. Sculley; Correspondence to Mr. Henderson; Receive and review of memo from John Ralston re proof of class membership.
10/8/2024	036227	RKM	0.50	0.00	0.50	Attend status conference with magistrate judge.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/9/2024	039552	DGS	4.00	0.00	4.00	correspondence with counsel; Review of file.
10/9/2024	036313	RKM	1.00	0.00	1.00	Conference call with counsel.
10/10/2024	039551	DGS	1.70	0.00	1.70	Review of file; correspondence with counsel.
10/11/2024	039544	DGS	2.50	0.00	2.50	Review of file; correspondence with counsel.
10/11/2024	039549	DGS	1.00	0.00	1.00	Review of file.
10/12/2024	036850	TSW	1.50	0.00	1.50	Review and index documents produced by TEP.
10/13/2024	036851	TSW	2.30	0.00	2.30	Review and index documents produced by TEP.
10/14/2024	039564	DGS	2.70	0.00	2.70	REview of file; correspondence with Jeff Quirin; Receive and review correspondence Bob Miller re additional experts.
10/15/2024	037238	DGS	2.50	0.00	2.50	Receive and review correspondence from Chirs Chrisman; Correspondence to Mr. Chrisman; Telephone conference with Ryan K. Meyer; Telephone conference with Bob Miller; tcw1 TSW1; review of file.
10/15/2024	037111	TSW	1.00	0.00	1.00	Review and index documents produced by TEP.
10/15/2024	037225	TSW	1.00	0.00	1.00	Review Miller's memo regarding Facts Supporting JPRF Class Claims for purposes of gathering documents to send to expert Phyllis Bourque; review documents previously sent to Ms. Bourque.
10/16/2024	037236	DGS	3.40	0.00	3.40	Zoom meeting with RKM1, Jeff Quirin and Laura Mossman; Telephone conference with Chris Chrisman re third-party discovery; Zoom with Bob Miller, Nate Keever, Gregory J. Stucky, and RKM1; telephone call to Paul Sculley and Kelly Martin re third-party discovery
10/16/2024	037479	RKM	1.10	0.00	1.10	Conference call with counsel to discuss experts, depositions, and mediation.
10/16/2024	037234	TSW	1.70	0.00	1.70	Review discovery documents for purposes of providing to expert Bourque.
10/17/2024	039541	DGS	3.00	0.00	3.00	Review of file; correspondence with counsel.
10/17/2024	037461	TSW	2.50	0.00	2.50	Continue review of discovery documents for purposes of providing to expert Bourque; email to Dave Seely regarding same.
10/18/2024	039542	DGS	3.30	0.00	3.30	Review of file; correspondence with counsel.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/18/2024	037635	EKA	0.30	0.00	0.30	Review of email correspondence between class members regarding upcoming settlement meeting and discussion of claims.
10/18/2024	037605	TSW	1.00	0.00	1.00	Review and index documents produced by TEP.
10/21/2024	037740	RKM	0.20	0.00	0.20	Conference call with Mr. Seely regarding mediation.
10/22/2024	039537	DGS	3.00	0.00	3.00	Review of file; correspondence with counsel.
10/22/2024	039538	DGS	3.00	0.00	3.00	Review of file; correspondence with counsel.
10/22/2024	037939	JWR	0.10	0.00	0.10	Conference w/ R. Meyer re need for legal research re identical factual predicate doctrine
10/22/2024	037940	JWR	2.60	0.00	2.60	Analyzed federal law re identical factual predicate doctrine.
10/22/2024	037941	JWR	1.00	0.00	1.00	Began drafting memo re circuit case holdings re identical factual predicate doctrine.
10/22/2024	037862	TSW	0.50	0.00	0.50	Revise expert engagement letter to Dr. Quirin; draft witness log for Ryan Meyer.
10/23/2024	039539	DGS	2.80	0.00	2.80	Review of file; correspondence with counsel.
10/23/2024	038078	JWR	6.50	0.00	6.50	Contemporaneous legal research re identical factual predicate doctrine and drafting of memo re same.
10/24/2024	038501	CLC	0.40	0.00	0.40	Preparation of documents for upcoming meeting for mediation.
10/24/2024	038631	DGS	3.70	0.00	3.70	REview of mediation documents; prepare for meeting in Denver; Zoom meeting with Nate, Bob, and Greg.
10/24/2024	038300	JWR	3.10	0.00	3.10	Finalized research and draft of memo re identical factual predicate doctrine.
10/24/2024	038685	RKM	4.90	0.00	4.90	Preparation for informal mediation in Denver.
10/24/2024	038198	JWR	0.10	0.00	0.10	Drafted email to R. Meyer re identical factual predicate memo.
10/25/2024	038630	DGS	18.00	0.00	18.00	Travel from KC to Denver for meeting with TEP's counsel re possible settlement; attend meeting; return to Wichita.
10/25/2024	038684	RKM	16.00	0.00	16.00	Attend informal mediation in Denver.
10/25/2024	038414	JWR	0.10	0.00	0.10	Email to R. Meyer re cases dealign with factual predicate.
10/29/2024	039175	DGS	2.40	0.00	2.40	TCW1 attorneys Rich Bonnifield and Michael Nolan of Husch, Blackwell, regarding discovery to Rockies Express Pipeline; review of file.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
10/29/2024	039177	DGS	0.30	0.00	0.30	Conference with TSW1 re documents for Phyllis Bourque.
10/30/2024	039178	DGS	0.30	0.00	0.30	Conference with TSW1 re documents for Phyllis Bourque.
10/30/2024	039278	DGS	2.10	0.00	2.10	Review and analysis of Bruce Chrisman's hearing testimony; review of 30b6 notice topics for Bruce Chrisman. settlement offer.
10/31/2024	039277	DGS	0.50	0.00	0.50	Review and analysis of TEP's settlement offer.
10/31/2024	039533	RKM	0.70	0.00	0.70	Review and analyze TEP settlement offer.
11/1/2024	039526	DGS	2.50	0.00	2.50	Zoom meeting with bob zMiller, Nate Keever, TDK1 , Gregory J. Stucky, and RKM1 to discuss M erit's settlement p[roposal and possible response.
11/1/2024	039550	RKM	3.00	0.00	3.00	Review and analyze TEP's settlement offer and conference call with counsel to discuss same.
11/1/2024	043595	TSW	1.50	0.00	1.50	Review, organize and index new TEP documents.
11/2/2024	039658	TSW	3.00	0.00	3.00	Review and index documents produced by TEP.
11/4/2024	040227	RKM	1.10	0.00	1.10	Obtain documents for depositions and communication with Mr. Miller regarding same.
11/5/2024	040221	CLC	0.20	0.00	0.20	Preparation of set of records for counsel.
11/5/2024	043537	DGS	3.00	0.00	3.00	Receive and review correspondence from Katherine Bell reTEP production; work on discovery.
11/5/2024	040226	RKM	2.50	0.00	2.50	Review and analyze and obtain documents for Killian's deposition.Communication with Mr. Miller regarding same.
11/6/2024	043528	DGS	3.00	0.00	3.00	Telephone conference with Bob re PHyllis Bourque; Correspondence to Phyllis; Receive and review correspondence Phyllis; Receive and review correspondence from Katherine Bell re production; Recept of documents.
11/6/2024	040343	JWR	0.10	0.00	0.10	Conference w/ D. Seely re need to outline expert Bourque's report.
11/6/2024	040345	JWR	3.30	0.00	3.30	Analyzed expert Bourque's report while contemporaneously creating outline for use in motions.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/6/2024	040275	TSW	0.90	0.00	0.90	Electronic mail to Phyllis Bourque third-party subpoenaed documents to review; review documents previously provided to Ms. Bourque to prepare log.
11/7/2024	043513	DGS	4.00	0.00	4.00	Receipt and review of deposition notices; Receive and review correspondence Bob Miller re depositions; review of memo.; review of John Ralston's memo re Phyllis Bourque.
11/7/2024	040522	JWR	2.20	0.00	2.20	Finalized outline of expert Bourque's report.
11/7/2024	040489	TSW	5.10	0.00	5.10	Review and index documents produced by TEP; review defendant's deposition topics spreadsheet.
11/8/2024	043511	DGS	3.00	0.00	3.00	rrc1 from co-counsel; review of counter proposal; Correspondence to copunsel re same; Receive and review correspondence Michelle Seares; engeagement letter to expert Frank Mason.
11/8/2024	045500	RKM	0.60	0.00	0.60	Conference call with Mr. Miller
11/11/2024	043409	DGS	7.50	0.00	7.50	REview of file; prepare for deposition of Bruce Chrisman.
11/11/2024	045502	RKM	4.80	0.00	4.80	Preparation for depositions and communication with Mr. Miller regarding same.
11/11/2024	040842	TSW	5.40	0.00	5.40	Review Bob Miller's deposition outline for exhibits to prepare and prepare six sets of exhibits.
11/12/2024	040971	CLC	2.30	0.00	2.30	Preparation of exhibits and notebooks for upcoming depositions.
11/12/2024	043407	DGS	8.00	0.00	8.00	REview of file; prepare for deposition of Bruce Chrisman.
11/12/2024	045503	RKM	5.80	0.00	5.80	Preparation for depositions and communication with Mr. Miller regarding same.
11/13/2024	043404	DGS	12.70	0.00	12.70	Travel to Denver; Prepare for Bruce Chrisman deposition; rrc1 Jim Henderson; RRC1 from Bob Miller; Conference with Bob Miller.
11/13/2024	045504	RKM	4.70	0.00	4.70	Preparation for depositions and communication with Mr. Miller regarding same.
11/13/2024	041131	TSW	3.90	0.00	3.90	Review and index TEP supplemental documents.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/14/2024	043406	DGS	8.00	0.00	8.00	prepare for deposition; conference with Bob Miller; take deposition of Bruce Chrisman; take Bob to DIA.
11/14/2024	044964	RKM	7.80	0.00	7.80	Preparation for deposition of Tiffany Pollock
11/14/2024	041221	TSW	0.10	0.00	0.10	Electronic mail to Mr. Quirin regarding TEP supplemental documents received.
11/14/2024	041259	TSW	1.80	0.00	1.80	Review and index TEP supplemental documents.
11/15/2024	044963	RKM	9.40	0.00	9.40	Preparation for deposition of Tiffany Pollock.
11/15/2024	041292	TSW	1.70	0.00	1.70	Review and index TEP supplemental documents; email Laura Mossman regarding same.
11/17/2024	041472	RKM	7.80	0.00	7.80	Preparation for deposition of Tiffany Pollock.
11/17/2024	041474	RKM	4.10	0.00	4.10	Travel to Houston for Pollock depo.
11/18/2024	041845	RKM	2.40	0.00	2.40	Preparation for Benaquista deposition.
11/18/2024	041475	RKM	2.50	0.00	2.50	Preparation for Pollock depo.
11/18/2024	041476	RKM	3.50	0.00	3.50	Deposition of Tiffany Pollock.
11/19/2024	041843	RKM	10.70	0.00	10.70	Appear at Paul Benaquista deposition and preparation for same.
11/19/2024	041844	RKM	3.50	0.00	3.50	Return travel from Houston for depositions.
11/21/2024	043458	DGS	9.00	0.00	9.00	Travel from Denver to Douglas County (return trip)
11/21/2024	043460	DGS	0.60	0.00	0.60	correspondence re Caerus settlement and attorney fees.
11/21/2024	042113	TSW	2.50	0.00	2.50	Review and index documents received from TEP.
11/22/2024	042206	DGS	2.00	0.00	2.00	Receive and review correspondence from Bob Miller, Nate Keever; Zoom meeting.
11/25/2024	042778	DGS	4.00	0.00	4.00	Tcw1 Bob Miller; review of file; Telephone conference with Bob Miller and Phyllis Bourque; Telephone call to Paul Sculley re KM PL's responses; RRC1 Mr. Sculley; Telephone calls to counsel for REX; Receive and review correspondence from REX counsel.
11/25/2024	042455	JWR	0.20	0.00	0.20	Conference w/ R. Meyer re need for research into moratory interest under Colorado and other states' law.
11/25/2024	042462	JWR	0.20	0.00	0.20	Reviewed mediation moratory interest arguments.
11/25/2024	042575	TSW	1.00	0.00	1.00	Review and Index documents received from TEP.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
11/26/2024	042694	CLC	1.10	0.00	1.10	Review of depositions and prepared list of additional bates numbered documents and exhibits and pulled copies of same to be sent to expert.
11/26/2024	042665	JWR	2.80	0.00	2.80	Analyzed law re moratory interest and commingling of funds under Colorado and other states' caselaw/statutes.
11/26/2024	042595	TSW	3.80	0.00	3.80	Review and Index documents received by TEP.
11/26/2024	042510	TSW	0.10	0.00	0.10	Electronic mail to Ryan Meyer regarding document list for Phyllis Bourque issues.
11/26/2024	042587	JWR	0.20	0.00	0.20	Drafted email memo to R. Meyer re comparative caselaw for mediation position statement.
11/27/2024	042807	DGS	1.00	0.00	1.00	REview of file; CT1 Jeff Quirin aND IAURA mOSSMAN regarding discovery and additional records.
11/27/2024	042815	JWR	0.20	0.00	0.20	Reviewed findings on moratory interest law to prep for conference w/ R. Meyer.
11/27/2024	042816	JWR	0.20	0.00	0.20	Conference w/ R. Meyer re findings on moratory interest law.
11/27/2024	042825	TSW	2.00	0.00	2.00	Review and index documents received from TEP.
11/29/2024	043438	DGS	1.60	0.00	1.60	Review of Lincioni engagement documents; Correspondence to B ob Miller; RRc1 Gregory J. Stucky.
12/2/2024	043441	DGS	1.00	0.00	1.00	Receive and review correspondence from TEP counsel; Correspondence to Jeff Quirin and Laura Mossman.
12/2/2024	043529	TSW	2.70	0.00	2.70	Review and index bank statements.
12/3/2024	046609	DGS	3.50	0.00	3.50	
12/4/2024	046608	DGS	3.50	0.00	3.50	
12/4/2024	043757	TSW	4.00	0.00	4.00	Review and index bank statements.
12/5/2024	046607	DGS	3.50	0.00	3.50	
12/5/2024	043777	TSW	0.80	0.00	0.80	Review Ryan Meyer's memo and prepare documents to send to Letha Lencione.
12/5/2024	043856	TSW	3.50	0.00	3.50	Review and index TEP documents; email bank statements to expert.
12/6/2024	046606	DGS	3.50	0.00	3.50	
12/6/2024	046635	RKM	2.40	0.00	2.40	Gather and send docs to Ms. Lencioni
12/6/2024	043998	TSW	0.10	0.00	0.10	Electronic mail to expert Charles Mason regarding W9.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/9/2024	044596	DGS	5.00	0.00	5.00	Review of correspondence re mediation and related issues; telephone call and email to Paul Sculley re responses to written questions; Zoom Conference with Bob Miller, Jeff Quirin and Laura Mossman.
12/9/2024	044147	JWR	0.30	0.00	0.30	Conference w/ R. Meyer re legal strategy.
12/9/2024	044148	JWR	0.60	0.00	0.60	Analyzed memo from Bob Miller.
12/9/2024	044150	JWR	0.20	0.00	0.20	Correspondence w/ R Meyer.
12/9/2024	046643	RKM	5.90	0.00	5.90	Review and revise mediation submission.
12/10/2024	044594	DGS	4.60	0.00	4.60	Review of correspondence re mediation and related issues; phone message from Paul Sculley; correspondence to Paul Sculley; CT! Bob Miller;CT1 Jeff Quirin and Laura Mossman; and documents for mediation.
12/10/2024	046576	RKM	1.00	0.00	1.00	Zoom meeting with counsel
12/11/2024	044593	DGS	4.60	0.00	4.60	Review of correspondence re mediation and related issues; Receive and review correspondence Paul Sculley; ct1 Paul Sculley; CT! Bob Miller;CT1 Jeff Quirin and Laura Mossman; and documents for mediation.
12/11/2024	046645	RKM	6.40	0.00	6.40	Review and revise mediation submission.
12/11/2024	044378	TSW	1.20	0.00	1.20	Review production index looking for missing bank statements for expert; draft report of findings and email expert regarding the same.
12/11/2024	044419	TSW	4.00	0.00	4.00	Review and index additional Devon documents received from TEP.
12/12/2024	044592	DGS	2.00	0.00	2.00	Review of correspondence and documents for mediation.
12/12/2024	046650	RKM	3.10	0.00	3.10	Work on Sefcovic release research and memo and communication with Mr. Miller regarding same.
12/12/2024	044595	TSW	6.50	0.00	6.50	Review and index Devon bank statements received from TEP.
12/13/2024	046610	DGS	3.50	0.00	3.50	
12/13/2024	046652	RKM	4.90	0.00	4.90	Communication with counsel regarding Sefcovic issue and review and revise memo.
12/13/2024	044717	TSW	5.10	0.00	5.10	Review and index bank statements from Devon subpoena received by TEP; email to Dr. Quirin and Laura Mossman regarding same.
12/16/2024	046611	DGS	3.50	0.00	3.50	
12/17/2024	046612	DGS	3.50	0.00	3.50	

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
12/17/2024	045259	RKM	13.20	0.00	13.20	Attend mediation and preparation for same.
12/17/2024	045067	TSW	0.10	0.00	0.10	Electronic mail (2) to/from Laura Mossman regarding bank statements.
12/18/2024	046613	DGS	3.50	0.00	3.50	
12/18/2024	046578	RKM	0.80	0.00	0.80	Conference call with Mr. Keever regarding mediation.
12/18/2024	045264	TSW	0.50	0.00	0.50	Review and index documents from TEP.
12/19/2024	046614	DGS	3.50	0.00	3.50	
12/19/2024	046581	RKM	0.90	0.00	0.90	Zoom call with counsel to discuss mediation.
12/19/2024	045441	TSW	3.70	0.00	3.70	Review and index documents received from TEP.
12/20/2024	046615	DGS	3.50	0.00	3.50	
12/20/2024	045643	JWR	1.50	0.00	1.50	Performed research at Sedgwick County Law Library re Newberg and Rubenstein on Class Actions for Bob Miller.
12/20/2024	045645	JWR	0.40	0.00	0.40	Examined Sefcovic docket to see if the case was removed under Class Action Fairness Act and whether defendants provided notice to appropriate government officials. Emails re same to R. Meyer and Bob Miller.
12/20/2024	045552	JWR	0.10	0.00	0.10	Email to Bob Miller re Newberg on identical factual predicate doctrine.
12/23/2024	046616	DGS	3.00	0.00	3.00	
12/23/2024	046654	RKM	1.40	0.00	1.40	Call to discuss status and strategy regarding settlement.
12/30/2024	046574	DGS	1.60	0.00	1.60	REview of correspondence; review of Maya's speradsheet; tcw1 GJs1 ; Conference with Ryan K. Meyer; Conference with Tammy S. West.
12/31/2024	046247	DGS	2.50	0.00	2.50	Review of GJS spreadsheet; compare to Keever spreadsheet; Review of Bob's memo and Greg's correspondence; Zoom call with GJS, TDK, RKM.
12/31/2024	046579	RKM	1.00	0.00	1.00	Conference call with Mr. Kitch, Mr. Stucky, and Mr. Seely to discuss mediation and settlement strategy.
1/1/2025	046580	DGS	1.20	0.00	1.20	Review of correspondence from GJS and TDK; work on evaluation.
1/2/2025	046837	TSW	0.50	0.00	0.50	Review list of documents sent to expert Phyllis Bourque; email Ryan Meyer, Dave Seely and Emily Arida regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/2/2025	046852	TSW	0.60	0.00	0.60	Review and index documents received from TEP.
1/3/2025	047004	DGS	1.00	0.00	1.00	REview of file; tcw1 JWR.
1/3/2025	046962	JWR	0.50	0.00	0.50	Analyzed federal law on whether identical factual predicate is the same as the "same transaction and occurrence" test.
1/3/2025	046889	JWR	0.20	0.00	0.20	Email memo re similarites between identical factual predicate doctrine and "same transaction or occurrence" standard.
1/4/2025	047005	DGS	1.00	0.00	1.00	CT! Bob Miller re IFP variations.
1/5/2025	047006	DGS	1.80	0.00	1.80	Work on settlement value of claims.
1/7/2025	050610	DGS	3.00	0.00	3.00	RRc1 Phyllis Bourque; Receive and review correspondence; work on settlement.
1/7/2025	050887	RKM	1.10	0.00	1.10	Zoom call with counsel to discuss TEP offer.
1/7/2025	047154	TSW	1.00	0.00	1.00	Review Mr. Miller's memo regarding documents to produce to our expert Phyllis Bourque; update my production list for Ms. Bourque; email to Dave Seely and Mr. Miller regarding same and link containing said documents.
1/7/2025	047211	TSW	3.50	0.00	3.50	Review and index documents received from TEP.
1/7/2025	047212	TSW	0.20	0.00	0.20	Conference with Dave Seely regarding documents to prepare for producing to expert Bourque.
1/8/2025	050611	DGS	3.20	0.00	3.20	Receive and review correspondence; work on settlement.
1/8/2025	047318	TSW	1.70	0.00	1.70	Review/analyze Mr. Miller's memo regarding questions for Phyllis Bourque; locate documents discussed within memo and written responses from third parties regarding our subpoenas; email to Ms. Bourque regarding same; email Dave Seely regarding Third Party Pipeline Discovery questions.
1/9/2025	050612	DGS	3.00	0.00	3.00	Receive and review correspondence; work on settlement.
1/9/2025	047593	TSW	1.80	0.00	1.80	Review and index documents received from TEP.
1/10/2025	050613	DGS	3.10	0.00	3.10	Receive and review correspondence; work on settlement.
1/10/2025	050885	RKM	2.50	0.00	2.50	Prepare assessment of claims.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/10/2025	050886	RKM	1.50	0.00	1.50	Zoom call with counsel to discuss settlement.
1/13/2025	047799	TSW	1.00	0.00	1.00	Review and index documents produced by TEP.
1/15/2025	048122	TSW	3.60	0.00	3.60	Review and index documents produced by TEP.
1/16/2025	048463	DGS	5.10	0.00	5.10	Zoom meetings with Phyllis Bourque and Bob Miller.; Zoom meeting with Bob Miller, Nate Keever, Gregory J. Stucky, TDK1, Ryan K. Meyer
1/16/2025	048222	TSW	0.20	0.00	0.20	Research missing bank statements information provided by Laura Mossman; email Dave Seely regarding same.
1/20/2025	048434	DGS	1.00	0.00	1.00	Receive and review correspondence Gregory J. Stucky. Nate Keever; Telephone conference with Bpob Miller; Receive and review of our latest counterproposal.
1/20/2025	049504	TSW	0.10	0.00	0.10	Issues with Phyllis Bourque statement; update Mr. Seely regarding same.
1/21/2025	050614	DGS	4.00	0.00	4.00	Receive and review correspondence; work on settlement.
1/22/2025	050615	DGS	4.00	0.00	4.00	Receive and review correspondence; work on settlement.
1/23/2025	050616	DGS	3.80	0.00	3.80	Receive and review correspondence; work on settlement.
1/24/2025	050617	DGS	3.10	0.00	3.10	Receive and review correspondence; work on settlement.
1/24/2025	050956	RKM	1.00	0.00	1.00	Conference call with counsel to discuss settlement.
1/26/2025	049492	DGS	1.00	0.00	1.00	Receive and review correspondence from GJS, TDK, CT1 Bob Miller.
1/27/2025	049214	DGS	1.00	0.00	1.00	Receive and review correspondence from Chuck Mason; Correspondence to Dr. Mason.
1/27/2025	049160	TSW	0.20	0.00	0.20	Analyze electronic mail sent to Charles Mason regarding data issue sent; electronic mail to Dave Seely regarding same.
1/28/2025	049501	DGS	1.50	0.00	1.50	Telephone conference with Bob Miller re experts; Receive and review correspondence Bob Miller; Correspondence to Executive Committee; Receive and review correspondence from EC.
1/29/2025	049566	DGS	2.00	0.00	2.00	Work on outline of settlement documents.
1/29/2025	049493	DGS	1.00	0.00	1.00	Zoom meeting with Bob Miller, Nate Keever, gjs1, rkm1.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
1/29/2025	049542	TSW	0.10	0.00	0.10	Electronic (2) to/from Mary Denomy regarding statements.
1/30/2025	050618	DGS	2.10	0.00	2.10	Receive and review correspondence; work on settlement.
1/31/2025	050619	DGS	3.00	0.00	3.00	Receive and review correspondence; work on settlement.
1/31/2025	049947	TSW	0.10	0.00	0.10	Electronic mail (4) to/from Becky Winegard regarding discovery index.
2/2/2025	054640	DGS	0.60	0.00	0.60	RRC1 counsel; Correspondence to counsek.
2/3/2025	054567	DGS	2.00	0.00	2.00	Correspondence with counsel re Mediation Settlement statement, escrow.
2/3/2025	054248	RKM	0.60	0.00	0.60	Review and analyze mediation statement and email communication regarding same.
2/4/2025	054568	DGS	2.80	0.00	2.80	Correspondence with counsel re Mediation Settlement statement, escrow; review and analysis of documents.
2/4/2025	051006	TSW	0.10	0.00	0.10	Telephone call from US Legal Support regarding an outstanding invoice.
2/5/2025	051036	DGS	2.00	0.00	2.00	Zoom meeting with Bob Miller, Nate Kever, GJS1 , RKM1 re settlement documents, escrow; Telephone conference with client gjs1 , RKM1.; RRC.
2/5/2025	054233	RKM	1.10	0.00	1.10	Conference call with counsel to discuss settlement documents.
2/5/2025	051007	TSW	0.20	0.00	0.20	Email from US Legal Support regarding outstanding invoice; research payment log; email Ryan Meyer and Dave Seely regarding same.
2/6/2025	051108	DGS	2.00	0.00	2.00	RRC1 Nate Kever; Receive and review correspondence Gregory J. Stucky; Receipt, review and analysis of draft Settlement AGreement and Exhibits.
2/6/2025	051110	TSW	0.20	0.00	0.20	Further research on invoice issues; email to US Legal Support regarding same.
2/8/2025	054388	RKM	2.70	0.00	2.70	Review and analyze draft settlement agreement.
2/10/2025	052706	DGS	4.20	0.00	4.20	work on settlement.
2/10/2025	051512	TSW	0.30	0.00	0.30	Telephone conversation with Dave Seely regarding expenses; review file regarding Double L. Engineering invoice status; conference with Sara Evans and email to David Seely regarding same.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/11/2025	052705	DGS	3.50	0.00	3.50	work on settlement.
2/12/2025	052704	DGS	3.20	0.00	3.20	work on settlement.
2/12/2025	054427	RKM	2.20	0.00	2.20	Review and analyze escrow agreement.
2/12/2025	054436	RKM	1.20	0.00	1.20	Conference call with counsel regarding escrow agreement.
2/13/2025	052703	DGS	2.80	0.00	2.80	work on settlement.
2/13/2025	054440	RKM	1.30	0.00	1.30	Conference call to discuss escrow agreement.
2/14/2025	052702	DGS	3.00	0.00	3.00	work on settlement.
2/14/2025	052045	TSW	0.30	0.00	0.30	Telephone call to Dorothy Brown with US Legal Support regarding (3) invoice issues.
2/17/2025	052701	DGS	3.20	0.00	3.20	work on settlement.
2/18/2025	052700	DGS	3.00	0.00	3.00	Work on changes to SA.
2/18/2025	054721	RKM	2.40	0.00	2.40	Review, analyze, and revise draft Settlement Agreement.
2/19/2025	052699	DGS	3.10	0.00	3.10	Zoom meeting with Bob, Nate, RKM, GJS re changes to SA; RRC Nate re Exhibits A & B; Review of same; RRC1 Bob Miller; Receive and review correspondence Nate Keever; Conference with TSW re comparison of Exhibit A to earlier spreadsheet.
2/19/2025	054481	RKM	1.50	0.00	1.50	Conference call with counsel to discuss settlement agreement.
2/19/2025	052439	TSW	0.10	0.00	0.10	Emails to/from (5) Dave Seely regarding Keever's TEP costs.
2/20/2025	052698	DGS	2.40	0.00	2.40	TCW TSW re comparison of Exhibit A to earlier spreadsheet; review of compare; CT counsel; rrc1 Bob ; rrc1 Nate; Work on revisions to settlement agreement.
2/20/2025	052548	TSW	1.20	0.00	1.20	Compare old verses new excel spreadsheet of leases; email Dave Seely regarding same.
2/21/2025	054569	DGS	3.50	0.00	3.50	work on expenses, refunds from expert retainers, settlement agreement, escrow agreement, correspondence with bob, GJS1 , TDK1 , TJL1
2/22/2025	054571	DGS	1.00	0.00	1.00	Correspondence with TDK1 , TJL1 re bankruptcy issues, escrow.
2/24/2025	054570	DGS	3.50	0.00	3.50	work on exhibits to settlement agreement; Correspondence with Nate, Bob, TDK1'
2/25/2025	054572	DGS	4.20	0.00	4.20	work on settlement agreement.
2/26/2025	054573	DGS	4.20	0.00	4.20	Zoom with Nate, Bob, Ryan K. Meyer, GJS1, re settlement agreement.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
2/26/2025	054483	RKM	2.50	0.00	2.50	Conference call to discuss settlement agreement. And review and analyze same.
2/26/2025	053367	TSW	0.20	0.00	0.20	Emails (5) to/from Tina Dorfmeier with US Legal Support regarding invoices issue.
2/27/2025	054575	DGS	5.80	0.00	5.80	Work on Settlement Agreement; Zoom with Nate, Bob, Ryan K. Meyer, GJS1, re settlement agreement. Zoom with Nate and Bob re exhibits.
2/27/2025	053448	TSW	0.10	0.00	0.10	Email to/from Tina Dorfmeier regarding invoice issues.
2/27/2025	053448	TSW	0.10	0.00	0.10	Email to/from Tina Dorfmeier regarding invoice issues.
2/27/2025	53911	TSW	1.00	0.00	1.00	Run report for expenses and fees; draft started of excel spreadsheet for same.
2/28/2025	054576	DGS	1.60	0.00	1.60	REview of Settlement Agreement and Exhibits; Correspondence with Nate Kever re same; Correspondence wiht TDK1.
3/1/2025	058671	DGS	1.00	0.00	1.00	RRc1 Bob Miller re Letha Lencioni payment; Correspondence to Tammy S. West re same; Correspondence to TDK` 1 re escrow agreement.
3/3/2025	054395	TSW	0.20	0.00	0.20	Research file for 30b6 notice proposed topics issue for Becky Winegard and email to her regarding same.
3/3/2025	054537	TSW	1.80	0.00	1.80	Continue drafting expense/fee spreadsheet.
3/4/2025	055012	DGS	0.70	0.00	0.70	Correspondence to Nate Kever re executed Settlement Agreement; RRC1 Nate Kever; Conference with Tammy West re expenses.
3/4/2025	054805	TSW	3.40	0.00	3.40	Review and revise excel spreadsheet for purposes of verifying total expenses paid; research status of Expert Lencioni's payment and refund status from Dr. Mason; email Dave Seely regarding same.
3/5/2025	055010	DGS	0.50	0.00	0.50	Receive and review correspondence from Nate Kever; review of executed Settlement Agreement.
3/5/2025	058669	DGS	1.00	0.00	1.00	correspondence with Chuck Mason re refund to Fleeson.
3/10/2025	058667	DGS	0.40	0.00	0.40	Receive and review correspondence Nate Kever re joint motion.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
3/13/2025	058664	DGS	3.80	0.00	3.80	Correspondence to counsel re filing of joint motin for preliminary approval; Receive and review correspondence expert Letha Lencioni re lost check; investigate status; Receive and review correspondence Tammy S. West re sameReceive and review correspondence from expert Chuck Mason; Correspondence weith Mr. Mason re his check refunding unearned retainer; TSDK1.
3/14/2025	058662	DGS	0.30	0.00	0.30	Receive and review correspondence TSDK1.
3/18/2025	058661	DGS	2.50	0.00	2.50	Receipt an review of court's minute order setting hearing for preliiminary apporval; correspondence with counsel.RRC1 Bob Miller, Gregory J. Stucky;
3/19/2025	058659	DGS	1.00	0.00	1.00	RRC1 Bob Miller, Gregory J. Stucky;
3/20/2025	058658	DGS	3.00	0.00	3.00	Revise Judgmentl; Correspondence to counsel re same; Review of notices; RRc1 Nate, GJS, TDK, Bob . Receive and review of Joint motion for prelimnary approval..
3/21/2025	058656	DGS	1.00	0.00	1.00	Receitp of CAFA Notice; Receive and review correspondence TDK1.
3/25/2025	058655	DGS	0.30	0.00	0.30	Receitp of notice from court setting preliinary approval hearing;
3/27/2025	058654	DGS	1.00	0.00	1.00	Telephone conference with Gregory J. Stucky; Correspondence to nate Keever re possible statet court adn folllow-on settlements; correspondence re preliminary approval hearing; . Receive and review correspondence Nate Keever, Michelle Seares, Bob Miller; Review of preliminary distribution schedule and related pleading; ;
4/4/2025	062243	DGS	1.20	0.00	1.20	Review of GJS draft; Correspondence with Nate Keever, TDK1 , and GJs re plreliminary distribution schedule; review of same.
4/7/2025	059174	CLC	0.70	0.00	0.70	Preparation of notebook for use in upcoming preliminary approval hearing.
4/7/2025	060733	RKM	2.70	0.00	2.70	Preparation for preliminary approval hearing.
4/8/2025	062245	DGS	6.50	0.00	6.50	Travel from Grand Lake to Denver for preliminary approval hearing; attend hearing; travel to Grand Lake; CT1 counsel
4/8/2025	059869	RKM	4.50	0.00	4.50	Travel to Denver for preliminary approval hearing.

Fleeson Gooing Time Entries

EntryDate	Entry ID	Timekeeper	Billable Hrs	Non Bill Hrs	Total Hours	Description
4/8/2025	059871	RKM	1.40	0.00	1.40	Attend preliminary approval hearing.
4/9/2025	062247	DGS	1.00	0.00	1.00	Correspondence with counsel re preliminary approval; work on notices.
4/10/2025	062250	DGS	1.00	0.00	1.00	correspondence with counsel; work on notices.
4/10/2025	059870	RKM	4.50	0.00	4.50	Return travel from preliminary approval hearing.
4/11/2025	062249	DGS	1.80	0.00	1.80	Correspondence with counsel re preliminary approval; work on notices.
Total			4,166.20	0.00	4,166.20	

Timekeeper Summary			Title		
ACH	Anna C. Hedstrom	9.60	0.00	9.60	Law Clerk
ADK	Audrey D. Koehler	135.50	0.00	135.50	Associate
CLC	Cheryl L. Clark	72.30	0.00	72.30	Paralegal
DEL	Daniel E. Lawrence	1.50	0.00	1.50	Member
DGS	David G. Seely	1725.00	0.00	1725.00	Member
EKA	Emily K. Arida	190.60	0.00	190.60	Associate
EMR	Elizabeth M. Raehpour	12.90	0.00	12.90	Law Clerk
GJS	Gregory J. Stucky	747.00	0.00	747.00	Member
JDH	Jack D. Hamilton	14.60	0.00	14.60	Law Clerk
JWR	John W. Ralston	26.70	0.00	26.70	Associate
KRD	Kathy R. Davis	59.30	0.00	59.30	Paralegal
LWV	Lyndon W. Vix	10.90	0.00	10.90	Member
RKM	Ryan K. Meyer	985.50	0.00	985.50	Member
TDK	Thomas D. Kitch	29.40	0.00	29.40	Member
TSW	Tammy S. West	145.40	0.00	145.40	Paralegal
Totals		4166.20	0.00	4166.20	

EXHIBIT A-3
DUFFORD TIME RECORDS

Nathan A. Keever Time Records

Client	Client Matter ID	Resp Lyr	File Type	File		
Date	Audit ID	Tmk	Type	Code	Description	Hrs
Terra Energy Partners Class Action 11/8/2018	18227/18227.004 117827	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Revise new case complaint / exchange emails with Bob re: same.	3.40
Terra Energy 11/9/2018	18227/18227.004 117825	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Exchange emails with Bob re: potential use of res judicata in new court action.	0.70
Terra Energy 11/12/2018	18227/18227.004 117820	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Conference call with Bob re: new actions	1.50
Terra Energy 11/12/2018	18227/18227.004 117822	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Revise and provide substantive comments and questions to Bob's latest draft complaint	3.60
Terra Energy 11/16/2018	18227/18227.004 117813	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Review and revise Bob's new federal draft / telephone conference with Bob re: same.	1.90
Terra Energy 11/16/2018	18227/18227.004 117814	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Revise complaint / email to Bob re: same.	3.20
Terra Energy 11/17/2018	18227/18227.004 117812	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Revise new complaint - review Bob's memo on leases	1.20
Terra Energy 11/19/2018	18227/18227.004 117810	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Preparation of federal complaint / email to Bob re: same.	3.30
Terra Energy 11/21/2018	18227/18227.004 117807	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Review Bob's updated memo on claims.	0.80
Terra Energy 11/28/2018	18227/18227.004 117798	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Conference with Chuck Sheer re: representative plaintiff / conference call and email with Bob re: same.	1.70
Terra Energy 11/29/2018	18227/18227.004 117796	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Exchange emails with potential class representative Keri Jensen.	0.40
Terra Energy 12/4/2018	18227/18227.004 122924	NAK NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Review Keri Jensen's lease / telephone conference with Keri re: same / emails re: same.	1.60

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/17/2019	126911	NAK	Time	Revise proposed complaint.	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/22/2019	126903	NAK	Time	Exchange emails with Sam Potter re: possible class representation / conference with Bob re: same and complaint.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/23/2019	126900	NAK	Time	Review Bob's revisions to proposed complaint / emails re: same	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/19/2019	130926	NAK	Time	Finalize complaint.	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/7/2019	132746	NAK	Time	Review federal complaint / prepare amended complaint / review potential collateral state enforcement complaint Bob prepared / telephone conference with	1.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/8/2019	133456	NAK	Time	Prepare amended complaint / emails with Bob re: same	1.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/27/2019	134808	NAK	Time	Telephone conference with Bob re: experts / costs / emails to potential expert.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/28/2019	134812	NAK	Time	Telephone conference with Mary Ellen re: potential investigations / telephone conference with Bob re: costs / emails re: same.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/22/2019	138506	NAK	Time	Exchange emails with Chrisman re: answer date.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/24/2019	139012	NAK	Time	Multiple emails re: prudent operator standard that will be applied in federal matter.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/25/2019	139014	NAK	Time	Emails re: objective prudent operator standard.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/14/2019	142116	NAK	Time	Telephone conference with Chrisman re: scheduling order and scheduling conference / email to Bob.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/24/2019				Review initial disclosures (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/25/2019				Review initial disclosures (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/26/2019				Review initial disclosures (time capped)	8.00

Nathan A. Keever Time Records

Terra Energy Partners Class 5/27/2019	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	Review initial disclosures (time capped)	8.00
Terra Energy 5/30/2019	18227/18227.004 143611	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Telephone conference with Bob re: scheduling order.	0.50
Terra Energy 5/31/2019	18227/18227.004 144160	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Preparation of draft scheduling order.	0.80
Terra Energy 6/3/2019	18227/18227.004 148214	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Exchange emails re: scheduling order with co-counsel and opposing counsel.	0.50
Terra Energy 6/10/2019	18227/18227.004 148213	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Preparation for and representation at scheduling conference.	2.80
Terra Energy 7/1/2019	18227/18227.004 152986	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Prepare motion for extension of time / emails re: same / conference with opposing counsel.	0.50
Terra Energy 7/2/2019	18227/18227.004 152988	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Exchange emails re: response to motion to dismiss.	1.30
Terra Energy 7/8/2019	18227/18227.004 152996	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Exchange emails with Bob re: motion to dismiss.	0.30
Terra Energy 7/10/2019	18227/18227.004 153000	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Telephone conference with Chrisman re: leases.	0.30
Terra Energy 7/16/2019	18227/18227.004 153016	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Exchange emails re: response to motion to dismiss.	0.30
Terra Energy 7/17/2019	18227/18227.004 153021	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Revise response to motion to dismiss.	3.50
Terra Energy 7/18/2019	18227/18227.004 153028	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Telephone conference with class member Casey / review email from Chrisman re: explanation of new adjustments.	0.70
Terra Energy 7/19/2019	18227/18227.004 153030	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Revise motion to dismiss.	1.50
Terra Energy 7/21/2019	18227/18227.004 153036	NAK	Oil & Gas Litigation Time	Terra Energy Partners - NGL Federal Court Action - 18227.004	Preparation of response to motion to dismiss.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		

Nathan A. Keever Time Records

7/22/2019	153043	NAK	Time	Preparation of response to motion to dismiss (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/23/2019	153048	NAK	Time	Preparation of Response to motion to dismiss.	2.10
Terra Energy Partners Class Action	18227/ NAK		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/27/2019				Review Amended disclosures (time capped)	8.00
Terra Energy Partners Class Action	18227/ NAK		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/28/2019				Review Amended disclosures (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/2/2019	158710	NAK	Time	Telephone conference with Chris re: protective order and disclosures.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/5/2019	158717	NAK	Time	Exchange emails re: disclosure documents.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/13/2019	158738	NAK	Time	Emails re: document disclosures.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/16/2019	158758	NAK	Time	Exchange emails with Chrisman re: disclosures.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/21/2019	158769	NAK	Time	Conference call with co-counsel to discuss next steps, tasks to be done.	1.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/22/2019	158774	NAK	Time	Exchange emails re: discovery.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/1/2019	163259	NAK	Time	Email from Marion Wells re: additional processing deductions for 2015. Review remittance statements.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/3/2019	163261	NAK	Time	Organization of disclosures / emails re: same.	3.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/5/2019	163257	NAK	Time	Disclosure organization / work with Jenny re: same / implementation of Teams to allow access to same.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/6/2019	163253	NAK	Time	Disclosure organization and review.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/7/2019	163251	NAK	Time	Exchange emails re: disclosures.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/9/2019	163249	NAK	Time	Emails re: discovery and disclosures / review same.	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/10/2019	163247	NAK	Time	Review and exchange emails re: discovery requests.	1.30

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/13/2019	163244	NAK	Time	Discovery requests / emails re: same.	1.50
Terra Energy Partners Class	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/14/2019		NAK	Time	Review First Supp Disclosures (time capped)	8.00
Terra Energy Partners Class	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/15/2019		NAK	Time	Review First Supp Disclosures (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/17/2019	163239	NAK	Time	Telephone conference with Mary Ellen re: Potter processing deductions /emails re: same.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/18/2019	163235	NAK	Time	Federal discovery issues.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/20/2019	163228	NAK	Time	Conference with MED re: processing deductions to Potter. Appear to be different from litigation deductions. MED will work on further / emails re: same.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/23/2019	163225	NAK	Time	Disclosure review and organization.	1.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/24/2019	163223	NAK	Time	Disclosure review and organization.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/8/2019	167997	NAK	Time	Exchange emails re: status.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/9/2019	167926	NAK	Time	Exchange emails re: status of matters / telephone conference with Sam Potter.	0.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/10/2019	167928	NAK	Time	Exchange emails re: remittance statements / disclosures	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/11/2019	167929	NAK	Time	Review Bob's email re: disclosures and TEP spin off.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/15/2019	167933	NAK	Time	Exchange emails re: TEP documents.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/17/2019	167938	NAK	Time	Review documents to set up for conference with Mary Ellen.	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/18/2019	167942	NAK	Time	Rechange status emails / preparation for and representation at conference with Mary Ellen and Bob.	2.50

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/21/2019	167947	NAK	Time	Emails re: discovery issues.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/22/2019	167950	NAK	Time	Exchange emails re: disclosures.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/6/2019	176231	NAK	Time	Discovery / emails re: same	1.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/9/2019	176229	NAK	Time	Rule 45 subpoenas / emails re: same / discovery issues.	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/11/2019	176225	NAK	Time	Discovery requests / emails re: same.	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/16/2019	176222	NAK	Time	Federal discovery requests.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/9/2020	181228	NAK	Time	Review discovery received.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/7/2020	185200	NAK	Time	Telephone conference with class members Johnsons re: status of matters.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/10/2020	185201	NAK	Time	Exchange emails re: claims, requirements for proof.	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/11/2020	185202	NAK	Time	Review discovery from TEP / exchange emails re: SOL	2.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/13/2020	185205	NAK	Time	Emails re: claims and discovery issues.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/14/2020	185209	NAK	Time	Exchange emails re: motion to compel.	2.80
Terra Energy Partners Class	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/15/2020		NAK	Time	Review Def Responses to First Set of requests for production and ROG	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/17/2020	185212	NAK	Time	Exchange emails re: discovery.	0.40
Terra Energy Partners Class	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/15/2020		NAK	Time	Review Def Responses to First Set of requests for production and ROG	7.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/19/2020	185219	NAK	Time	Discovery issues / emails re: same.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/19/2020	185223	NAK	Time	Telephone conference with royalty owners re: status of matters.	1.10

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/20/2020	185229	NAK	Time	Exchange emails re: discovery.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/25/2020	185238	NAK	Time	Preparation and representation at conference call with co-counsel re: pending issues including potential motion to compel / discuss next steps and	2.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/26/2020	185241	NAK	Time	Exchange emails re: discovery issues.	0.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/27/2020	185246	NAK	Time	Emails re: discovery issues.	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/28/2020	185247	NAK	Time	Exchange emails re: leases / transportation discovery / remittance statements.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/29/2020	185249	NAK	Time	Exchange emails re: Questar data and liquids margin.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/1/2020	189470	NAK	Time	Exchange emails re: net liquids margin.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/2/2020	189467	NAK	Time	Exchange emails re: net liquids margin / exchange emails re: requests for admissions.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/5/2020	189462	NAK	Time	Exchange emails re: discovery issues/ motion to compel / discovery responses.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/9/2020	189458	NAK	Time	Exchange emails re: lease language issues.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/10/2020	189453	NAK	Time	Review and exchange emails re: market value leases issue.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/11/2020	189449	NAK	Time	Review and exchange emails re: lease language.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/12/2020	189448	NAK	Time	Review and exchange emails re: transportation contracts.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/13/2020	189445	NAK	Time	Review and exchange3 transportation agreement emails / responses to	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/14/2020	189444	NAK	Time	Review and exchange3 emails re: transportation.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/16/2020	189443	NAK	Time	Exchange emails re: interrogatories.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/17/2020	189442	NAK	Time	Review emails re: prudent operator rule.	0.50

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/19/2020	189433	NAK	Time	Review prudent operator emails.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/21/2020	189425	NAK	Time	Exchange emails re: interrogatories.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/24/2020	189421	NAK	Time	Conference call and emails with co-counsel re: status of matters / next steps / review discovery received from H & H.	3.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/26/2020	189406	NAK	Time	Review Greg's BPA memo / receipt of discovery documents from TEP	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/9/2020	194468	NAK	Time	Review draft of motion for class certification.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/10/2020	194470	NAK	Time	Review requests for admissions.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/13/2020	194475	NAK	Time	Requests for admissions	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/15/2020	194480	NAK	Time	Extension of time for discovery / requests for admissions in support of class certification.	2.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/17/2020	194556	NAK	Time	Review motion for class certification.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/1/2020	195046	NAK	Time	Emails re: next steps.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/5/2020	195055	NAK	Time	Exchange emails re: next steps.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/8/2020	196046	NAK	Time	Prepare for and representation at conference call with co-counsel re: next steps and status (time split between matters)	0.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/10/2020	196050	NAK	Time	Emails re: discovery.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/13/2020	196737	NAK	Time	Conference with Jenny re: document management / email re: same.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/15/2020	203358	NAK	Time	Review RFAs to TEP prepared by co-counsel / emails re: same.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/26/2020	203447	NAK	Time	Finalization of RFA / conference call re: same.	2.40

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/26/2020	203450	NAK	Time	Exchange emails re: federal claims.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/9/2020	208649	NAK	Time	Conference call re: status / next steps / division of labor.	1.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/11/2020	208645	NAK	Time	Emails re: Factual predicate research.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/17/2020	208627	NAK	Time	Telephone conference re: document requests, discovery, next steps.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/23/2020	208615	NAK	Time	Prepare for and telephone conference with co-counsel re: next steps, status, and division of labor.	1.50
Terra Energy Partners Class Action	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/25/2020				Review defendants first set of responses to request for admissions / work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/26/2020				Review defendants first set of responses to request for admissions / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/31/2020	208602	NAK	Time	Conference call with co-counsel re: status and next steps and tasks.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/27/2020	213874	NAK	Time	Telephone conference with Bob re: next steps.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/28/2020	213877	NAK	Time	Telephone conference with Sam Potter re: status of matter.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/1/2020	222703	NAK	Time	Review of show cause order / research issues / emails re: same / telephone conference with Bob re: same.	4.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/2/2020	222823	NAK	Time	Emails re: original settlement agreement / emails to class members / response to show cause orders.	2.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/3/2020	222824	NAK	Time	Response to show cause / emails re: same / emails with Sam Potter re: residency / distributions	3.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/16/2020	226807	NAK	Time	Review Bob's fact sheet memo / discovery responses.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

9/17/2020	226808	NAK	Time	Discovery issues, including responses. .	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/21/2020	226809	NAK	Time	Conference call re: discovery responses.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/30/2020	226810	NAK	Time	Preparation of discovery responses.	3.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/1/2020	227598	NAK	Time	Discussions with co-counsel re: experts / emails re: responses to discovery.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/2/2020	227603	NAK	Time	30(b)(6) depositions emails.	0.50
Terra Energy Partners Class Action	18227 NAK /1822 7.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/3/2020				Review defendants second responses to request for admissions and interrogatories/ work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /1822 7.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/4/2020				Review defendants supplemental responses to first requests for admissions and interrogatories/ work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/13/2020	227615	NAK	Time	Preparation for and representation at discovery conference with co-counsel to discuss RFPs, and depositions.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/14/2020	227616	NAK	Time	Preparation of discovery responses.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/19/2020	227891	NAK	Time	Exchange emails with Sam Potter re: depositions and status.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/26/2020	227896	NAK	Time	Exchange emails re: depos.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/27/2020	227898	NAK	Time	Emails with Potter re: depositions	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/2/2020	231699	NAK	Time	Emails re: depositions.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/5/2020	231704	NAK	Time	Document management with staff and Ryan.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/11/2020	232001	NAK	Time	Telephone conference with Bob re: calculations.	0.50

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/13/2020	232006	NAK	Time	Review Order denying TEP's motion to dismiss / emails re: same.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/14/2020	232008	NAK	Time	Review Mary Ellen's calculations.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/6/2020	234227	NAK	Time	Preparation of answer to counterclaims / emails re: same.	1.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/8/2020	234891	NAK	Time	Prepare answer and counterclaim / responses to discovery / conference call with co-counsel.	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/9/2020	234894	NAK	Time	Emails and stipulation re: discovery / TEP allocations list.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/10/2020	234896	NAK	Time	Exchange emails with class members.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/14/2020	234898	NAK	Time	Finalize answer to TEP's counterclaim.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/15/2020	234900	NAK	Time	Telephone conference with co-counsel re: depositions / next steps.	1.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/16/2020	234904	NAK	Time	Exchange emails with royalty owner re: lease categorization / review Bob's spreadsheet.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/17/2020	234905	NAK	Time	Preparation of discovery responses.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/18/2020	234907	NAK	Time	Preparation of discovery responses.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/20/2020	236455	NAK	Time	Exchange emails re: class definition.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/29/2020	236579	NAK	Time	Preparation of responses to TEP's first set of discovery requests.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/30/2020	236580	NAK	Time	Preparation of responses to TEP's first set of discovery requests.	4.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/31/2020	236581	NAK	Time	Preparation of responses to TEP's first set of discovery requests.	3.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/5/2021	239877	NAK	Time	Preparation of discovery responses / emails re: same.	2.70

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/8/2021	240991	NAK	Time	Revisions to discovery response / emails re: same.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/18/2021	241608	NAK	Time	Work with Bob and Mary Ellen on discovery responses.	4.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/19/2021	241610	NAK	Time	Preparation of discovery responses.	3.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/21/2021	241611	NAK	Time	Exchange emails re: depositions.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/1/2021	244144	NAK	Time	Telephone conference with Bob re: federal class, location of wells utilizing Canyon Gathering.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/3/2021	244148	NAK	Time	Exchange emails re: class definition.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/4/2021	244152	NAK	Time	Emails re: class definition modification.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/6/2021	244157	NAK	Time	Pull Potter leases for representation confirmation on GVGS / emails re: same / search for system maps.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/7/2021	244158	NAK	Time	Review disclosure documents to answer gathering system issues / emails re: leases for Potter.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/8/2021	244159	NAK	Time	Cross-check checks with Potter wells to GVGS system.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/9/2021	244161	NAK	Time	Review discovery for initial disclosures / review TEP supplemental disclosures.	3.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/10/2021	244163	NAK	Time	Prepare initial disclosures / exchange email re: deposition schedule / review proposed 30(b)(6) disclosure of Potter / conference call with co-counsel re: next steps / lease categorizations.	4.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/24/2021	246914	NAK	Time	Preparation of initial disclosures / review TEP lease categorization emails and spreadsheets.	0.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/25/2021	246922	NAK	Time	Preparation of disclosures / emails to Becky, Bob, Ryan, and Jenny re: same.	2.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

2/26/2021	246941	NAK	Time	Finalize initial disclosures and documents / emails with Sam.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/10/2021	251944	NAK	Time	Exchange emails re: Potter's deposition.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/11/2021	251942	NAK	Time	Emails re: deposition of Potter / telephone conference with Sam re: same.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/12/2021	252774	NAK	Time	miscellaneous	0.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/13/2021	251940	NAK	Time	Exchange emails with Bob re: 30(b)(6) deposition categories for Potter / emails with class member the Wilsons	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/14/2021	251913	NAK	Time	Prepare documents for Sam Potter deposition / conference calls and memos with co-counsel re: same / conference calls with Potter.	5.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/14/2021	251946	NAK	Time	Prepare for and conference call with co-counsel re: 30(b)(6) topics / emails re: same.	1.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/17/2021	251947	NAK	Time	Prepare for and conference call with co-counsel and opposing counsel re: Sam Potter's 30(b)(6) deposition topics.	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/21/2021	252130	NAK	Time	Emails re: preparation of Sam Potter / preparation to prepare Sam for his deposition.	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/22/2021	252132	NAK	Time	Deposition preparation of Sam Potter with Sam Potter / conference. Conference call with Wilsons re: status of TEP matters.	4.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/23/2021	252133	NAK	Time	Deposition preparation of Sam Potter with Sam and co-counsel.	3.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/24/2021	252134	NAK	Time	Prepare for and representation at deposition of Sam Potter (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/28/2021	252140	NAK	Time	Review and comment on proposed amendment to class definition.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/29/2021	252142	NAK	Time	Emails re: experts and additional discovery.	0.90

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/1/2021	253867	NAK	Time	Prepare for and representation at conference call with co-counsel.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/2/2021	257279	NAK	Time	Exchange emails re: discovery	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/5/2021	257277	NAK	Time	Review and comment on language proposed in the new class definition and effect on lease categorization still unresolved.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/20/2021	258988	NAK	Time	Telephone conference with Chris Chrisman re: discovery / emails re: same.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/23/2021	259058	NAK	Time	Emails with Bob, Sam Potter and Mary Ellen re: information needed for next phase of accounting.	1.00
Terra Energy Partners Class Action	18227 NAK /1822		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/26/2021				Review defendants first amended responses to first set of discovery requests / work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /1822		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/26/2021				Review defendants second supplemental disclosures / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/5/2021	264015	NAK	Time	Emails with Mary Ellen, Sam Potter, and Chris Chrisman re: discovery issues.	0.60
Terra Energy Partners Class Action	18227 NAK /1822		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/23/2021				Review defendant's responses to third requests for discovery / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/4/2021	265165	NAK	Time	Telephone conference with Chris Chrisman re: status of accounting with GVGS parameters and URSA.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/5/2021	265169	NAK	Time	Email to co-counsel re: conversation with Chrisman / lease classification of index leases / ct of appeals jurisdiction opinion that is favorable / status of URSA leases.	1.10
Terra Energy Partners Class Action	18227 NAK /1822		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/6/2021	7.004			Review defendant's amended responses to second set of requests / work on case outline	7.00

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/9/2021	267207	NAK	Time	Review TEP lease spreadsheets / email with co-counsel and Chrisman re: same.	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/10/2021	267203	NAK	Time	Telephone conference with Chrisman re: discovery / leases.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/16/2021	267996	NAK	Time	Exchange emails re: class certification.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/17/2021	267999	NAK	Time	Research producers / exchange emails re: producers and class definition language.	3.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/22/2021	269744	NAK	Time	Exchange emails re: transportation agreements / telephone conferences with Sam Potter re: documents.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/24/2021	269770	NAK	Time	Prepare for and conferences with co-counsel and marketing expert and accounting expert regarding class certification reports.	3.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/25/2021	269780	NAK	Time	Exchange emails re: Platts data.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/29/2021	269854	NAK	Time	Exchange emails re: accounting and marketing reports / pull additional data from discovery for experts / telephone conference with Bob / emails with Ryan.	4.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/2/2021	277125	NAK	Time	Exchange emails re: status of expert reports.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/14/2021	277164	NAK	Time	Exchange emails re: expert documents needed / review spreadsheets.	0.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/20/2021	277161	NAK	Time	Conference call with co-counsel re: expert reports / emails re: same / review pricing data for spreadsheets.	2.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/23/2021	277113	NAK	Time	Review and comment on expert report re: marketing / emails re: same.	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/26/2021	277109	NAK	Time	Review revised expert report / comment and emails re: same.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/4/2021	277527	NAK	Time	Emails re: status of expert reports.	0.20

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/13/2021	279189	NAK	Time	Exchange emails re: Platts data.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/17/2021	279191	NAK	Time	Review emails re: Platts data related to Mary Ellen's upcoming report.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/27/2021	280621	NAK	Time	Telephone conference with Mary Ellen re: expert report issues. / email re: same.	0.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/31/2021	281144	NAK	Time	Emails re: index pricing data for expert reports.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/8/2021	282685	NAK	Time	Review, revise, and comment on initial draft expert report by Denomy / emails re: same.	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/20/2021	284197	NAK	Time	Telephone conference with Chrisman re: status of discovery motion.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/21/2021	284418	NAK	Time	Prepare for and conference call with co-counsel and expert.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/22/2021	285836	NAK	Time	Prepare for and conference with co-counsel with Mary Ellen re: her spreadsheets / follow up conference	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/23/2021	285837	NAK	Time	Review and comment on Mary Ellen spreadsheet	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/24/2021	286192	NAK	Time	Preparation of class definition / emails re: same,	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/25/2021	286193	NAK	Time	Revamp expert's spreadsheet on WASP damages / emails re: same.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/11/2021	290301	NAK	Time	Emails re: class definition / review original lessors for response.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/14/2021	290343	NAK	Time	Exchange emails re: class definition / Denomy report	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/18/2021	290392	NAK	Time	Attempt to finalize applicable lease spreadsheet / email re: same / review Denomy spreadsheet.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

10/20/2021	290391	NAK	Time	Exchange emails re: class definition and URSA leases.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/21/2021	290410	NAK	Time	Exchange emails re: URSA leases and class definition issues (best efforts) language / review and revise expert report of Denomy / emails re: same	0.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/22/2021	290423	NAK	Time	Review and multiple revisions to Mary Ellen Denomy's expert report / emails with co-counsel re: same.	1.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/26/2021	290452	NAK	Time	Review updated Denomy expert report.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/28/2021	290531	NAK	Time	Telephone conference with Chrisman re: deadlines.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/31/2021	290526	NAK	Time	Review and provide comments on Bourque's expert report.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/1/2021	290206	NAK	Time	Review and comment on expert marketing report of Phyllis / telephone conference with co-counsel regarding the same / prepare disclosure re: same.	1.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/3/2021	293808	NAK	Time	Preparation of expert disclosures / telephone conference with Sam re: status	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/8/2021	293801	NAK	Time	Edits to stipulation re: lease spreadsheet / emails re: same	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/22/2021	293776	NAK	Time	Exchange emails re: needed remittance statement. Conference call with Sam Potter re: same.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/30/2021	294872	NAK	Time	Review memos on claims / emails re: remittance statements.	0.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/3/2022	301023	NAK	Time	Prepare for and conferences with co-counsel and experts - Phyllis and Mary Ellen.	4.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/12/2022	301303	NAK	Time	Conference with co-counsel and expert, Phyllis, re: reply report.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/14/2022	303034	NAK	Time	Telephone conference with expert, Phyllis, and co-counsel re: rebuttal report. Prepare for same.	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/27/2022	303052	NAK	Time	Review of supplemental expert reports / emails and comments re: same	1.10

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/28/2022	303053	NAK	Time	Review Phyllis's expert rebuttal report / comments and emails re: same.	0.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/1/2022	308540	NAK	Time	Exchange emails with co-counsel re: motion for class certification.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/2/2022	308537	NAK	Time	Exchange emails with co-counsel re: logistics of class certification motion.	0.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/5/2022	308533	NAK	Time	Email exchange with co-counsel re: settlement proposal.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/7/2022	308344	NAK	Time	Telephone conference with co-counsel re: motion for class certification issues.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/9/2022	308334	NAK	Time	Telephone conference with Chrisman re: timing of motions / agreement in place (he will provide)	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/11/2022	308529	NAK	Time	Review emails re: motion for class certification / next steps.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/27/2022	308513	NAK	Time	Review proposed revisions to motion for certification.	1.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/1/2022	313409	NAK	Time	Review revisions to motion for clarification.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/3/2022	313428	NAK	Time	Emails re: motion for class certification related to ORRI	0.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/10/2022	313512	NAK	Time	Telephone conference with Sam re: status of matter, next steps, effect of motion for certification.	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/19/2022	314031	NAK	Time	Review and revise motion for certification.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/27/2022	313672	NAK	Time	Preparation of motion for class certification.	2.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/29/2022	313693	NAK	Time	Exchange emails re: motion for class certification.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/4/2022	314923	NAK	Time	Revisions to motion to certify / emails re: same.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/5/2022	314927	NAK	Time	Review, revise, and comment on Motion for certification / revise affidavit re: same.	1.80

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
4/7/2022	314934	NAK	Time	Finalize for filing lease stipulations and joint motion for dismissal. Revisions to Motion for class certification / emails re: same	1.70	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
4/8/2022	315327	NAK	Time	Finalizing motion for certification of class and related documents / emails re: same.	0.90	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
4/18/2022	316765	NAK	Time	Review interest memo by Bob / emails re: same.	0.30	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
4/28/2022	318574	NAK	Time	Telephone conference with Sam re: status of matters	0.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
4/29/2022	318595	NAK	Time	Exchange emails re: setting conference.	0.20	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/13/2022	320768	NAK	Time	Conference call with co-counsel re: certification hearing / telephone conference with Sam Potter re: status	1.30	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/16/2022	322509	NAK	Time	Prepare for and telephone conference with co-counsel and opposing counsel re: scheduling order.	0.80	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/18/2022	322502	NAK	Time	Prepare and representation at setting conference for class certification hearing.	0.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/19/2022	322498	NAK	Time	Telephone conference with Andy Dunn re: issues he is having with TEP	0.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/25/2022	322491	NAK	Time	Conference call with co-counsel re: TEP's response to motion for certification.	1.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/27/2022	322472	NAK	Time	Exchange emails re: proceeds language in leases	0.40	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/31/2022	322690	NAK	Time	Exchange emails re: reply brief re: motion for certification.	0.30	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/1/2022	322864	NAK	Time	Prepare for conference call tomorrow -- review Bob's legal memos / review TEP's response brief / review Daves outline and related follow up memos.	1.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		

Nathan A. Keever Time Records

6/2/2022	323385	NAK	Time	Prepare for conference call with co-counsel re: reply brief on motion for certification / review emails and outlines / representation at call / division of brief	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/3/2022	325568	NAK	Time	Review outline for reply brief / emails re: same	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/7/2022	324474	NAK	Time	Telephone conference with Sam re: status of motion for certification.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/10/2022	325423	NAK	Time	Preparation of portions of reply brief.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/12/2022	325425	NAK	Time	Research and preparation of sections of reply brief supporting motion for certification.	4.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/14/2022	326899	NAK	Time	Preparation of reply brief - statute of limitations issue.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/27/2022	329615	NAK	Time	Emails re: reply	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/27/2022	329610	NAK	Time	Telephone conferences with Chrisman and Bob re: Reply brief / GVGS reasonableness issue / merits discovery	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/30/2022	330062	NAK	Time	Review reply brief / conference call with co-counsel re: same.	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/1/2022	332759	NAK	Time	Preparation of reply brief	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/3/2022	332755	NAK	Time	Preparation of Reply brief	5.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/4/2022	331059	NAK	Time	Preparation of Reply brief.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/5/2022	331058	NAK	Time	Preparation of reply brief / conference call with co-counsel re: same	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/6/2022	332753	NAK	Time	Preparation of reply brief / conference calls and emails with co-counsel re: same.	3.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/13/2022	333446	NAK	Time	Exchange emails re: map use at hearing.	0.30

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
8/5/2022	338565	NAK	Time	Prep and rep at conference call with co-counsel re: hearing on class certification.	1.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
9/2/2022	343167	NAK	Time	Conference call with co-counsel re: class certification hearing order of proof; plan for hearing; next steps and duties	1.60	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
9/22/2022	347048	NAK	Time	{re}are and conference call with co-counsel re: order of witness and opening statement for class certification hearing.	2.20	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
10/1/2022	356674	NAK	Time	Preparation of order of proof for certification hearing / work on Potter's testimony.	2.30	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
10/4/2022	356676	NAK	Time	Telephone conference with co-counsel re: exhibits for hearing / emails re: same / telephone conference with Chrisman re: same.	2.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
10/8/2022	356683	NAK	Time	Preparation of witness outline and exhibits for certification hearing.	2.40	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
10/11/2022	354597	NAK	Time	Preparation of Sam Potter's hearing testimony / emails re: exhibits / conference call with co-counsel re: same.	4.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
11/3/2022	356690	NAK	Time	Preparation of witness outline and exhibit for Potters testimony / emails re: same.	1.90	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
1/11/2023	369045	NAK	Time	Exchange emails re: exhibits for hearing	0.30	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
1/21/2023	369605	NAK	Time	Prepare Sam Potter's testimony / conference with Sam to go through his testimony / conference with co-counsel re: expert testimony.	6.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
1/22/2023	370290	NAK	Time	Assist with preparation of experts for hearing (time capped)	7.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
1/23/2023	370291	NAK	Time	Representation at first day of class certification hearing / prepare for second day. (time capped)	10.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		

Nathan A. Keever Time Records

1/24/2023	370292	NAK	Time	Representation at second day of trial / prepare for third day of trial (time capped)	10.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/25/2023	370294	NAK	Time	Prepare for and representation at third day of class certification hearing (time capped)	0.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/27/2023	370691	NAK	Time	Exchange emails and memos with co-counsel re: post-hearing thoughts and next steps.	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/4/2023	374217	NAK	Time	Review Bob's memo re: affiliate gathering / prepare response to same / emails re: same / review Savage transcript for Zeeb testimony	2.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/5/2023	373173	NAK	Time	Exchange email re: caselaw. Review Bob's memo.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/6/2023	374213	NAK	Time	Telephone conference with Sam re: hearing, next steps.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/14/2023	375308	NAK	Time	Receipt and review of class certification order / Outline order / emails re: same.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/15/2023	376252	NAK	Time	Exchange emails with Sam Potter and co-counsel re: order and next steps / conference call with co-counsel re: same / telephone conference with Sam Potter re: same and next steps.	2.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/16/2023	376253	NAK	Time	Telephone conference with co-counsel re: objections to recommendations / emails re: same / review memos re: same / provide Nermberg research re: same.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/28/2023	377807	NAK	Time	Review and finalize objection to file / emails re: same	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/2/2023	381099	NAK	Time	Prep and rep at conference call with co-counsel re: response to TEP's objections	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/20/2023	382334	NAK	Time	Exchange email with class member re: status	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/21/2023	383071	NAK	Time	Edit and comment on our response brief to TEP's objections to Magistrate's recommendations / emails re: same	1.50

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/21/2023	382337	NAK	Time	Telephone conference with representative of class member Ackerman Energy re: status	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/22/2023	382985	NAK	Time	Conference call with co-counsel re: response to TEP's objection brief.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/24/2023	384600	NAK	Time	Review Simpson declaration / emails re: same	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/28/2023	384415	NAK	Time	Review response brief / emails re: same / finalize same	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/16/2023	388115	NAK	Time	Review and comment on response to supplemental authority / email re: same	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/19/2023	388834	NAK	Time	Finalize response to TEP's supplemental authority.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/18/2023	429118	NAK	Time	Exchange emails re: potter remittance statements	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/21/2023	428121	NAK	Time	Receipt and review of order approving class certification / emails re: same / telephone conference with Sam Potter	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/22/2023	426504	NAK	Time	Telephone conference with Chrisman re: federal order, next steps, discovery, potential appeal / email to co-counsel re: same.	1.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/26/2023	428130	NAK	Time	Exchange emails re: pricing and case management issues.	0.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/6/2023	430129	NAK	Time	Prepare for and representation at conference call with co-counsel re: TEP's appeal.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/8/2023	430135	NAK	Time	Review order confirming class certification and TEP's motion on appeal.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/13/2023	433306	NAK	Time	Review TEP's 10th appeal request / emails re: same / revise response brief / emails re: same.	2.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

10/17/2023	433316	NAK	Time	Review Mary Ellen's affidavit /emails re: same	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/26/2023	435813	NAK	Time	Emails re: status of federal matter issues / update Sam Potter re: status and residency questions.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/27/2023	434084	NAK	Time	Telephone conference with Bob and Chrisman re: discovery plan under 408.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/30/2023	435815	NAK	Time	Review Bob's memos / conference call with co-counsel re: discovery requests.	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/6/2023	436970	NAK	Time	Telephone conference with Chrisman re: merits cmo.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/8/2023	438389	NAK	Time	Conference call re: notice to class and procedure for same / emails re: same	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/9/2023	442030	NAK	Time	Exchange emails re: notice	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/1/2023	442387	NAK	Time	Exchange emails re: case management order for merits phase	0.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/8/2024	455790	NAK	Time	Conference call with Bob re: scheduling order.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/10/2024	455876	NAK	Time	Telephone conference with co-counsel / preparation of supplemental responses to initial disclosures	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
1/12/2024	455882	NAK	Time	Telephone conference with Chrisman re: disclosures and amended pleading / review documents for updated disclosures / emails re: same	4.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/9/2024	463796	NAK	Time	Telephone conference with Chrisman re: informal discovery issues / email re: same	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/22/2024	464641	NAK	Time	Review Bob's memo on TEP time period / exchange emails re: disclosures and discovery / emails with co-counsel re: same.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/23/2024	464922	NAK	Time	Exchange emails with co-counsel re: status of disclosures / next steps.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

2/26/2024	466201	NAK	Time	Emails re: updated class notice / outstanding discovery / telephone conference with Chrisman re: several outstanding issues / emails to co-counsel re: same.	1.20
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
2/29/2024	468141	NAK	Time	Update Sam Potter on status of matter and next steps.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/12/2024	472797	NAK	Time	Review disclosure issues / begin discovery lists	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/13/2024	473476	NAK	Time	Prepare Reply to counterclaim / emails re: same	0.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/19/2024	474980	NAK	Time	Conference with TEP counsel re: discovery issues / telephone conference with co-	1.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/22/2024	475524	NAK	Time	Review Bob's memo / prepare supplemental disclosures / review case outline / prepare notice of class action / emails re: same	3.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/27/2024	477981	NAK	Time	Prepare supplemental disclosures	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/28/2024	477982	NAK	Time	Conference with opposing counsel re: 408 numbers / conference with co-counsel re: same / emails re: same	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
3/31/2024	479341	NAK	Time	Exchange emails re: 408 disclosures by TEP	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/1/2024	479342	NAK	Time	Emails and telephone conferences with Bob re: 408 information provided by TEP / review updates / confirm class notice mailing	2.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/2/2024	480629	NAK	Time	Exchange emails re: disclosures	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/4/2024	480634	NAK	Time	Conference with Bob re: discovery / prepare same.	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/5/2024	491620	NAK	Time	Zoom call with Bob and Mary Ellen re: next steps / 408 information provided by TEP.	1.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/7/2024	481822	NAK	Time	Work on case outline / prepare discovery requests	5.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

4/11/2024	483558	NAK	Time	Review 408 documents provided by TEP / telephone conference with Chris Chrisman / telephone conferences with Bob miller / emails re: same	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/12/2024	484028	NAK	Time	Prepare for and conference with co-counsel re: to do list	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/13/2024	491692	NAK	Time	Exchange emails re: Teams updates, discovery, organization.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/15/2024	490488	NAK	Time	Review Mary Ellen's memos re: 408 information / review Bob's comments and questions re: same / telephone conference with Bob re: same / emails re: same.	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/16/2024	491688	NAK	Time	OPrepare for and conference call with Bob and Mary Ellen re: 408 documents, research needed / conference call with Chrisman and TEP group re: 408 information / emails with Bob re: same.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/17/2024	490489	NAK	Time	Review Bob's discovery and interest memos / emails re: same / attend discovery to case outline	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/24/2024	490490	NAK	Time	Telephone conference with Chrisman re: discovery -- he is getting additional information, ok with 90 day extension, would like mediation.	1.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
4/26/2024	491675	NAK	Time	Exchange emails re: motion for extension of time for discovery / review motion re: same / prepare for and conference call with co-counsel re: status	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/2/2024	500371	NAK	Time	Exchange emails with Bob and class member / emails with Dave	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/6/2024	500471	NAK	Time	Conference with Becky re: discovery / conference with co-counsel re: discovery / emails re: same.	1.80
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/11/2024	500648	NAK	Time	Exchange emails with Sam Potter re: status of matter / telephone conference re: same	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
5/15/2024	496187	NAK	Time	Telephone conference with Chris re: outstanding issues / email to co-counsel re: same.	0.90

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
5/20/2024	500642	NAK	Time	Prepare for and representation at status conference with magistrate / telephone conferences with Chrisman and co-counsel following / emails re: same.	3.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/3/2024	510317	NAK	Time	Emails / discovery / conference call with co-counsel / emails with Chrisman and Mary Ellen	3.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/5/2024	510320	NAK	Time	Exchange emails re: mediation logistics.	0.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/7/2024	510323	NAK	Time	Responding to questions related to subpoenas / telephone conferences and emails re: same.	2.10	
Terra Energy Partners Class Action		18227 NAK /1822	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/8/2024				Review defendant's responses to first set of merits discovery requests / work on case outline (time capped)	8.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/10/2024	510325	NAK	Time	Conference call with co-counsel re: TEP discovery update / emails re: same	1.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/11/2024	510327	NAK	Time	Exchange emails with Chrisman re: mediation logistics and outstanding discovery issues.	0.90	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/12/2024	510330	NAK	Time	Prepare for and conference call with Bob and Mary Ellen re: next steps in expert review, additional documents needed.	2.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/13/2024	510332	NAK	Time	Exchange emails re: discovery issues and documents / research issues	2.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/14/2024	510336	NAK	Time	Exchange emails re: discovery issues	0.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/18/2024	510340	NAK	Time	Telephone conferences with Bob re: discovery, WPX issues, next steps.	1.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		
6/19/2024	510342	NAK	Time	Discovery conference call with co-counsel division of labor, next steps / emails re: same	2.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004		

Nathan A. Keever Time Records

6/20/2024	510344	NAK	Time	Exchange emails and telephone conferences with attorneys for third parties regarding subpoenas	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/22/2024	510347	NAK	Time	Exchange emails re: lease language issues.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/24/2024	510350	NAK	Time	Emails with third party counsel re: Rule 45 subpoena / conference with Bob re: same.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/25/2024	510351	NAK	Time	Prepare for and conference with Kelly Murphy - Rockies Express attorney - re: subpoena for information / conference with Bob re: same.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
6/26/2024	510353	NAK	Time	Telephone conference with Sam Potter re: status / exchange emails re: discovery deadlines.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/1/2024	519238	NAK	Time	Telephone conference with Chrisman re: discovery responses.	0.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/2/2024	519239	NAK	Time	Exchange emails with Mary Ellen re: BP calculations.	0.40
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/3/2024	519241	NAK	Time	Telephone conference with Bob and Mary Ellen re: BP determinations / emails re: same	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/8/2024	519243	NAK	Time	Telephone conference with Chrisman re: discovery responses, additional settlement information, 30(b)(6) depositions.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/9/2024	519246	NAK	Time	Conference call with Chrisman re: discovery responses./ receipt of discovery responses from third parties./ emails re: same	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/10/2024	519248	NAK	Time	Review status of third party 30(b)(6) deposition notices / status and emails re: same / telephone conference with co-counsel re: next steps in discovery, allocation of work	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/11/2024	519250	NAK	Time	Exchange emails re: BP contract damages estimates by Mary Ellen	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/15/2024	519258	NAK	Time	Telephone conference with Mary Ellen re: report issues.	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

7/16/2024	519261	NAK	Time	Exchange emails re: Concord documents in discovery / conference call with co-counsel re: discovery issues, responses	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/24/2024	519269	NAK	Time	Discovery issues / responses / prepare for and conference call with co-counsel re: same, next steps, our responses, our requests / emails re: same.	2.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/26/2024	519273	NAK	Time	Preparation of responses to TEPs discovery requests. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/27/2024	519274	NAK	Time	Prepare responses to TEP's discovery requests. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/30/2024	519279	NAK	Time	Conference call with co-counsel re: discovery issues / preparation of discovery responses (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
7/31/2024	519283	NAK	Time	Preparation of responses to discovery requests.	4.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/1/2024	521008	NAK	Time	Review, revise, and comment on discovery related to moratory interest claim / emails and telephone conference with Bob re: same	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/2/2024	521012	NAK	Time	Review 408 spreadsheet and back up data provided by Mary Ellen / exchange emails re: same.	2.10
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/3/2024				Review defendant's discovery response disclosure documents / work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/4/2024				Review defendant's discovery response disclosure documents / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/5/2024	521013	NAK	Time	Prepare for and telephone conference with Bob and Mary Ellen re: damage calculations / review responses to subpoena to third party / emails re: same / preparation of responses to discovery (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

8/6/2024	521014	NAK	Time	Review subpoena responses / emails re: same / preparation of discovery responses	3.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/8/2024	521019	NAK	Time	Prepare responses to TEPs request for discovery / conference call with Chrisman re: status of discovery issues / telephone conference with co-counsel re: status of discovery, next steps, delegation of duties. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/9/2024	522478	NAK	Time	Preparation of discovery responses (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/10/2024	522482	NAK	Time	Preparation of discovery responses.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/15/2024	522487	NAK	Time	Review joint motion to extend fact discovery cut off / emails re: same.	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/19/2024	523650	NAK	Time	Conference call with Bob / email from Mountain West re: subpoena	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/20/2024	523894	NAK	Time	Discovery issues / emails and telephone conference with Bob	0.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/21/2024	524458	NAK	Time	Preparation of discovery responses.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/22/2024	524463	NAK	Time	Work on discovery issues, including: responses to TEP's discovery, our contention discovery, our moretury interest discovery, our 30(b)(6) notice, and our supplemental disclosures.	4.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/23/2024	524467	NAK	Time	Prepare responses to discovery requests. (time capped)	8.00
Terra Energy Partners Class Action		18227 NAK /18227.004	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/24/2024				Review defendant's discovery response disclosure documents / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

8/28/2024	526723	NAK	Time	Prepare responses to discovery requests. Conference call with co-counsel. Emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
8/30/2024	526725	NAK	Time	Conference call with Mary Ellen and Bob / conference call with TEP's attorneys and experts / emails re:same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/1/2024	533750	NAK	Time	Emails re: expert 408 exchanges.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/2/2024	533751	NAK	Time	Draft mediation statement. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/3/2024	536476	NAK	Time	Review Denomy input of 408 data / review Bob's review of financial documents.	0.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/5/2024	536479	NAK	Time	Review Denomy reports on potential damages./ prepare mediation statement outline	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/9/2024	536480	NAK	Time	Preparation of settlement memorandum / emails re: same.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/12/2024	536483	NAK	Time	Exchange emails re: third party subpoenas.	0.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/17/2024	536484	NAK	Time	Telephone conference with Chrisman re: discovery issues / emails re: same	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/18/2024	536485	NAK	Time	Conference with co-counsel on discovery, mediation statement.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/19/2024	536487	NAK	Time	Telephone conference with Chrisman re: outstanding issues./ review charts provided by Mary Ellen	2.90
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/20/2024	536488	NAK	Time	Prepare for and telephone conference with chrisman and experts re: outstanding issues / emails re: same. / conference call with co-counsel	4.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/21/2024	536489	NAK	Time	Exchange emails re: moratory interest	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

9/23/2024	536491	NAK	Time	Finalize mediation documents / emails re: same	1.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/26/2024	536495	NAK	Time	Telephone conference and emails with Sam Potter re: mediation statement and mediation.	2.10
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/28/2024				Review defendant's discovery response disclosure documents / work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/29/2024				Review defendant's second supplement to merits discovery responses / work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
9/30/2024		NAK	Time	Prepare outline for mediation / conference call with Chrisman re: depositions / conference call with co-counsel re: mediation / review latest damages figures provided by Denomy. (time capped)	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/1/2024	544382	NAK	Time	Conferences with co-counsel re: discovery issues, 30(b)(6) depositions, next steps / prepare for upcoming mediation / emails re: same / emails with Sam Potter /	4.20
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/2/2024				Review defendant's discovery responses disclosures / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/3/2024	544402	NAK	Time	Prepare for mediation / conference call with co-counsel re: continued mediation / discovery issues	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

10/4/2024	544403	NAK	Time	Prepare joint motion regarding discovery dates / emails re: discovery issues / third party subpoenas (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/7/2024	544391	NAK	Time	Exchange emails re: scheduling order / motion regarding same /	1.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/8/2024	544399	NAK	Time	Prepare for and representation at federal court status conference / conference with co-counsel post conference / emails re: same	3.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/9/2024	544396	NAK	Time	Prepare 30(b)(6) deposition topics for Devon. / telephone conference with co-counsel re: outstanding discovery, depositions, mediation / emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/10/2024	544393	NAK	Time	Exchange emails with Denomy re: expert report / review discovery	3.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/11/2024	544388	NAK	Time	Exchange emails re: discovery / review documents	2.00
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/9/2024				Review defendant's discovery responses / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/14/2024	544418	NAK	Time	Telephone conference with Chrisman re: notice of deposition, discovery issues / emails re: same	2.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/16/2024	544417	NAK	Time	Telephone conference call with co-counsel re: dicoverly issues /e mails re: same / expert discussion with Denomy and Bob	4.10
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/20/2024				Review defendant's discovery responses to contention discovery requests / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/21/2024	544412	NAK	Time	Review discovery responses / arrange settlement conference / emails re: discovery (time capped)	8.00

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/23/2024	544411	NAK	Time	Review damage information prepared by Denomy / review discovery responses / emails re: discovery (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/24/2024	544381	NAK	Time	Conference call with co-counsel re: discovery issues and expert next steps / review discovery / prepare for settlement conference (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/25/2024	544397	NAK	Time	Prepare for / travel to / and representation at settlement conference in Denver (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/26/2024				Review defendant's discovery responses to moratory interest discovery requests / work on case outline (time capped)	8.00
Terra Energy Partners Class Action	18227 NAK /18227.004		Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/27/2024				Review defendant's amended responses to first set of merits discovery / work on case outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/28/2024	544383	NAK	Time	Discovery review / prepare for depositions (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
10/31/2024	544688	NAK	Time	Deposition preparation (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/1/2024	552302	NAK	Time	Prepare counterclaim / conference with co-counsel re: same	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/2/2024	552301	NAK	Time	Preparation of deposition outline for Alan Killion (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/3/2024	552300	NAK	Time	Preparation of deposition outline for Alan Killion / travel to Tulsa (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/4/2024	552299	NAK	Time	30(b)(6) depositions of Beth Edgeller and Alan Killion / prepare for second day of depositions (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/5/2024	552297	NAK	Time	Deposition of Killion / prepare for third day of depositions (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

11/6/2024	552296	NAK	Time	Prepare for and third day of 30(b)(6) depositions (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/7/2024	552294	NAK	Time	Travel from Tulsa (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/8/2024	552293	NAK	Time	Conference with co-counsel re: depositions and proposed counterproposal review defendant's amended responses regarding moratory interest	7.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/11/2024	552292	NAK	Time	Telephone conference with Chrisman re: Caerus, outstanding discovery, next round of depositions / emails re: same	1.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/12/2024	552291	NAK	Time	Emails re: next round of depositions / prepare outline for Pail B depostion. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/13/2024	552290	NAK	Time	Preparation of exhibits for next round of depositions / emails re: same	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/15/2024	552288	NAK	Time	Preparation of deposition outline for Paul B deposition.	4.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/16/2024	552287	NAK	Time	Prepare for deposition of Paul B.	4.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/17/2024	552286	NAK	Time	Prepare for depositions / travel (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/18/2024	552283	NAK	Time	Travel to Houston / first day of depositions / prepare for second day of depositions (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/19/2024	552281	NAK	Time	Second day of deposition (Paul Benaquista) / prepare for third day of deposition. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/20/2024	552280	NAK	Time	Third day of depositions (Mike Row) / travel from Houston (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/21/2024	552279	NAK	Time	Prepare for and conference call with Bob and Chrisman re: document issues that came out of depositions / emails re: same	2.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	

Nathan A. Keever Time Records

11/22/2024	552276	NAK	Time	Conference call with co-counsel re: status of discovery, to do list, counterproposal, deposition review / follow up emails re: same.	1.70
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/25/2024	552274	NAK	Time	Review Bob's memo on moratory interest / telephone conference with Chrisman re: outstanding document discovery, remaining depositions / follow up conference with Bob re: same, next steps, potential expert	2.30
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
11/27/2024	552267	NAK	Time	Telephone conference with Sam Potter re: status of discovery and negotiations / review email from Chrisman re: status of document / review defendants third supplemental responses to merits discovery requests discovery from WPX /	7.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/3/2024	556281	NAK	Time	Telephone conference with Chrisman re: outstanding discovery, depositions, mediation / telephone conferences with Bob re: same and expert reports / emails re: same.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/4/2024	556282	NAK	Time	Prepare for and telephone conference with Denomy and Bob re: items needed for mediation prep / follow up conference with Bob re: settlement counterproposal / emails re: same / review Bob's memo on interpretation of counterproposal / pull items for Mary Ellen.	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/5/2024	556283	NAK	Time	Telephone conferences with co-counsel re: TEP counterproposal / emails re: same / telephone conference with Chrisman re: discovery and settlement / emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/6/2024	556284	NAK	Time	Conferences with Bob and exchange emails re: potential next counterproposal on settlement / draft counterproposal letter	2.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/7/2024	556285	NAK	Time	Review Fleeson case law update memos / review Bob's moratory interest memo / revise counterproposal letter to TEP re: deposition information to add to claims / emails re: same	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
12/8/2024	556288	NAK	Time	Review Bob's Sefcovic memorandum / emails re: same	1.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/9/2024	558937	NAK	Time	Prepare couterproposal letter to TEP / conference calls with Bob re: same, moratory interest, effect of Sefcovic, settlement. (time capped).	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	

Nathan A. Keever Time Records

12/10/2024	558940	NAK	Time	Preparation of counterproposal letter to Chrisman. / exchange emails re: Careus proposal / conference call with co-counsel re: status of matters. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/11/2024	558941	NAK	Time	Preparation of counterproposal / prepare damage and interest spreadsheet on all claims / revise moratory interest memo / emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/12/2024	558945	NAK	Time	Conference calls with co-counsel re: mediation letters and memos / conference with engineer / revise letters / run spreadsheets (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/13/2024	558946	NAK	Time	Prepare counterproposal / conference with Bob re: same / conference with Chrisman re: same and outstanding discovery and discovery order / emails to co-counsel re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/14/2024	558948	NAK	Time	Revise memos on Sefcovic defense and moratory interest / finalize coverletter and 408 counterproposal to Chrisman / emails and telephone conference re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/15/2024	558950	NAK	Time	Finalize supplemental mediation disclosure with memorandum on moratory interest and memorandum on Sefcovic release defense / letter to mediator / telephone conferences and emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/16/2024	560303	NAK	Time	Preparation for mediaiton, including conference calls with Sam Potter, Bob Miller, and co-counsel / conference with Bob / conference with mediator / prepare outline (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/17/2024	560302	NAK	Time	Prepare for and representation at mediation.	12.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/18/2024	560299	NAK	Time	Continuation of mediation discussions and emails / conference call with Bob and Mary Ellen / conference call with Chrisman re: next steps / emails re: same / review Sefcovic agreement (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
12/19/2024	560298	NAK	Time	Continuation of mediation discussions, calculations of damages, research of issues / telephone conferences and emails re: same.	3.00

Nathan A. Keever Time Records

Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
12/23/2024	560295	NAK	Time	Research SOL issue / telephone conference with co-counsel re: potential settlement discussions.	2.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/3/2025	564769	NAK	Time	Prepare for and telephone conference with Chris Chrisman re: potential settlement options / outstanding discovery issue.	3.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/6/2025	564321	NAK	Time	Telephone conference with Chris re: potential settlement / telephone conference with Bob re: outstanding discovery / emails re: same	2.30	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/7/2025	564324	NAK	Time	Review spreadsheet provided by Mary Ellen / conference call with Bob and Mary Ellen / emails re: settlement proposal / conference call with co-counsel regarding settlement proposal	3.50	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/8/2025	564767	NAK	Time	Settlement proposal discussions and emails / update spreadsheets (time capped)	8.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/9/2025	564771	NAK	Time	Conference calls, emails, prepare spreadsheets regarding proposed spreadsheets / finalize Caerus portion. (time capped)	8.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/10/2025	566465	NAK	Time	Emails and conference call with co-counsel re: counterproposal / revise counterproposal / emails and calls with Bob re: same. (time capped)	8.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/11/2025	566467	NAK	Time	Prepare class counterproposal. Emails regarding same.	2.60	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/13/2025	567654	NAK	Time	Prepare class counterproposal / telephone conference with Bob re: same / emails re: same.	2.10	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		
1/15/2025	567657	NAK	Time	Settlement and discovery discussions with Chrisman and Bob / next step outlines / proposed discovery schedule (time capped)	8.00	
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004		

Nathan A. Keever Time Records

1/16/2025	567659	NAK	Time	Prepare for and telephone conference with co-counsel re: Class counterproposal / emails re: same / revise class counter-proposal / email to Sam Potter re: same / follow up discussions (time capped)	8.00
Terra Energy Partners Class Action	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - NGL Federal Court Action - 18227.004	
		/18227.004			
1/18/2025			Review defendant's second amended responses to moratory / contention discovery and related disclosures (time capped)		8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/19/2025	567698	NAK	Time	Begin preparation for potential Oklahoma City depositions / review newest disclosures by TEP (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/20/2025	567699	NAK	Time	Telephone conference and emails re: settlement -- with opposing counsel and co-counsel	5.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/21/2025	568375	NAK	Time	Conference with co-counsel re: TEP settlement proposal. Emails re: same / calculation of potential damages and interest / preparation of deposition outline./ telephone conferences with Chrisman re: potential second mediation. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/22/2025	568372	NAK	Time	Telephone conferences with Chrisman and Bob / emails re: second mediation meeting / conference call with Sam potter re: potential settlement, potential mediation session, claims, risks, updates, etc.	4.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/23/2025	568371	NAK	Time	Discussions with opposing counsel, co-counsel, and respresentative plaintiff in anticipation of conference call with mediation judge / emails re: same / calculation of damages re: same / prepare for mediation session (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/24/2025	570101	NAK	Time	Prepare for and mediation session with Judge Downes / conference call with co-counsel and Sam Potter / emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	

Nathan A. Keever Time Records

1/25/2025	570104	NAK	Time	Exchange emails with Sam Potter re: potential settlement / locate and provide requested documents / emails re: same / review spreadsheet, agreements, and emails in preparation of potential settlement.	3.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/26/2025	570105	NAK	Time	Outline settlement steps / begin preparing potential settlement exhibits / emails re: next steps / review potential escrow agreement (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/27/2025	570106	NAK	Time	Settlement reached with TEP / conferences with co-counsel / conference with opposing counsel / begin work on settlement documents / emails re: same.	6.50
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/28/2025	570111	NAK	Time	Settlement procedures and documents / escrow documents / call with Jim at Timberline Bank / email re: same / emails to experts re: settlement / emails with co-counsel re: escrow agreement / begin preparing same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/29/2025	570819	NAK	Time	Conference call with co-counsel re: settlement documents / drafts and emails re: same./ draft mediation settlement document / emails re: same and escrow agreement issues and rates, research same prepare draft escrow agreement , emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/30/2025	571916	NAK	Time	Preparation of escrow agreement / emails with co-counsel re: same	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
1/31/2025	571914	NAK	Time	Exchange emails and drafts with co-counsel of proposed escrow agreement.	2.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/1/2025	571912	NAK	Time	Exchange emails with Chrisman re: status of settlement documents / emails with co-counsel re: same	1.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/2/2025	572432	NAK	Time	Research class action requirements for escrow agreements / emails with co-counsel re: same / review list of attachments to settlement agreement / begin organizing structure of settlement agreement (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	

Nathan A. Keever Time Records

2/3/2025	572431	NAK	Time	Preparation of settlement agreement / research subsequent filing by potential opt out of class member.	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/4/2025	572428	NAK	Time	Revise escrow agreement / emails with co-counsel debating the pros and cons of each clause in the agreement -- resolution not reached/ schedule conference call and agenda for same / conference with Sam Potter re: class members, escrow agreement and option. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/5/2025	574058	NAK	Time	Telephone conference with Chrisman re: status of settlement agreement revisions, issues with escrow bank./ conference call with Louise Goodman at Timberline / emails re: same / prepare and email issues list to co-counsel / conference call with co-counsel / telephone conference with Ted Clark of T&T who is a class member / exchange emails with Sam Potter re: status and class list, talking points, extent of confidentiality / initial review o proposed agreement from Chrisman / emails re: same	6.60
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/6/2025	574059	NAK	Time	Review redlines provided by TEP / emails re: issues / modify agreements / prepare for discussion tomorrow / telephone conference with Sam Potter, Bob Miller re: status and agreements. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/7/2025	574064	NAK	Time	Preparation of notice of settlement / revisions to settlement agreement / conference call with co-counsel walking through revisions to settlement agreement / emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/8/2025	574869	NAK	Time	Conference calls with co-counsel re: settlement agreement revisions, excorw agreement procedures / prepare settlement implementation timeline / emails with co-counsel and opposing counsel re: same. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/9/2025	574070	NAK	Time	Continual work on settlement documents / conference calls and emails re; same / signed mediated statement from Downes / emails to Chrisman (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/10/2025	574867	NAK	Time	Exchange emails with Louise at Timberline bank / emails with co-counsel / exchange emails and conference calls re: settlement documents	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	

Nathan A. Keever Time Records

2/11/2025	575067	NAK	Time	Telephone conferences with Chrisman re: escrow agreement and bank issues / emails re: same / conference calls with Bob / revise escrow agreements / emails re same	3.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/12/2025	575503	NAK	Time	Continual revision and discussion of escrow agreement / conferences with co-counsel and opposing counsel / emails with JP Morgan (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/13/2025	575501	NAK	Time	Preparation and negotiation of escrow agreement / conference calls and emails re: same (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/14/2025	575798	NAK	Time	Conference calls with Chrisman re: escrow agreement and settlement agreement / revise same / emails with co-counsel re: same / multiple revisions to finalize document / settlement funded. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/15/2025	576799	NAK	Time	Preparation of settlement agreement exhibits	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/17/2025	576835	NAK	Time	Revise settlement agreement and exhibits	3.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/18/2025	577525	NAK	Time	Telephone conference with Chrisman re: settlement agreement allocations / emails re: same / review and revise cost spreadsheet / emails re: same	3.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/19/2025	577535	NAK	Time	Preparation, negotiation, rewriting, revising, proposed settlement agreements / multiple telephone and video conferences and emails with TEP counsel and co-counsel re: same. (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/20/2025	577872	NAK	Time	Provide redline of settlement agreement back to TEP's counsel / emails and conference call with co-counsel re: same	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/21/2025	578996	NAK	Time	Telephone conference with Chrisman re: settlement agreement / conference calls with co-counsel / emails re: same	2.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/24/2025	579698	NAK	Time	Conference call with Chrisman re: changes to settlement agreement / revisions to same / emails re: same	2.10
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	

Nathan A. Keever Time Records

2/26/2025	579701	NAK	Time	Conference calls and emails with co-counsel / revise settlement agreement and exhibits / emails to Chrisman re: same	3.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/27/2025	579948	NAK	Time	Conference calls with Chrisman and Michelle re: settlement agreement / conference call with Bob re: same / meet with Sam Potter to go through settlement agreement / finalize and execute same / review and finalize exhibits (time capped)	8.00
Terra Energy	18227/18227.004	NAK	Oil & Gas Litigation	Terra Energy Partners - Federal Class Action - 18227.004	
2/28/2025	581449	NAK	Time	Emails re: settlement agreement / conference call and email setting out next steps for co-counsel	1.50
NAK Totals					1,506.90

EXHIBIT A-4
MILLER TIME RECORDS

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45737	TIME	Miller, Bob	18.00	1/20/2019	1/26/2019	prof.services	GRM Jolley Fed	Research and draft JPRF initial complaint; review Keever redrafts; emails re: same.
45738	TIME	Miller, Bob	10.50	1/27/2019	2/1/2019	prof.services	GRM Jolley Fed	Research and redraft initial complaint; review Keever redrafts; emails re: same.
45739	TIME	Miller, Bob	6.50	2/3/2019	2/9/2019	prof.services	GRM Jolley Fed	Research and redrafting gathering fuel claim; emails w/Keever.
45740	TIME	Miller, Bob	2.50	2/10/2019	2/16/2019	prof.services	GRM Jolley Fed	Identify and examine facts re: Piceance formations, production and take away capacity.
45741	TIME	Miller, Bob	2.50	2/18/2019	2/19/2019	prof.services	GRM Jolley Fed	Filed JPRF complaint
45742	TIME	Miller, Bob	7.50	3/3/2019	3/9/2019	prof.services	GRM Jolley Fed	Preparing amended complaint; research re: same; prepare potential alternative complaint (re: enforcement in State court/re transport cost claims). Filed amended complaint; emails re: FOIA request and facts underlying complaint; redraft amended complaint; emails re: same, telephone conference re: same.
45743	TIME	Miller, Bob	6.25	3/24/2019	3/30/2019	prof.services	GRM Jolley Fed	Legal research re: objective prudent operator standard; memo re: same; email discussion re: same w/co-counsel.
45744	TIME	Miller, Bob	10.50	4/23/2019	4/27/2019	prof.services	GRM Jolley Fed	Legal research re: Objective Prudent Operator.
45330	TIME	Miller, Bob	3.10	4/25/2019		prof.services	GRM Jolley Fed	Fact research re: Platts pipeline data.
45332	TIME	Miller, Bob	0.75	5/1/2019		prof.services	GRM Jolley Fed	Telephone conference with Platts re: data sources; legal research re: removal; emails re: same.
45745	TIME	Miller, Bob	4.50	5/2/2019	5/4/2019	prof.services	GRM Jolley Fed	Conference w/co-counsel re: mediation.
45337	TIME	Miller, Bob	0.75	5/7/2019		prof.services	GRM Jolley Fed	Participate in Jolley Federal Mediation.
45338	TIME	Miller, Bob	2.15	5/7/2019		prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45746	TIME	Miller, Bob	1.50	5/27/2019	5/31/2019	prof.services	GRM Jolley Fed	Review draft scheduling order; telephone conference with Keever re: same; emails re: same.
45747	TIME	Miller, Bob	0.50	6/3/2019		prof.services	GRM Jolley Fed	Emails w/Keever re: scheduling order.
45748	TIME	Miller, Bob	11.00	6/9/2019	6/15/2019	prof.services	GRM Jolley Fed	Review of TEP motion to dismiss JPRF; legal research re: same; memo re: same.
45363	TIME	Miller, Bob	5.35	6/10/2019		prof.services	GRM Jolley Fed	Review TEP Motion to Dismiss and prepare memo to co-counsel re: same.
45749	TIME	Miller, Bob	9.50	6/16/2019	6/22/2019	prof.services	GRM Jolley Fed	Prepare first draft of Third Party discovery questions to 7 Piceance Basin takeaway pipelines; and initial discovery requests from TEP; fact research re: same; emails re: same.
45750	TIME	Miller, Bob	5.50	7/2/2019	7/6/2019	prof.services	GRM Jolley Fed	Extended email discussion w/co-counsel re: TEP motion to dismiss and scope of Lindauer settlement; telephone conference with Keever re: extension of time; legal research re: same.
45751	TIME	Miller, Bob	21.25	7/14/2019	7/20/2019	prof.services	GRM Jolley Fed	Memo re: factual basis of JPRF claims; prepared first draft of Response to TEP Motion to dismiss JPRF claims, review and revise multiple drafts; emails re: same; legal research re: same.
45752	TIME	Miller, Bob	12.50	7/21/2019	7/27/2019	prof.services	GRM Jolley Fed	Review and revise multiple drafts of Response, emails re: same.
45753	TIME	Miller, Bob	3.50	8/4/2019	8/10/2019	prof.services	GRM Jolley Fed	Received TEP voluntary disclosures, review North Dakota Sup. Ct. case from DS; emails re: SQL; zooms w/co-counsel
45754	TIME	Miller, Bob	3.50	8/18/2019	8/20/2019	prof.services	GRM Jolley Fed	Review and analyze TEP reply plus co-counsel questions & emails re: same; TK sunk cost emails; review Keever outline.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45755	TIME	Miller, Bob	4.25	8/25/2019	8/30/2019	prof.services	GRM Jolley Fed	Review Keever memo re: JPRF; prepare memo re: same; email w/RM re: TEAMS requires 365.
45756	TIME	Miller, Bob	1.25	9/3/2019		prof.services	GRM Jolley Fed	Comments on RFPs.
45757	TIME	Miller, Bob	5.00	10/6/2019	10/10/2019	prof.services	GRM Jolley Fed	Prepare memo re: class certification & pipeline discovery; circulate same.
45758	TIME	Miller, Bob	16.00	10/13/2019	10/19/2019	prof.services	GRM Jolley Fed	Review Potter Remittance statements; Telephone conference with MED & Keever re: same + MED data; legal and fact research; start to prepare 3rd Party Pipeline discovery; Interrogatories, RFP; RFA. Emails from TK re: discovery; review and comment on RM/ADK memo re: application of covenant of good faith & fair /dealing to Class Claims & JPRF; preparing 3rd Party discovery.
45759	TIME	Miller, Bob	9.50	10/20/2019	10/26/2019	prof.services	GRM Jolley Fed	
45760	TIME	Miller, Bob	2.00	10/28/2019	10/29/2019	prof.services	GRM Jolley Fed	Review DS amendment to 3rd Party Pipeline discovery.
45761	TIME	Miller, Bob	1.50	11/3/2019	11/9/2019	prof.services	GRM Jolley Fed	Review and revise 3rd Party Pipeline discovery; emails re: same.
45762	TIME	Miller, Bob	2.25	11/17/2019	11/20/2019	prof.services	GRM Jolley Fed	Review Whipple emails re;; Rule 45 subpoenas JPRF; telephone conference with re: same.
45763	TIME	Miller, Bob	3.00	11/25/2019	11/26/2019	prof.services	GRM Jolley Fed	Review JPRF class Lease summary.
45764	TIME	Miller, Bob	12.50	12/1/2019	12/7/2019	prof.services	GRM Jolley Fed	Prepare first draft of discovery request to TEP/WPX. Review comments and revise discovery requests to TEP/WPX.
45765	TIME	Miller, Bob	3.50	12/8/2019	12/14/2019	prof.services	GRM Jolley Fed	
45766	TIME	Miller, Bob	5.25	12/15/2019	12/20/2019	prof.services	GRM Jolley Fed	Emails w/Whipple & pipelines re: 3rd Party discovery requests; revised RFPs; emails w/Whipple, DS et al re: TEP/WPX discovery requests.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45767	TIME	Miller, Bob	1.25	12/22/2019	12/24/2019	prof.services	GRM Jolley Fed	Review & revise TEP/WPX discovery requests re: RM comments.
45768	TIME	Miller, Bob	13.50	1/5/2020	1/9/2020	prof.services	GRM Jolley Fed	Review RM email re: status JPRF; recirculate discovery memo; start to review produced documents.
45769	TIME	Miller, Bob	12.00	1/12/2020	1/18/2020	prof.services	GRM Jolley Fed	Review of TEP Leases; zoom w/co-counsel re: next steps; exchange multiple emails re: BAP claims, holding in Rogers, and abrogation of implied covenants; plus legal research re: same.
45770	TIME	Miller, Bob	9.50	1/19/2020	1/25/2020	prof.services	GRM Jolley Fed	Emails re: Rio Blanco County leases; multiple emails re: BAP claim; plus legal research re: same; review TEP docs.
45771	TIME	Miller, Bob	4.25	1/26/2020	1/29/2020	prof.services	GRM Jolley Fed	Telephone conference with TK & GS (1); identify and circulate docs re: WPX firm transportation; telephone conference with co-counsel re: same.
45772	TIME	Miller, Bob	15.00	2/2/2020	2/8/2020	prof.services	GRM Jolley Fed	Emails re: questions for experts to Keever; emails to MED re: retroactive adjustments plus statute of limitations; review of WPX/TEP documents, including Concord Remittance Statements.
45773	TIME	Miller, Bob	27.00	2/9/2020	2/15/2020	prof.services	GRM Jolley Fed	Multiple emails w/co-counsel re: Concord Remittance Statements; review of WPX/TEP documents; receive TEP discovery responses; multiple emails re: TEP discovery responses & motion to compel; emails re: Vela & Statute of Limitations and research re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45774	TIME	Miller, Bob	17.00	2/16/2020	2/22/2020	prof.services	GRM Jolley Fed	Multiple emails re: tolling the Statute of Limitation using the discovery rule; related legal research; review of WPX/TEP documents; emails re: motion to compel.
45775	TIME	Miller, Bob	28.00	2/23/2020	2/29/2020	prof.services	GRM Jolley Fed	Prepared summary of TEP documents reviewed to date and claims they support; review and forward MED spreadsheet re: NGL vs Residue pricing; contact potential marketing expert: Bourque; review and comment on draft scheduling order; receive and review GS memo re: implied covenant to market; review and circulate sample Bourque opinion; emails re: commonality and royalty language; review of implied covenant cases; emails re: abrogation of implied covenant; emails re: firm transportation claim; review of TEP documents; conference call re: BAP.
45776	TIME	Miller, Bob	18.00	3/3/2020	3/7/2020	prof.services	GRM Jolley Fed	Identify net liquids margin docs; provide to co-counsel w/MED calcs; multiple emails re: net liquids margin; receive TEP discovery requests; email plan to respond to co-counsel; email to co-counsel GRM evaluation of TEP responses plus follow up necessary; identify and circulate all prior legal memos re: class claims; emails re: authorizes supporting unreasonable deduction of affiliate costs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45777	TIME	Miller, Bob	22.00	3/8/2020	3/14/2020	prof.services	GRM Jolley Fed	Prepare and circulate memo re: Wms/NWPL affiliate contracts and questions for marketing expert; review and respond to multiple replies to NWPL affiliate contracts memo; prepare 1st draft of Class responses to TEP discovery; emails re: scope of affiliate cost claims and related expert witness opinions; emails re: Lease language.
45778	TIME	Miller, Bob	13.50	3/15/2020	3/21/2020	prof.services	GRM Jolley Fed	Emails w/co-counsel re: BAP claims and prudent operator claims; drafted summary of Law; related legal research; fact research re: residue & NGL pricing; TEP financial status; review TEP docs.
45779	TIME	Miller, Bob	12.00	3/22/2020	3/28/2020	prof.services	GRM Jolley Fed	Zoom w/Keever/Whipple re: discovery documents; review ADL memo re: best reasonably available price (BAP); review TEP documents.
45780	TIME	Miller, Bob	18.00	3/29/2020	4/3/2020	prof.services	GRM Jolley Fed	Emails re: extension re: Class discovery responses, COVID and expert reports; review TEP documents; research re: facts supporting class cert; compile and forward to DS.
45781	TIME	Miller, Bob	17.50	4/5/2020	4/11/2020	prof.services	GRM Jolley Fed	Review Motion, Order, Status Report re: JPRF scheduling; emails re: same and necessary discovery & timing; review DS Motion for Class Certification; review GS redraft; memo re: facts in support of Class cert.; review TEP docs re: same; review mmeo re: deduction of affiliate profits; fact and legal research re: same; review RFAs. Review ADK prudent operator mem and related cases.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45782	TIME	Miller, Bob	14.00	4/12/2020	4/18/2020	prof.services	GRM Jolley Fed	Emails re: deduction of affiliate costs; review attorney memos re: prudent operator standard; emails re: same; review RFAs; review Motion for Class Certification; review TEP documents.
45783	TIME	Miller, Bob	1.75	4/27/2020	4/30/2020	prof.services	GRM Jolley Fed	Identify TEP Letter to Royalty Owners; forward to Keever.
45784	TIME	Miller, Bob	11.00	5/3/2020	5/9/2020	prof.services	GRM Jolley Fed	Zoom call w/co-counsel re: status JPRF (2); review GS agenda; review and redrafted RFAs to TEP; review RM redraft of RFAs to TEP; redrafted and expanded GS agenda.
45785	TIME	Miller, Bob	18.50	5/18/2020	5/20/2020	prof.services	GRM Jolley Fed	Telephone conference with Keever re: RFAs; reviewing and amending same. Discussions w/Bourque; enage as consulting expert witness re: marketing; forward 3rd party discovery for review; discussion re: discovery; review her analysis; review and revise engagement agreement; email to Bourque and co-counsel re: same.
45786	TIME	Miller, Bob	3.50	6/1/2020	6/5/2020	prof.services	GRM Jolley Fed	Review emails re: JPRF; review TEP documents.
45787	TIME	Miller, Bob	10.00	6/7/2020	6/13/2020	prof.services	GRM Jolley Fed	Zoom co-counsel re: JPRF status (2); prepare list of JPRF Action Items; review redraft of Class Cert. Motion; review TEP documents.
45788	TIME	Miller, Bob	19.00	6/14/2020	6/20/2020	prof.services	GRM Jolley Fed	Receive, review and comment on Fleeson categorization of 1900 JPRF Leases; prepare memo table re: JPRF common claims have common answers; discovery requests; start compiling facts to support JPRF class claims; emails to co-counsel; review TEP documents.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45789	TIME	Miller, Bob	5.50	6/21/2020	6/27/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel (1.5); memos re: factual predicated collateral attack on class settlement; telephone conference with RM re: same.
45790	TIME	Miller, Bob	1.00	7/1/2020		prof.services	GRM Jolley Fed	Review emails re: 30(b)(6) notice.
45791	TIME	Miller, Bob	7.50	7/6/2020	7/11/2020	prof.services	GRM Jolley Fed	Conference call re: status and next steps JPRF (1.5); research re: identical factual predicate; memo re: same.
45792	TIME	Miller, Bob	14.00	7/13/2020	7/18/2020	prof.services	GRM Jolley Fed	Compiling facts to support common JPRF class claims, zoom w/co-counsel re: next steps.
45793	TIME	Miller, Bob	15.00	7/20/2020	7/24/2020	prof.services	GRM Jolley Fed	Emails re: class cert. discovery; review and revise same; compiling facts to support common JPRF class claims; redrafting Motion for class cert. JPRF; zoom w/co-counsel re: next steps.
45794	TIME	Miller, Bob	15.00	7/27/2020	7/31/2020	prof.services	GRM Jolley Fed	Redrafting Motion for class cert. JPRF; zoom w/co-counsel re: next steps; reviewing TEP docs; email re: class cert. discovery; review and comment on same.
45795	TIME	Miller, Bob	18.00	8/3/2020	8/8/2020	prof.services	GRM Jolley Fed	Working draft Motion for class cert to co-counsel; emails re: same; circulate redraft, memo re: 30(b)(6) deposition re: lease types and common issues.
45796	TIME	Miller, Bob	9.50	8/10/2020	8/15/2020	prof.services	GRM Jolley Fed	Review of Lease chart to identify class members to be excluded; emails re: same.
45797	TIME	Miller, Bob	10.00	8/17/2020	8/22/2020	prof.services	GRM Jolley Fed	Review TEP marketing docs (TJPF_040677-040882) and prepare summary of same w/commoents.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45798	TIME	Miller, Bob	6.50	8/24/2020	8/29/2020	prof.services	GRM Jolley Fed	Telephone conference with Keever re: status JPRF; emails re: class cert. discovery; review and comment on same; MED re: SQL data; review and revise class answers to TEP discovery requests.
45799	TIME	Miller, Bob	16.00	9/1/2020	9/5/2020	prof.services	GRM Jolley Fed	Review Reponse to Show cause order; emails re: same; compiling significant TEP documents supporting class claims; indexing TEP documents (10); review TEP docs printed by LC.
45800	TIME	Miller, Bob	14.00	9/7/2020	9/12/2020	prof.services	GRM Jolley Fed	Compiling significant TEP documents supporting class claims; indexing TEP documents.
45801	TIME	Miller, Bob	23.00	9/14/2020	9/19/2020	prof.services	GRM Jolley Fed	Provided memo re: significant TEP docs to co-counsel; expanded memo re: docs; emails w/co-counsel to discuss which facts support each claim; review TEP docs; indxing TEP docs; discovery issues, emails re: status of case; telephone conference with DS. Zoom w/co-counsel; emails re: Lindauer Settlement; emails re: Concord Remittance statements; review TEP docs; indexing TEP docs; telephone conference with DS.
45802	TIME	Miller, Bob	22.00	9/21/2020	9/26/2020	prof.services	GRM Jolley Fed	
45803	TIME	Miller, Bob	25.00	9/28/2020	10/3/2020	prof.services	GRM Jolley Fed	Memo re: additional significant TEP documents; zoom w/co-counsel; telephone conference with Jerry and DS; prepare Rule 26 (b) interrogatory response for the class; fact research re: same; indexing TEP documents; review discovery responses; emails 30(b)(6) depos.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45804	TIME	Miller, Bob	40.50	10/5/2020	10/10/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel, indexing TEP docs; identify documents to provide to experts; emails re: same; review and amend 30(b)(6) topics, telephone conference with DS; review TEP documents, review TEP document binders by LC; prepare sample outline to organize TEP docs for experts.
45805	TIME	Miller, Bob	20.30	10/12/2020	10/17/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel; indexing TEP docs, zoom w/ MED & Keever; emails re: 30 (b)(6) topics; telephone conference with DS re: outline; review TEP documents; review TEP doc binders by LC; emails w/BW re: expert docs, emails and telephone conferences with LC re: doc notebooks and indexing; review and revised 30 (b)(6) topics, emails w/DS re: same.
45806	TIME	Miller, Bob	25.00	10/19/2020	10/24/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; emails re: 30 (b)(6) topics depositions; review TEP docs; emails and telephone conference with LC re: indexing; email memos re: 30 (b)(6) to DS. Zoom w/co-counsel; emails re: 30 (b)(6) depositions; indexing TEP docs, review TEP docs; emails and telephone conferences with LC re: indexing; index to co-counsel.
45807	TIME	Miller, Bob	22.00	10/26/2020	10/31/2020	prof.services	GRM Jolley Fed	Indexing TEP docs, telephone conference with and emails w/DS; memo to DS; telephone conference with DS; telephone conference with DS & MED and review MED spreadsheet; emails re: 30 (b)(6) ; changes to 30 (b)(6) outline; emails and telephone conference with LC re: indexing.
45808	TIME	Miller, Bob	27.00	11/2/2020	11/7/2020	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45809	TIME	Miller, Bob	30.00	11/9/2020	11/14/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; telephone conference with DS re: 30 (b)(6) depositions; telephone conference with DS & MED; review Ct. Order Denying Motion to Dismiss; emails re: 30 (b)(6); provide docs to MED; email questions to MED; review of 5 MED spreadsheets re: residue/claims; emails re: same; prepare memo re: factual basis for common claims & 30 (b)(6) questions.
45810	TIME	Miller, Bob	35.00	11/16/2020	11/21/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; emails re: 30 (b)(6) depositions; emails re: MED spreadsheets; review and amend DS Letter to Chrisman re: 30 (b)(6); emails w/ MED re: TERRA deductions, zoom w/ co-counsel; zoom w/Keever & MED; emails and review data re: component cost deductions; review checkstubs & MED data re: same.
45812	TIME	Miller, Bob	18.00	11/23/2020	11/28/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; prepared outline for Wiseman and Beraquista depositions; emails re: 30 (b)(6). Identify 30 (b)(6) depo docs per request from DS; review of emails between TEP & DS re: depositions; prep for depositions, Telephone conference with & emails w/ DS re: depositions.
45813	TIME	Miller, Bob	28.00	12/1/2020	12/5/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel, prepare for depositions; identify and prepare docs, emails, telephone conference with co-counsel.
45814	TIME	Miller, Bob	55.00	12/7/2020	12/12/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel; prepare depo summary; conf call w/co-counsel; preparation of responses to TEP discovery; review and revise answer to counter claim.
45815	TIME	Miller, Bob	12.00	12/14/2020	12/19/2020	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45816	TIME	Miller, Bob	18.00	12/21/2020	12/26/2020	prof.services	GRM Jolley Fed	Telephone conference with RM re: class certification; analyze 2 Simpson NGL spreadsheets, email to co-counsel re: same; class certification brief; review and analyze Beraquista spreadsheet; forward to MED; prepare chart of WPX/TEP royalty allocation pools; emails re: same. Review Keever draft of Class Response to TEP discovery; response re: Merrill 84, identify & forward Simpson & Beraquista spreadsheets to MESD; Wms Shrink data to MED; redraft of Keever responses to TEP discovery
45863	TIME	Miller, Bob	8.00	12/27/2020	1/2/2021	prof.services	GRM Jolley Fed	discovery
45817	TIME	Miller, Bob	10.50	12/28/2020	12/30/2020	prof.services	GRM Jolley Fed	Prepare responses to TEP discovery requests.
45865	TIME	Miller, Bob	6.50	1/3/2021	1/9/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets re: NGL values, volumes, etc.; emails re: Class discovery responses.
45866	TIME	Miller, Bob	1.50	1/10/2021	1/16/2021	prof.services	GRM Jolley Fed	Emails re: facts considered by Ct on SJ.
45867	TIME	Miller, Bob	8.50	1/17/2021	1/23/2021	prof.services	GRM Jolley Fed	emails w/MED re: Canyon gathering; revise discover responses w/Keever & MED.
45868	TIME	Miller, Bob	23.00	1/31/2021	2/6/2021	prof.services	GRM Jolley Fed	Identify Summit/ETC gathering invoices & forward to MED; review and organize TEP documents; prepare memo re: amendment to class definition; emails re: same; legal & fact research re: same; emails re: Potter Leases; review Potter leases and maps.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45869	TIME	Miller, Bob	23.00	2/7/2021	2/13/2021	prof.services	GRM Jolley Fed	Zoom w/co-counsel; review Lease categorization schedule; review and comment on emails re: Lease categorization; review Keever data re: Potter Leases, wells and maps and identify Potter wells on TEP GVG docs; preparation of initial disclosures; review TEP docs.
45870	TIME	Miller, Bob	15.50	2/14/2021	2/20/2021	prof.services	GRM Jolley Fed	30 (b)(6) emails; Telephone conference with Keever; review and provide comments re: Lease spreadsheets; review TEP docs.
45871	TIME	Miller, Bob	8.50	2/21/2021	2/27/2021	prof.services	GRM Jolley Fed	Review additional TEP disclosures; review emails re: Class Lease spreadsheet; review initial disclosures; emails re: Lease categorization.
45872	TIME	Miller, Bob	13.00	3/7/2021	3/13/2021	prof.services	GRM Jolley Fed	Prepare memo re: Potter 30 (b)(6) deposition; research re: same; conference call w/ Keever & Seely re: same; prepared summary of class claims; answer co-counsel questions (facts & law) re: same; review TEP docs.
45873	TIME	Miller, Bob	20.00	3/17/2021	3/20/2021	prof.services	GRM Jolley Fed	Draft expanded summary of class claims; emails re: same; email re: Facts which support class claims; memo identifying such Facts; Telephone conference with Chrisman re: Potter depo and lease categorization and class definition; prepared summary of; emails re: same.
45874	TIME	Miller, Bob	14.00	3/21/2021	3/27/2021	prof.services	GRM Jolley Fed	Identify, review and answer RM questions re: docs 67 to 72; emails w/DS re: errata to Pollock deposition; zoom w/co-counsel re: Potter depo, review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45875	TIME	Miller, Bob	8.50	3/31/2021	4/3/2021	prof.services	GRM Jolley Fed	Zoom w/-co-counsel re: JPRF; Telephone conference with Seely re: engaging expert witness; review docs re: same; review TEP docs; discussion w/ DS re: plats contract.
45876	TIME	Miller, Bob	10.00	4/4/2021	4/10/2021	prof.services	GRM Jolley Fed	Review Lease spreadsheet and uncategorized Leases together w/TEPRFA & RO6 responses; emails re: same; review TEP docs.
45877	TIME	Miller, Bob	23.00	4/11/2021	4/17/2021	prof.services	GRM Jolley Fed	Telephone conference with Bourque; emails w/Bourque and co-counsel re: engagement of marketing expert; review and revise contracts; identify and prepare list of documents to provide to Bourque together w/summary of Class Claims and applicable law.
45878	TIME	Miller, Bob	25.00	4/18/2021	4/24/2021	prof.services	GRM Jolley Fed	Telephone conference with DS re: Bourque engagement and work; review MED gathering spreadsheets and emails; review TEP docs and gathering docs and Potter check stubs re: gathering deducts; prepare memo re: Lease categorization and review applicable leases and legal research. Legal research re: Implied Covenant to market.
45879	TIME	Miller, Bob	17.50	4/25/2021	4/26/2021	prof.services	GRM Jolley Fed	Answer Keever questions re: pricing claim; legal and fact reseach re: same; memo re: lease categorization to co-counsel. Legal research re: Implied Covenant to market.
45880	TIME	Miller, Bob	19.50	5/5/2021	5/8/2021	prof.services	GRM Jolley Fed	Zoom w/co-counsel re: JPRF; review TEP docs; review Keever email; zoom w/DS & Bourque. Legal research re: Implied covenant to market; memo re: ICM in Colorado.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45881	TIME	Miller, Bob	13.00	5/10/2021	5/15/2021	prof.services	GRM Jolley Fed	Review and analyze TEP discovery responses; review TEP documents. Prepare and circulate memo re: TEP discovery responses; emails to DS re: Bourque class
45882	TIME	Miller, Bob	6.50	5/16/2021	5/22/2021	prof.services	GRM Jolley Fed	cert.issues/questions
45883	TIME	Miller, Bob	6.00	5/23/2021	5/26/2021	prof.services	GRM Jolley Fed	Review TEP documents. Review facts related certification of class claims; review and revise memo re: facts/issues for Bourque to address re: Class Cert; review and respond to GS questions re: same; answer GS question re: lease spreadsheets; co-counsel emails.
45884	TIME	Miller, Bob	14.00	5/30/2021	6/3/2021	prof.services	GRM Jolley Fed	Review TEP docs; review lease spreadsheets.
45885	TIME	Miller, Bob	12.00	6/7/2021	6/12/2021	prof.services	GRM Jolley Fed	Review Lease categorization spreadsheets & emails w/co-counsel re: same; memo re: Lease types in BAP cases and related legal research; review Keever BAP memo; legal research re: BAP case law (all jurisdictions); mem proposing end date for class period.
45886	TIME	Miller, Bob	18.00	6/13/2021	6/19/2021	prof.services	GRM Jolley Fed	Zoom call w/DS, Bourque, Kitch; review TEP docs; identify docs to forward to Bourque; summarize applicable Colorado Law for Bourque; emails re: same; review of Keever email re: Wms & Myers 853 (BAP); identify and forward Bourque docs re: TEP divestment of TRANS obligations; review Bourque expert witness report and comments and revisions re: same.
45887	TIME	Miller, Bob	18.00	6/20/2021	6/24/2021	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45888	TIME	Miller, Bob	21.00	7/11/2021	7/17/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets and Bourque comments re: NGL costs and revenue; review Bourque expert report re: Class Cert. re: pricing data to MED; start preparing comments re: same.
45889	TIME	Miller, Bob	21.50	7/18/2021	7/24/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets re: comparative prices, NGL prices, shrink, WPX calcs and daily prices; multiple emails re: pricing data and questions; comments re: Bourque expert report; review co-counsel comments re: same; emails re: same; zoom w/co-counsel.
45890	TIME	Miller, Bob	7.50	7/25/2021	7/31/2021	prof.services	GRM Jolley Fed	Review MED spreadsheet re: WRH, CIG, Opal; price comparison; Telephone conference with MED re: same; email comments to Bourque, review TEP documents.
45891	TIME	Miller, Bob	13.00	8/1/2021	8/7/2021	prof.services	GRM Jolley Fed	Research re: NGL pricing and shrink; request prior MED spreadsheets; Zoom call w/MED, Bourque, DS re: 6 MED spreadsheets; answer Bourque questions re: Ryan & Starkey Gulch receipt points and processing plants; answer Bourque quesions re: Concord Remittance Statements.
45892	TIME	Miller, Bob	18.00	8/8/2021	8/14/2021	prof.services	GRM Jolley Fed	Zoom w/DS, Bourque; Telephone conference with DS, RM; emails w/MED re: acquisition of pricing data; review MED pricing spreadsheets; analysis of MED pricing spreadsheets; review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45893	TIME	Miller, Bob	23.00	8/15/2021	8/21/2021	prof.services	GRM Jolley Fed	Answer Bourque questions; additional docs to Bourque; analysis of MED pricing spreadsheets and memo to co-counsel re: same; Review Bourque comments and pricing spreadsheets; co-counsel emails re: obtaining pricing data from TEP; emails re: scheduling; emails re: pricing data; conference call w/Bourque, review TEP data.
45894	TIME	Miller, Bob	12.00	8/22/2021	8/28/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets comparing check stubs and SQL data; review and analyze Bourque analysis of MED pricing data & Bourque spreadsheets re: same; emails re: same; review TEP data.
45895	TIME	Miller, Bob	23.00	8/29/2021	9/4/2021	prof.services	GRM Jolley Fed	Prepare analysis of MED pricing data w/comments, extensive emails re: use of unweighted pricing data for some purposes; review TEP data; prepare tables & comments to compare pricing and differentials; Telephone conference with MED and emails re: flow data pricing.
45896	TIME	Miller, Bob	17.00	9/5/2021	9/11/2021	prof.services	GRM Jolley Fed	Obtain and review JPRF costs; Telephone conference with DS & Bourque; Telephone conference with DS; review & forward 4 MED pricing spreadsheets to Bourque and co-counsel; Telephone conference with MED re: same; identify and forward docs to MED and Bourque; review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45897	TIME	Miller, Bob	21.00	9/12/2021	9/18/2021	prof.services	GRM Jolley Fed	Review and comment on MED expert witness report; extensive emails and comments by co-counsel; review Keever comments; compile comments and forward to MED for review; more emails. Zoom w/Bourque & DS; Zoom w/MED & DS; review draft Bourque expert report; document to Bourque; review two Simpson spreadsheets and forward to MED; prepare memo response to GS emails re: Wms/BP REX Contract; review GS response; extensive emails and fact and legal research; review MED spreadsheets re: NGL claims; review Keever emails re: same.
45898	TIME	Miller, Bob	29.00	9/19/2021	9/25/2021	prof.services	GRM Jolley Fed	Detailed response to comments re: MED spreadsheets; email to MED re: royalty payors; review history of lease categorization and special pricing leases and related facts; comment on same; review 6 Simpson spreadsheets; review TEP docs.
45899	TIME	Miller, Bob	21.00	9/26/2021	10/2/2021	prof.services	GRM Jolley Fed	Emails w/DS re: JPRF expenses; review and comment on draft MED report; emails re: same; redraft class definition and realted fact research 20 hours over 4 months; review GS drafts re: same; extended emails re: same; review MED proposed pricing exhibit; Keever redraft and emails; legal research re: recent BAP cases; prepare memo re: same; Zoom MED & DS.
45900	TIME	Miller, Bob	39.50	10/3/2021	10/9/2021	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45901	TIME	Miller, Bob	15.50	10/10/2021	10/16/2021	prof.services	GRM Jolley Fed	Review TEP list of TRANS contracts and the contracts themselves; emails re: BAP cases and related research; emails re: redraft class definition and lease spreadsheets and review of lease spreadsheet; review Keever comments to MED expert report; emails w/MED re: same; review TEP docs.
45902	TIME	Miller, Bob	34.00	10/17/2021	10/23/2021	prof.services	GRM Jolley Fed	Review of Beracquista spreadsheets and forward to Bourque; review MED spreadsheets and forward to Bourque; prepare memo re: excluding Major operators from class definition; fact research re: same; emails re: same; Telephone conference with MED re: data sources; prepared memo re: same for Bourque; review GS proposed class definition and related emails; review TEP data re: WPX workbooks; Keever comments on MED expert report; review TEP docs.
45903	TIME	Miller, Bob	25.00	10/24/2021	10/30/2021	prof.services	GRM Jolley Fed	Telephone conference with Keever re: Lindauer Settlement and fact research re: same; comments on Bourque Expert Report and related emails; review Bourque's "last draft" of expert report plus exhibits; review and resolve multiple co-counsel comments re: MED expert report; multiple emails re: same; review MED final expert report with Exhibits; review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45904	TIME	Miller, Bob	28.00	11/1/2021	11/6/2021	prof.services	GRM Jolley Fed	Review of TEP docs and recent TEP disclosures; legal research re: class claims; and abrogation of implied covenants; legal research re: good faith and Colorado implied covenant to market; Zoom w/Bourque & DS; Zoom w/co-counsel, Telephone conference with DS.
45905	TIME	Miller, Bob	37.00	11/7/2021	11/13/2021	prof.services	GRM Jolley Fed	Review proposed stipulation and attached Lease spreadsheet; legal research re: waiver of TEP implied covenant duties; emails w/DS re: JPRF expenses; memo re: Colorado Law re: good faith and abrogation of Leasee's implied covenant duties; review Covenant of Further Exploration Law review from Keever; emails w/co-counsel and legal research re: same issues; memo re: wrongdoing & BAP plus related legal and fact research; research re: relational contracts; research re: affiliate contracts.
45906	TIME	Miller, Bob	18.00	11/14/2021	11/20/2021	prof.services	GRM Jolley Fed	Legal research re: unjust enrichment and restitution; memo re: Colorado implied covenant duty to diligently market.
45907	TIME	Miller, Bob	11.00	11/21/2021	11/27/2021	prof.services	GRM Jolley Fed	Review of emails re: Caerus & Ursa and class definition and comment re: same; review TEP docs; continued legal research.
45908	TIME	Miller, Bob	16.00	11/28/2021	12/4/2021	prof.services	GRM Jolley Fed	Review EKA memo re: affiliate contracts; emails discussing same; legal research re: same; review EKA supplemental memo; review TEP docs and disclosures. Review EKA memo re: unjust enrichment and related cases.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45909	TIME	Miller, Bob	27.00	12/5/2021	12/11/2021	prof.services	GRM Jolley Fed	Response to affiliate contract emails; memo re: facts plus comments; identify and review documents related to Wms/BPREXGPA; prepare memo re: same; Telephone conference with DS; conference call re: settlement; legal research re: unjust enrichment. Emails to MED and Bourque re: TEP expert witness reports; review TEP docs.
45910	TIME	Miller, Bob	6.00	12/12/2021	12/18/2021	prof.services	GRM Jolley Fed	
45911	TIME	Miller, Bob	28.00	12/19/2021	12/25/2021	prof.services	GRM Jolley Fed	Review TEP expert witness reports; memo to co-counsel re: same; continued review and emails re: TEP expert reports and exhibits; start working on memo summarizing TEP expert reports.
45912	TIME	Miller, Bob	6.00	12/26/2021	12/31/2021	prof.services	GRM Jolley Fed	Completed memo re: TEP expert reports.
45934	TIME	Miller, Bob	17.50	1/4/2022	1/8/2022	prof.services	GRM Jolley Fed	Review Lease spreadsheet redraft by TEP; memo re: Lease spreadsheet and common questions; zoom w/co-counsel; review MED massive SQL data; zoom w/MED; zoom w/ Bourque; review MED analysis of NGL data; emails re: shrink calcs and revised spreadsheets; prepare memo re: Lease spreadsheet.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45935	TIME	Miller, Bob	22.00	1/10/2022	1/15/2022	prof.services	GRM Jolley Fed	Respond to Stucky questions re: common issues memo; zoom call w/DS and Bourque; zoom w/co-counsel; zoom call w/Bourque and DS; email re: economics expert; discussion of whether to proceed with NGL claim, self dealing, BAP and wrong doing; memo and related research re: same; identify and forward docs to Bourque; Telephone conference with MED re: expert report; co-counsel emails re: use of Classwide methodology.
45936	TIME	Miller, Bob	37.00	1/17/2022	1/22/2022	prof.services	GRM Jolley Fed	Review TEP responses to discovery; answer Bourque question re: TERRA supply deal; legal research re: abrogation of implied covenants and memos re: same; answer Bourque question re: NGLs; locate and forward documents requested by Bourque; respond to GS questions re: covenants implied in law; legal research re: Comparable Price Method; memo re: same; review and comment on Bourque expert rebuttal report; review DS comments to rebuttal report.
45937	TIME	Miller, Bob	15.50	1/24/2022	1/29/2022	prof.services	GRM Jolley Fed	Review and comment on MED expert Rebuttal report; review EKA memo on equitable remedies in JPRF; memo re: same; emails re: same; review and comment on final draft Bourque Rebuttal report and co-counsel comments; review additional Bourque comments and emails re: same; Telephone conference with MED re: common questions; comment to MED rebuttal report.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45938	TIME	Miller, Bob	13.00	1/31/2022	2/5/2022	prof.services	GRM Jolley Fed	Co-counsel emails re: class cert. brief and timing; identify and organize facts and docs re: Wms/BPRex GPA; review TEP docs and disclosures.
45939	TIME	Miller, Bob	17.00	2/7/2022	2/12/2022	prof.services	GRM Jolley Fed	Review and revise lease stipulation; prepare outline of facts and docs re: Wms/BPRex GPA; co-counsel emails re: organizing class cert brief; Telephone conference with Keever re: Second Amended gathering agreement; review TEP docs and disclosures; emails w/co-counsel.
45940	TIME	Miller, Bob	15.00	2/14/2022	2/19/2022	prof.services	GRM Jolley Fed	Emails re: Class Cert. Motion; zoom w/co-counsel re: same; redraft fact statement for Class Cert. Motion; statement of claims and common questions, email w/co-counsel.
45941	TIME	Miller, Bob	14.00	2/21/2022	2/26/2022	prof.services	GRM Jolley Fed	Finalize and circulate redraft Motion to Certify Class; co-counsel emails re: same; review DS redraft; review GJS redraft; review TEP docs and disclosures.
45942	TIME	Miller, Bob	9.00	2/28/2022	11/2/2024	prof.services	GRM Jolley Fed	Identify authorities and memos which establish legal basis for BAP claim; email w/co-counsel re: class definition re: ORRI owners; review RM redraft Class Motion to Certify; review GS draft, emails re: same.
45943	TIME	Miller, Bob	17.00	3/7/2022	3/12/2022	prof.services	GRM Jolley Fed	Prepare first draft Bourque Affidavit; revise draft to include all facts in brief; review DS redraft of motion; review of TEP docs and disclosures.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45944	TIME	Miller, Bob	22.50	3/14/2022	3/19/2022	prof.services	GRM Jolley Fed	Review and revise Motion to Certify Class; fact research re: same and find citations (fact & law); review GS redraft; review TK redraft; find and fix cites; revise fact statement, review DS draft; revise DS draft and add cites to affidavits. Find docs to support Class Cert. Brief; review amended complaint to add cites to brief; review DS revisions; another redraft of Motion; find and fix cites; review Keever draft and comments; Telephone conference with DS.
45945	TIME	Miller, Bob	10.50	3/21/2022	3/26/2022	prof.services	GRM Jolley Fed	
45946	TIME	Miller, Bob	25.00	3/28/2022	4/2/2022	prof.services	GRM Jolley Fed	Prepare first draft of Denomy Affidavit; emails w/co-counsel re: ORRI owners; review TEP disclosures re: ORRI owners; review DS draft; emails re: unreasonable deductions and damages; review and revise GS change to Expert Witness affidavits; review RM and GS changes to affidavits; Telephone conference with RM; add affidavit cites to motion; review Bourque draft of affidavit; review GS redraft Bourque affidavit.
45947	TIME	Miller, Bob	19.00	4/4/2022	4/9/2022	prof.services	GRM Jolley Fed	Review MED affidavit and revisions; review DS affidavit and exhibits; attorney emails re: class cert. motion and affidavits; review Sam Potter depo and identify facts for affidavit; review DS and RM changes to Motion; review and comment on RM, GS, DS changes to affidavits; review MED affidavit and exhibits.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45948	TIME	Miller, Bob	15.00	4/11/2022	4/16/2022	prof.services	GRM Jolley Fed	Co-counsel emails re: Certification Hearing; comment on evidence and legal issues re: hearing; legal research re: unjust enrichment and memo; legal research re: statute of limitations; legal and fact research re: moratory interest; memo re: moratory interest; answer co-counsel questions re: moratory interest. Legal research and memo re: BP v Patterson (damages); co-counsel emails re: Hearing; legal research re: class cert.; review TEP doc and disclosures.
45949	TIME	Miller, Bob	18.00	4/18/2022	4/23/2022	prof.services	GRM Jolley Fed	Review MED data re: retroactive adjustments and statute of limitations; fact research re: same; legal research re: tolling by retroactive adjustment; review EA memo re: effect of TEP defenses on certification; legal research re: same; legal research re: class cert.
45950	TIME	Miller, Bob	21.00	4/25/2022	4/30/2022	prof.services	GRM Jolley Fed	Legal research re: standard for abrogating implied covenant to market; email to Keever re: statute of limitations; fact research re: retroactive adjustments; memo re: abrogation of implied covenant to markets.
45951	TIME	Miller, Bob	24.50	5/2/2022	5/7/2022	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45952	TIME	Miller, Bob	29.00	5/9/2022	5/14/2022	prof.services	GRM Jolley Fed	Legal research re: standard for abrogating implied covenant to market; memo re: abrogation of implied covenant to market; fact research re: statute of limitations/retroactive adjustments; amendment to moratory interest memo and post cert discovery; review emails re: class cert. hearing; Telephone conference with expert witnesses; email discussion w/co-counsel re: abrogation.
45953	TIME	Miller, Bob	13.00	5/31/2022	6/4/2022	prof.services	GRM Jolley Fed	Review Bourque comments re: TEP response; zoom w/co-counsel; review TEP response; prepare memo re: TEP response.
45954	TIME	Miller, Bob	27.50	6/6/2022	6/11/2022	prof.services	GRM Jolley Fed	Prepare reply to facts in TEP response; review DS draft of reply; review DS reply to processing argument; email discussion w/co-counsel re: class cert. issues; and related research; prepare first draft of class reply re: facts, affirmative defenses, comparable prices, lease language, abrogation, price, TRANS cost and Lindauer settlement; zoom w/co-counsel re: reply.
45955	TIME	Miller, Bob	19.50	6/13/2022	6/18/2022	prof.services	GRM Jolley Fed	Emails re: Lease types; revised Lease Language section of Reply; Telephone conference with co-counsel re: same; review and analyze exhibits to TEP response, including expert reports and exhibits, zoom w/co-counsel.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45956	TIME	Miller, Bob	17.00	6/20/2022	6/25/2022	prof.services	GRM Jolley Fed	Prepare memo re: exhibits to TEP response; draft reply section re: Lindauer Settlement; review Bourque and MED affidavits; Telephone conference with Bourque re: Killion/Odegard Declarations; Telephone conference with DS re: reply.
45957	TIME	Miller, Bob	29.50	6/27/2022	7/2/2022	prof.services	GRM Jolley Fed	Zoom call w/Bourque and Seely re: Reply Affid; review RM draft Reply; redraft final section Reply; review GS draft Reply; redraft Reply; Telephone conference with Keever and Chrisman; zoom w/ co-counsel; Telephone conference with DS; Telephone conference with DS; zoom w/co-counsel; work on cites in Reply, review DS draft; emails w/Keever re: gathering.
45958	TIME	Miller, Bob	20.00	7/5/2022	7/9/2022	prof.services	GRM Jolley Fed	Review and comment on Bourque Declaration; review EA memo re: Trans costs; docs for Bourque Dec.; review and revise Reply brief; zoom w/co-counsel re: same; numerous emails re: same; another revision; emails re: reply; review and comment on MED Declaration; finalize Reply.
45959	TIME	Miller, Bob	6.00	7/11/2022	7/16/2022	prof.services	GRM Jolley Fed	Emails re: COPAS manual; review COPAS manuals; identify TEP docs; TEP maps.
45960	TIME	Miller, Bob	1.50	7/20/2022		prof.services	GRM Jolley Fed	Zoom call w/co-counsel re: Lease construction.
45961	TIME	Miller, Bob	3.00	7/26/2022	7/30/2022	prof.services	GRM Jolley Fed	Review of O. Anderson BAP article, emails re: same.
45962	TIME	Miller, Bob	8.00	8/1/2022	8/6/2022	prof.services	GRM Jolley Fed	Zoom w/co-counsel; review TEP docs and disclosures.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45963	TIME	Miller, Bob	15.00	8/8/2022	8/13/2022	prof.services	GRM Jolley Fed	Review and revise Order of Proof re: Class Cert. Hearing; review TEP docs and disclosures; prepare List of TEP Trans Contracts; prepare summary of Lindauer Settlement for Bourque.
45964	TIME	Miller, Bob	11.00	8/15/2022	8/20/2022	prof.services	GRM Jolley Fed	Identify and provide TEP docs to Bourque; multiple emails re: same; review TEP docs and disclosures.
45965	TIME	Miller, Bob	9.00	8/22/2022	8/27/2022	prof.services	GRM Jolley Fed	Review TEP docs, review and revise Order of Proof.
45966	TIME	Miller, Bob	16.50	8/29/2022	9/3/2022	prof.services	GRM Jolley Fed	Telephone conference with DS re: Class Cert. Hearing and Order of Proof; review and revise Order of Proof; conference calls re: Order of Proof; review TEP docs; zoom w/co-counsel re: Class Cert.
45967	TIME	Miller, Bob	16.50	9/5/2022	9/10/2022	prof.services	GRM Jolley Fed	Emails w/ DS re: TEP Lease Language defenses; review Bourque statements and expert reports; identify evidence re: Class Cert. Hearing; zoom w/co-counsel; prepare Order of Proof for rebuttal at Class Cert. w/exhibits.
45968	TIME	Miller, Bob	16.00	9/12/2022	9/17/2022	prof.services	GRM Jolley Fed	Review DS redraft of order of Proof; emails and comments re: same; redraft and simplify Order of Proof; zoom w/co-counsel; emails re: maps.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45969	TIME	Miller, Bob	21.00	9/19/2022	9/24/2022	prof.services	GRM Jolley Fed	Review Bourque expert report re: Class Cert.; review Denomy expert report; detailed comments re: both reports; incorporate co-counsel comments; forward comments to Bourque and Denomy; Telephone conference with Seely; zoom w/co-counsel; Telephone conference with RKM; comments to TDK opening statement; email re: same; review co-counsel revisions. Compile class cert. exhibits; Telephone conference with RKM (multiple re: same); identify and prep class cert. exhibits, review and revise list of witnesses and exhibits.
45970	TIME	Miller, Bob	21.00	9/26/2022	9/28/2022	prof.services	GRM Jolley Fed	
45971	TIME	Miller, Bob	12.00	10/4/2022	10/8/2022	prof.services	GRM Jolley Fed	Review and pare down class cert. exhibits; emails w/Denomy re: her report; zoom w/co-counsel; preparation of demonstrative exhibits, Telephone conference with RKM and NA.
45972	TIME	Miller, Bob	21.00	10/10/2022	10/15/2022	prof.services	GRM Jolley Fed	Zoom w/co-counsel; review and revise demonstrative exhibits; review RKM demonstratives; revision to Rebuttal Order of Proof; review GJS demonstratives; review TEP demonstratives; revise class demonstratives; answer questions re: order of proof DS and RKM; reschedule Class Cert Hearing (DS COVID); Telephone conference with NK, RKM, DS re: class cert. hearing.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45973	TIME	Miller, Bob	22.00	10/17/2022	10/22/2022	prof.services	GRM Jolley Fed	Detailed analyzie of TEP pricing sheets; prepared report re: same; review and comment on TEP Class Cert. exhibits; email exchanges re: same and related legal research; zoom call w/co-counsel.
45974	TIME	Miller, Bob	12.00	10/25/2022	10/29/2022	prof.services	GRM Jolley Fed	Legal research re: gathering and processing cost claims; review 5 law; review articles re: same; emails re: gathering and processing claims.
45975	TIME	Miller, Bob	21.00	10/31/2022	11/2/2022	prof.services	GRM Jolley Fed	Review TEP expert witness reports; legal research re: commonality re: class damages; prepared memo re: Walls Report, damages and class cert.; zoom w/co-counsel, emails w/co-counsel.
45976	TIME	Miller, Bob	13.00	11/7/2022	11/12/2022	prof.services	GRM Jolley Fed	Review DS response to Walls memo; answer questions re: same; review GS response to Walls memo; answer questions re: same; memo to DS re: Class Cert opening and rebuttal, prepared 14 demonstrative exhibits plus related fact research.
45977	TIME	Miller, Bob	9.00	11/14/2022	11/19/2022	prof.services	GRM Jolley Fed	Review class leases; categorize re: Rogers Lease types; memo to DS re: same; Telephone conference with DS & RM; zoom call w/co-counsel.
45978	TIME	Miller, Bob	5.00	11/21/2022	11/23/2022	prof.services	GRM Jolley Fed	Review Terry expert report plus comments re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45979	TIME	Miller, Bob	9.00	12/5/2022	12/10/2022	prof.services	GRM Jolley Fed	Answer DS questions re: TEP gas prices and analysis and Concord Remittance statements; fact research re: same; review TEP demonstrative exhibits; review DS revisions to Class demonstratives.
45980	TIME	Miller, Bob	2.00	12/12/2022	12/14/2022	prof.services	GRM Jolley Fed	Receive and review Seifkin article.
45981	TIME	Miller, Bob	6.00	1/2/2023	1/7/2023	prof.services	GRM Jolley Fed	Answer DS questions re: TEP docs and WPX spinoff statements; emails re: same; emails w/co-counsel and expert witnesses.
45982	TIME	Miller, Bob	25.50	1/9/2023	1/14/2023	prof.services	GRM Jolley Fed	Zoom w/MED and DS; review MED spreadsheets re: TRANS costs; review and amend DS drafts of Class demonstratives; related fact research; revise Bourque demonstratives; answer DS questions re: Benacquista testimony; related fact research; review thoughts and order of proff re: rebuttal testimony; RKM changes to demonstratives; prepare demonstratives; Bourque questions re: pricing/ RKM question re: Implied Covenant to market; DS questions; zoom w/ DS, Bourque, RM re: testimony.
45983	TIME	Miller, Bob	29.50	1/16/2023	1/21/2023	prof.services	GRM Jolley Fed	Prepare cross-exam questions for TEP witnesses; review depositions re: same; review and revise demonstratives; review TEP power points; conference calls w/co-counsel re: expert testimony; prepare comments on TEP power points; review DS notes on Bourque conference call/testimony; travel to Grand Junction.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45984	TIME	Miller, Bob	60.00	1/23/2023	1/28/2023	prof.services	GRM Jolley Fed	Prepare for and attend hearing for Class Cert. 1/22-1/25; travel to DRO; memo re: testimony at Class Cert. hearing.
45985	TIME	Miller, Bob	35.00	1/30/2023	2/4/2023	prof.services	GRM Jolley Fed	Reviewing identifying WPX and TEP check subs re: gathering and processing deductions; emails re: same; review O. Anderson article; legal research re: Gathering and Trans cost deductions; drafting memo re: application of Atlantic Richfield to JPRF; review docs from Clough case re: plant payouts; prepare memo re: same; legal research re: same.
45986	TIME	Miller, Bob	21.00	2/6/2023	2/11/2023	prof.services	GRM Jolley Fed	Continue legal research re: Gath and Trans costs; review TEP discovery responses re: costs; completed memo re: application of Atlantic Richfield to JPRF; continue review of Clough plant payout docs.
45987	TIME	Miller, Bob	29.00	2/13/2023	2/18/2023	prof.services	GRM Jolley Fed	Receive and review order recommending class certification; zoom w/co-counsel; review facts and repara memo re: effect of order on class claims; prepare memo recommending motion to reconsider and legal and fact research re: same; legal research and Newberg outline of issues for reconsideration; zoom w/co-counsel; emails re: same.
45988	TIME	Miller, Bob	18.00	2/20/2023	2/25/2023	prof.services	GRM Jolley Fed	Work w/MED to estimate TRANS damages for class; review MED spreadsheets; Telephone conference with co-counsel; emails re: objection to class cert; review EA motion to amend class definition, redraft of objection; prepare exhibit re: objection.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45989	TIME	Miller, Bob	14.00	2/27/2023	3/4/2023	prof.services	GRM Jolley Fed	Receive and review TEP objections to Class Cert; Telephone conference with DS re: same; emails re: same; Telephone conference with DS and RM re: same; Newberg research; zoom w/co-counsel.
45990	TIME	Miller, Bob	29.00	3/6/2023	3/11/2023	prof.services	GRM Jolley Fed	Draft of response to TEP's objections plus factual and legal research; zoom w/co-counsel; identify facts/docs re: TEPIRR; review Motions re: extension of time; legal research re: comparable pricing; legal research re: moratory interest; legal research re: Middleton; drafted brief re: Leyda.
45992	TIME	Miller, Bob	8.00	3/20/2023	3/25/2023	prof.services	GRM Jolley Fed	Revise Class Response to TEP Objections; review RM and DS drafts; review NK and GS drafts.
45993	TIME	Miller, Bob	4.00	4/3/2023	4/8/2023	prof.services	GRM Jolley Fed	Review TEP supplemental authority; legal research re: same, emails re: same.
45994	TIME	Miller, Bob	5.00	4/10/2023	4/14/2024	prof.services	GRM Jolley Fed	Legal research re: Colorado cases contrary to supplemental authority; emails re: same.
45995	TIME	Miller, Bob	11.00	4/17/2023	4/22/2023	prof.services	GRM Jolley Fed	Legal research re: Colorado cases contrary to supplemental authority; review and revise DS and RM drafts re: supplemental authority; emails re: same.
45996	TIME	Miller, Bob	6.00	5/1/2023	5/6/2023	prof.services	GRM Jolley Fed	Legal research re: gathering & processing cost deductions.
45997	TIME	Miller, Bob	8.00	5/8/2023	5/13/2023	prof.services	GRM Jolley Fed	Legal research plus docs review re: gathering and processing costs.
45998	TIME	Miller, Bob	5.00	5/15/2023	5/20/2023	prof.services	GRM Jolley Fed	Prepared memo re: gathering and clost deduction claims.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45999	TIME	Miller, Bob	14.00	6/12/2023	6/17/2023	prof.services	GRM Jolley Fed	legal research re: IDC and COC cost deductions; email w/GS re: same; motion & stip.
46000	TIME	Miller, Bob	15.00	6/26/2023	7/1/2023	prof.services	GRM Jolley Fed	Legal research re: WPX/TEP costs and GAAP accounting.
46001	TIME	Miller, Bob	24.00	7/3/2023	7/8/2023	prof.services	GRM Jolley Fed	Review MED spreadsheet, memo re: costs; fact and legal research re: GVGS & Parachute Plant Operations; estimate of plant revenues and cost; legal research re: capital cost recovery, tolling, good faith and fair dealing, burden of proof, unjust enrichment.
46002	TIME	Miller, Bob	8.00	7/10/2023	7/15/2023	prof.services	GRM Jolley Fed	Memo re: unreasonable cost claims.
46003	TIME	Miller, Bob	8.00	8/28/2023	9/2/2023	prof.services	GRM Jolley Fed	Emails re: other TEP cases; prepare questions for MED; review MED response and spreadsheet re: processing costs.
46004	TIME	Miller, Bob	4.00	9/25/2023	9/30/2023	prof.services	GRM Jolley Fed	Review order granting class certification and research; zoom w/co-counsel; comparable pricing memo; discussion of Cts pricing questions.
46005	TIME	Miller, Bob	9.00	10/2/2023	10/7/2023	prof.services	GRM Jolley Fed	Review TEP petition for interlocutory appeal; zoom w/co-counsel; legal research; drafting answer; review study of class action appeals.
46006	TIME	Miller, Bob	3.00	10/16/2023	10/21/2023	prof.services	GRM Jolley Fed	Review and comment on DS draft of answer.
46007	TIME	Miller, Bob	14.00	10/23/2023	10/28/2023	prof.services	GRM Jolley Fed	Telephone conference with Keever and Chrisman re: discovery plan; review and comment on Motion of Extension of Time; review comment on discovery deadlines; review TEP data re: unreasonable cost claims.
46008	TIME	Miller, Bob	3.00	10/30/2023	11/4/2023	prof.services	GRM Jolley Fed	Memo re: TEP data re: unreasonable cost claims.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
46009	TIME	Miller, Bob	1.50	11/8/2023	11/10/2023	prof.services	GRM Jolley Fed	Zoom call w/co-counsel; emails to DS.
45915	TIME	Miller, Bob	4.00	1/1/2024	1/6/2024	prof.services	GRM Jolley Fed	Review case management order; zoom meeting w/co-counsel; zoom w/DS, Keever, experts.
45916	TIME	Miller, Bob	4.50	1/7/2024	1/13/2024	prof.services	GRM Jolley Fed	Telephone conference with Keever re: disclosures; DS email to experts and responses; review TEP disclosures; zoom w/co-counsel; emails re: scheduling.
45917	TIME	Miller, Bob	26.00	1/14/2024	1/20/2024	prof.services	GRM Jolley Fed	review TEP docs; legal and fact research to prepare working case outline; preparing outline, legal research re: tolling limitations period.
45918	TIME	Miller, Bob	24.00	1/21/2024	1/27/2024	prof.services	GRM Jolley Fed	Legal and fact research to prepare working case outline; preparing outline, continue tolling research and BAP.
45919	TIME	Miller, Bob	22.00	1/28/2024	2/3/2024	prof.services	GRM Jolley Fed	TEP appeal denied; legal and fact research re: merits discovery requests to TEP; review TEP responses to Class Cert. discovery and disclosures.
45920	TIME	Miller, Bob	26.00	2/4/2024	2/10/2024	prof.services	GRM Jolley Fed	legal and fact research re: discovery state requests to TEP; prepare first draft discovery requests; detailed discussions w/co-counsel re: same; review TEP docs.
45921	TIME	Miller, Bob	22.00	2/11/2024	2/17/2024	prof.services	GRM Jolley Fed	Legal and fact research re: concord/NWPL claims, review TEP docs.
45922	TIME	Miller, Bob	27.00	2/18/2024	2/24/2024	prof.services	GRM Jolley Fed	Answer TK request for description of class claims; review DS timeline for class claims; preparation of mem re: Concord/NWPL claims; legal and fact research re: third party pipeline discovery requests.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45923	TIME	Miller, Bob	21.00	2/25/2024	3/2/2024	prof.services	GRM Jolley Fed	Review TK order of proof; revise order of proof; legal and fact research; prepare third party pipeline discovery requests (1st draft); legal and fact research re: same.
45924	TIME	Miller, Bob	33.00	3/3/2024	3/9/2024	prof.services	GRM Jolley Fed	Legal and fact research re: prudent operatory rule and setting aside lease terms; legal and fact research re: case outline; preparation of mem re: prudent operator rule; preparation of memo re: case outline; mem re: BAP claims; answer TK questions re: order of proof; compile Bourque docs re: Wms/BPRex GPA.
45925	TIME	Miller, Bob	39.00	3/10/2024	3/16/2024	prof.services	GRM Jolley Fed	Legal research re: BAP; answer Kitch questions re: same; dredraft of outline; numerous emails re: same; start review of TEP doc disclosures; legal and fact research re: discovery requests re: plant payouts; prepare discovery requests re: plant payouts; prepare discovery requests re: plant payouts, research Rule 45; extensive discussions w/co-counsel re: plant payout discovery requests.
45991	TIME	Miller, Bob	28.00	3/13/2024	3/18/2024	prof.services	GRM Jolley Fed	Review of TEP docs re: discounted gathering fees; memo re: same; draft of Response to TEP Objections re: class cert.; respond to Dave's comments; legal research re: cost deductions and share of cost and operating cost.
45926	TIME	Miller, Bob	29.00	3/17/2024	3/23/2024	prof.services	GRM Jolley Fed	Reviewing TEP docs; answer TK questions re: Walls testimony & TEP marketing strategy; review and comment on Class Notice/optout; 1st draft of 30(b)(6) topics, Telephone conference with Keever and DS.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45927	TIME	Miller, Bob	26.00	3/25/2024	3/30/2024	prof.services	GRM Jolley Fed	Zoom w/co-counsel; Telephone conference with Chrisman et al; compile GUGS docs and Barrett docs re: plant operation and payout; review MED spreadsheets, twc MED; memo re: Chrisman call (GATH and Proc); review additional MED underreporting spreadsheets; memo between co-counsel re: same.
45928	TIME	Miller, Bob	30.00	4/1/2024	4/6/2024	prof.services	GRM Jolley Fed	Review TEP documents on TEAMS; review Clough disclosure docs; review Simpson Rule 408 disclosures and damage estimate; prepared memo re: Rule 408 damage estimates; discussion w/Keever re: BPRex GPA; docs to Bourque re: BPREX GPA; Telephone conference with Keever; zoom w/Keever and MED.
45929	TIME	Miller, Bob	36.00	4/8/2024	4/13/2024	prof.services	GRM Jolley Fed	Zoom w/co-counsel; email discussion re: BAP application to facts; zoom w/Keever, MED; review TEP documents; reparation of pipeline discovery requests; discussions w/co-counsel re: same and plus downstream markets; prepare JPRF- to do list; review 30 (b)(6) topics, prepared questions for MED re: Rule 408 for all claims; review multiple MED spreadsheets w/attached docs, Telephone conference with Keever.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45930	TIME	Miller, Bob	23.00	4/15/2024	4/20/2024	prof.services	GRM Jolley Fed	Zoom w/Keever, MED; zoom w/co-counsel; conference call w/Chrisman et al; prepare memo re: moratory interest and legal research re: same; review multiple MED spreadsheet w/attached docs; review MED responses to GRM questions; ONRR docs; Telephone conference with Keever, prepare summary of Chrisman conference call; memo re: MED conference call.
45931	TIME	Miller, Bob	20.00	5/6/2024	5/11/2024	prof.services	GRM Jolley Fed	Review and revised Merits discovery requests to TEP, WPX, and third parties; review TEP docs, zoom w/co-counsel.
45932	TIME	Miller, Bob	19.00	5/13/2024	5/18/2024	prof.services	GRM Jolley Fed	Review and revise Mertis discovery requests to TEP, WPX, and third parties; supply exhibits to discovery; review TEP docs.
45552	TIME	Miller, Bob	2.75	5/27/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever, Telephone conference with Fleeson, re: mediation etc and JPRF status. Review status JPRF.
45933	TIME	Miller, Bob	11.00	5/27/2024	6/1/2024	prof.services	GRM Jolley Fed	Review and draft of Merits discovery requests; legal research re: moratory interest.
45553	TIME	Miller, Bob	4.65	5/28/2024		prof.services	GRM Jolley Fed	Legal research re: Moratory Interest. Review effects re: Rate of Return Merits discovery.
45554	TIME	Miller, Bob	4.20	5/29/2024		prof.services	GRM Jolley Fed	Legal research re: Moratory Interest. Review of facts re: Rate of Return.
45555	TIME	Miller, Bob	4.75	5/30/2024		prof.services	GRM Jolley Fed	Preparing third party pipeline discovery. Work on discovery to TEP.
45556	TIME	Miller, Bob	5.50	5/31/2024		prof.services	GRM Jolley Fed	Review Keever comments on TEP discovery. Research re: same: facts and Law. Conference call re: JPRF.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45557	TIME	Miller, Bob	5.10	6/2/2024		prof.services	GRM Jolley Fed	Legal research re: Tracing and Restatement of Restitution.
45558	TIME	Miller, Bob	6.25	6/3/2024		prof.services	GRM Jolley Fed	JPRF status zoom call. Review Keever email. Review and revise pipeline discovery. Legal research re:: Moratory Interest.
45559	TIME	Miller, Bob	5.75	6/4/2024		prof.services	GRM Jolley Fed	Finished Moratory Interest Memo. Review TEPs supplemenal document disclosures.
45560	TIME	Miller, Bob	6.40	6/5/2024		prof.services	GRM Jolley Fed	Review identical factual predicate research. Additional research re: same. Review discovery requests to TEP.
45580	TIME	Miller, Bob	4.20	6/6/2024		prof.services	GRM Jolley Fed	Additional Moratory Interest/Tracing Research. Review TEP doc disclosures.
45581	TIME	Miller, Bob	3.75	6/7/2024		prof.services	GRM Jolley Fed	Review Pipeline Discovery Responses. Review TEP doc disclosures.
45582	TIME	Miller, Bob	4.10	6/8/2024		prof.services	GRM Jolley Fed	Work on discovery to TEP. Review TEP doc disclosures.
45583	TIME	Miller, Bob	2.50	6/9/2024		prof.services	GRM Jolley Fed	Work on discovery to TEP. Review TEP doc disclosures.
45584	TIME	Miller, Bob	3.65	6/10/2024		prof.services	GRM Jolley Fed	Additional Moratory Interest/Tracing Research, AI. Review TEP discovery to class. Telephone conference with Keever.
45585	TIME	Miller, Bob	4.50	6/11/2024		prof.services	GRM Jolley Fed	Additional Moratory Interest/Tracing Research. MED gather and proc costs, 30(b)(6) topics. Review facts re:gathering and proc costs.
45586	TIME	Miller, Bob	4.50	6/12/2024		prof.services	GRM Jolley Fed	Review MED data re: gathering and proc costs/prep docs and questions for MED. Review facts re: gathering and proc costs. Legal research re: same/30(b)(6) topics.
45587	TIME	Miller, Bob	4.25	6/13/2024		prof.services	GRM Jolley Fed	Prepare draft 30(b)(6) topics, gathering and proc deducations. Review MED data.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45588	TIME	Miller, Bob	4.65	6/14/2024		prof.services	GRM Jolley Fed	Questions to and discussion w/MED re: Trans deductions. Review of TEP disclosures re: deductions. Working on Class Response to TEP Discovery plus fact and legal research.
45589	TIME	Miller, Bob	6.35	6/15/2024		prof.services	GRM Jolley Fed	
45570	TIME	Miller, Bob	3.50	6/16/2024		prof.services	GRM Jolley Fed	Legal research re: BAP claims.
45571	TIME	Miller, Bob	6.20	6/17/2024		prof.services	GRM Jolley Fed	Legal research re: tolling limitation period. Telephone conference with Kyle Steplans.
45572	TIME	Miller, Bob	5.75	6/18/2024		prof.services	GRM Jolley Fed	Legal research re: tolling limitation period. Memo re: same.
45573	TIME	Miller, Bob	5.60	6/19/2024		prof.services	GRM Jolley Fed	JPRF Status call re:: TEP discovery, etc. Evaluate and discuss MED spreadsheets and data re: WPXNGL and Residue Pricing. Circulated Tolling Memo plus research.
45574	TIME	Miller, Bob	6.50	6/20/2024		prof.services	GRM Jolley Fed	Class response to TEP Discovery.
45575	TIME	Miller, Bob	6.00	6/21/2024		prof.services	GRM Jolley Fed	Class response to TEP Discovery.
45576	TIME	Miller, Bob	3.75	6/22/2024		prof.services	GRM Jolley Fed	Research re: Responses to TEP discovery. Moratory interest discovery to TEP.
45577	TIME	Miller, Bob	3.50	6/23/2024		prof.services	GRM Jolley Fed	Moratory interest discovery to TEP.
45578	TIME	Miller, Bob	5.70	6/24/2024		prof.services	GRM Jolley Fed	Research re: facts and Law re:: Response to TEP discovery. Moratory Interest Discovery to TEP.
45579	TIME	Miller, Bob	6.25	6/25/2024		prof.services	GRM Jolley Fed	Moratory Interest Discovery to TEP, WPX, Devon. Telephone conference with Murphy re:: REX discovery responses. JPRF Status Conference.
45561	TIME	Miller, Bob	5.50	6/26/2024		prof.services	GRM Jolley Fed	Review Ryan's draft of Class Discovery Responses. Research re: identical factual predicate.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45562	TIME	Miller, Bob	5.80	6/27/2024		prof.services	GRM Jolley Fed	Review Ryan's draft of Class Discovery Responses. Research re: identical factual predicate. Review and dicuss TEP objections to discovery.
45563	TIME	Miller, Bob	4.20	6/28/2024		prof.services	GRM Jolley Fed	Review Ryan memo and research identical factual predicate (10th and other circuits).
45564	TIME	Miller, Bob	4.20	6/29/2024		prof.services	GRM Jolley Fed	Review of factual data re: facilities Capital Cost Payouts.
45565	TIME	Miller, Bob	5.50	6/30/2024		prof.services	GRM Jolley Fed	Review of factual data re: facilities Capital Cost Payouts. Exchange emails w/MED re: same. Review and analyze MED spreadsheets.
45566	TIME	Miller, Bob	5.75	7/1/2024		prof.services	GRM Jolley Fed	Review fatual data on re: facilities Capital Cost Payouts.
45567	TIME	Miller, Bob	4.40	7/2/2024		prof.services	GRM Jolley Fed	Review Seely draft of 30 (6)(b) topics. Evaluated MED pricing spreadsheets and underlying data.
45568	TIME	Miller, Bob	4.20	7/3/2024		prof.services	GRM Jolley Fed	Review Cost of Service Docs produced by TEP. Review WPX monthly pricing sheets and discuss w/MED.
45569	TIME	Miller, Bob	4.75	7/5/2024		prof.services	GRM Jolley Fed	Review documents produced by TEP. Review MED pricing spreadsheets and data and discuss. Detailed evaluation of MED class damages spreadsheets and data re: Wms/BPREX GPA. Review WPX Pricing Sheets also Trans N WPL damages during
45590	TIME	Miller, Bob	5.75	7/6/2024		prof.services	GRM Jolley Fed	TEP period.
45591	TIME	Miller, Bob	6.25	7/8/2024		prof.services	GRM Jolley Fed	Preparing JPRF discovery w/related fact and legal research and third party.
45592	TIME	Miller, Bob	4.00	7/9/2024		prof.services	GRM Jolley Fed	Review Rockies Express discovery response. Preparing JPRF discovery.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45593	TIME	Miller, Bob	3.75	7/10/2024		prof.services	GRM Jolley Fed	Conference call re: JPRF to do list. Review emails re: pipeline discovery. Preparing JPRF discovery.
45594	TIME	Miller, Bob	5.50	7/11/2024		prof.services	GRM Jolley Fed	Legal and fact research re: Moratory Interest. Drafting 30(b)(6) topics.
45595	TIME	Miller, Bob	5.75	7/12/2024		prof.services	GRM Jolley Fed	Moratory Interest Research and Moratory Interest Discovery. Review Denomy data and Rate of Return Research.
45596	TIME	Miller, Bob	4.50	7/13/2024		prof.services	GRM Jolley Fed	Moratory Interest discovery.
45597	TIME	Miller, Bob	4.50	7/14/2024		prof.services	GRM Jolley Fed	Search TEAMS for Concord Statements. Discussion w/MED re: same. Moratory Interest.
45598	TIME	Miller, Bob	6.25	7/15/2024		prof.services	GRM Jolley Fed	Review of TEP supplemental disclosures-identify Concord Statements for MED. Review and revise Moratory Interest Discovery per comments.
45599	TIME	Miller, Bob	4.40	7/16/2024		prof.services	GRM Jolley Fed	Status conference re: JPRF to do - conference re: additional research. Review TEP supplemental disclosures.
45600	TIME	Miller, Bob	5.25	7/17/2024		prof.services	GRM Jolley Fed	Review mediation docs. Review TEP docs. Contention Interrogatories.
45601	TIME	Miller, Bob	6.00	7/18/2024		prof.services	GRM Jolley Fed	Contention Interrogatories - doc research for DS Moratory Interest.
45602	TIME	Miller, Bob	6.25	7/19/2024		prof.services	GRM Jolley Fed	Review of TEP docs.
45603	TIME	Miller, Bob	6.50	7/19/2024		prof.services	GRM Jolley Fed	Drafting Class Discovery Responses.
45604	TIME	Miller, Bob	5.75	7/20/2024		prof.services	GRM Jolley Fed	Drafting Class Discovery Responses.
45605	TIME	Miller, Bob	6.50	7/21/2024		prof.services	GRM Jolley Fed	Drafting Class Discovery Responses.
45606	TIME	Miller, Bob	5.50	7/22/2024		prof.services	GRM Jolley Fed	Legal research re: Class Claims. Facts re: Class Claims - Contention Interrogatories.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45607	TIME	Miller, Bob	4.75	7/23/2024		prof.services	GRM Jolley Fed	Review DS comments re:: Contention Interrogatories. Review TEPs supplemental disclosure binders. Conference call re: JPRF To Do - review MED
45608	TIME	Miller, Bob	3.50	7/24/2024		prof.services	GRM Jolley Fed	spreadsheets. Mediation discussions. Review of TEP docs re: facility
45609	TIME	Miller, Bob	5.50	7/25/2024		prof.services	GRM Jolley Fed	payouts. Research re: facility payouts. Responses to TEP
45610	TIME	Miller, Bob	6.25	7/26/2024		prof.services	GRM Jolley Fed	discovery.
45611	TIME	Miller, Bob	4.25	7/27/2024		prof.services	GRM Jolley Fed	Responses to TEP discovery.
45612	TIME	Miller, Bob	4.75	7/28/2024		prof.services	GRM Jolley Fed	Conference call re: JPRF status/to do. Research re: abrogatory/implied covenants.
45613	TIME	Miller, Bob	5.25	7/29/2024		prof.services	GRM Jolley Fed	Conference call MED/Keever. Research re: abrogatory/implied covenants.
45614	TIME	Miller, Bob	6.25	7/30/2024		prof.services	GRM Jolley Fed	Conference call Keever/Chrisman re;; Moratory Interest. Conference call w/Keever re: same. Conference call Keever/MED - Research re: abrogatory/implied covenants.
45615	TIME	Miller, Bob	5.75	7/31/2024		prof.services	GRM Jolley Fed	Review and revise Class Discovery Responses. Review of Moratory Interest Discovery. Review of TEP docs.
45616	TIME	Miller, Bob	6.25	8/1/2024		prof.services	GRM Jolley Fed	Review of TEP produced docs. Review docs in TEP supplemental moratory interest discovery disclosure.
45617	TIME	Miller, Bob	5.50	8/2/2024		prof.services	GRM Jolley Fed	Review and revise Class responses to TEP discovery. Conference w/Keever - Moratory Interest and pipeline
45618	TIME	Miller, Bob	5.25	8/3/2024		prof.services	GRM Jolley Fed	discover. Conference call w/Keever/MED re: TEP 408. Review of TEP supplemental disclosures.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45619	TIME	Miller, Bob	5.25	8/4/2024		prof.services	GRM Jolley Fed	Legal and fact research re: gathering deductions. Review of TEP produced docs.
45620	TIME	Miller, Bob	6.25	8/5/2024		prof.services	GRM Jolley Fed	Review pipeline discovery responses, conference w DS. Conference call re: JPRF to do. Review/discuss supplemental TEP 406 disclosure.
45621	TIME	Miller, Bob	6.00	8/6/2024		prof.services	GRM Jolley Fed	30(b)(6) topics - contention interrogatories. Fact research re: facility payout. Start review 8/5 TEP disclosures.
45622	TIME	Miller, Bob	6.50	8/7/2024		prof.services	GRM Jolley Fed	Conference call re: JPRF Status. Fact research re: facility payout plus trial calculation pipeline discovery.
45623	TIME	Miller, Bob	6.25	8/8/2024		prof.services	GRM Jolley Fed	Fact research re: facility payout and trial calculation. Discussed w/Keever. Table re: capital cost payout. Start review of COS documents.
45624	TIME	Miller, Bob	5.50	8/9/2024		prof.services	GRM Jolley Fed	Finalizing Moratory Interest Discovery, Contention Interrogatories. Additional FPs to TEP. Review of COS/ONRR documents.
45625	TIME	Miller, Bob	5.50	8/10/2024		prof.services	GRM Jolley Fed	Conference w/Keever re: response to TEP discovery. Review of COS/ONRR documents.
45626	TIME	Miller, Bob	3.75	8/14/2024		prof.services	GRM Jolley Fed	Joint Motion to Modify Case Management. Review of COS/ONRR docs.
45627	TIME	Miller, Bob	5.50	8/15/2024		prof.services	GRM Jolley Fed	Reviewing TEP docs re: gath proc fees.
45628	TIME	Miller, Bob	6.25	8/16/2024		prof.services	GRM Jolley Fed	Review TEP docs re: capital cost payout plus review ONRR docs.
45629	TIME	Miller, Bob	5.25	8/17/2024		prof.services	GRM Jolley Fed	Review ONRR docs and WPX docs.
45630	TIME	Miller, Bob	4.75	8/18/2024		prof.services	GRM Jolley Fed	Review ONRR docs and WPX docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45631	TIME	Miller, Bob	6.00	8/19/2024		prof.services	GRM Jolley Fed	Memo re: gathering/proc deductions. Review MED data re: gathering. Review data re: gathering/proc - determine monthly gathering deductions.
45632	TIME	Miller, Bob	4.00	8/20/2024		prof.services	GRM Jolley Fed	Conference w/Keever re:structuring gathering/proc claim - memo re: same. Fact and legal research re: gathering/prod - review MED data re: gathering.
45633	TIME	Miller, Bob	6.25	8/21/2024		prof.services	GRM Jolley Fed	Review of TEP discovery responses to gathering/proc. Fact and legal research re: same.
45634	TIME	Miller, Bob	6.25	8/22/2024		prof.services	GRM Jolley Fed	Analyze MED spreadsheets re: TRANS deductions - third party discovery responses. Review moratory interest discovery.
45635	TIME	Miller, Bob	5.25	8/23/2024		prof.services	GRM Jolley Fed	Conference call JPRF to do/status, finalize contention interrogatories. Review WFS data produced, responses.
45636	TIME	Miller, Bob	5.75	8/24/2024		prof.services	GRM Jolley Fed	Review of docs produced by TEP and docs re: WFS plants and facilities.
45637	TIME	Miller, Bob	5.00	8/25/2024		prof.services	GRM Jolley Fed	Review of docs produced by TEP and docs re: WFS plants and facilities.
45638	TIME	Miller, Bob	6.50	8/26/2024		prof.services	GRM Jolley Fed	Review MED spreadsheets re: WFS capital and expenses and fuel costs. Comments re: 30(b)(6) topics, conference w/MED re: calculation of plant payouts.
45639	TIME	Miller, Bob	6.25	8/27/2024		prof.services	GRM Jolley Fed	Review and compile COS/ONRR data and spreadsheet data.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45640	TIME	Miller, Bob	6.50	8/28/2024		prof.services	GRM Jolley Fed	Conference call w/co-counsel, TEP discovery requests, review TEP disclosures. Research re: actual, direct cost limitation, Willow Creek capital cost payout.
45641	TIME	Miller, Bob	6.00	8/29/2024		prof.services	GRM Jolley Fed	Review RM mediation statement, review agenda for TEP conference call 8/30, Telephone conference with Keever, etal. Revise Class answers to TEP Interrogatories 17 & 18; review TEP docs. Telephone conference with DS re: Rule 45 Requests.
45642	TIME	Miller, Bob	6.25	8/30/2024		prof.services	GRM Jolley Fed	Conference call w/Keever and MED, conference call w/TEP attorney and experts. Review of TEP data, review pipeline discovery responses.
45643	TIME	Miller, Bob	5.75	8/31/2024		prof.services	GRM Jolley Fed	Review TEP 8/28 disclosures, review TEP 408 data.
45644	TIME	Miller, Bob	5.50	9/1/2024		prof.services	GRM Jolley Fed	Email; expert 408 exchanges - prepare notes re: 8/30 conference call. Review TEP 408 data and documents re: capital costs and gathering and proc deductions.
45647	TIME	Miller, Bob	6.25	9/2/2024		prof.services	GRM Jolley Fed	Review 8/28 TEP disclosures, email re: notes re: 408 emails re: TEP pie charts/volumes.
45648	TIME	Miller, Bob	6.00	9/3/2024		prof.services	GRM Jolley Fed	Start on medication statement, emails re: TEP royalty volumes.
45649	TIME	Miller, Bob	6.50	9/4/2024		prof.services	GRM Jolley Fed	Drafting mediation statement outline and fact research. Review MEP downloads of voluminous COGCC docs; review MEP price data.
45650	TIME	Miller, Bob	2.25	9/5/2024		prof.services	GRM Jolley Fed	Review of Index of TEP Docs and Docs to MED, Concord Remittance Statements. Mediation statement outline and fact statement.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45651	TIME	Miller, Bob	5.75	9/6/2024		prof.services	GRM Jolley Fed	Email w/DS re: Mountain West discovery and system maps and discussions; mediation statement outline and fact statement outline.
45652	TIME	Miller, Bob	5.50	9/7/2024		prof.services	GRM Jolley Fed	Preparing mediation statement outline and fact statement outline.
45653	TIME	Miller, Bob	6.25	9/8/2024		prof.services	GRM Jolley Fed	Research TEP COS/fin doc roundup and related docs; draft outline of mediation statement: claims and fact statement, emails re: same.
45654	TIME	Miller, Bob	6.50	9/9/2024		prof.services	GRM Jolley Fed	Emails re: Mountain West discovery responses, call w/MED re: facilities payouts, emails re: same, expand COS/TEP roadmap, review docs produced by TEP, review MED compilation of Willow Creek Plant Data dn Analysis and Parachute Plant/GUGS.
45655	TIME	Miller, Bob	3.25	9/10/2024		prof.services	GRM Jolley Fed	Identify and collect TEP docs for mediation exhibits. Emails w/DS re: 3rd Party discovery followup, review MED Willow Creek payout analysis, legal research re: B/AP claim.
45656	TIME	Miller, Bob	3.25	9/11/2024		prof.services	GRM Jolley Fed	Telephone conference with DS, RM, GS re: mediation letter; legal research re: BAP claim; identify and collect TEP docs for mediation exhibits.
45657	TIME	Miller, Bob	6.25	9/12/2024		prof.services	GRM Jolley Fed	Emails re: 3rd party subpoenas, legal research re: comparable price and wrongful deductions; prep of mediation statement, plus fact research re: mediation statement.
45658	TIME	Miller, Bob	3.75	9/12/2024		prof.services	GRM Jolley Fed	Legal research re: statutory prejudgment interest and tracing.
45659	TIME	Miller, Bob	6.00	9/14/2024		prof.services	GRM Jolley Fed	Drafting mediation statement plus fact research re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45660	TIME	Miller, Bob	6.25	9/15/2024		prof.services	GRM Jolley Fed	Drafting mediation statement plus fact research re: same.
45661	TIME	Miller, Bob	2.25	9/16/2024		prof.services	GRM Jolley Fed	Identify and send facility and plant docs to MED; identify and forward Savage & Clough exhibits to MED.
45662	TIME	Miller, Bob	5.75	9/17/2024		prof.services	GRM Jolley Fed	Identify and send facility and plant docs to MED; review MED analysis of Simpson fuel costs; Telephone conference with Keever re: discovery issues, emails to MED re: fuel cost; emails re: mediation statement; legal research re: burden of proof.
45663	TIME	Miller, Bob	5.50	9/18/2024		prof.services	GRM Jolley Fed	Emails re: discovery discussions w/TEP counsel; zoom w/co-counsel re: JPR to do, review MED spreadsheets re: revenue, costs for Parachute, GUGS and analysis.
45664	TIME	Miller, Bob	6.50	9/19/2024		prof.services	GRM Jolley Fed	JPR status conference; review exhibit to mediation statement on TEAM; answer MED questions; review and analysis MED capital cost payout spreadsheets plus Willow Creek spreadsheets, email exchanges w/ MED and damage calcs.
45665	TIME	Miller, Bob	5.75	9/20/2024		prof.services	GRM Jolley Fed	Prep for Chrisman/Simpson conference call; prior conference call w/co-counsel; zoom meeting re: JPR to do; research re: tracing, research re: Devon Energy. Emails re: Moratory interest; legal research re: tracing; drafting tracing and moratory interest section of mediation statement; calculations re: moratory interest impacts.
45666	TIME	Miller, Bob	5.00	9/21/2024		prof.services	GRM Jolley Fed	
45667	TIME	Miller, Bob	6.50	9/22/2024		prof.services	GRM Jolley Fed	Mediation docs; legal research re: tracing.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45668	TIME	Miller, Bob	7.25	9/23/2024		prof.services	GRM Jolley Fed	Mediation docs; Telephone conference with RM re: same and docs; Telephone conference with RKM; review MED calculations of moratory interest; Telephone conference with MED; received and review MED gathering deductions by month; MED cal of GUGS and Parachute payout; identify MED pricing spreadsheets for Keever; Telephone conference with Keever; email Chrisman; multiple emails w/ MED< Keevery, RMK.
45669	TIME	Miller, Bob	6.50	9/24/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; co-counsel emails re: mediation; Telephone conference with DS re: 3rd party discovery and Bourque; MED calculation of GUGS and Parachute payout calculation; calcs re: gathering damages; identify exhibits and provide to RKM; WPX pricing data.
45670	TIME	Miller, Bob	5.75	9/25/2024		prof.services	GRM Jolley Fed	Telephone conference with DS re: 3rd party discovery; multiple emails and telephone conferences with co-counsel re: mediation, discovery and Chrisman; review TEP documents.
45671	TIME	Miller, Bob	6.25	9/26/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; plus emails; mediation statement plus exhibits; email from Chrisman re: mediation statement, email re: mediation, email to Chrisman re: 408 data; emails re: WPX COS workbooks.
45672	TIME	Miller, Bob	5.50	9/27/2024		prof.services	GRM Jolley Fed	Finalized and delivered mediation statement; identify and compile additional documents for mediation.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45673	TIME	Miller, Bob	6.00	9/28/2024		prof.services	GRM Jolley Fed	Identify, compile and provide co-counsel additional documents for mediation; email to RKM re: omitted exhibits; gather and list additional documents for mediation.
45674	TIME	Miller, Bob	5.00	9/29/2024		prof.services	GRM Jolley Fed	RKM response re: omitted exhibits; add Ex20A; review TEP documents.
45675	TIME	Miller, Bob	7.25	9/30/2024		prof.services	GRM Jolley Fed	Co-counsel zoom call; zoom call w/Chrisman et al; preparation. Prepare moratory interest 30(b)(6) topics and review moratory interest interrogatories; emails Becky re: Koch remittance statements.
45676	TIME	Miller, Bob	5.50	10/1/2024		prof.services	GRM Jolley Fed	Co-counsel calls and emails; prepare for mediation; receive and review TEP mediation statement; prepare outline of mediation topics and assignments; emails to Tallgrass re: pipeline discovery.
45677	TIME	Miller, Bob	8.75	10/2/2024		prof.services	GRM Jolley Fed	Travel to Grand Junction for mediation; prepare for mediation; review question discovery responses; seeking Tracing Experts.
45678	TIME	Miller, Bob	9.00	10/3/2024		prof.services	GRM Jolley Fed	Prepare for mediation; mediation cancelled (mediator health); discussions w/Keever, co-counsel zoom; travel to Durango; emails w/MED & RMK re: amended Exhibit 7.
45679	TIME	Miller, Bob	5.50	10/4/2024		prof.services	GRM Jolley Fed	Emails re: discovery issues; review and amend 3rd party subpoenas; review scheduling order, emails DS & Skully and SQL data; emails re: indexing TEP disclosures and scheduling order.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45680	TIME	Miller, Bob	5.75	10/5/2024		prof.services	GRM Jolley Fed	Prepare list of additional discovery documents Chrisman agreed to provide; identifying check tracing expert; review TEP docs.
45681	TIME	Miller, Bob	5.00	10/6/2024		prof.services	GRM Jolley Fed	Review of TEP docs and prepare summary of TEP supplemental disclosure; review of Index of TEP documents.
45682	TIME	Miller, Bob	5.50	10/7/2024		prof.services	GRM Jolley Fed	Review amended scheduling order; email pipeline depositions; review Motion to modify scheduling; review indexing and TEP documents.
45683	TIME	Miller, Bob	6.00	10/8/2024		prof.services	GRM Jolley Fed	Review of TEP docs and disclosures, email re: 12/17 mediation.
45684	TIME	Miller, Bob	6.25	10/9/2024		prof.services	GRM Jolley Fed	30(b)(6) discovery topics; telephone conference with co-counsel (zoom); review follow up moratory interest discovery, review TEP documents and disclosures.
45685	TIME	Miller, Bob	6.25	10/10/2024		prof.services	GRM Jolley Fed	emails w/DS re: pipeline discovery; detailed conference w/LC re: JPRF documents list; indentify TEP docs for MED and documents for Becky; review TEP document disclosures.
45686	TIME	Miller, Bob	4.00	10/11/2024		prof.services	GRM Jolley Fed	Emails w/DS re: pipeline discovery; review TEP docs.
45687	TIME	Miller, Bob	5.50	10/12/2024		prof.services	GRM Jolley Fed	Preparing summary of facts supporting class claims.
45688	TIME	Miller, Bob	3.50	10/13/2024		prof.services	GRM Jolley Fed	Preparing summary of facts supporting class claims.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45689	TIME	Miller, Bob	7.25	10/14/2024		prof.services	GRM Jolley Fed	Emails re: additional experts and Qinrian, identify GUGS capital cost locations; multiple emails re: Bourque Expert Reports; review outline of opinions; email to Marshall; finish and circulate summary of facts supporting class claims, emails to Chrisman re: MED payout calculations.
45690	TIME	Miller, Bob	6.00	10/15/2024		prof.services	GRM Jolley Fed	Identifying expert witness re: basis differentials; email to candidates; fact research re: basis differentials; emails re: Bourque expert witness report; review DS memo re: same.
45691	TIME	Miller, Bob	6.50	10/16/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; discussion w/Keever & MED re:expert report; review proposed deposition schedule; response from Matthew Oliver; emails re: Transco pipeline discovery; review TEP docs.
45692	TIME	Miller, Bob	5.75	10/16/2024		prof.services	GRM Jolley Fed	Review TEP supplemental discovery responses; identify expert witnesses (economist); review TEP documents.
45693	TIME	Miller, Bob	5.75	10/17/2024		prof.services	GRM Jolley Fed	Emails w/Chrisman re: discovery after 2/10/2020; reviewing TEP responses to contention interrogatories, emails re: partial settlement; emails re:transaction confirmations; email re: engagement terms for moratory interest experts; emails re: pipeline discovery responses.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45694	TIME	Miller, Bob	6.25	10/18/2024		prof.services	GRM Jolley Fed	Response for N. Marshall; emails re: REX discovery; review and evaluate TEP responses to moratory interest; email w/Keevery re: same; emails re: settlement conference 10/25; legal research re:TEP defenses based on Lindauer Appeal; circulate Mason CU.
45695	TIME	Miller, Bob	5.50	10/19/2024		prof.services	GRM Jolley Fed	Evaluation of MED detailed analysis of GUGS payout; telephone conference with MED re: same; review TEP responses to contention interrogatories.
45696	TIME	Miller, Bob	4.75	10/20/2024		prof.services	GRM Jolley Fed	Emails to MED re: assets, costs, revenue re:: GUGS payouts analysis; review same; prepare and send comments re: TEP responses to contention interrogatories.
45697	TIME	Miller, Bob	4.75	10/21/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; email re: discovery; co-counsel zoom call w/ C. Mason re: expert witness re: basis differential; identify and forward exhibits; prepare bullet points; MED gathering revenue & costs, data to MED.
45698	TIME	Miller, Bob	5.25	10/22/2024		prof.services	GRM Jolley Fed	Review MED spreadsheets, telephone conference with MED & RKM re: same; telephone conference with DS re: Rate of Return and TEP accounts; email to Keever forward to Chrisman; review TEP check account data; review and comment on 30 (b)(6) subpoena; emails re: timing of depos.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45699	TIME	Miller, Bob	6.00	10/23/2024		prof.services	GRM Jolley Fed	Review MEDS spreadsheets - damages; emails; discovery responses; emails between Sculley & DS re: pipelines; review TEP check account data; review Quirian evaluation and engagement letter; review TEP documents.
45700	TIME	Miller, Bob	6.00	10/24/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; prep for settlement conference; review TEP supplemental disclosures; emails re: application of moratory interest in Colorado; review TEP documents.
45701	TIME	Miller, Bob	14.50	10/25/2024		prof.services	GRM Jolley Fed	Travel to Denver for mediation; attend mediation a Holland & Hart, prep for settlement conference.
45702	TIME	Miller, Bob	6.25	10/26/2024		prof.services	GRM Jolley Fed	Review Quirian comments re: Tracing in TEP bank accounts; preparing outline and documents and questions for Killion deposition.
45703	TIME	Miller, Bob	6.50	10/27/2024		prof.services	GRM Jolley Fed	Preparing outline and questions for Killion depo; review of TEP documents.
45704	TIME	Miller, Bob	5.75	10/28/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: documents and questions for Killion depo. Review of TEP documents. Answer Keever questions re: mediation statement; review notices of 30 (b)(6) depositions; review Mason engagement letter.
45705	TIME	Miller, Bob	5.75	10/29/2024		prof.services	GRM Jolley Fed	
45706	TIME	Miller, Bob	6.00	10/30/2024		prof.services	GRM Jolley Fed	Revise summary of documents and questions for Killion deposition, telephone conference with Keevery re: same; review of TEP documents.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45707	TIME	Miller, Bob	6.25	10/31/2024		prof.services	GRM Jolley Fed	Receive and review TEP counter offer; redraft of documents and questions for Illion depo. Telephone conference with Keever re: same; review of TEP documents, documents to Keever.
45708	TIME	Miller, Bob	6.50	11/1/2024		prof.services	GRM Jolley Fed	Co-counsel zoom re: TEP offer; multiple emails re: counter; prepare Class settlement proposal; prepare outline 30(b)(6) topics by witness; prepare documents and questions for Wiseman depo.
45709	TIME	Miller, Bob	6.50	11/2/2024		prof.services	GRM Jolley Fed	Review of TEP supplemental disclosures; identify Killion 30(b)(6) topics and topics for each witness; request documents from Becky; forward Mason contract to DS; emails re: same; prepare for Wiseman depo; email re: TEP counter proposal.
45710	TIME	Miller, Bob	11.00	11/3/2024		prof.services	GRM Jolley Fed	Travel to Tulsa for 30(b)(6) depositions; prep for Edgeller and Killion depositions; conference w/Keever; prepare exhibits, receive docs from Becky for depo and review. 30(b)(6) depositions - prepare for 2nd day of depositions - identify docs for Killion depo and Wiseman depo; receive and review docs from Becky and RKM, and supplemental production from TEP.
45711	TIME	Miller, Bob	11.75	11/4/2024		prof.services	GRM Jolley Fed	30(b)(6) depositions - prepare for 3rd day of depositions. identify docs for Killion depo, received and review docs from Becky, RKM and Chrisman.
45712	TIME	Miller, Bob	13.50	11/5/2024		prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45713	TIME	Miller, Bob	13.00	11/6/2024		prof.services	GRM Jolley Fed	30(b)(6) depositions - prepare in AM, travel to Durango. Telephone conference with DS re: Bourque, review docs; prepare summary of Killion depo. Emails w/DS re: depositions; review Mason docs; emails re: depositions; preparing for B. Chrisman depo; draft & circulate summary of Killion depo; review TEP documents.
45714	TIME	Miller, Bob	5.00	11/7/2024		prof.services	GRM Jolley Fed	
45715	TIME	Miller, Bob	6.25	11/8/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; review summary of Bourque expert reports; review of WPX transaction confirmations; discussion w/Keever re: TRANS deductions; revise To Do List and circulate; documents and questions for B. Chrisman depo; review B. Chrisman 30(b)(6) topics.
45716	TIME	Miller, Bob	6.00	11/9/2024		prof.services	GRM Jolley Fed	Reviewing TEP documents; review MED NWPL Trans cost deduction summary; to DS & Kever; email discussion w/Keever re: BP/REX & marketing; plus seek questions re: B. Chrisman depo; documents and questions for B. Chrisman depo.
45717	TIME	Miller, Bob	5.75	11/10/2024		prof.services	GRM Jolley Fed	Reviewing TEP docs, answer Kever question re: Koch & Kever questions re: BP/REX & Seely questions re: B. Chrisman depo; forward Seely documents and questions for B. Chrisman depo.
45718	TIME	Miller, Bob	4.50	11/11/2024		prof.services	GRM Jolley Fed	Emails re: Caerus settlement/opt out; discussed B. Chrisman depo outline w/Seely; searching for 2010-2019 pricing data; emails re: TEP counter proposal.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45719	TIME	Miller, Bob	4.50	11/12/2024		prof.services	GRM Jolley Fed	Chrisman depo preparation; review numerous pricing data from MED; review, revise and comment on Class settlement proposal; emails re: Carens settlement; MED price comparisons, review TEP docs; email to MED w/capital cost data.
45720	TIME	Miller, Bob	9.00	11/13/2024		prof.services	GRM Jolley Fed	Travel to Denver for B. Chrisman 30(b)(6) depo - prep for depo. Email to Chrsman re: WPX/TEP agreement.
45721	TIME	Miller, Bob	11.75	11/14/2024		prof.services	GRM Jolley Fed	B. Chrisman depo; preparation for depo, travel to Durango; discussion w/RKM re: Pollock depo, prepare and circulate memo re: B. Chrisman depo.
45722	TIME	Miller, Bob	6.00	11/15/2024		prof.services	GRM Jolley Fed	Pipeline discovery responses; emails re: tracing experts; find TEP docs; Telephone conference with Keever; propane depo question for Pollock.
45723	TIME	Miller, Bob	6.25	11/16/2024		prof.services	GRM Jolley Fed	Prepare for Rowe depo; review TEP docs; review class settlement poposal; telephone conference with and email w/MED re: WPX vendors; telephone conference with Keever; review TEP bank statements, Telephone conference with and emails Keever re: documents and questions for Rowe and Benaquista depos.
45724	TIME	Miller, Bob	10.50	11/17/2024		prof.services	GRM Jolley Fed	Travel to Houston - prep for 30(b)(6) depos of Pollock, Beraquista and Rowe; review docs from Becky.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45725	TIME	Miller, Bob	9.50	11/18/2024		prof.services	GRM Jolley Fed	Prep for Pollock; Pollock 30(b)(6) depo; prep for Beraquisto; review docs from Becky, conversations w/Keever.
45726	TIME	Miller, Bob	12.25	11/19/2024		prof.services	GRM Jolley Fed	Prep for Beraquista depo, Beraquista 30(b)(6) depo, prep for Rowe, mediation discussion w/TEP counsel.
45727	TIME	Miller, Bob	14.00	11/20/2024		prof.services	GRM Jolley Fed	Prep for Rowe, Rowe 30(b)(6) depo; travel to Durango; thoughts re: Houston depositions (prepare & circulate).
45728	TIME	Miller, Bob	4.75	11/21/2024		prof.services	GRM Jolley Fed	Zoom w/Keever/Chrisman re: document issues, prep & emails re: same (2.6). Review docs re: Caerus settlement, memo re: depositions, emails re: Caerus; zoom w/Keever, Chrisman, summary of Houston depositions, emails re: same
45729	TIME	Miller, Bob	5.00	11/22/2024		prof.services	GRM Jolley Fed	Co-Counsel zoom (1.7); co-counsel emails; research re: tracing; looking for petroleum engineering expert; research engineering data in WPX 10KS; memo re: same.
45730	TIME	Miller, Bob	7.25	11/23/2024		prof.services	GRM Jolley Fed	Research re: tracing & Restatement of Restitution; disgorgement; looking for petroleum engineering expert, email re: non-conformity terms.
45731	TIME	Miller, Bob	7.25	11/24/2024		prof.services	GRM Jolley Fed	Research re: tracing & disgorgement; looking for petroleum engineer; drafting supplemental moratory interest statement for mediator.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45732	TIME	Miller, Bob	6.50	11/25/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: discovery/depos (1.0); Telephone conference with DS & Bourque, emails re: pipeline discovery; research re: tracing & disgorgement & commingling; email to DS re: tracing in TEP bank accounts; Telephone conference with Bourque & DS re: expert report; review MED materials re: export report; zoom w/co-counsel
45733	TIME	Miller, Bob	5.75	11/26/2024		prof.services	GRM Jolley Fed	Legal research re: moratory interest tracing, restatement of restitution disgorgement, Telephone conference with petroleum engineers.
45734	TIME	Miller, Bob	4.50	11/27/2024		prof.services	GRM Jolley Fed	Review emails w/tracing experts; review MED analysis of WPX sales by location by month.
45735	TIME	Miller, Bob	0.00	11/28/2024	12/2/2024	prof.services	GRM Jolley Fed	Thanksgiving break. No work
45736	TIME	Miller, Bob	5.00	12/3/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: discovery, depos, mediation (1.3); review of emails to tracing experts; email w/Denomy re: WPX marketing @ WRH; Telephone conference with DS re: pipeline reponses; identify documents to forward to Lencione to evaluate; WPX drilling program rate-of-return; memo re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45818	TIME	Miller, Bob	7.25	12/4/2024		prof.services	GRM Jolley Fed	Engage petroleum engineer; Telephone conference with Keever & MED re: mediation prop., Telephone conference with Keever re: same; docs for MED; bullet points for MED expert report; analyze and provide calculation re: Settlement proposal; preparation for WPX depositions.
45819	TIME	Miller, Bob	6.50	12/5/2024		prof.services	GRM Jolley Fed	Zoom w/co-counsel re: TEP counter proposal; moratory interest research, review TEP documents; emails re: same; review MED spreadsheet.
45820	TIME	Miller, Bob	5.75	12/6/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: Class proposal; emails re: same; research and working on supplemental mediation submission; emails and Telephone conference re: same; review TEP docs; docs to MED.
45821	TIME	Miller, Bob	5.50	12/7/2024		prof.services	GRM Jolley Fed	Working on supplemental mediation submission. Legal research re: Setcovic and identical factual predicate, release and settlement notice.
45822	TIME	Miller, Bob	6.75	12/8/2024		prof.services	GRM Jolley Fed	Working on supplemental mediation submission; legal research re: Setcovic and other issues.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45823	TIME	Miller, Bob	5.50	12/9/2024		prof.services	GRM Jolley Fed	Calculations re: settlement and MED interest calcs; Telephone conference with Keever re: settlement, moratory interest, etc. Telephone conference with DS, Quirian, Mossman re: tracing; compile docs re: mediation; emails re: mediation; review and summarize Concord Agreements; memo to Keever re: same; amendments to mediation submission and emails re: same.
45824	TIME	Miller, Bob	5.00	12/10/2024		prof.services	GRM Jolley Fed	Preparation Class proposal, zoom w/co-counsel; remails re: same; amend mediation supplement; emails re: same and Caerus Settlement; review TEP docs; TK questions re: recognized gain; research re: commingle funds.
45825	TIME	Miller, Bob	5.50	12/11/2024		prof.services	GRM Jolley Fed	Preparation Class proposal; Telephone conference with Petroleum Engineer; Telephone conference with DS; Caerus Settlement, review TEP account statements; review MED outline of expert report; TK questions; review Letter to Chrisman

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45826	TIME	Miller, Bob	7.25	12/12/2024		prof.services	GRM Jolley Fed	Telephone conference with Weever and petroleum engineer, Telephone conference with RKM re: Sefcovic issue/mediation submission amendments to Settlement Proposal; Motion ot Amend Acheduling Order; review petroleum engineer report; Telephone conference with re: same; review MED damage and interest spreadsheets; Telephone conference with Keever re: same; zoom co-counsel.
45827	TIME	Miller, Bob	6.25	12/13/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: settlement; review TEP docs; legal research re: Sefcovic issues; preparing Sefcovic and Claim Preculsion; circulate same.
45828	TIME	Miller, Bob	5.25	12/14/2024		prof.services	GRM Jolley Fed	Review TEP docs; legal research; gather notes from prior settlement discussions; co-counsel emails re: settlement proposals and docs; review TEP docs.
45829	TIME	Miller, Bob	6.50	12/15/2024		prof.services	GRM Jolley Fed	Amendment to supplemental mediation statement, emails re: same; calculations re: pricing and trans cost claims; docs to Keever; review and revision of mediation statement; reviewe TEP docs; review TCPL discovery responses.
45830	TIME	Miller, Bob	8.50	12/15/2024		prof.services	GRM Jolley Fed	Travel to Grand Junction, prepare for mediation, discussion w/Keevery re: mediation, Telephone conference with Keever & MED, Telephone conference with Keever & Chrisman; emails re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45831	TIME	Miller, Bob	12.00	12/17/2024		prof.services	GRM Jolley Fed	Prepare for and representation at mediation, review petroleum engineer calcs.
45832	TIME	Miller, Bob	4.75	12/18/2024		prof.services	GRM Jolley Fed	Return to Durango; review emails re: tracing; legal research.
45833	TIME	Miller, Bob	5.50	12/19/2024		prof.services	GRM Jolley Fed	Legal research comparable pricing, Colo. precedent binding on federal courts; Sefcovic issues; class notice.
45834	TIME	Miller, Bob	6.75	12/20/2024		prof.services	GRM Jolley Fed	Review Newburgan Class Actions 18.1 through 18.46 and related cases; Sefcovic issues; class notice; memo re: claim preclusion, identical factual predicate and collateral attack on class judgements.
45835	TIME	Miller, Bob	2.00	12/23/2024		prof.services	GRM Jolley Fed	Zoom w/co-counsel, answer GS questions re: TEP 408 docs.
45836	TIME	Miller, Bob	5.75	12/27/2024		prof.services	GRM Jolley Fed	Legal research re: scope and effect of Sefcovic Release.
45864	TIME	Miller, Bob	8.00	12/27/2024	1/2/2025	prof.services	GRM Jolley Fed	Review Keever draft of Class Response to TEP discovery; response re: Merrill 84, identify & forward Simpson & Beraquista spreadsheets to MESD; Wms Shrink data to MED; redraft of Keever responses to TEP discovery
45837	TIME	Miller, Bob	6.50	12/28/2024		prof.services	GRM Jolley Fed	Legal research re: scope and effect of Sefcovic Release.
45838	TIME	Miller, Bob	7.75	12/29/2024		prof.services	GRM Jolley Fed	Legal research re: scope and effect of Sefcovic Release. Memo re: Sefcovic Release does not bar class claims.
45839	TIME	Miller, Bob	6.50	12/30/2024		prof.services	GRM Jolley Fed	Legal research re: Restatement of Restitution and disgorgement.
45840	TIME	Miller, Bob	6.50	12/31/2024		prof.services	GRM Jolley Fed	Legal research re: Restatement of Restitution and disgorgement.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45841	TIME	Miller, Bob	4.75	1/1/2025		prof.services	GRM Jolley Fed	Finished and circulated memo comparing Disgorgement to Moratory Interest and legal research re: same.
45842	TIME	Miller, Bob	3.75	1/2/2025		prof.services	GRM Jolley Fed	Multiple emails re: effect of disgorgement on settlement/class action; answer GS questions; email discussions w/co-counsel re: disgorgement/settlement.
45843	TIME	Miller, Bob	5.00	1/3/2025		prof.services	GRM Jolley Fed	Discussion w/Keever re: settlement options; calculations re: estimates of damages and interest for each claim.
45844	TIME	Miller, Bob	4.25	1/4/2025		prof.services	GRM Jolley Fed	Receive and review DS & JR memos re: identical factual predicate rule; legal research re: identical factual predicate.
45845	TIME	Miller, Bob	6.25	1/6/2025		prof.services	GRM Jolley Fed	Memo to DS & JR et al. Responding to analysis of identical factual predicate; legal research re: same; email to co-counsel re: moratory interest; review MED analysis of Simpson 408 calcs; review Barton 10th C.R. case; Telephone conference with Keever re: MED data; memo to Seely/Bourque re: pipeline discovery.
45846	TIME	Miller, Bob	5.75	1/7/2025		prof.services	GRM Jolley Fed	Zoom Keever & MED re: 408 data; zoom w/co-counsel re: TEP settlement offer; Telephone conference with DS re: pipeline discovery; documents to Bourque re: pipeline discovery; zoom w/ DS & Bourque re: pipeline discover.
45847	TIME	Miller, Bob	6.00	1/8/2025		prof.services	GRM Jolley Fed	Review damage assessment JPRF; prepare damage assessment; settlement proposal discussions, update calculations.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45848	TIME	Miller, Bob	9.50	1/9/2025		prof.services	GRM Jolley Fed	Settlement conference calls, emails, finalize Caerus settlement; Kitch emails re: settlement; evaluate settlement offers; propose alternative settlement offer and structure.
45849	TIME	Miller, Bob	5.25	1/10/2025		prof.services	GRM Jolley Fed	Emails and conference calls re: counter proposal; revise proposal; Telephone conference with Keever re: same; zoom w/co-counsel re: settlement.
45850	TIME	Miller, Bob	4.00	1/11/2025		prof.services	GRM Jolley Fed	Class counter proposal; emails re: same; Telephone conference with Keever re: settlement.
45852	TIME	Miller, Bob	4.25	1/14/2025		prof.services	GRM Jolley Fed	Telephone conference with Keever re: substance of post-class period complaint; review TEP docs.
45853	TIME	Miller, Bob	4.00	1/15/2025		prof.services	GRM Jolley Fed	Zoom w/Keever & Chrisman re: settlement and discovery next steps; review TEP docs, Telephone conference with Keever re: discovery and scheduling. Zoom w/DS & Bourque re: pipeline discovery; zoom w/co-counsel re: settlement; emails re: settlement; revisions to class proposal; MED data to Keever; redraft settlement proposal.
45854	TIME	Miller, Bob	5.25	1/16/2025		prof.services	GRM Jolley Fed	Telephone conference with DS; review Bourque email; receive TEP counterproposal; Telephone conference with co-counsel.
45855	TIME	Miller, Bob	4.00	1/20/2025		prof.services	GRM Jolley Fed	Review TEP proposal; revise same; zoom w/co-counsel, Telephone conference with Keever.
45856	TIME	Miller, Bob	4.25	1/21/2025		prof.services	GRM Jolley Fed	
45857	TIME	Miller, Bob	4.00	1/22/2025		prof.services	GRM Jolley Fed	Review MED emails re: Simpson 408 calcs; co-counsel emails re: same and settlement proposals.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45858	TIME	Miller, Bob	2.75	1/23/2025		prof.services	GRM Jolley Fed	Review TEP emails re: TEP bank statements; Telephone conference with Keever; emails w/co-counsel.
45859	TIME	Miller, Bob	3.50	1/24/2025		prof.services	GRM Jolley Fed	zoom w/co-counsel re: settlement; Telephone conference with Keever re: settlement.
45860	TIME	Miller, Bob	4.75	1/27/2025		prof.services	GRM Jolley Fed	Emails re: Caerus settlement; JPRF preliminary settlement reached; zooms w/co-counsel; start work on settlement docs; consider next steps.
45861	TIME	Miller, Bob	3.75	1/28/2025		prof.services	GRM Jolley Fed	Telephone conference with DS; emails to expert witnesses; email w/co-counsel re: escrow agreement; review escrow agreement; legal research re: same.
45862	TIME	Miller, Bob	4.25	1/29/2025		prof.services	GRM Jolley Fed	Zoom w/co-counsel re: settlement documents; emails re: same; Telephone conference with Keever.
	Total		4880.65					

EXHIBIT B
ATTORNEY TIME RECORDS

EXHIBIT B-1

SUMMARY FOR ALL TIMEKEEPERS

SUMMARY HOURS WORKED

Timekeeper	Sum of Billable Hours (Quantity)	Sum of Billable Value
DGS	18.90	\$ 6,142.50
RKM	1.40	\$ 385.00
TSW	0.20	\$ 18.00
Grand Total	20.50	\$ 6,545.50

Exhibit B-1

EXHIBIT B-2
FLEESON TIME RECORDS

Billing Entries Jolley Potter Ranches Energy - Jolley Potter v TEP Follow-On State

HOURS WORKED DETAIL

Name	EntryDate	Timekeeper	Billing Code.Type	Billable Hours		Description	Billable Value
				(Quantity)			
054475	2/13/2025	RKM	Time	1.40		Review and revise Complaint.	385.00
054636	2/18/2025	DGS	Time	1.00		Firm-to-Firm agreement	325.00
054634	2/21/2025	DGS	Time	1.00		Firm-to-Firm agreement	325.00
054637	2/28/2025	DGS	Time	1.00		Representation agreement.	325.00
060167	4/10/2025	TSW	Time	0.20		Communications with Dave Seely and Sara Evans regarding vendor invoice.	18.00
						Receive and review correspondence Nate Keever re settlement proposal for new lawsuit;	
062927	5/5/2025	DGS	Time	1.00		Zoom with Nate, Bob, Tom, Greg & Ryan re same.	325.00
067377	5/20/2025	DGS	Time	0.50		Receive and review written settlement proposal.	162.50
085127	5/28/2025	DGS	Time	1.80		Review of settlement agreement for follow-on case.	585.00
						Review of settlement agreement; Receive and review correspondence to Nate Keever;	
085128	6/2/2025	DGS	Time	2.00		Correspondence to Nate.	650.00
074034	7/2/2025	DGS	Time	0.50		RRC1 Nate Keever and documents re settlement.	162.50
						Receive and review correspondence from Nate Keever re court documents for settlement;;	
085132	7/14/2025	DGS	Time	3.00		Review of proposed order granting preliminary approval and setting fairness hearing; review of lease list; review of draft motion for approval..	975.00
085130	8/8/2025	DGS	Time	0.50		Receive and review correspondence Nate Keever re settlment.	162.50
						Receive and review correspondence from Nate Keever reorder granting preliminary approval and setting fairness hearing review of order..	
085131	8/20/2025	DGS	Time	1.00			325.00
						Receipt and review of Motion for certification of settlement class and for preliminary approval of settlement, and all exhibits.	
085129	9/17/2025	DGS	Time	2.50			812.50
						REview of file; Receive and review correspondence Gratn STiefel; Receive and review correspondence from Ryan K. Meyer re Grant Stiefel; Receive and review correspondence from Bob Miller, .	
087060	10/17/2025	DGS	Time	2.00			650.00
086205	10/27/2025	DGS	Time	0.50		Review of Denomy invoices; Correspondence to Nate Keever.	162.50
						Receive and review correspondence Nate Keever; Correspondence to Becky Robertson; RRC1	
086204	10/28/2025	DGS	Time	0.60		Becky Robertson.	195.00

EXHIBIT C
FLEESON'S EXPENSES

EXPENSES DETAIL

Name	EntryDate	Description	Billable Value
		E119 Experts	
		Mary Ellen Denomy CPA	
059637	4/11/2025	WORK ON SQL INFORMATION RECEIVED	\$ 200.00
		E119 Experts	
		Mary Ellen Denomy	
		REVIEW TEP PROVIDED SETTLEMENT MATERIALS	
		Jolley Potter Ranches Energy - Jolley v TEP - Follow-On	
066229	6/2/2025	Federal	\$ 800.00
		TOTAL	\$ 1,000.00

EXHIBIT D
DUFFORD'S EXPENSE

Dufford, Waldeck, Milburn and Krohn, LLP

Client Expense Report

13 November, 2025

Client Date	Client Matter ID Audit #	Resp. Lwyr.	File Type Type	File Code	Description	Units	Rate	Value	Invoice #
Terra Energy Partners Class Action 03/06/2025	18227/18227.008 550075	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 CCEF #CV30027 - Complaint	1.00	277.00	277.00	Bill
Terra Energy Partners Class Action 07/17/2025	18227/18227.008 581619	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 CCEF #CV30027 - Replay to Counterclaim	1.00	24.00	24.00	Bill
Terra Energy Partners Class Action 08/29/2025	18227/18227.008 593825	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 FedEx - Mail Services	1.00	474.55	474.55	Bill

Firm Totals 775.55

Summary by Responsible Lawyer		Value
NAK		775.55
Total		775.55

Summary by Type		Value
Soft		775.55
Total		775.55

Summary by Code		Value
		775.55
Total		775.55

Summary by File Type		Value
Oil & Gas		775.55
Total		775.55

Summary by Billing Category		Value
Contingency		775.55
Total		775.55

Report Selections

End Date: Nov 13, 2025
File: Terra Energy Partners - TEP State Class 2021-2024 - 18227.008
Include Task Based Files: Yes
Include Closed Files: No
Include Corrections: No

DISTRICT COURT, COUNTY OF GARFIELD, COLORADO 109 8th Street, Suite 104 Glenwood Springs, CO 81601	
Plaintiff: JOLLEY POTTER RANCHES ENERGY CO., LLC, v. Defendant: TEP ROCKY MOUNTAIN LLC.	
<i>Attorneys for Plaintiff and the Class</i> Nathan A. Keever, Attorney Reg. No. 24630 DUFFORD WALDECK 744 Horizon Court, Suite 300 Grand Junction, CO 81506 Telephone: (970) 241-5500; Fax: (970) 243-7738 E-mail: keever@dwmk.com ; dwmk@dwmk.com G.R. Miller, #8406 G.R. MILLER, P.C. 1040 Main Avenue Durango, CO 81302 Telephone: (970) 247-1113 E-mail: bob@grmillerlaw.com	▲ COURT USE ONLY ▲ Case Number: 2025CV30027 Division:
DECLARATION OF GEORGE ROBERT MILLER	

I, George Robert Miller, declare as follows:

1. My name is George Robert (Bob) Miller. I am seventy-five years of age and am competent to give this affidavit.

2. I am submitting this declaration in support of Class Counsel's Motion for Attorney Fees and Expenses. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, I could and would testify to such facts.

3. I graduated from Colorado State University in 1973 and earned a J.D. from the University of New Mexico in 1977. I have been a licensed attorney in the state of Colorado since 1977.

4. I practiced primarily oil and gas law with the firm of Clanahan, Tanner, Downing & Knowlton in Denver from 1977 to 1980.

5. From 1980 to 1988 I was employed by Monsanto Oil Company as Senior Landman, Madden Dep Unit Landman and Regional Land Manager for the Rocky Mountains, and was responsible for large lease acquisition programs, hundreds of intercompany agreements per year, large drilling programs, and working with revenue accounting and others to resolve contract and payment disputes with royalty and working interest owners.

6. From 1988 to 1991 I was employed by BHP Petroleum (acquirer of Monsanto Oil Co.) as Legal and Negotiations Manager, Asia/Pacific Region, (located in Melbourne, Australia); BHP Asia/Pacific unit held oil and gas exploration and/or production licenses in Oman, UAE, China, India, Korea, Australia, Papua New Guinea, Burma, Indonesia and Bangladesh and evaluated numerous other potential license areas.

7. My experience working for oil and gas operators has proven to be quite useful in my later representation of underpaid oil and gas royalty owners.

8. From 1992 to present I have practiced oil and gas law in Durango, Colorado, primarily representing underpaid oil and gas royalty owners in multiple class action cases against oil and gas operators/lessees, including *Parry v. Amoco*, 2003 WL 2306663 (District Court of La Plata County, Colorado) together with at least a dozen other such royalty underpayment class actions. Among other matters, I also negotiated numerous leases and other agreements between farmers and ranchers and oil and gas operators, together with co-counsel filed amicus briefs in *Garman v. Conoco*, 886 P.2d 652 (Colo. 1994), *Rogers v. Westerman Farms Co.*, 29 P.3d 887 (Colo. 2001) (and related cases), represented royalty owners in *Southern Ute Tribe v. Amoco*, 526 U.S. 865 (U.S. 1999) and successfully worked to stop Senate Bill 451 (Amoco's attempt to abrogate *Garman* in the Colorado legislature). Most, but not all, of these cases were litigated with co-counsel Fleeson, Gooing, Coulson and Kitch, L.L.C. and/or Dufford, Waldeck & Krohn LLP also representing the royalty owners.

9. Building on our collective experience with litigating and successfully resolving oil and gas royalty cases in Colorado and elsewhere, Mr. Seely, Mr. Meyer, Mr. Stucky, and Mr. Kitch (with the Fleeson firm), Mr. Keever (with the Dufford Firm), and I represented the Plaintiff and the Class as co-counsel in the Jolley Potter Ranch Federal Class Action Case against TEP ("JPRF"), Case No. 19-CV-495. Together, we worked for more than six years to investigate the defendant's gas marketing, production operations, revenue accounting, and royalty calculations, as well as its use of midstream and transportation services, to identify the facts and legal authority that underly the Class Claims, and to litigate the Class Claims in this court. Through extensive written discovery, we obtained and analyzed more than 100,000 pages of documents produced by TEP in disclosures and in response to the Class's multiple discovery requests. We reviewed more than 5,000 Excel spreadsheets and more than 335 GB of data to develop the Class Claims. We

took thirteen depositions, including four prior to class certification and nine during the merits phase, which took place in Colorado, Oklahoma, and Texas. We also issued more than ten third-party subpoenas and received voluminous accounting, bank, and other data in response, and we filed numerous pleadings in this court.

10. On behalf of the JPRF Class, we retained four experts in the fields of royalty accounting, gas marketing, economics and forensic accounting. TEP retained four experts in royalty accounting, gas marketing, economics, and forensic accounting to analyze TEP's royalty data, prepare expert reports, and assist TEP in determining the amounts at issue. Two of the Class's experts and three of TEP's experts prepared reports related to class certification. The Parties exchanged their expert reports, and the opposing experts then reviewed each other's and issued rebuttal reports analyzing the accuracy of their counterpart's report. At the time of settlement of the JPRF Case, the Class's experts were working diligently on their merit's reports. The Parties worked with their experts to develop a better understanding of the facts in this case, to assist each Party in determining the amounts at issue, and most recently to negotiate the proposed settlement agreement.

11. In March 2024, the Defendant TEP provided us with spreadsheets which summarized voluminous TEP monthly operational and accounting data necessary to estimate the damages resulting from most, but not all, of the Class Claims. Over the next year, the parties worked together to resolve their factual differences and factual questions regarding calculations of damage amounts. As a result of this process, the parties were eventually able to agree on the amount of actual damages (without interest) that could result from a decision in which the Class prevailed on all merits issues. This understanding then formed the foundation upon which the parties were able to negotiate a fair, reasonable, and adequate settlement in the JPRF Case.

12. The Parties participated in a formal mediation of the JPRF Case on December 17, 2024, with the Honorable William H. Downes, who is a former federal judge and professional mediator with experience in handling royalty class action cases. Although the formal mediation did not end in a settlement, Judge Downes stayed in contact with the Parties and oversaw their further settlement discussions.

13. Counsel for both parties in the JPRF Case communicated frequently over the approximately one-year period negotiate a methodology for valuing each claim and determining damages and appropriate settlement terms. These negotiations were fair, honest, and involved no improper pressure or collusion. Following these negotiations, the Parties reached a proposed class-action settlement agreement in February 2025.

14. Attached hereto as Exhibit A is a print-out of my time entries for work done on the JPRF Case from January 20, 2019, through January 29, 2025. Exhibit A does not include the significant amounts of additional time I spent in the investigation, planning, and preparation of the case prior to its filing on February 19, 2019, nor additional time I spent on this case after January 29, 2025.

15. Building on our collective experience with litigating and successfully resolving the JPRF Case, Mr. Seely, Mr. Meyer, Mr. Stucky, and Mr. Kitch (with the Fleeson firm), Mr. Keever (with the Dufford Firm), and I represented the Plaintiff and the Class as co-counsel in this case (the “JPRS 2025 Case”). Each of the class claims in the JPRS 2025 Case was litigated and settled in the JPRF Case for the time period prior to January 1, 2021. The JPRS 2025 Case (this case) was filed to resolve class claims and counterclaims actually litigated and settled in the JPRF Case for the period from and after January 1, 2021.

16. The class members, leases and wells in the JPRS 2025 Case are substantially the same as the JPRF case. TEP's method of calculation and payment of royalty was the same during the periods covered by the JPRF Case and the JPRS 2025 Case (this case).

17. The discovery conducted during the JPRF Case, included the data and information relevant to the period covered in the JPRS 2025 Case (from January 1, 2021 through December 31, 2024) regarding the claims included in both cases.

18. The parties to the JPRF case considered expanding the class period in the JPRF case to include the period through the date of judgment in the JPRF case, but since such an expansion would have required recertifying the JPRF Class, and would have substantially delayed the JPRF Settlement, the parties to the JPRF case elected to file the JPRS Case (this case) as a more efficient method of resolving the class claims which continued into the January 1, 2021 through December 31, 2024 time period.

19. Each of the class claims in the JPRS 2025 Case (this case) was separately negotiated and settled, and the settlement for each JPRS 2025 Claim was patterned on the same terms used to settle that claim in the JPRF Case.

20. Attached hereto as Exhibit B is a print-out of my time entries for work done on the JPRS 2025 Case (this case) through August 14, 2025.

21. With regard to the factors set forth in *Johnson v. Railway Express* concerning the reasonableness of attorney fees, I understand that not every factor may apply in this case. *See, e.g., Gudenkauf v. Stauffer Communs.*, 158 F.3d 1074, 1083 (10th Cir. 1998) ("We have never held that a district court abuses its discretion by failing to specifically address each *Johnson* factor. To the contrary, we have stated that not all of them need be considered."). Because the JPRF Case and the JPRS 2025 State Case (this case) relate to substantially the same the class members, class

claims, discovered facts and methods of royalty calculation and payment by TEP, I will discuss both cases together with regard to the Johnson factors. I represent to the Court as follows:

a. The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly - Exhibits A-1 and A-2 itemize the time spent by me on the JPRF and JPRS 2025 State Case—complex, fact-intensive lawsuits, which litigated numerous class issues of first impression in Colorado.

I am not aware of any Colorado decisions which have awarded damages to oil and gas royalty owners based on either i) an underpricing claim or ii) a claim that the amount of gathering, processing or transportation was unreasonable¹ Therefore, each of the Class Claims asserted in this case raised an issue of “first” impression in Colorado:

- 1) Unreasonable Gathering and Processing Costs Claim: The primary class claim related to both gathering and processing costs is that TEP’s deductions of gathering and processing costs had recovered more than the proportionate royalty owner share of the capital and operating costs incurred to construct and operate the applicable gathering and processing facilities, and that deduction of more than the actual, direct cost incurred to gather and process produced gas is unreasonable, *citing Pursue Energy Corp. v. Abernathy*, 77 So. 1094 (MISS. 2011).
- 2) Unreasonable Transportation Costs Claim (TEP Period): The Class asserted that during the TEP Period, TEP’s deduction of NWPL transportation costs was unreasonable because: i) TEP deducted transportation costs TEP did not incur, ii) TEP could market its residue gas at White River Hub without

¹ Defendant TEP argued there are no such cases.

incurring NWPL transportation costs on better terms, and iii) TEP deducted NWPL transportation costs from royalty owners whose leases expressly precluded deduction of transportation costs.

- 3) Other Issues: In addition, TEP asserted defenses based on the applicable statutes of limitation, terms of prior settlement agreements, variations in lease language, and other grounds, and the Class asserted claims for prejudgment interest based on the amount TEP gained on wrongfully detained funds, citing disgorgement and tracing provisions of the Restatement of the Law of Restitution, Third.

In addition, class certification was vigorously and fully litigated in the JPRF Case, effectively creating a case-within-a-case that had to be won before the merits of the main class action were addressed, but was avoided by early settlement in the JPRS 2025 Case. Moreover, several of the issues raised in the JPRF Case were novel—or at least not so common as to be encountered routinely. These included difficult issues such as the question of first impression in Colorado of whether an oil and gas lessee’s implied covenant to market includes the duty to obtain the best price reasonably available for the produced gas, and the proper application and scope of the identical factual predicate test regarding the preclusive effect of prior class action settlements and judgments. Because of the lack of reported Colorado cases awarding damages to royalty owners based on an underpricing claim or on a claim that the amount of gathering, processing or transportation was unreasonable, each of the Class Claims arguably raised an issue of “first impression” in Colorado. In any event, there was no “roadmap” for how to litigate these claims, defenses and disgorgement issues, which proved to be difficult and challenging. The facts

were also complex, as reflected by the number of Class Members in the case and the considerable amount of discovery from defendant TEP and from third-party companies and witnesses.

b. The preclusion of other employment by the attorneys due to the acceptance of the case - The significant amounts of time that these cases required of me and of co-counsel precluded us from working on other matters that could have otherwise generated hourly fees.

c. The customary fee – In my experience, the customary attorneys’ fee in a royalty class action that results in the creation of a common fund for the benefit of the class is a percentage of the common fund. In the cases of which I am aware, the percentage of the common fund (after payment of expenses) was typically one-third of the common fund. Higher percentages may be warranted in the event of an appeal, where the risks of losing are multiplied.

d. Whether the fee is fixed or contingent - These cases were handled entirely on a contingent fee basis, with no assurance that any fees would ever be received. Receipt of compensation for our work was wholly dependent upon achieving a favorable result for the Class. The three law firms here incurred significant risk in pursuing this case. By taking these cases on a contingent fee basis, we not only shared in the risk of loss with the Class, but we also fully assumed the risk that we would be paid nothing for our services even after having invested not only a total of over 17,000 hours in recorded time (by all Class Counsel), and the risk that our cash outlay of over \$450,000 for out-of- pocket expenses would not be recovered. In my opinion, the fact that we worked diligently on this case for seven years without any compensation from hourly fees, retainer, or any other source, weighs heavily in favor of the award of a percentage fee of one-third (1/3) of the recovered common fund, that Class Counsel are requesting.

e. Any time limitations imposed by the client or the circumstances - There were no unusual time limitations imposed in these matters.

f. The amount involved and the results obtained – As was explained in the Settlement Agreement, each of the Class Claims was separately valued and negotiated based on its own merits. The settlement amount for each claim was different, and reflects the varying strengths, weaknesses, and risks of each claim. The total payment by TEP in this case is \$6,140,607, which is more than eighty-five percent of the damages which were supported by the evidence in the JPRS 2025 Case (this case) together with prejudgment interest thereon at eight percent (8%) per annum compounded annually from the date of the deduction by TEP. This Court has previously acknowledged, and the Tenth Circuit affirmed, that the median settlement amount for common fund class actions was 7.6%. *See Voulgaris v. Array Biopharma*, Civil Action No. 17-cv-02789-KLM, 2021 U.S. Dist. LEXIS 249646, at *21 (D. Colo. Dec. 3, 2021) affirmed *Voulgaris v. Array Biopharma, Inc.*, 60 F.4th 1259 (10th Cir. 2023). Given the inherent uncertainties of litigation and the risks presented here, especially with claims involving questions of first impression under Colorado law, the recovery here is an excellent result for the Class.

g. The experience, reputation, and ability of the attorneys - Fleeson, Gooing, Coulson & Kitch, L.L.C. is one of the premier advocates for royalty owners in class action underpayment cases, and Dufford Waldeck brought the leading royalty under payment case in Colorado (*Garman v. Conoco*, 886 P.2d 652 (Colo. 1994)) and has worked diligently to continually represent its many oil and gas lessor clients ever since. I am proud to work with them as co-counsel in this and other cases.

h. The nature and length of the professional relationship with the client – Jolley Potter Ranches Energy Co., LLC, the named plaintiff in the JPRF Case and the JPRS 2025 Case (this case), has maintained a long-term attorney/client relationship Nathan Kever, with Dufford Waldeck, Class Counsel. Although this is the JPRF Case was the first case in which I have

represented Jolley Potter Ranches Energy Co., LLC, over the past seven years we also have developed a good and effective working relationship.

i. Awards in similar cases- As set out in the Motion for Attorney Fees and Costs filed in this case on November 14, 2025, the requested fee of one-third of the common fund is well within the range of what the Colorado Courts have awarded common fund cases.

I believe the requested fee of one-third of the common fund, created by the settlement in this case, is fair and reasonable.

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

Executed this 14th day of November 2025.

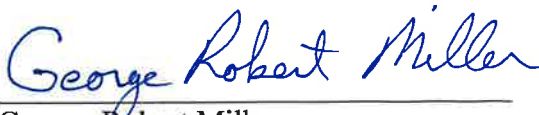

George Robert Miller

EXHIBIT A

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45737	TIME	Miller, Bob	18.00	1/20/2019	1/26/2019	prof.services	GRM Jolley Fed	Research and draft JPRF initial complaint; review Keever redrafts; emails re: same.
45738	TIME	Miller, Bob	10.50	1/27/2019	2/1/2019	prof.services	GRM Jolley Fed	Research and redraft initial complaint; review Keever redrafts; emails re: same.
45739	TIME	Miller, Bob	6.50	2/3/2019	2/9/2019	prof.services	GRM Jolley Fed	Research and redrafting gathering fuel claim; emails w/Keever.
45740	TIME	Miller, Bob	2.50	2/10/2019	2/16/2019	prof.services	GRM Jolley Fed	Identify and examine facts re: Piceance formations, production and take away capacity.
45741	TIME	Miller, Bob	2.50	2/18/2019	2/19/2019	prof.services	GRM Jolley Fed	Filed JPRF complaint
45742	TIME	Miller, Bob	7.50	3/3/2019	3/9/2019	prof.services	GRM Jolley Fed	Preparing amended complaint; research re: same; prepare potential alternative complaint (re: enforcement in State court/re transport cost claims). Filed amended complaint; emails re: FOIA request and facts underlying complaint; redraft amended complaint; emails re: same, telephone conference re: same.
45743	TIME	Miller, Bob	6.25	3/24/2019	3/30/2019	prof.services	GRM Jolley Fed	Legal research re: objective prudent operator standard; memo re: same; email discussion re: same w/co-counsel.
45744	TIME	Miller, Bob	10.50	4/23/2019	4/27/2019	prof.services	GRM Jolley Fed	Legal research re: Objective Prudent Operator.
45330	TIME	Miller, Bob	3.10	4/25/2019		prof.services	GRM Jolley Fed	Fact research re: Platts pipeline data.
45332	TIME	Miller, Bob	0.75	5/1/2019		prof.services	GRM Jolley Fed	Telephone conference with Platts re: data sources; legal research re: removal; emails re: same.
45745	TIME	Miller, Bob	4.50	5/2/2019	5/4/2019	prof.services	GRM Jolley Fed	Conference w/co-counsel re: mediation.
45337	TIME	Miller, Bob	0.75	5/7/2019		prof.services	GRM Jolley Fed	Participate in Jolley Federal Mediation.
45338	TIME	Miller, Bob	2.15	5/7/2019		prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45746	TIME	Miller, Bob	1.50	5/27/2019	5/31/2019	prof.services	GRM Jolley Fed	Review draft scheduling order; telephone conference with Keever re: same; emails re: same.
45747	TIME	Miller, Bob	0.50	6/3/2019		prof.services	GRM Jolley Fed	Emails w/Keever re: scheduling order.
45748	TIME	Miller, Bob	11.00	6/9/2019	6/15/2019	prof.services	GRM Jolley Fed	Review of TEP motion to dismiss JPRF; legal research re: same; memo re: same.
45363	TIME	Miller, Bob	5.35	6/10/2019		prof.services	GRM Jolley Fed	Review TEP Motion to Dismiss and prepare memo to co-counsel re: same.
45749	TIME	Miller, Bob	9.50	6/16/2019	6/22/2019	prof.services	GRM Jolley Fed	Prepare first draft of Third Party discovery questions to 7 Piceance Basin takeaway pipelines; and initial discovery requests from TEP; fact research re: same; emails re: same.
45750	TIME	Miller, Bob	5.50	7/2/2019	7/6/2019	prof.services	GRM Jolley Fed	Extended email discussion w/co-counsel re: TEP motion to dismiss and scope of Lindauer settlement; telephone conference with Keever re: extension of time; legal research re: same.
45751	TIME	Miller, Bob	21.25	7/14/2019	7/20/2019	prof.services	GRM Jolley Fed	Memo re: factual basis of JPRF claims; prepared first draft of Response to TEP Motion to dismiss JPRF claims, review and revise multiple drafts; emails re: same; legal research re: same.
45752	TIME	Miller, Bob	12.50	7/21/2019	7/27/2019	prof.services	GRM Jolley Fed	Review and revise multiple drafts of Response, emails re: same.
45753	TIME	Miller, Bob	3.50	8/4/2019	8/10/2019	prof.services	GRM Jolley Fed	Received TEP voluntary disclosures, review North Dakota Sup. Ct. case from DS; emails re: SQL; zooms w/co-counsel
45754	TIME	Miller, Bob	3.50	8/18/2019	8/20/2019	prof.services	GRM Jolley Fed	Review and analyze TEP reply plus co-counsel questions & emails re: same; TK sunk cost emails; review Keever outline.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45755	TIME	Miller, Bob	4.25	8/25/2019	8/30/2019	prof.services	GRM Jolley Fed	Review Keever memo re: JPRF; prepare memo re: same; email w/RM re: TEAMS requires 365.
45756	TIME	Miller, Bob	1.25	9/3/2019		prof.services	GRM Jolley Fed	Comments on RFPs.
45757	TIME	Miller, Bob	5.00	10/6/2019	10/10/2019	prof.services	GRM Jolley Fed	Prepare memo re: class certification & pipeline discovery; circulate same.
45758	TIME	Miller, Bob	16.00	10/13/2019	10/19/2019	prof.services	GRM Jolley Fed	Review Potter Remittance statements; Telephone conference with MED & Keever re: same + MED data; legal and fact research; start to prepare 3rd Party Pipeline discovery; Interrogatories, RFP; RFA. Emails from TK re: discovery; review and comment on RM/ADK memo re: application of covenant of good faith & fair /dealing to Class Claims & JPRF; preparing 3rd Party discovery.
45759	TIME	Miller, Bob	9.50	10/20/2019	10/26/2019	prof.services	GRM Jolley Fed	
45760	TIME	Miller, Bob	2.00	10/28/2019	10/29/2019	prof.services	GRM Jolley Fed	Review DS amendment to 3rd Party Pipeline discovery.
45761	TIME	Miller, Bob	1.50	11/3/2019	11/9/2019	prof.services	GRM Jolley Fed	Review and revise 3rd Party Pipeline discovery; emails re: same.
45762	TIME	Miller, Bob	2.25	11/17/2019	11/20/2019	prof.services	GRM Jolley Fed	Review Whipple emails re;; Rule 45 subpoenas JPRF; telephone conference with re: same.
45763	TIME	Miller, Bob	3.00	11/25/2019	11/26/2019	prof.services	GRM Jolley Fed	Review JPRF class Lease summary.
45764	TIME	Miller, Bob	12.50	12/1/2019	12/7/2019	prof.services	GRM Jolley Fed	Prepare first draft of discovery request to TEP/WPX. Review comments and revise discovery requests to TEP/WPX.
45765	TIME	Miller, Bob	3.50	12/8/2019	12/14/2019	prof.services	GRM Jolley Fed	
45766	TIME	Miller, Bob	5.25	12/15/2019	12/20/2019	prof.services	GRM Jolley Fed	Emails w/Whipple & pipelines re: 3rd Party discovery requests; revised RFPs; emails w/Whipple, DS et al re: TEP/WPX discovery requests.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45767	TIME	Miller, Bob	1.25	12/22/2019	12/24/2019	prof.services	GRM Jolley Fed	Review & revise TEP/WPX discovery requests re: RM comments.
45768	TIME	Miller, Bob	13.50	1/5/2020	1/9/2020	prof.services	GRM Jolley Fed	Review RM email re: status JPRF; recirculate discovery memo; start to review produced documents.
45769	TIME	Miller, Bob	12.00	1/12/2020	1/18/2020	prof.services	GRM Jolley Fed	Review of TEP Leases; zoom w/co-counsel re: next steps; exchange multiple emails re: BAP claims, holding in Rogers, and abrogation of implied covenants; plus legal research re: same.
45770	TIME	Miller, Bob	9.50	1/19/2020	1/25/2020	prof.services	GRM Jolley Fed	Emails re: Rio Blanco County leases; multiple emails re: BAP claim; plus legal research re: same; review TEP docs.
45771	TIME	Miller, Bob	4.25	1/26/2020	1/29/2020	prof.services	GRM Jolley Fed	Telephone conference with TK & GS (1); identify and circulate docs re: WPX firm transportation; telephone conference with co-counsel re: same.
45772	TIME	Miller, Bob	15.00	2/2/2020	2/8/2020	prof.services	GRM Jolley Fed	Emails re: questions for experts to Keever; emails to MED re: retroactive adjustments plus statute of limitations; review of WPX/TEP documents, including Concord Remittance Statements.
45773	TIME	Miller, Bob	27.00	2/9/2020	2/15/2020	prof.services	GRM Jolley Fed	Multiple emails w/co-counsel re: Concord Remittance Statements; review of WPX/TEP documents; receive TEP discovery responses; multiple emails re: TEP discovery responses & motion to compel; emails re: Vela & Statute of Limitations and research re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45774	TIME	Miller, Bob	17.00	2/16/2020	2/22/2020	prof.services	GRM Jolley Fed	Multiple emails re: tolling the Statute of Limitation using the discovery rule; related legal research; review of WPX/TEP documents; emails re: motion to compel.
45775	TIME	Miller, Bob	28.00	2/23/2020	2/29/2020	prof.services	GRM Jolley Fed	Prepared summary of TEP documents reviewed to date and claims they support; review and forward MED spreadsheet re: NGL vs Residue pricing; contact potential marketing expert: Bourque; review and comment on draft scheduling order; receive and review GS memo re: implied covenant to market; review and circulate sample Bourque opinion; emails re: commonality and royalty language; review of implied covenant cases; emails re: abrogation of implied covenant; emails re: firm transportation claim; review of TEP documents; conference call re: BAP.
45776	TIME	Miller, Bob	18.00	3/3/2020	3/7/2020	prof.services	GRM Jolley Fed	Identify net liquids margin docs; provide to co-counsel w/MED calcs; multiple emails re: net liquids margin; receive TEP discovery requests; email plan to respond to co-counsel; email to co-counsel GRM evaluation of TEP responses plus follow up necessary; identify and circulate all prior legal memos re: class claims; emails re: authorizes supporting unreasonable deduction of affiliate costs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45777	TIME	Miller, Bob	22.00	3/8/2020	3/14/2020	prof.services	GRM Jolley Fed	Prepare and circulate memo re: Wms/NWPL affiliate contracts and questions for marketing expert; review and respond to multiple replies to NWPL affiliate contracts memo; prepare 1st draft of Class responses to TEP discovery; emails re: scope of affiliate cost claims and related expert witness opinions; emails re: Lease language.
45778	TIME	Miller, Bob	13.50	3/15/2020	3/21/2020	prof.services	GRM Jolley Fed	Emails w/co-counsel re: BAP claims and prudent operator claims; drafted summary of Law; related legal research; fact research re: residue & NGL pricing; TEP financial status; review TEP docs.
45779	TIME	Miller, Bob	12.00	3/22/2020	3/28/2020	prof.services	GRM Jolley Fed	Zoom w/Keever/Whipple re: discovery documents; review ADL memo re: best reasonably available price (BAP); review TEP documents.
45780	TIME	Miller, Bob	18.00	3/29/2020	4/3/2020	prof.services	GRM Jolley Fed	Emails re: extension re: Class discovery responses, COVID and expert reports; review TEP documents; research re: facts supporting class cert; compile and forward to DS.
45781	TIME	Miller, Bob	17.50	4/5/2020	4/11/2020	prof.services	GRM Jolley Fed	Review Motion, Order, Status Report re: JPRF scheduling; emails re: same and necessary discovery & timing; review DS Motion for Class Certification; review GS redraft; memo re: facts in support of Class cert.; review TEP docs re: same; review mmeo re: deduction of affiliate profits; fact and legal research re: same; review RFAs. Review ADK prudent operator mem and related cases.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45782	TIME	Miller, Bob	14.00	4/12/2020	4/18/2020	prof.services	GRM Jolley Fed	Emails re: deduction of affiliate costs; review attorney memos re: prudent operator standard; emails re: same; review RFAs; review Motion for Class Certification; review TEP documents.
45783	TIME	Miller, Bob	1.75	4/27/2020	4/30/2020	prof.services	GRM Jolley Fed	Identify TEP Letter to Royalty Owners; forward to Keever.
45784	TIME	Miller, Bob	11.00	5/3/2020	5/9/2020	prof.services	GRM Jolley Fed	Zoom call w/co-counsel re: status JPRF (2); review GS agenda; review and redrafted RFAs to TEP; review RM redraft of RFAs to TEP; redrafted and expanded GS agenda.
45785	TIME	Miller, Bob	18.50	5/18/2020	5/20/2020	prof.services	GRM Jolley Fed	Telephone conference with Keever re: RFAs; reviewing and amending same. Discussions w/Bourque; enage as consulting expert witness re: marketing; forward 3rd party discovery for review; discussion re: discovery; review her analysis; review and revise engagement agreement; email to Bourque and co-counsel re: same.
45786	TIME	Miller, Bob	3.50	6/1/2020	6/5/2020	prof.services	GRM Jolley Fed	Review emails re: JPRF; review TEP documents.
45787	TIME	Miller, Bob	10.00	6/7/2020	6/13/2020	prof.services	GRM Jolley Fed	Zoom co-counsel re: JPRF status (2); prepare list of JPRF Action Items; review redraft of Class Cert. Motion; review TEP documents.
45788	TIME	Miller, Bob	19.00	6/14/2020	6/20/2020	prof.services	GRM Jolley Fed	Receive, review and comment on Fleeson categorization of 1900 JPRF Leases; prepare memo table re: JPRF common claims have common answers; discovery requests; start compiling facts to support JPRF class claims; emails to co-counsel; review TEP documents.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45789	TIME	Miller, Bob	5.50	6/21/2020	6/27/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel (1.5); memos re: factual predicated collateral attack on class settlement; telephone conference with RM re: same.
45790	TIME	Miller, Bob	1.00	7/1/2020		prof.services	GRM Jolley Fed	Review emails re: 30(b)(6) notice.
45791	TIME	Miller, Bob	7.50	7/6/2020	7/11/2020	prof.services	GRM Jolley Fed	Conference call re: status and next steps JPRF (1.5); research re: identical factual predicate; memo re: same.
45792	TIME	Miller, Bob	14.00	7/13/2020	7/18/2020	prof.services	GRM Jolley Fed	Compiling facts to support common JPRF class claims, zoom w/co-counsel re: next steps.
45793	TIME	Miller, Bob	15.00	7/20/2020	7/24/2020	prof.services	GRM Jolley Fed	Emails re: class cert. discovery; review and revise same; compiling facts to support common JPRF class claims; redrafting Motion for class cert. JPRF; zoom w/co-counsel re: next steps.
45794	TIME	Miller, Bob	15.00	7/27/2020	7/31/2020	prof.services	GRM Jolley Fed	Redrafting Motion for class cert. JPRF; zoom w/co-counsel re: next steps; reviewing TEP docs; email re: class cert. discovery; review and comment on same.
45795	TIME	Miller, Bob	18.00	8/3/2020	8/8/2020	prof.services	GRM Jolley Fed	Working draft Motion for class cert to co-counsel; emails re: same; circulate redraft, memo re: 30(b)(6) deposition re: lease types and common issues.
45796	TIME	Miller, Bob	9.50	8/10/2020	8/15/2020	prof.services	GRM Jolley Fed	Review of Lease chart to identify class members to be excluded; emails re: same.
45797	TIME	Miller, Bob	10.00	8/17/2020	8/22/2020	prof.services	GRM Jolley Fed	Review TEP marketing docs (TJPF_040677-040882) and prepare summary of same w/commoents.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45798	TIME	Miller, Bob	6.50	8/24/2020	8/29/2020	prof.services	GRM Jolley Fed	Telephone conference with Keever re: status JPRF; emails re: class cert. discovery; review and comment on same; MED re: SQL data; review and revise class answers to TEP discovery requests.
45799	TIME	Miller, Bob	16.00	9/1/2020	9/5/2020	prof.services	GRM Jolley Fed	Review Reponse to Show cause order; emails re: same; compiling significant TEP documents supporting class claims; indexing TEP documents (10); review TEP docs printed by LC.
45800	TIME	Miller, Bob	14.00	9/7/2020	9/12/2020	prof.services	GRM Jolley Fed	Compiling significant TEP documents supporting class claims; indexing TEP documents.
45801	TIME	Miller, Bob	23.00	9/14/2020	9/19/2020	prof.services	GRM Jolley Fed	Provided memo re: significant TEP docs to co-counsel; expanded memo re: docs; emails w/co-counsel to discuss which facts support each claim; review TEP docs; indxing TEP docs; discovery issues, emails re: status of case; telephone conference with DS. Zoom w/co-counsel; emails re: Lindauer Settlement; emails re: Concord Remittance statements; review TEP docs; indexing TEP docs; telephone conference with DS.
45802	TIME	Miller, Bob	22.00	9/21/2020	9/26/2020	prof.services	GRM Jolley Fed	
45803	TIME	Miller, Bob	25.00	9/28/2020	10/3/2020	prof.services	GRM Jolley Fed	Memo re: additional significant TEP documents; zoom w/co-counsel; telephone conference with Jerry and DS; prepare Rule 26 (b) interrogatory response for the class; fact research re: same; indexing TEP documents; review discovery responses; emails 30(b)(6) depos.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45804	TIME	Miller, Bob	40.50	10/5/2020	10/10/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel, indexing TEP docs; identify documents to provide to experts; emails re: same; review and amend 30(b)(6) topics, telephone conference with DS; review TEP documents, review TEP document binders by LC; prepare sample outline to organize TEP docs for experts.
45805	TIME	Miller, Bob	20.30	10/12/2020	10/17/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel; indexing TEP docs, zoom w/ MED & Keever; emails re: 30 (b)(6) topics; telephone conference with DS re: outline; review TEP documents; review TEP doc binders by LC; emails w/BW re: expert docs, emails and telephone conferences with LC re: doc notebooks and indexing; review and revised 30 (b)(6) topics, emails w/DS re: same.
45806	TIME	Miller, Bob	25.00	10/19/2020	10/24/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; emails re: 30 (b)(6) topics depositions; review TEP docs; emails and telephone conference with LC re: indexing; email memos re: 30 (b)(6) to DS. Zoom w/co-counsel; emails re: 30 (b)(6) depositions; indexing TEP docs, review TEP docs; emails and telephone conferences with LC re: indexing; index to co-counsel.
45807	TIME	Miller, Bob	22.00	10/26/2020	10/31/2020	prof.services	GRM Jolley Fed	Indexing TEP docs, telephone conference with and emails w/DS; memo to DS; telephone conference with DS; telephone conference with DS & MED and review MED spreadsheet; emails re: 30 (b)(6) ; changes to 30 (b)(6) outline; emails and telephone conference with LC re: indexing.
45808	TIME	Miller, Bob	27.00	11/2/2020	11/7/2020	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45809	TIME	Miller, Bob	30.00	11/9/2020	11/14/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; telephone conference with DS re: 30 (b)(6) depos; telephone conference with DS & MED; review Ct. Order Denying Motion to Dismiss; emails re: 30 (b)(6); provide docs to MED; email questions to MED; review of 5 MED spreadsheets re: residue/claims; emails re: same; prepare memo re: factual basis for common claims & 30 (b)(6) questions.
45810	TIME	Miller, Bob	35.00	11/16/2020	11/21/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; emails re: 30 (b)(6) depos; emails re: MED spreadsheets; review and amend DS Letter to Chrisman re: 30 (b)(6); emails w/ MED re: TERRA deductions, zoom w/ co-counsel; zoom w/Keever & MED; emails and review data re: component cost deductions; review checkstubs & MED data re: same.
45812	TIME	Miller, Bob	18.00	11/23/2020	11/28/2020	prof.services	GRM Jolley Fed	Indexing TEP docs; prepared outline for Wiseman and Beraquista depos; emails re: 30 (b)(6). Identify 30 (b)(6) depo docs per request from DS; review of emails between TEP & DS re: depos; prep for depos, Telephone conference with & emails w/ DS re: depos.
45813	TIME	Miller, Bob	28.00	12/1/2020	12/5/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel, prepare for depos; identify and prepare docs, emails, telephone conference with co-counsel.
45814	TIME	Miller, Bob	55.00	12/7/2020	12/12/2020	prof.services	GRM Jolley Fed	Zoom w/co-counsel; prepare depo summary; conf call w/co-counsel; preparation of responses to TEP discovery; review and revise answer to counter claim.
45815	TIME	Miller, Bob	12.00	12/14/2020	12/19/2020	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45816	TIME	Miller, Bob	18.00	12/21/2020	12/26/2020	prof.services	GRM Jolley Fed	Telephone conference with RM re: class certification; analyze 2 Simpson NGL spreadsheets, email to co-counsel re: same; class certification brief; review and analyze Beraquista spreadsheet; forward to MED; prepare chart of WPX/TEP royalty allocation pools; emails re: same. Review Keever draft of Class Response to TEP discovery; response re: Merrill 84, identify & forward Simpson & Beraquista spreadsheets to MESD; Wms Shrink data to MED; redraft of Keever responses to TEP discovery
45863	TIME	Miller, Bob	8.00	12/27/2020	1/2/2021	prof.services	GRM Jolley Fed	discovery
45817	TIME	Miller, Bob	10.50	12/28/2020	12/30/2020	prof.services	GRM Jolley Fed	Prepare responses to TEP discovery requests.
45865	TIME	Miller, Bob	6.50	1/3/2021	1/9/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets re: NGL values, volumes, etc.; emails re: Class discovery responses.
45866	TIME	Miller, Bob	1.50	1/10/2021	1/16/2021	prof.services	GRM Jolley Fed	Emails re: facts considered by Ct on SJ.
45867	TIME	Miller, Bob	8.50	1/17/2021	1/23/2021	prof.services	GRM Jolley Fed	emails w/MED re: Canyon gathering; revise discover responses w/Keever & MED.
45868	TIME	Miller, Bob	23.00	1/31/2021	2/6/2021	prof.services	GRM Jolley Fed	Identify Summit/ETC gathering invoices & forward to MED; review and organize TEP documents; prepare memo re: amendment to class definition; emails re: same; legal & fact research re: same; emails re: Potter Leases; review Potter leases and maps.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45869	TIME	Miller, Bob	23.00	2/7/2021	2/13/2021	prof.services	GRM Jolley Fed	Zoom w/co-counsel; review Lease categorization schedule; review and comment on emails re: Lease categorization; review Keever data re: Potter Leases, wells and maps and identify Potter wells on TEP GVG docs; preparation of initial disclosures; review TEP docs.
45870	TIME	Miller, Bob	15.50	2/14/2021	2/20/2021	prof.services	GRM Jolley Fed	30 (b)(6) emails; Telephone conference with Keever; review and provide comments re: Lease spreadsheets; review TEP docs.
45871	TIME	Miller, Bob	8.50	2/21/2021	2/27/2021	prof.services	GRM Jolley Fed	Review additional TEP disclosures; review emails re: Class Lease spreadsheet; review initial disclosures; emails re: Lease categorization.
45872	TIME	Miller, Bob	13.00	3/7/2021	3/13/2021	prof.services	GRM Jolley Fed	Prepare memo re: Potter 30 (b)(6) deposition; research re: same; conference call w/ Keever & Seely re: same; prepared summary of class claims; answer co-counsel questions (facts & law) re: same; review TEP docs.
45873	TIME	Miller, Bob	20.00	3/17/2021	3/20/2021	prof.services	GRM Jolley Fed	Draft expanded summary of class claims; emails re: same; email re: Facts which support class claims; memo identifying such Facts; Telephone conference with Chrisman re: Potter depo and lease categorization and class definition; prepared summary of; emails re: same.
45874	TIME	Miller, Bob	14.00	3/21/2021	3/27/2021	prof.services	GRM Jolley Fed	Identify, review and answer RM questions re: docs 67 to 72; emails w/DS re: errata to Pollock deposition; zoom w/co-counsel re: Potter depo, review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45875	TIME	Miller, Bob	8.50	3/31/2021	4/3/2021	prof.services	GRM Jolley Fed	Zoom w/-co-counsel re: JPRF; Telephone conference with Seely re: engaging expert witness; review docs re: same; review TEP docs; discussion w/ DS re: plats contract.
45876	TIME	Miller, Bob	10.00	4/4/2021	4/10/2021	prof.services	GRM Jolley Fed	Review Lease spreadsheet and uncategorized Leases together w/TEPRFA & RO6 responses; emails re: same; review TEP docs.
45877	TIME	Miller, Bob	23.00	4/11/2021	4/17/2021	prof.services	GRM Jolley Fed	Telephone conference with Bourque; emails w/Bourque and co-counsel re: engagement of marketing expert; review and revise contracts; identify and prepare list of documents to provide to Bourque together w/summary of Class Claims and applicable law.
45878	TIME	Miller, Bob	25.00	4/18/2021	4/24/2021	prof.services	GRM Jolley Fed	Telephone conference with DS re: Bourque engagement and work; review MED gathering spreadsheets and emails; review TEP docs and gathering docs and Potter check stubs re: gathering deducts; prepare memo re: Lease categorization and review applicable leases and legal research. Legal research re: Implied Covenant to market.
45879	TIME	Miller, Bob	17.50	4/25/2021	4/26/2021	prof.services	GRM Jolley Fed	Answer Keever questions re: pricing claim; legal and fact reseach re: same; memo re: lease categorization to co-counsel. Legal research re: Implied Covenant to market.
45880	TIME	Miller, Bob	19.50	5/5/2021	5/8/2021	prof.services	GRM Jolley Fed	Zoom w/co-counsel re: JPRF; review TEP docs; review Keever email; zoom w/DS & Bourque. Legal research re: Implied covenant to market; memo re: ICM in Colorado.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45881	TIME	Miller, Bob	13.00	5/10/2021	5/15/2021	prof.services	GRM Jolley Fed	Review and analyze TEP discovery responses; review TEP documents. Prepare and circulate memo re: TEP discovery responses; emails to DS re: Bourque class cert.issues/questions
45882	TIME	Miller, Bob	6.50	5/16/2021	5/22/2021	prof.services	GRM Jolley Fed	
45883	TIME	Miller, Bob	6.00	5/23/2021	5/26/2021	prof.services	GRM Jolley Fed	Review TEP documents. Review facts related certification of class claims; review and revise memo re: facts/issues for Bourque to address re: Class Cert; review and respond to GS questions re: same; answer GS question re: lease spreadsheets; co-counsel emails.
45884	TIME	Miller, Bob	14.00	5/30/2021	6/3/2021	prof.services	GRM Jolley Fed	
45885	TIME	Miller, Bob	12.00	6/7/2021	6/12/2021	prof.services	GRM Jolley Fed	Review TEP docs; review lease spreadsheets. Review Lease categorization spreadsheets & emails w/co-counsel re: same; memo re: Lease types in BAP cases and related legal research; review Keever BAP memo; legal research re: BAP case law (all jurisdictions); mem proposing end date for class period.
45886	TIME	Miller, Bob	18.00	6/13/2021	6/19/2021	prof.services	GRM Jolley Fed	
45887	TIME	Miller, Bob	18.00	6/20/2021	6/24/2021	prof.services	GRM Jolley Fed	Zoom call w/DS, Bourque, Kitch; review TEP docs; identify docs to forward to Bourque; summarize applicable Colorado Law for Bourque; emails re: same; review of Keever email re: Wms & Myers 853 (BAP); identify and forward Bourque docs re: TEP divestment of TRANS obligations; review Bourque expert witness report and comments and revisions re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45888	TIME	Miller, Bob	21.00	7/11/2021	7/17/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets and Bourque comments re: NGL costs and revenue; review Bourque expert report re: Class Cert. re: pricing data to MED; start preparing comments re: same.
45889	TIME	Miller, Bob	21.50	7/18/2021	7/24/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets re: comparative prices, NGL prices, shrink, WPX calcs and daily prices; multiple emails re: pricing data and questions; comments re: Bourque expert report; review co-counsel comments re: same; emails re: same; zoom w/co-counsel.
45890	TIME	Miller, Bob	7.50	7/25/2021	7/31/2021	prof.services	GRM Jolley Fed	Review MED spreadsheet re: WRH, CIG, Opal; price comparison; Telephone conference with MED re: same; email comments to Bourque, review TEP documents.
45891	TIME	Miller, Bob	13.00	8/1/2021	8/7/2021	prof.services	GRM Jolley Fed	Research re: NGL pricing and shrink; request prior MED spreadsheets; Zoom call w/MED, Bourque, DS re: 6 MED spreadsheets; answer Bourque questions re: Ryan & Starkey Gulch receipt points and processing plants; answer Bourque quesions re: Concord Remittance Statements.
45892	TIME	Miller, Bob	18.00	8/8/2021	8/14/2021	prof.services	GRM Jolley Fed	Zoom w/DS, Bourque; Telephone conference with DS, RM; emails w/MED re: acquisition of pricing data; review MED pricing spreadsheets; analysis of MED pricing spreadsheets; review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45893	TIME	Miller, Bob	23.00	8/15/2021	8/21/2021	prof.services	GRM Jolley Fed	Answer Bourque questions; additional docs to Bourque; analysis of MED pricing spreadsheets and memo to co-counsel re: same; Review Bourque comments and pricing spreadsheets; co-counsel emails re: obtaining pricing data from TEP; emails re: scheduling; emails re: pricing data; conference call w/Bourque, review TEP data.
45894	TIME	Miller, Bob	12.00	8/22/2021	8/28/2021	prof.services	GRM Jolley Fed	Review MED spreadsheets comparing check stubs and SQL data; review and analyze Bourque analysis of MED pricing data & Bourque spreadsheets re: same; emails re: same; review TEP data.
45895	TIME	Miller, Bob	23.00	8/29/2021	9/4/2021	prof.services	GRM Jolley Fed	Prepare analysis of MED pricing data w/comments, extensive emails re: use of unweighted pricing data for some purposes; review TEP data; prepare tables & comments to compare pricing and differentials; Telephone conference with MED and emails re: flow data pricing.
45896	TIME	Miller, Bob	17.00	9/5/2021	9/11/2021	prof.services	GRM Jolley Fed	Obtain and review JPRF costs; Telephone conference with DS & Bourque; Telephone conference with DS; review & forward 4 MED pricing spreadsheets to Bourque and co-counsel; Telephone conference with MED re: same; identify and forward docs to MED and Bourque; review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45897	TIME	Miller, Bob	21.00	9/12/2021	9/18/2021	prof.services	GRM Jolley Fed	Review and comment on MED expert witness report; extensive emails and comments by co-counsel; review Keever comments; compile comments and forward to MED for review; more emails. Zoom w/Bourque & DS; Zoom w/MED & DS; review draft Bourque expert report; document to Bourque; review two Simpson spreadsheets and forward to MED; prepare memo response to GS emails re: Wms/BP REX Contract; review GS response; extensive emails and fact and legal research; review MED spreadsheets re: NGL claims; review Keever emails re: same.
45898	TIME	Miller, Bob	29.00	9/19/2021	9/25/2021	prof.services	GRM Jolley Fed	Detailed response to comments re: MED spreadsheets; email to MED re: royalty payors; review history of lease categorization and special pricing leases and related facts; comment on same; review 6 Simpson spreadsheets; review TEP docs.
45899	TIME	Miller, Bob	21.00	9/26/2021	10/2/2021	prof.services	GRM Jolley Fed	Emails w/DS re: JPRF expenses; review and comment on draft MED report; emails re: same; redraft class definition and realted fact research 20 hours over 4 months; review GS drafts re: same; extended emails re: same; review MED proposed pricing exhibit; Keever redraft and emails; legal research re: recent BAP cases; prepare memo re: same; Zoom MED & DS.
45900	TIME	Miller, Bob	39.50	10/3/2021	10/9/2021	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45901	TIME	Miller, Bob	15.50	10/10/2021	10/16/2021	prof.services	GRM Jolley Fed	Review TEP list of TRANS contracts and the contracts themselves; emails re: BAP cases and related research; emails re: redraft class definition and lease spreadsheets and review of lease spreadsheet; review Keever comments to MED expert report; emails w/MED re: same; review TEP docs.
45902	TIME	Miller, Bob	34.00	10/17/2021	10/23/2021	prof.services	GRM Jolley Fed	Review of Beracquista spreadsheets and forward to Bourque; review MED spreadsheets and forward to Bourque; prepare memo re: excluding Major operators from class definition; fact research re: same; emails re: same; Telephone conference with MED re: data sources; prepared memo re: same for Bourque; review GS proposed class definition and related emails; review TEP data re: WPX workbooks; Keever comments on MED expert report; review TEP docs.
45903	TIME	Miller, Bob	25.00	10/24/2021	10/30/2021	prof.services	GRM Jolley Fed	Telephone conference with Keever re: Lindauer Settlement and fact research re: same; comments on Bourque Expert Report and related emails; review Bourque's "last draft" of expert report plus exhibits; review and resolve multiple co-counsel comments re: MED expert report; multiple emails re: same; review MED final expert report with Exhibits; review TEP docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45904	TIME	Miller, Bob	28.00	11/1/2021	11/6/2021	prof.services	GRM Jolley Fed	Review of TEP docs and recent TEP disclosures; legal research re: class claims; and abrogation of implied covenants; legal research re: good faith and Colorado implied covenant to market; Zoom w/Bourque & DS; Zoom w/co-counsel, Telephone conference with DS.
45905	TIME	Miller, Bob	37.00	11/7/2021	11/13/2021	prof.services	GRM Jolley Fed	Review proposed stipulation and attached Lease spreadsheet; legal research re: waiver of TEP implied covenant duties; emails w/DS re: JPRF expenses; memo re: Colorado Law re: good faith and abrogation of Leasee's implied covenant duties; review Covenant of Further Exploration Law review from Kever; emails w/co-counsel and legal research re: same issues; memo re: wrongdoing & BAP plus related legal and fact research; research re: relational contracts; research re: affiliate contracts.
45906	TIME	Miller, Bob	18.00	11/14/2021	11/20/2021	prof.services	GRM Jolley Fed	Legal research re: unjust enrichment and restitution; memo re: Colorado implied covenant duty to diligently market.
45907	TIME	Miller, Bob	11.00	11/21/2021	11/27/2021	prof.services	GRM Jolley Fed	Review of emails re: Caerus & Ursa and class definition and comment re: same; review TEP docs; continued legal research.
45908	TIME	Miller, Bob	16.00	11/28/2021	12/4/2021	prof.services	GRM Jolley Fed	Review EKA memo re: affiliate contracts; emails discussing same; legal research re: same; review EKA supplemental memo; review TEP docs and disclosures. Review EKA memo re: unjust enrichment and related cases.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45909	TIME	Miller, Bob	27.00	12/5/2021	12/11/2021	prof.services	GRM Jolley Fed	Response to affiliate contract emails; memo re: facts plus comments; identify and review documents related to Wms/BPREXGPA; prepare memo re: same; Telephone conference with DS; conference call re: settlement; legal research re: unjust enrichment. Emails to MED and Bourque re: TEP expert witness reports; review TEP docs.
45910	TIME	Miller, Bob	6.00	12/12/2021	12/18/2021	prof.services	GRM Jolley Fed	
45911	TIME	Miller, Bob	28.00	12/19/2021	12/25/2021	prof.services	GRM Jolley Fed	Review TEP expert witness reports; memo to co-counsel re: same; continued review and emails re: TEP expert reports and exhibits; start working on memo summarizing TEP expert reports.
45912	TIME	Miller, Bob	6.00	12/26/2021	12/31/2021	prof.services	GRM Jolley Fed	Completed memo re: TEP expert reports.
45934	TIME	Miller, Bob	17.50	1/4/2022	1/8/2022	prof.services	GRM Jolley Fed	Review Lease spreadsheet redraft by TEP; memo re: Lease spreadsheet and common questions; zoom w/co-counsel; review MED massive SQL data; zoom w/MED; zoom w/ Bourque; review MED analysis of NGL data; emails re: shrink calcs and revised spreadsheets; prepare memo re: Lease spreadsheet.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45935	TIME	Miller, Bob	22.00	1/10/2022	1/15/2022	prof.services	GRM Jolley Fed	Respond to Stucky questions re: common issues memo; zoom call w/DS and Bourque; zoom w/co-counsel; zoom call w/Bourque and DS; email re: economics expert; discussion of whether to proceed with NGL claim, self dealing, BAP and wrong doing; memo and related research re: same; identify and forward docs to Bourque; Telephone conference with MED re: expert report; co-counsel emails re: use of Classwide methodology.
45936	TIME	Miller, Bob	37.00	1/17/2022	1/22/2022	prof.services	GRM Jolley Fed	Review TEP responses to discovery; answer Bourque question re: TERRA supply deal; legal research re: abrogation of implied covenants and memos re: same; answer Bourque question re: NGLs; locate and forward documents requested by Bourque; respond to GS questions re: covenants implied in law; legal research re: Comparable Price Method; memo re: same; review and comment on Bourque expert rebuttal report; review DS comments to rebuttal report.
45937	TIME	Miller, Bob	15.50	1/24/2022	1/29/2022	prof.services	GRM Jolley Fed	Review and comment on MED expert Rebuttal report; review EKA memo on equitable remedies in JPRF; memo re: same; emails re: same; review and comment on final draft Bourque Rebuttal report and co-counsel comments; review additional Bourque comments and emails re: same; Telephone conference with MED re: common questions; comment to MED rebuttal report.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45938	TIME	Miller, Bob	13.00	1/31/2022	2/5/2022	prof.services	GRM Jolley Fed	Co-counsel emails re: class cert. brief and timing; identify and organize facts and docs re: Wms/BPRex GPA; review TEP docs and disclosures.
45939	TIME	Miller, Bob	17.00	2/7/2022	2/12/2022	prof.services	GRM Jolley Fed	Review and revise lease stipulation; prepare outline of facts and docs re: Wms/BPRex GPA; co-counsel emails re: organizing class cert brief; Telephone conference with Keever re: Second Amended gathering agreement; review TEP docs and disclosures; emails w/co-counsel.
45940	TIME	Miller, Bob	15.00	2/14/2022	2/19/2022	prof.services	GRM Jolley Fed	Emails re: Class Cert. Motion; zoom w/co-counsel re: same; redraft fact statement for Class Cert. Motion; statement of claims and common questions, email w/co-counsel.
45941	TIME	Miller, Bob	14.00	2/21/2022	2/26/2022	prof.services	GRM Jolley Fed	Finalize and circulate redraft Motion to Certify Class; co-counsel emails re: same; review DS redraft; review GJS redraft; review TEP docs and disclosures.
45942	TIME	Miller, Bob	9.00	2/28/2022	11/2/2024	prof.services	GRM Jolley Fed	Identify authorities and memos which establish legal basis for BAP claim; email w/co-counsel re: class definition re: ORRI owners; review RM redraft Class Motion to Certify; review GS draft, emails re: same.
45943	TIME	Miller, Bob	17.00	3/7/2022	3/12/2022	prof.services	GRM Jolley Fed	Prepare first draft Bourque Affidavit; revise draft to include all facts in brief; review DS redraft of motion; review of TEP docs and disclosures.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45944	TIME	Miller, Bob	22.50	3/14/2022	3/19/2022	prof.services	GRM Jolley Fed	Review and revise Motion to Certify Class; fact research re: same and find citations (fact & law); review GS redraft; review TK redraft; find and fix cites; revise fact statement, review DS draft; revise DS draft and add cites to affidavits. Find docs to support Class Cert. Brief; review amended complaint to add cites to brief; review DS revisions; another redraft of Motion; find and fix cites; review Keever draft and comments; Telephone conference with DS.
45945	TIME	Miller, Bob	10.50	3/21/2022	3/26/2022	prof.services	GRM Jolley Fed	
45946	TIME	Miller, Bob	25.00	3/28/2022	4/2/2022	prof.services	GRM Jolley Fed	Prepare first draft of Denomy Affidavit; emails w/co-counsel re: ORRI owners; review TEP disclosures re: ORRI owners; review DS draft; emails re: unreasonable deductions and damages; review and revise GS change to Expert Witness affidavits; review RM and GS changes to affidavits; Telephone conference with RM; add affidavit cites to motion; review Bourque draft of affidavit; review GS redraft Bourque affidavit.
45947	TIME	Miller, Bob	19.00	4/4/2022	4/9/2022	prof.services	GRM Jolley Fed	Review MED affidavit and revisions; review DS affidavit and exhibits; attorney emails re: class cert. motion and affidavits; review Sam Potter depo and identify facts for affidavit; review DS and RM changes to Motion; review and comment on RM, GS, DS changes to affidavits; review MED affidavit and exhibits.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45948	TIME	Miller, Bob	15.00	4/11/2022	4/16/2022	prof.services	GRM Jolley Fed	Co-counsel emails re: Certification Hearing; comment on evidence and legal issues re: hearing; legal research re: unjust enrichment and memo; legal research re: statute of limitations; legal and fact research re: moratory interest; memo re: moratory interest; answer co-counsel questions re: moratory interest. Legal research and memo re: BP v Patterson (damages); co-counsel emails re: Hearing; legal research re: class cert.; review TEP doc and disclosures.
45949	TIME	Miller, Bob	18.00	4/18/2022	4/23/2022	prof.services	GRM Jolley Fed	Review MED data re: retroactive adjustments and statute of limitations; fact research re: same; legal research re: tolling by retroactive adjustment; review EA memo re: effect of TEP defenses on certification; legal research re: same; legal research re: class cert.
45950	TIME	Miller, Bob	21.00	4/25/2022	4/30/2022	prof.services	GRM Jolley Fed	Legal research re: standard for abrogating implied covenant to market; email to Keever re: statute of limitations; fact research re: retroactive adjustments; memo re: abrogation of implied covenant to markets.
45951	TIME	Miller, Bob	24.50	5/2/2022	5/7/2022	prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45952	TIME	Miller, Bob	29.00	5/9/2022	5/14/2022	prof.services	GRM Jolley Fed	Legal research re: standard for abrogating implied covenant to market; memo re: abrogation of implied covenant to market; fact research re: statute of limitations/retroactive adjustments; amendment to moratory interest memo and post cert discovery; review emails re: class cert. hearing; Telephone conference with expert witnesses; email discussion w/co-counsel re: abrogation.
45953	TIME	Miller, Bob	13.00	5/31/2022	6/4/2022	prof.services	GRM Jolley Fed	Review Bourque comments re: TEP response; zoom w/co-counsel; review TEP response; prepare memo re: TEP response.
45954	TIME	Miller, Bob	27.50	6/6/2022	6/11/2022	prof.services	GRM Jolley Fed	Prepare reply to facts in TEP response; review DS draft of reply; review DS reply to processing argument; email discussion w/co-counsel re: class cert. issues; and related research; prepare first draft of class reply re: facts, affirmative defenses, comparable prices, lease language, abrogation, price, TRANS cost and Lindauer settlement; zoom w/co-counsel re: reply.
45955	TIME	Miller, Bob	19.50	6/13/2022	6/18/2022	prof.services	GRM Jolley Fed	Emails re: Lease types; revised Lease Language section of Reply; Telephone conference with co-counsel re: same; review and analyze exhibits to TEP response, including expert reports and exhibits, zoom w/co-counsel.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45956	TIME	Miller, Bob	17.00	6/20/2022	6/25/2022	prof.services	GRM Jolley Fed	Prepare memo re: exhibits to TEP response; draft reply section re: Lindauer Settlement; review Bourque and MED affidavits; Telephone conference with Bourque re: Killion/Odegard Declarations; Telephone conference with DS re: reply.
45957	TIME	Miller, Bob	29.50	6/27/2022	7/2/2022	prof.services	GRM Jolley Fed	Zoom call w/Bourque and Seely re: Reply Affid; review RM draft Reply; redraft final section Reply; review GS draft Reply; redraft Reply; Telephone conference with Keever and Chrisman; zoom w/ co-counsel; Telephone conference with DS; Telephone conference with DS; zoom w/co-counsel; work on cites in Reply, review DS draft; emails w/Keever re: gathering.
45958	TIME	Miller, Bob	20.00	7/5/2022	7/9/2022	prof.services	GRM Jolley Fed	Review and comment on Bourque Declaration; review EA memo re: Trans costs; docs for Bourque Dec.; review and revise Reply brief; zoom w/co-counsel re: same; numerous emails re: same; another revision; emails re: reply; review and comment on MED Declaration; finalize Reply.
45959	TIME	Miller, Bob	6.00	7/11/2022	7/16/2022	prof.services	GRM Jolley Fed	Emails re: COPAS manual; review COPAS manuals; identify TEP docs; TEP maps.
45960	TIME	Miller, Bob	1.50	7/20/2022		prof.services	GRM Jolley Fed	Zoom call w/co-counsel re: Lease construction.
45961	TIME	Miller, Bob	3.00	7/26/2022	7/30/2022	prof.services	GRM Jolley Fed	Review of O. Anderson BAP article, emails re: same.
45962	TIME	Miller, Bob	8.00	8/1/2022	8/6/2022	prof.services	GRM Jolley Fed	Zoom w/co-counsel; review TEP docs and disclosures.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45963	TIME	Miller, Bob	15.00	8/8/2022	8/13/2022	prof.services	GRM Jolley Fed	Review and revise Order of Proof re: Class Cert. Hearing; review TEP docs and disclosures; prepare List of TEP Trans Contracts; prepare summary of Lindauer Settlement for Bourque.
45964	TIME	Miller, Bob	11.00	8/15/2022	8/20/2022	prof.services	GRM Jolley Fed	Identify and provide TEP docs to Bourque; multiple emails re: same; review TEP docs and disclosures.
45965	TIME	Miller, Bob	9.00	8/22/2022	8/27/2022	prof.services	GRM Jolley Fed	Review TEP docs, review and revise Order of Proof.
45966	TIME	Miller, Bob	16.50	8/29/2022	9/3/2022	prof.services	GRM Jolley Fed	Telephone conference with DS re: Class Cert. Hearing and Order of Proof; review and revise Order of Proof; conference calls re: Order of Proof; review TEP docs; zoom w/co-counsel re: Class Cert.
45967	TIME	Miller, Bob	16.50	9/5/2022	9/10/2022	prof.services	GRM Jolley Fed	Emails w/ DS re: TEP Lease Language defenses; review Bourque statements and expert reports; identify evidence re: Class Cert. Hearing; zoom w/co-counsel; prepare Order of Proof for rebuttal at Class Cert. w/exhibits.
45968	TIME	Miller, Bob	16.00	9/12/2022	9/17/2022	prof.services	GRM Jolley Fed	Review DS redraft of order of Proof; emails and comments re: same; redraft and simplify Order of Proof; zoom w/co-counsel; emails re: maps.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45969	TIME	Miller, Bob	21.00	9/19/2022	9/24/2022	prof.services	GRM Jolley Fed	Review Bourque expert report re: Class Cert.; review Denomy expert report; detailed comments re: both reports; incorporate co-counsel comments; forward comments to Bourque and Denomy; Telephone conference with Seely; zoom w/co-counsel; Telephone conference with RKM; comments to TDK opening statement; email re: same; review co-counsel revisions. Compile class cert. exhibits; Telephone conference with RKM (multiple re: same); identify and prep class cert. exhibits, review and revise list of witnesses and exhibits.
45970	TIME	Miller, Bob	21.00	9/26/2022	9/28/2022	prof.services	GRM Jolley Fed	
45971	TIME	Miller, Bob	12.00	10/4/2022	10/8/2022	prof.services	GRM Jolley Fed	Review and pare down class cert. exhibits; emails w/Denomy re: her report; zoom w/co-counsel; preparation of demonstrative exhibits, Telephone conference with RKM and NA.
45972	TIME	Miller, Bob	21.00	10/10/2022	10/15/2022	prof.services	GRM Jolley Fed	Zoom w/co-counsel; review and revise demonstrative exhibits; review RKM demonstratives; revision to Rebuttal Order of Proof; review GJS demonstratives; review TEP demonstratives; revise class demonstratives; answer questions re: order of proof DS and RKM; reschedule Class Cert Hearing (DS COVID); Telephone conference with NK, RKM, DS re: class cert. hearing.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45973	TIME	Miller, Bob	22.00	10/17/2022	10/22/2022	prof.services	GRM Jolley Fed	Detailed analyzie of TEP pricing sheets; prepared report re: same; review and comment on TEP Class Cert. exhibits; email exchanges re: same and related legal research; zoom call w/co-counsel.
45974	TIME	Miller, Bob	12.00	10/25/2022	10/29/2022	prof.services	GRM Jolley Fed	Legal research re: gathering and processing cost claims; review 5 law; review articles re: same; emails re: gathering and processing claims.
45975	TIME	Miller, Bob	21.00	10/31/2022	11/2/2022	prof.services	GRM Jolley Fed	Review TEP expert witness reports; legal research re: commonality re: class damages; prepared memo re: Walls Report, damages and class cert.; zoom w/co-counsel, emails w/co-counsel.
45976	TIME	Miller, Bob	13.00	11/7/2022	11/12/2022	prof.services	GRM Jolley Fed	Review DS response to Walls memo; answer questions re: same; review GS response to Walls memo; answer questions re: same; memo to DS re: Class Cert opening and rebuttal, prepared 14 demonstrative exhibits plus related fact research.
45977	TIME	Miller, Bob	9.00	11/14/2022	11/19/2022	prof.services	GRM Jolley Fed	Review class leases; categorize re: Rogers Lease types; memo to DS re: same; Telephone conference with DS & RM; zoom call w/co-counsel.
45978	TIME	Miller, Bob	5.00	11/21/2022	11/23/2022	prof.services	GRM Jolley Fed	Review Terry expert report plus comments re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45979	TIME	Miller, Bob	9.00	12/5/2022	12/10/2022	prof.services	GRM Jolley Fed	Answer DS questions re: TEP gas prices and analysis and Concord Remittance statements; fact research re: same; review TEP demonstrative exhibits; review DS revisions to Class demonstratives.
45980	TIME	Miller, Bob	2.00	12/12/2022	12/14/2022	prof.services	GRM Jolley Fed	Receive and review Seifkin article.
45981	TIME	Miller, Bob	6.00	1/2/2023	1/7/2023	prof.services	GRM Jolley Fed	Answer DS questions re: TEP docs and WPX spinoff statements; emails re: same; emails w/co-counsel and expert witnesses.
45982	TIME	Miller, Bob	25.50	1/9/2023	1/14/2023	prof.services	GRM Jolley Fed	Zoom w/MED and DS; review MED spreadsheets re: TRANS costs; review and amend DS drafts of Class demonstratives; related fact research; revise Bourque demonstratives; answer DS questions re: Benacquista testimony; related fact research; review thoughts and order of proff re: rebuttal testimony; RKM changes to demonstratives; prepare demonstratives; Bourque questions re: pricing/ RKM question re: Implied Covenant to market; DS questions; zoom w/ DS, Bourque, RM re: testimony.
45983	TIME	Miller, Bob	29.50	1/16/2023	1/21/2023	prof.services	GRM Jolley Fed	Prepare cross-exam questions for TEP witnesses; review depositions re: same; review and revise demonstratives; review TEP power points; conference calls w/co-counsel re: expert testimony; prepare comments on TEP power points; review DS notes on Bourque conference call/testimony; travel to Grand Junction.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45984	TIME	Miller, Bob	60.00	1/23/2023	1/28/2023	prof.services	GRM Jolley Fed	Prepare for and attend hearing for Class Cert. 1/22-1/25; travel to DRO; memo re: testimony at Class Cert. hearing.
45985	TIME	Miller, Bob	35.00	1/30/2023	2/4/2023	prof.services	GRM Jolley Fed	Reviewing identifying WPX and TEP check subs re: gathering and processing deductions; emails re: same; review O. Anderson article; legal research re: Gathering and Trans cost deductions; drafting memo re: application of Atlantic Richfield to JPRF; review docs from Clough case re: plant payouts; prepare memo re: same; legal research re: same.
45986	TIME	Miller, Bob	21.00	2/6/2023	2/11/2023	prof.services	GRM Jolley Fed	Continue legal research re: Gath and Trans costs; review TEP discovery responses re: costs; completed memo re: application of Atlantic Richfield to JPRF; continue review of Clough plant payout docs.
45987	TIME	Miller, Bob	29.00	2/13/2023	2/18/2023	prof.services	GRM Jolley Fed	Receive and review order recommending class certification; zoom w/co-counsel; review facts and repara memo re: effect of order on class claims; prepare memo recommending motion to reconsider and legal and fact research re: same; legal research and Newberg outline of issues for reconsideration; zoom w/co-counsel; emails re: same.
45988	TIME	Miller, Bob	18.00	2/20/2023	2/25/2023	prof.services	GRM Jolley Fed	Work w/MED to estimate TRANS damages for class; review MED spreadsheets; Telephone conference with co-counsel; emails re: objection to class cert; review EA motion to amend class definition, redraft of objection; prepare exhibit re: objection.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45989	TIME	Miller, Bob	14.00	2/27/2023	3/4/2023	prof.services	GRM Jolley Fed	Receive and review TEP objections to Class Cert; Telephone conference with DS re: same; emails re: same; Telephone conference with DS and RM re: same; Newberg research; zoom w/co-counsel.
45990	TIME	Miller, Bob	29.00	3/6/2023	3/11/2023	prof.services	GRM Jolley Fed	Draft of response to TEP's objections plus factual and legal research; zoom w/co-counsel; identify facts/docs re: TEPIRR; review Motions re: extension of time; legal research re: comparable pricing; legal research re: moratory interest; legal research re: Middleton; drafted brief re: Leyda.
45992	TIME	Miller, Bob	8.00	3/20/2023	3/25/2023	prof.services	GRM Jolley Fed	Revise Class Response to TEP Objections; review RM and DS drafts; review NK and GS drafts.
45993	TIME	Miller, Bob	4.00	4/3/2023	4/8/2023	prof.services	GRM Jolley Fed	Review TEP supplemental authority; legal research re: same, emails re: same.
45994	TIME	Miller, Bob	5.00	4/10/2023	4/14/2024	prof.services	GRM Jolley Fed	Legal research re: Colorado cases contrary to supplemental authority; emails re: same.
45995	TIME	Miller, Bob	11.00	4/17/2023	4/22/2023	prof.services	GRM Jolley Fed	Legal research re: Colorado cases contrary to supplemental authority; review and revise DS and RM drafts re: supplemental authority; emails re: same.
45996	TIME	Miller, Bob	6.00	5/1/2023	5/6/2023	prof.services	GRM Jolley Fed	Legal research re: gathering & processing cost deductions.
45997	TIME	Miller, Bob	8.00	5/8/2023	5/13/2023	prof.services	GRM Jolley Fed	Legal research plus docs review re: gathering and processing costs.
45998	TIME	Miller, Bob	5.00	5/15/2023	5/20/2023	prof.services	GRM Jolley Fed	Prepared memo re: gathering and clost deduction claims.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45999	TIME	Miller, Bob	14.00	6/12/2023	6/17/2023	prof.services	GRM Jolley Fed	legal research re: IDC and COC cost deductions; email w/GS re: same; motion & stip.
46000	TIME	Miller, Bob	15.00	6/26/2023	7/1/2023	prof.services	GRM Jolley Fed	Legal research re: WPX/TEP costs and GAAP accounting.
46001	TIME	Miller, Bob	24.00	7/3/2023	7/8/2023	prof.services	GRM Jolley Fed	Review MED spreadsheet, memo re: costs; fact and legal research re: GVGS & Parachute Plant Operations; estimate of plant revenues and cost; legal research re: capital cost recovery, tolling, good faith and fair dealing, burden of proof, unjust enrichment.
46002	TIME	Miller, Bob	8.00	7/10/2023	7/15/2023	prof.services	GRM Jolley Fed	Memo re: unreasonable cost claims.
46003	TIME	Miller, Bob	8.00	8/28/2023	9/2/2023	prof.services	GRM Jolley Fed	Emails re: other TEP cases; prepare questions for MED; review MED response and spreadsheet re: processing costs.
46004	TIME	Miller, Bob	4.00	9/25/2023	9/30/2023	prof.services	GRM Jolley Fed	Review order granting class certification and research; zoom w/co-counsel; comparable pricing memo; discussion of Cts pricing questions.
46005	TIME	Miller, Bob	9.00	10/2/2023	10/7/2023	prof.services	GRM Jolley Fed	Review TEP petition for interlocutory appeal; zoom w/co-counsel; legal research; drafting answer; review study of class action appeals.
46006	TIME	Miller, Bob	3.00	10/16/2023	10/21/2023	prof.services	GRM Jolley Fed	Review and comment on DS draft of answer.
46007	TIME	Miller, Bob	14.00	10/23/2023	10/28/2023	prof.services	GRM Jolley Fed	Telephone conference with Keever and Chrisman re: discovery plan; review and comment on Motion of Extension of Time; review comment on discovery deadlines; review TEP data re: unreasonable cost claims.
46008	TIME	Miller, Bob	3.00	10/30/2023	11/4/2023	prof.services	GRM Jolley Fed	Memo re: TEP data re: unreasonable cost claims.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
46009	TIME	Miller, Bob	1.50	11/8/2023	11/10/2023	prof.services	GRM Jolley Fed	Zoom call w/co-counsel; emails to DS.
45915	TIME	Miller, Bob	4.00	1/1/2024	1/6/2024	prof.services	GRM Jolley Fed	Review case management order; zoom meeting w/co-counsel; zoom w/DS, Keever, experts.
45916	TIME	Miller, Bob	4.50	1/7/2024	1/13/2024	prof.services	GRM Jolley Fed	Telephone conference with Keever re: disclosures; DS email to experts and responses; review TEP disclosures; zoom w/co-counsel; emails re: scheduling.
45917	TIME	Miller, Bob	26.00	1/14/2024	1/20/2024	prof.services	GRM Jolley Fed	review TEP docs; legal and fact research to prepare working case outline; preparing outline, legal research re: tolling limitations period.
45918	TIME	Miller, Bob	24.00	1/21/2024	1/27/2024	prof.services	GRM Jolley Fed	Legal and fact research to prepare working case outline; preparing outline, continue tolling research and BAP.
45919	TIME	Miller, Bob	22.00	1/28/2024	2/3/2024	prof.services	GRM Jolley Fed	TEP appeal denied; legal and fact research re: merits discovery requests to TEP; review TEP responses to Class Cert. discovery and disclosures.
45920	TIME	Miller, Bob	26.00	2/4/2024	2/10/2024	prof.services	GRM Jolley Fed	legal and fact research re: discovery state requests to TEP; prepare first draft discovery requests; detailed discussions w/co-counsel re: same; review TEP docs.
45921	TIME	Miller, Bob	22.00	2/11/2024	2/17/2024	prof.services	GRM Jolley Fed	Legal and fact research re: concord/NWPL claims, review TEP docs.
45922	TIME	Miller, Bob	27.00	2/18/2024	2/24/2024	prof.services	GRM Jolley Fed	Answer TK request for description of class claims; review DS timeline for class claims; preparation of mem re: Concord/NWPL claims; legal and fact research re: third party pipeline discovery requests.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45923	TIME	Miller, Bob	21.00	2/25/2024	3/2/2024	prof.services	GRM Jolley Fed	Review TK order of proof; revise order of proof; legal and fact research; prepare third party pipeline discovery requests (1st draft); legal and fact research re: same.
45924	TIME	Miller, Bob	33.00	3/3/2024	3/9/2024	prof.services	GRM Jolley Fed	Legal and fact research re: prudent operatory rule and setting aside lease terms; legal and fact research re: case outline; preparation of mem re: prudent operator rule; preparation of memo re: case outline; mem re: BAP claims; answer TK questions re: order of proof; compile Bourque docs re: Wms/BPRex GPA.
45925	TIME	Miller, Bob	39.00	3/10/2024	3/16/2024	prof.services	GRM Jolley Fed	Legal research re: BAP; answer Kitch questions re: same; dredraft of outline; numerous emails re: same; start review of TEP doc disclosures; legal and fact research re: discovery requests re: plant payouts; prepare discovery requests re: plant payouts; prepare discovery requests re: plant payouts, research Rule 45; extensive discussions w/co-counsel re: plant payout discovery requests.
45991	TIME	Miller, Bob	28.00	3/13/2024	3/18/2024	prof.services	GRM Jolley Fed	Review of TEP docs re: discounted gathering fees; memo re: same; draft of Response to TEP Objections re: class cert.; respond to Dave's comments; legal research re: cost deductions and share of cost and operating cost.
45926	TIME	Miller, Bob	29.00	3/17/2024	3/23/2024	prof.services	GRM Jolley Fed	Reviewing TEP docs; answer TK questions re: Walls testimoney & TEP marketing strategy; review and comment on Class Notice/optout; 1st draft of 30(b)(6) topics, Telephone conference with Keever and DS.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45927	TIME	Miller, Bob	26.00	3/25/2024	3/30/2024	prof.services	GRM Jolley Fed	Zoom w/co-counsel; Telephone conference with Chrisman et al; compile GUGS docs and Barrett docs re: plant operation and payout; review MED spreadsheets, twc MED; memo re: Chrisman call (GATH and Proc); review additional MED underreporting spreadsheets; memo between co-counsel re: same.
45928	TIME	Miller, Bob	30.00	4/1/2024	4/6/2024	prof.services	GRM Jolley Fed	Review TEP documents on TEAMS; review Clough disclosure docs; review Simpson Rule 408 disclosures and damage estimate; prepared memo re: Rule 408 damage estimates; discussion w/Keever re: BPRex GPA; docs to Bourque re: BPREX GPA; Telephone conference with Keever; zoom w/Keever and MED.
45929	TIME	Miller, Bob	36.00	4/8/2024	4/13/2024	prof.services	GRM Jolley Fed	Zoom w/co-counsel; email discussion re: BAP application to facts; zoom w/Keever, MED; review TEP documents; reparation of pipeline discovery requests; discussions w/co-counsel re: same and plus downstream markets; prepare JPRF- to do list; review 30 (b)(6) topics, prepared questions for MED re: Rule 408 for all claims; review multiple MED spreadsheets w/attached docs, Telephone conference with Keever.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45930	TIME	Miller, Bob	23.00	4/15/2024	4/20/2024	prof.services	GRM Jolley Fed	Zoom w/Keever, MED; zoom w/co-counsel; conference call w/Chrisman et al; prepare memo re: moratory interest and legal research re: same; review multiple MED spreadsheet w/attached docs; review MED responses to GRM questions; ONRR docs; Telephone conference with Keever, prepare summary of Chrisman conference call; memo re: MED conference call.
45931	TIME	Miller, Bob	20.00	5/6/2024	5/11/2024	prof.services	GRM Jolley Fed	Review and revised Merits discovery requests to TEP, WPX, and third parties; review TEP docs, zoom w/co-counsel.
45932	TIME	Miller, Bob	19.00	5/13/2024	5/18/2024	prof.services	GRM Jolley Fed	Review and revise Mertis discovery requests to TEP, WPX, and third parties; supply exhibits to discovery; review TEP docs.
45552	TIME	Miller, Bob	2.75	5/27/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever, Telephone conference with Fleeson, re: mediation etc and JPRF status. Review status JPRF.
45933	TIME	Miller, Bob	11.00	5/27/2024	6/1/2024	prof.services	GRM Jolley Fed	Review and draft of Merits discovery requests; legal research re: moratory interest.
45553	TIME	Miller, Bob	4.65	5/28/2024		prof.services	GRM Jolley Fed	Legal research re: Moratory Interest. Review effects re: Rate of Return Merits discovery.
45554	TIME	Miller, Bob	4.20	5/29/2024		prof.services	GRM Jolley Fed	Legal research re: Moratory Interest. Review of facts re: Rate of Return.
45555	TIME	Miller, Bob	4.75	5/30/2024		prof.services	GRM Jolley Fed	Preparing third party pipeline discovery. Work on discovery to TEP.
45556	TIME	Miller, Bob	5.50	5/31/2024		prof.services	GRM Jolley Fed	Review Keever comments on TEP discovery. Research re: same: facts and Law. Conference call re: JPRF.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45557	TIME	Miller, Bob	5.10	6/2/2024		prof.services	GRM Jolley Fed	Legal research re: Tracing and Restatement of Restitution.
45558	TIME	Miller, Bob	6.25	6/3/2024		prof.services	GRM Jolley Fed	JPRF status zoom call. Review Keever email. Review and revise pipeline discovery. Legal research re:: Moratory Interest.
45559	TIME	Miller, Bob	5.75	6/4/2024		prof.services	GRM Jolley Fed	Finished Moratory Interest Memo. Review TEPs supplemenal document disclosures.
45560	TIME	Miller, Bob	6.40	6/5/2024		prof.services	GRM Jolley Fed	Review identical factual predicate research. Additional research re: same. Review discovery requests to TEP.
45580	TIME	Miller, Bob	4.20	6/6/2024		prof.services	GRM Jolley Fed	Additional Moratory Interest/Tracing Research. Review TEP doc disclosures.
45581	TIME	Miller, Bob	3.75	6/7/2024		prof.services	GRM Jolley Fed	Review Pipeline Discovery Responses. Review TEP doc disclosures.
45582	TIME	Miller, Bob	4.10	6/8/2024		prof.services	GRM Jolley Fed	Work on discovery to TEP. Review TEP doc disclosures.
45583	TIME	Miller, Bob	2.50	6/9/2024		prof.services	GRM Jolley Fed	Work on discovery to TEP. Review TEP doc disclosures.
45584	TIME	Miller, Bob	3.65	6/10/2024		prof.services	GRM Jolley Fed	Additional Moratory Interest/Tracing Research, AI. Review TEP discovery to class. Telephone conference with Keever.
45585	TIME	Miller, Bob	4.50	6/11/2024		prof.services	GRM Jolley Fed	Additional Moratory Interest/Tracing Research. MED gather and proc costs, 30(b)(6) topics. Review facts re:gathering and proc costs.
45586	TIME	Miller, Bob	4.50	6/12/2024		prof.services	GRM Jolley Fed	Review MED data re: gathering and proc costs/prep docs and questions for MED. Review facts re: gathering and proc costs. Legal research re: same/30(b)(6) topics.
45587	TIME	Miller, Bob	4.25	6/13/2024		prof.services	GRM Jolley Fed	Prepare draft 30(b)(6) topics, gathering and proc deducations. Review MED data.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45588	TIME	Miller, Bob	4.65	6/14/2024		prof.services	GRM Jolley Fed	Questions to and discussion w/MED re: Trans deductions. Review of TEP disclosures re: deductions. Working on Class Response to TEP Discovery plus fact and legal research.
45589	TIME	Miller, Bob	6.35	6/15/2024		prof.services	GRM Jolley Fed	
45570	TIME	Miller, Bob	3.50	6/16/2024		prof.services	GRM Jolley Fed	Legal research re: BAP claims.
45571	TIME	Miller, Bob	6.20	6/17/2024		prof.services	GRM Jolley Fed	Legal research re: tolling limitation period. Telephone conference with Kyle Steplans.
45572	TIME	Miller, Bob	5.75	6/18/2024		prof.services	GRM Jolley Fed	Legal research re: tolling limitation period. Memo re: same.
45573	TIME	Miller, Bob	5.60	6/19/2024		prof.services	GRM Jolley Fed	JPRF Status call re:: TEP discovery, etc. Evaluate and discuss MED spreadsheets and data re: WPXNGL and Residue Pricing. Circulated Tolling Memo plus research.
45574	TIME	Miller, Bob	6.50	6/20/2024		prof.services	GRM Jolley Fed	Class response to TEP Discovery.
45575	TIME	Miller, Bob	6.00	6/21/2024		prof.services	GRM Jolley Fed	Class response to TEP Discovery.
45576	TIME	Miller, Bob	3.75	6/22/2024		prof.services	GRM Jolley Fed	Research re: Responses to TEP discovery. Moratory interest discovery to TEP.
45577	TIME	Miller, Bob	3.50	6/23/2024		prof.services	GRM Jolley Fed	Moratory interest discovery to TEP.
45578	TIME	Miller, Bob	5.70	6/24/2024		prof.services	GRM Jolley Fed	Research re: facts and Law re:: Response to TEP discovery. Moratory Interest Discovery to TEP.
45579	TIME	Miller, Bob	6.25	6/25/2024		prof.services	GRM Jolley Fed	Moratory Interest Discovery to TEP, WPX, Devon. Telephone conference with Murphy re:: REX discovery responses. JPRF Status Conference.
45561	TIME	Miller, Bob	5.50	6/26/2024		prof.services	GRM Jolley Fed	Review Ryan's draft of Class Discovery Responses. Research re: identical factual predicate.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45562	TIME	Miller, Bob	5.80	6/27/2024		prof.services	GRM Jolley Fed	Review Ryan's draft of Class Discovery Responses. Research re: identical factual predicate. Review and dicuss TEP objections to discovery.
45563	TIME	Miller, Bob	4.20	6/28/2024		prof.services	GRM Jolley Fed	Review Ryan memo and research identical factual predicate (10th and other circuits).
45564	TIME	Miller, Bob	4.20	6/29/2024		prof.services	GRM Jolley Fed	Review of factual data re: facilities Capital Cost Payouts.
45565	TIME	Miller, Bob	5.50	6/30/2024		prof.services	GRM Jolley Fed	Review of factual data re: facilities Capital Cost Payouts. Exchange emails w/MED re: same. Review and analyze MED spreadsheets.
45566	TIME	Miller, Bob	5.75	7/1/2024		prof.services	GRM Jolley Fed	Review fatual data on re: facilities Capital Cost Payouts.
45567	TIME	Miller, Bob	4.40	7/2/2024		prof.services	GRM Jolley Fed	Review Seely draft of 30 (6)(b) topics. Evaluated MED pricing spreadsheets and underlying data.
45568	TIME	Miller, Bob	4.20	7/3/2024		prof.services	GRM Jolley Fed	Review Cost of Service Docs produced by TEP. Review WPX monthly pricing sheets and discuss w/MED.
45569	TIME	Miller, Bob	4.75	7/5/2024		prof.services	GRM Jolley Fed	Review documents produced by TEP. Review MED pricing spreadsheets and data and discuss. Detailed evaluation of MED class damages spreadsheets and data re: Wms/BPREX GPA. Review WPX Pricing Sheets also Trans N WPL damages during
45590	TIME	Miller, Bob	5.75	7/6/2024		prof.services	GRM Jolley Fed	TEP period.
45591	TIME	Miller, Bob	6.25	7/8/2024		prof.services	GRM Jolley Fed	Preparing JPRF discovery w/related fact and legal research and third party.
45592	TIME	Miller, Bob	4.00	7/9/2024		prof.services	GRM Jolley Fed	Review Rockies Express discovery response. Preparing JPRF discovery.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45593	TIME	Miller, Bob	3.75	7/10/2024		prof.services	GRM Jolley Fed	Conference call re: JPRF to do list. Review emails re: pipeline discovery. Preparing JPRF discovery.
45594	TIME	Miller, Bob	5.50	7/11/2024		prof.services	GRM Jolley Fed	Legal and fact research re: Moratory Interest. Drafting 30(b)(6) topics.
45595	TIME	Miller, Bob	5.75	7/12/2024		prof.services	GRM Jolley Fed	Moratory Interest Research and Moratory Interest Discovery. Review Denomy data and Rate of Return Research.
45596	TIME	Miller, Bob	4.50	7/13/2024		prof.services	GRM Jolley Fed	Moratory Interest discovery.
45597	TIME	Miller, Bob	4.50	7/14/2024		prof.services	GRM Jolley Fed	Search TEAMS for Concord Statements. Discussion w/MED re: same. Moratory Interest.
45598	TIME	Miller, Bob	6.25	7/15/2024		prof.services	GRM Jolley Fed	Review of TEP supplemental disclosures-identify Concord Statements for MED. Review and revise Moratory Interest Discovery per comments.
45599	TIME	Miller, Bob	4.40	7/16/2024		prof.services	GRM Jolley Fed	Status conference re: JPRF to do - conference re: additional research. Review TEP supplemental disclosures.
45600	TIME	Miller, Bob	5.25	7/17/2024		prof.services	GRM Jolley Fed	Review mediation docs. Review TEP docs. Contention Interrogatories.
45601	TIME	Miller, Bob	6.00	7/18/2024		prof.services	GRM Jolley Fed	Contention Interrogatories - doc research for DS Moratory Interest.
45602	TIME	Miller, Bob	6.25	7/19/2024		prof.services	GRM Jolley Fed	Review of TEP docs.
45603	TIME	Miller, Bob	6.50	7/19/2024		prof.services	GRM Jolley Fed	Drafting Class Discovery Responses.
45604	TIME	Miller, Bob	5.75	7/20/2024		prof.services	GRM Jolley Fed	Drafting Class Discovery Responses.
45605	TIME	Miller, Bob	6.50	7/21/2024		prof.services	GRM Jolley Fed	Drafting Class Discovery Responses.
45606	TIME	Miller, Bob	5.50	7/22/2024		prof.services	GRM Jolley Fed	Legal research re: Class Claims. Facts re: Class Claims - Contention Interrogatories.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45607	TIME	Miller, Bob	4.75	7/23/2024		prof.services	GRM Jolley Fed	Review DS comments re:: Contention Interrogatories. Review TEPs supplemental disclosure binders. Conference call re: JPRF To Do - review MED
45608	TIME	Miller, Bob	3.50	7/24/2024		prof.services	GRM Jolley Fed	spreadsheets. Mediation discussions. Review of TEP docs re: facility payouts.
45609	TIME	Miller, Bob	5.50	7/25/2024		prof.services	GRM Jolley Fed	Research re: facility payouts. Responses to TEP
45610	TIME	Miller, Bob	6.25	7/26/2024		prof.services	GRM Jolley Fed	discovery.
45611	TIME	Miller, Bob	4.25	7/27/2024		prof.services	GRM Jolley Fed	Responses to TEP discovery.
45612	TIME	Miller, Bob	4.75	7/28/2024		prof.services	GRM Jolley Fed	Conference call re: JPRF status/to do. Research re: abrogatory/implied covenants.
45613	TIME	Miller, Bob	5.25	7/29/2024		prof.services	GRM Jolley Fed	Conference call MED/Keever. Research re: abrogatory/implied covenants.
45614	TIME	Miller, Bob	6.25	7/30/2024		prof.services	GRM Jolley Fed	Conference call Keever/Chrisman re;; Moratory Interest. Conference call w/Keever re: same. Conference call Keever/MED - Research re: abrogatory/implied covenants.
45615	TIME	Miller, Bob	5.75	7/31/2024		prof.services	GRM Jolley Fed	Review and revise Class Discovery Responses. Review of Moratory Interest Discovery. Review of TEP docs.
45616	TIME	Miller, Bob	6.25	8/1/2024		prof.services	GRM Jolley Fed	Review of TEP produced docs. Review docs in TEP supplemental moratory interest discovery disclosure.
45617	TIME	Miller, Bob	5.50	8/2/2024		prof.services	GRM Jolley Fed	Review and revise Class responses to TEP discovery. Conference w/Keever - Moratory Interest and pipeline
45618	TIME	Miller, Bob	5.25	8/3/2024		prof.services	GRM Jolley Fed	discover. Conference call w/Keever/MED re: TEP 408. Review of TEP supplemental disclosures.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45619	TIME	Miller, Bob	5.25	8/4/2024		prof.services	GRM Jolley Fed	Legal and fact research re: gathering deductions. Review of TEP produced docs.
45620	TIME	Miller, Bob	6.25	8/5/2024		prof.services	GRM Jolley Fed	Review pipeline discovery responses, conference w DS. Conference call re: JPRF to do. Review/discuss supplemental TEP 406 disclosure.
45621	TIME	Miller, Bob	6.00	8/6/2024		prof.services	GRM Jolley Fed	30(b)(6) topics - contention interrogatories. Fact research re: facility payout. Start review 8/5 TEP disclosures.
45622	TIME	Miller, Bob	6.50	8/7/2024		prof.services	GRM Jolley Fed	Conference call re: JPRF Status. Fact research re: facility payout plus trial calculation pipeline discovery.
45623	TIME	Miller, Bob	6.25	8/8/2024		prof.services	GRM Jolley Fed	Fact research re: facility payout and trial calculation. Discussed w/Keever. Table re: capital cost payout. Start review of COS documents.
45624	TIME	Miller, Bob	5.50	8/9/2024		prof.services	GRM Jolley Fed	Finalizing Moratory Interest Discovery, Contention Interrogatories. Additional FPs to TEP. Review of COS/ONRR documents.
45625	TIME	Miller, Bob	5.50	8/10/2024		prof.services	GRM Jolley Fed	Conference w/Keever re: response to TEP discovery. Review of COS/ONRR documents.
45626	TIME	Miller, Bob	3.75	8/14/2024		prof.services	GRM Jolley Fed	Joint Motion to Modify Case Management. Review of COS/ONRR docs.
45627	TIME	Miller, Bob	5.50	8/15/2024		prof.services	GRM Jolley Fed	Reviewing TEP docs re: gath proc fees.
45628	TIME	Miller, Bob	6.25	8/16/2024		prof.services	GRM Jolley Fed	Review TEP docs re: capital cost payout plus review ONRR docs.
45629	TIME	Miller, Bob	5.25	8/17/2024		prof.services	GRM Jolley Fed	Review ONRR docs and WPX docs.
45630	TIME	Miller, Bob	4.75	8/18/2024		prof.services	GRM Jolley Fed	Review ONRR docs and WPX docs.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45631	TIME	Miller, Bob	6.00	8/19/2024		prof.services	GRM Jolley Fed	Memo re: gathering/proc deductions. Review MED data re: gathering. Review data re: gathering/proc - determine monthly gathering deductions.
45632	TIME	Miller, Bob	4.00	8/20/2024		prof.services	GRM Jolley Fed	Conference w/Keever re: structuring gathering/proc claim - memo re: same. Fact and legal research re: gathering/prod - review MED data re: gathering.
45633	TIME	Miller, Bob	6.25	8/21/2024		prof.services	GRM Jolley Fed	Review of TEP discovery responses to gathering/proc. Fact and legal research re: same.
45634	TIME	Miller, Bob	6.25	8/22/2024		prof.services	GRM Jolley Fed	Analyze MED spreadsheets re: TRANS deductions - third party discovery responses. Review moratory interest discovery.
45635	TIME	Miller, Bob	5.25	8/23/2024		prof.services	GRM Jolley Fed	Conference call JPRF to do/status, finalize contention interrogatories. Review WFS data produced, responses.
45636	TIME	Miller, Bob	5.75	8/24/2024		prof.services	GRM Jolley Fed	Review of docs produced by TEP and docs re: WFS plants and facilities.
45637	TIME	Miller, Bob	5.00	8/25/2024		prof.services	GRM Jolley Fed	Review of docs produced by TEP and docs re: WFS plants and facilities.
45638	TIME	Miller, Bob	6.50	8/26/2024		prof.services	GRM Jolley Fed	Review MED spreadsheets re: WFS capital and expenses and fuel costs. Comments re: 30(b)(6) topics, conference w/MED re: calculation of plant payouts.
45639	TIME	Miller, Bob	6.25	8/27/2024		prof.services	GRM Jolley Fed	Review and compile COS/ONRR data and spreadsheet data.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45640	TIME	Miller, Bob	6.50	8/28/2024		prof.services	GRM Jolley Fed	Conference call w/co-counsel, TEP discovery requests, review TEP disclosures. Research re: actual, direct cost limitation, Willow Creek capital cost payout.
45641	TIME	Miller, Bob	6.00	8/29/2024		prof.services	GRM Jolley Fed	Review RM mediation statement, review agenda for TEP conference call 8/30, Telephone conference with Keever, etal. Revise Class answers to TEP Interrogatories 17 & 18; review TEP docs. Telephone conference with DS re: Rule 45 Requests.
45642	TIME	Miller, Bob	6.25	8/30/2024		prof.services	GRM Jolley Fed	Conference call w/Keever and MED, conference call w/TEP attorney and experts. Review of TEP data, review pipeline discovery responses.
45643	TIME	Miller, Bob	5.75	8/31/2024		prof.services	GRM Jolley Fed	Review TEP 8/28 disclosures, review TEP 408 data.
45644	TIME	Miller, Bob	5.50	9/1/2024		prof.services	GRM Jolley Fed	Email; expert 408 exchanges - prepare notes re: 8/30 conference call. Review TEP 408 data and documents re: capital costs and gathering and proc deductions.
45647	TIME	Miller, Bob	6.25	9/2/2024		prof.services	GRM Jolley Fed	Review 8/28 TEP disclosures, email re: notes re: 408 emails re: TEP pie charts/volumes.
45648	TIME	Miller, Bob	6.00	9/3/2024		prof.services	GRM Jolley Fed	Start on medication statement, emails re: TEP royalty volumes.
45649	TIME	Miller, Bob	6.50	9/4/2024		prof.services	GRM Jolley Fed	Drafting mediation statement outline and fact research. Review MEP downloads of voluminous COGCC docs; review MEP price data.
45650	TIME	Miller, Bob	2.25	9/5/2024		prof.services	GRM Jolley Fed	Review of Index of TEP Docs and Docs to MED, Concord Remittance Statements. Mediation statement outline and fact statement.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45651	TIME	Miller, Bob	5.75	9/6/2024		prof.services	GRM Jolley Fed	Email w/DS re: Mountain West discovery and system maps and discussions; mediation statement outline and fact statement outline.
45652	TIME	Miller, Bob	5.50	9/7/2024		prof.services	GRM Jolley Fed	Preparing mediation statement outline and fact statement outline.
45653	TIME	Miller, Bob	6.25	9/8/2024		prof.services	GRM Jolley Fed	Research TEP COS/fin doc roundup and related docs; draft outline of mediation statement: claims and fact statement, emails re: same.
45654	TIME	Miller, Bob	6.50	9/9/2024		prof.services	GRM Jolley Fed	Emails re: Mountain West discovery responses, call w/MED re: facilities payouts, emails re: same, expand COS/TEP roadmap, review docs produced by TEP, review MED compilation of Willow Creek Plant Data dn Analysis and Parachute Plant/GUGS.
45655	TIME	Miller, Bob	3.25	9/10/2024		prof.services	GRM Jolley Fed	Identify and collect TEP docs for mediation exhibits. Emails w/DS re: 3rd Party discovery followup, review MED Willow Creek payout analysis, legal research re: B/AP claim.
45656	TIME	Miller, Bob	3.25	9/11/2024		prof.services	GRM Jolley Fed	Telephone conference with DS, RM, GS re: mediation letter; legal research re: BAP claim; identify and collect TEP docs for mediation exhibits.
45657	TIME	Miller, Bob	6.25	9/12/2024		prof.services	GRM Jolley Fed	Emails re: 3rd party subpoenas, legal research re: comparable price and wrongful deductions; prep of mediation statement, plus fact research re: mediation statement.
45658	TIME	Miller, Bob	3.75	9/12/2024		prof.services	GRM Jolley Fed	Legal research re: statutory prejudgment interest and tracing.
45659	TIME	Miller, Bob	6.00	9/14/2024		prof.services	GRM Jolley Fed	Drafting mediation statement plus fact research re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45660	TIME	Miller, Bob	6.25	9/15/2024		prof.services	GRM Jolley Fed	Drafting mediation statement plus fact research re: same.
45661	TIME	Miller, Bob	2.25	9/16/2024		prof.services	GRM Jolley Fed	Identify and send facility and plant docs to MED; identify and forward Savage & Clough exhibits to MED.
45662	TIME	Miller, Bob	5.75	9/17/2024		prof.services	GRM Jolley Fed	Identify and send facility and plant docs to MED; review MED analysis of Simpson fuel costs; Telephone conference with Keever re: discovery issues, emails to MED re: fuel cost; emails re: mediation statement; legal research re: burden of proof.
45663	TIME	Miller, Bob	5.50	9/18/2024		prof.services	GRM Jolley Fed	Emails re: discovery discussions w/TEP counsel; zoom w/co-counsel re: JPR to do, review MED spreadsheets re: revenue, costs for Parachute, GUGS and analysis.
45664	TIME	Miller, Bob	6.50	9/19/2024		prof.services	GRM Jolley Fed	JPR status conference; review exhibit to mediation statement on TEAM; answer MED questions; review and analysis MED capital cost payout spreadsheets plus Willow Creek spreadsheets, email exchanges w/ MED and damage calcs.
45665	TIME	Miller, Bob	5.75	9/20/2024		prof.services	GRM Jolley Fed	Prep for Chrisman/Simpson conference call; prior conference call w/co-counsel; zoom meeting re: JPR to do; research re: tracing, research re: Devon Energy. Emails re: Moratory interest; legal research re: tracing; drafting tracing and moratory interest section of mediation statement; calculations re: moratory interest impacts.
45666	TIME	Miller, Bob	5.00	9/21/2024		prof.services	GRM Jolley Fed	
45667	TIME	Miller, Bob	6.50	9/22/2024		prof.services	GRM Jolley Fed	Mediation docs; legal research re: tracing.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45668	TIME	Miller, Bob	7.25	9/23/2024		prof.services	GRM Jolley Fed	Mediation docs; Telephone conference with RM re: same and docs; Telephone conference with RKM; review MED calculations of moratory interest; Telephone conference with MED; received and review MED gathering deductions by month; MED cal of GUGS and Parachute payout; identify MED pricing spreadsheets for Keever; Telephone conference with Keever; email Chrisman; multiple emails w/ MED< Keevery, RMK.
45669	TIME	Miller, Bob	6.50	9/24/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; co-counsel emails re: mediation; Telephone conference with DS re: 3rd party discovery and Bourque; MED calculation of GUGS and Parachute payout calculation; calcs re: gathering damages; identify exhibits and provide to RKM; WPX pricing data.
45670	TIME	Miller, Bob	5.75	9/25/2024		prof.services	GRM Jolley Fed	Telephone conference with DS re: 3rd party discovery; multiple emails and telephone conferences with co-counsel re: mediation, discovery and Chrisman; review TEP documents.
45671	TIME	Miller, Bob	6.25	9/26/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; plus emails; mediation statement plus exhibits; email from Chrisman re: mediation statement, email re: mediation, email to Chrisman re: 408 data; emails re: WPX COS workbooks.
45672	TIME	Miller, Bob	5.50	9/27/2024		prof.services	GRM Jolley Fed	Finalized and delivered mediation statement; identify and compile additional documents for mediation.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45673	TIME	Miller, Bob	6.00	9/28/2024		prof.services	GRM Jolley Fed	Identify, compile and provide co-counsel additional documents for mediation; email to RKM re: omitted exhibits; gather and list additional documents for mediation.
45674	TIME	Miller, Bob	5.00	9/29/2024		prof.services	GRM Jolley Fed	RKM response re: omitted exhibits; add Ex20A; review TEP documents.
45675	TIME	Miller, Bob	7.25	9/30/2024		prof.services	GRM Jolley Fed	Co-counsel zoom call; zoom call w/Chrisman et al; preparation. Prepare moratory interest 30(b)(6) topics and review moratory interest interrogatories; emails Becky re: Koch remittance statements.
45676	TIME	Miller, Bob	5.50	10/1/2024		prof.services	GRM Jolley Fed	Co-counsel calls and emails; prepare for mediation; receive and review TEP mediation statement; prepare outline of mediation topics and assignments; emails to Tallgrass re: pipeline discovery.
45677	TIME	Miller, Bob	8.75	10/2/2024		prof.services	GRM Jolley Fed	Travel to Grand Junction for mediation; prepare for mediation; review question discovery responses; seeking Tracing Experts.
45678	TIME	Miller, Bob	9.00	10/3/2024		prof.services	GRM Jolley Fed	Prepare for mediation; mediation cancelled (mediator health); discussions w/Keever, co-counsel zoom; travel to Durango; emails w/MED & RMK re: amended Exhibit 7.
45679	TIME	Miller, Bob	5.50	10/4/2024		prof.services	GRM Jolley Fed	Emails re: discovery issues; review and amend 3rd party subpoenas; review scheduling order, emails DS & Skully and SQL data; emails re: indexing TEP disclosures and scheduling order.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45680	TIME	Miller, Bob	5.75	10/5/2024		prof.services	GRM Jolley Fed	Prepare list of additional discovery documents Chrisman agreed to provide; identifying check tracing expert; review TEP docs.
45681	TIME	Miller, Bob	5.00	10/6/2024		prof.services	GRM Jolley Fed	Review of TEP docs and prepare summary of TEP supplemental disclosure; review of Index of TEP documents.
45682	TIME	Miller, Bob	5.50	10/7/2024		prof.services	GRM Jolley Fed	Review amended scheduling order; email pipeline depositions; review Motion to modify scheduling; review indexing and TEP documents.
45683	TIME	Miller, Bob	6.00	10/8/2024		prof.services	GRM Jolley Fed	Review of TEP docs and disclosures, email re: 12/17 mediation.
45684	TIME	Miller, Bob	6.25	10/9/2024		prof.services	GRM Jolley Fed	30(b)(6) discovery topics; telephone conference with co-counsel (zoom); review follow up moratory interest discovery, review TEP documents and disclosures.
45685	TIME	Miller, Bob	6.25	10/10/2024		prof.services	GRM Jolley Fed	emails w/DS re: pipeline discovery; detailed conference w/LC re: JPRF documents list; indentify TEP docs for MED and documents for Becky; review TEP document disclosures.
45686	TIME	Miller, Bob	4.00	10/11/2024		prof.services	GRM Jolley Fed	Emails w/DS re: pipeline discovery; review TEP docs.
45687	TIME	Miller, Bob	5.50	10/12/2024		prof.services	GRM Jolley Fed	Preparing summary of facts supporting class claims.
45688	TIME	Miller, Bob	3.50	10/13/2024		prof.services	GRM Jolley Fed	Preparing summary of facts supporting class claims.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45689	TIME	Miller, Bob	7.25	10/14/2024		prof.services	GRM Jolley Fed	Emails re: additional experts and Qinrian, identify GUGS capital cost locations; multiple emails re: Bourque Expert Reports; review outline of opinions; email to Marshall; finish and circulate summary of facts supporting class claims, emails to Chrisman re: MED payout calculations.
45690	TIME	Miller, Bob	6.00	10/15/2024		prof.services	GRM Jolley Fed	Identifying expert witness re: basis differentials; email to candidates; fact research re: basis differentials; emails re: Bourque expert witness report; review DS memo re: same.
45691	TIME	Miller, Bob	6.50	10/16/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; discussion w/Keever & MED re:expert report; review proposed deposition schedule; response from Matthew Oliver; emails re: Transco pipeline discovery; review TEP docs.
45692	TIME	Miller, Bob	5.75	10/16/2024		prof.services	GRM Jolley Fed	Review TEP supplemental discovery responses; identify expert witnesses (economist); review TEP documents.
45693	TIME	Miller, Bob	5.75	10/17/2024		prof.services	GRM Jolley Fed	Emails w/Chrisman re: discovery after 2/10/2020; reviewing TEP responses to contention interrogatories, emails re: partial settlement; emails re:transaction confirmations; email re: engagement terms for moratory interest experts; emails re: pipeline discovery responses.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45694	TIME	Miller, Bob	6.25	10/18/2024		prof.services	GRM Jolley Fed	Response for N. Marshall; emails re: REX discovery; review and evaluate TEP responses to moratory interest; email w/Keevery re: same; emails re: settlement conference 10/25; legal research re:TEP defenses based on Lindauer Appeal; circulate Mason CU.
45695	TIME	Miller, Bob	5.50	10/19/2024		prof.services	GRM Jolley Fed	Evaluation of MED detailed analysis of GUGS payout; telephone conference with MED re: same; review TEP responses to contention interrogatories.
45696	TIME	Miller, Bob	4.75	10/20/2024		prof.services	GRM Jolley Fed	Emails to MED re: assets, costs, revenue re:: GUGS payouts analysis; review same; prepare and send comments re: TEP responses to contention interrogatories.
45697	TIME	Miller, Bob	4.75	10/21/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; email re: discovery; co-counsel zoom call w/ C. Mason re: expert witness re: basis differential; identify and forward exhibits; prepare bullet points; MED gathering revenue & costs, data to MED.
45698	TIME	Miller, Bob	5.25	10/22/2024		prof.services	GRM Jolley Fed	Review MED spreadsheets, telephone conference with MED & RKM re: same; telephone conference with DS re: Rate of Return and TEP accounts; email to Keever forward to Chrisman; review TEP check account data; review and comment on 30 (b)(6) subpoena; emails re: timing of depos.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45699	TIME	Miller, Bob	6.00	10/23/2024		prof.services	GRM Jolley Fed	Review MEDS spreadsheets - damages; emails; discovery responses; emails between Sculley & DS re: pipelines; review TEP check account data; review Quirian evaluation and engagement letter; review TEP documents.
45700	TIME	Miller, Bob	6.00	10/24/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; prep for settlement conference; review TEP supplemental disclosures; emails re: application of moratory interest in Colorado; review TEP documents.
45701	TIME	Miller, Bob	14.50	10/25/2024		prof.services	GRM Jolley Fed	Travel to Denver for mediation; attend mediation a Holland & Hart, prep for settlement conference.
45702	TIME	Miller, Bob	6.25	10/26/2024		prof.services	GRM Jolley Fed	Review Quirian comments re: Tracing in TEP bank accounts; preparing outline and documents and questions for Killion deposition.
45703	TIME	Miller, Bob	6.50	10/27/2024		prof.services	GRM Jolley Fed	Preparing outline and questions for Killion depo; review of TEP documents.
45704	TIME	Miller, Bob	5.75	10/28/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: documents and questions for Killion depo. Review of TEP documents. Answer Keever questions re: mediation statement; review notices of 30 (b)(6) depositions; review Mason engagement letter.
45705	TIME	Miller, Bob	5.75	10/29/2024		prof.services	GRM Jolley Fed	
45706	TIME	Miller, Bob	6.00	10/30/2024		prof.services	GRM Jolley Fed	Revise summary of documents and questions for Killion deposition, telephone conference with Keevery re: same; review of TEP documents.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45707	TIME	Miller, Bob	6.25	10/31/2024		prof.services	GRM Jolley Fed	Receive and review TEP counter offer; redraft of documents and questions for Illion depo. Telephone conference with Keever re: same; review of TEP documents, documents to Keever.
45708	TIME	Miller, Bob	6.50	11/1/2024		prof.services	GRM Jolley Fed	Co-counsel zoom re: TEP offer; multiple emails re: counter; prepare Class settlement proposal; prepare outline 30(b)(6) topics by witness; prepare documents and questions for Wiseman depo.
45709	TIME	Miller, Bob	6.50	11/2/2024		prof.services	GRM Jolley Fed	Review of TEP supplemental disclosures; identify Killion 30(b)(6) topics and topics for each witness; request documents from Becky; forward Mason contract to DS; emails re: same; prepare for Wiseman depo; email re: TEP counter proposal.
45710	TIME	Miller, Bob	11.00	11/3/2024		prof.services	GRM Jolley Fed	Travel to Tulsa for 30(b)(6) depositions; prep for Edgeller and Killion depositions; conference w/Keever; prepare exhibits, receive docs from Becky for depo and review. 30(b)(6) depositions - prepare for 2nd day of depositions - identify docs for Killion depo and Wiseman depo; receive and review docs from Becky and RKM, and supplemental production from TEP.
45711	TIME	Miller, Bob	11.75	11/4/2024		prof.services	GRM Jolley Fed	30(b)(6) depositions - prepare for 3rd day of depositions. identify docs for Killion depo, received and review docs from Becky, RKM and Chrisman.
45712	TIME	Miller, Bob	13.50	11/5/2024		prof.services	GRM Jolley Fed	

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45713	TIME	Miller, Bob	13.00	11/6/2024		prof.services	GRM Jolley Fed	30(b)(6) depositions - prepare in AM, travel to Durango. Telephone conference with DS re: Bourque, review docs; prepare summary of Killion depo. Emails w/DS re: depositions; review Mason docs; emails re: depositions; preparing for B. Chrisman depo; draft & circulate summary of Killion depo; review TEP documents.
45714	TIME	Miller, Bob	5.00	11/7/2024		prof.services	GRM Jolley Fed	
45715	TIME	Miller, Bob	6.25	11/8/2024		prof.services	GRM Jolley Fed	Co-counsel zoom; review summary of Bourque expert reports; review of WPX transaction confirmations; discussion w/Keever re: TRANS deductions; revise To Do List and circulate; documents and questions for B. Chrisman depo; review B. Chrisman 30(b)(6) topics.
45716	TIME	Miller, Bob	6.00	11/9/2024		prof.services	GRM Jolley Fed	Reviewing TEP documents; review MED NWPL Trans cost deduction summary; to DS & Kever; email discussion w/Keever re: BP/REX & marketing; plus seek questions re: B. Chrisman depo; documents and questions for B. Chrisman depo.
45717	TIME	Miller, Bob	5.75	11/10/2024		prof.services	GRM Jolley Fed	Reviewing TEP docs, answer Kever question re: Koch & Kever questions re: BP/REX & Seely questions re: B. Chrisman depo; forward Seely documents and questions for B. Chrisman depo.
45718	TIME	Miller, Bob	4.50	11/11/2024		prof.services	GRM Jolley Fed	Emails re: Caerus settlement/opt out; discussed B. Chrisman depo outline w/Seely; searching for 2010-2019 pricing data; emails re: TEP counter proposal.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45719	TIME	Miller, Bob	4.50	11/12/2024		prof.services	GRM Jolley Fed	Chrisman depo preparation; review numerous pricing data from MED; review, revise and comment on Class settlement proposal; emails re: Carens settlement; MED price comparisons, review TEP docs; email to MED w/capital cost data.
45720	TIME	Miller, Bob	9.00	11/13/2024		prof.services	GRM Jolley Fed	Travel to Denver for B. Chrisman 30(b)(6) depo - prep for depo. Email to Chrsman re: WPX/TEP agreement.
45721	TIME	Miller, Bob	11.75	11/14/2024		prof.services	GRM Jolley Fed	B. Chrisman depo; preparation for depo, travel to Durango; discussion w/RKM re: Pollock depo, prepare and circulate memo re: B. Chrisman depo.
45722	TIME	Miller, Bob	6.00	11/15/2024		prof.services	GRM Jolley Fed	Pipeline discovery responses; emails re: tracing experts; find TEP docs; Telephone conference with Keever; propane depo question for Pollock.
45723	TIME	Miller, Bob	6.25	11/16/2024		prof.services	GRM Jolley Fed	Prepare for Rowe depo; review TEP docs; review class settlement poposal; telephone conference with and email w/MED re: WPX vendors; telephone conference with Keever; review TEP bank statements, Telephone conference with and emails Keever re: documents and questions for Rowe and Benaquista depos.
45724	TIME	Miller, Bob	10.50	11/17/2024		prof.services	GRM Jolley Fed	Travel to Houston - prep for 30(b)(6) depos of Pollock, Beraquista and Rowe; review docs from Becky.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45725	TIME	Miller, Bob	9.50	11/18/2024		prof.services	GRM Jolley Fed	Prep for Pollock; Pollock 30(b)(6) depo; prep for Beraquisto; review docs from Becky, conversations w/Keever.
45726	TIME	Miller, Bob	12.25	11/19/2024		prof.services	GRM Jolley Fed	Prep for Beraquista depo, Beraquista 30(b)(6) depo, prep for Rowe, mediation discussion w/TEP counsel.
45727	TIME	Miller, Bob	14.00	11/20/2024		prof.services	GRM Jolley Fed	Prep for Rowe, Rowe 30(b)(6) depo; travel to Durango; thoughts re: Houston depositions (prepare & circulate).
45728	TIME	Miller, Bob	4.75	11/21/2024		prof.services	GRM Jolley Fed	Zoom w/Keever/Chrisman re: document issues, prep & emails re: same (2.6). Review docs re: Caerus settlement, memo re: depositions, emails re: Caerus; zoom w/Keever, Chrisman, summary of Houston depositions, emails re: same
45729	TIME	Miller, Bob	5.00	11/22/2024		prof.services	GRM Jolley Fed	Co-Counsel zoom (1.7); co-counsel emails; research re: tracing; looking for petroleum engineering expert; research engineering data in WPX 10KS; memo re: same.
45730	TIME	Miller, Bob	7.25	11/23/2024		prof.services	GRM Jolley Fed	Research re: tracing & Restatement of Restitution; disgorgement; looking for petroleum engineering expert, email re: non-conformity terms.
45731	TIME	Miller, Bob	7.25	11/24/2024		prof.services	GRM Jolley Fed	Research re: tracing & disgorgement; looking for petroleum engineer; drafting supplemental moratory interest statement for mediator.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45732	TIME	Miller, Bob	6.50	11/25/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: discovery/depos (1.0); Telephone conference with DS & Bourque, emails re: pipeline discovery; research re: tracing & disgorgement & commingling; email to DS re: tracing in TEP bank accounts; Telephone conference with Bourque & DS re: expert report; review MED materials re: export report; zoom w/co-counsel
45733	TIME	Miller, Bob	5.75	11/26/2024		prof.services	GRM Jolley Fed	Legal research re: moratory interest tracing, restatement of restitution disgorgement, Telephone conference with petroleum engineers.
45734	TIME	Miller, Bob	4.50	11/27/2024		prof.services	GRM Jolley Fed	Review emails w/tracing experts; review MED analysis of WPX sales by location by month.
45735	TIME	Miller, Bob	0.00	11/28/2024	12/2/2024	prof.services	GRM Jolley Fed	Thanksgiving break. No work
45736	TIME	Miller, Bob	5.00	12/3/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: discovery, depos, mediation (1.3); review of emails to tracing experts; email w/Denomy re: WPX marketing @ WRH; Telephone conference with DS re: pipeline reponses; identify documents to forward to Lencione to evaluate; WPX drilling program rate-of-return; memo re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45818	TIME	Miller, Bob	7.25	12/4/2024		prof.services	GRM Jolley Fed	Engage petroleum engineer; Telephone conference with Keever & MED re: mediation prop., Telephone conference with Keever re: same; docs for MED; bullet points for MED expert report; analyze and provide calculation re: Settlement proposal; preparation for WPX depositions.
45819	TIME	Miller, Bob	6.50	12/5/2024		prof.services	GRM Jolley Fed	Zoom w/co-counsel re: TEP counter proposal; moratory interest research, review TEP documents; emails re: same; review MED spreadsheet.
45820	TIME	Miller, Bob	5.75	12/6/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: Class proposal; emails re: same; research and working on supplemental mediation submission; emails and Telephone conference re: same; review TEP docs; docs to MED.
45821	TIME	Miller, Bob	5.50	12/7/2024		prof.services	GRM Jolley Fed	Working on supplemental mediation submission. Legal research re: Setcovic and identical factual predicate, release and settlement notice.
45822	TIME	Miller, Bob	6.75	12/8/2024		prof.services	GRM Jolley Fed	Working on supplemental mediation submission; legal research re: Setcovic and other issues.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45823	TIME	Miller, Bob	5.50	12/9/2024		prof.services	GRM Jolley Fed	Calculations re: settlement and MED interest calcs; Telephone conference with Keever re: settlement, moratory interest, etc. Telephone conference with DS, Quirian, Mossman re: tracing; compile docs re: mediation; emails re: mediation; review and summarize Concord Agreements; memo to Keever re: same; amendments to mediation submission and emails re: same.
45824	TIME	Miller, Bob	5.00	12/10/2024		prof.services	GRM Jolley Fed	Preparation Class proposal, zoom w/co-counsel; remails re: same; amend mediation supplement; emails re: same and Caerus Settlement; review TEP docs; TK questions re: recognized gain; research re: commingle funds.
45825	TIME	Miller, Bob	5.50	12/11/2024		prof.services	GRM Jolley Fed	Preparation Class proposal; Telephone conference with Petroleum Engineer; Telephone conference with DS; Caerus Settlement, review TEP account statements; review MED outline of expert report; TK questions; review Letter to Chrisman

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45826	TIME	Miller, Bob	7.25	12/12/2024		prof.services	GRM Jolley Fed	Telephone conference with Weever and petroleum engineer, Telephone conference with RKM re: Sefcovic issue/mediation submission amendments to Settlement Proposal; Motion ot Amend Acheduling Order; review petroleum engineer report; Telephone conference with re: same; review MED damage and interest spreadsheets; Telephone conference with Keever re: same; zoom co-counsel.
45827	TIME	Miller, Bob	6.25	12/13/2024		prof.services	GRM Jolley Fed	Telephone conference with Keever re: settlement; review TEP docs; legal research re: Sefcovic issues; preparing Sefcovic and Claim Preculsion; circulate same.
45828	TIME	Miller, Bob	5.25	12/14/2024		prof.services	GRM Jolley Fed	Review TEP docs; legal research; gather notes from prior settlement discussions; co-counsel emails re: settlement proposals and docs; review TEP docs.
45829	TIME	Miller, Bob	6.50	12/15/2024		prof.services	GRM Jolley Fed	Amendment to supplemental mediation statement, emails re: same; calculations re: pricing and trans cost claims; docs to Keever; review and revision of mediation statement; reviewe TEP docs; review TCPL discovery responses.
45830	TIME	Miller, Bob	8.50	12/15/2024		prof.services	GRM Jolley Fed	Travel to Grand Junction, prepare for mediation, discussion w/Keevery re: mediation, Telephone conference with Keever & MED, Telephone conference with Keever & Chrisman; emails re: same.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45831	TIME	Miller, Bob	12.00	12/17/2024		prof.services	GRM Jolley Fed	Prepare for and representation at mediation, review petroleum engineer calcs.
45832	TIME	Miller, Bob	4.75	12/18/2024		prof.services	GRM Jolley Fed	Return to Durango; review emails re: tracing; legal research.
45833	TIME	Miller, Bob	5.50	12/19/2024		prof.services	GRM Jolley Fed	Legal research comparable pricing, Colo. precedent binding on federal courts; Sefcovic issues; class notice.
45834	TIME	Miller, Bob	6.75	12/20/2024		prof.services	GRM Jolley Fed	Review Newburgan Class Actions 18.1 through 18.46 and related cases; Sefcovic issues; class notice; memo re: claim preclusion, identical factual predicate and collateral attack on class judgements.
45835	TIME	Miller, Bob	2.00	12/23/2024		prof.services	GRM Jolley Fed	Zoom w/co-counsel, answer GS questions re: TEP 408 docs.
45836	TIME	Miller, Bob	5.75	12/27/2024		prof.services	GRM Jolley Fed	Legal research re: scope and effect of Sefcovic Release.
45864	TIME	Miller, Bob	8.00	12/27/2024	1/2/2025	prof.services	GRM Jolley Fed	Review Keever draft of Class Response to TEP discovery; response re: Merrill 84, identify & forward Simpson & Beraquista spreadsheets to MESD; Wms Shrink data to MED; redraft of Keever responses to TEP discovery
45837	TIME	Miller, Bob	6.50	12/28/2024		prof.services	GRM Jolley Fed	Legal research re: scope and effect of Sefcovic Release.
45838	TIME	Miller, Bob	7.75	12/29/2024		prof.services	GRM Jolley Fed	Legal research re: scope and effect of Sefcovic Release. Memo re: Sefcovic Release does not bar class claims.
45839	TIME	Miller, Bob	6.50	12/30/2024		prof.services	GRM Jolley Fed	Legal research re: Restatement of Restitution and disgorgement.
45840	TIME	Miller, Bob	6.50	12/31/2024		prof.services	GRM Jolley Fed	Legal research re: Restatement of Restitution and disgorgement.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45841	TIME	Miller, Bob	4.75	1/1/2025		prof.services	GRM Jolley Fed	Finished and circulated memo comparing Disgorgement to Moratory Interest and legal research re: same.
45842	TIME	Miller, Bob	3.75	1/2/2025		prof.services	GRM Jolley Fed	Multiple emails re: effect of disgorgement on settlement/class action; answer GS questions; email discussions w/co-counsel re: disgorgement/settlement.
45843	TIME	Miller, Bob	5.00	1/3/2025		prof.services	GRM Jolley Fed	Discussion w/Keever re: settlement options; calculations re: estimates of damages and interest for each claim.
45844	TIME	Miller, Bob	4.25	1/4/2025		prof.services	GRM Jolley Fed	Receive and review DS & JR memos re: identical factual predicate rule; legal research re: identical factual predicate.
45845	TIME	Miller, Bob	6.25	1/6/2025		prof.services	GRM Jolley Fed	Memo to DS & JR et al. Responding to analysis of identical factual predicate; legal research re: same; email to co-counsel re: moratory interest; review MED analysis of Simpson 408 calcs; review Barton 10th C.R. case; Telephone conference with Keever re: MED data; memo to Seely/Bourque re: pipeline discovery.
45846	TIME	Miller, Bob	5.75	1/7/2025		prof.services	GRM Jolley Fed	Zoom Keever & MED re: 408 data; zoom w/co-counsel re: TEP settlement offer; Telephone conference with DS re: pipeline discovery; documents to Bourque re: pipeline discovery; zoom w/ DS & Bourque re: pipeline discover.
45847	TIME	Miller, Bob	6.00	1/8/2025		prof.services	GRM Jolley Fed	Review damage assessment JPRF; prepare damage assessment; settlement proposal discussions, update calculations.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45848	TIME	Miller, Bob	9.50	1/9/2025		prof.services	GRM Jolley Fed	Settlement conference calls, emails, finalize Caerus settlement; Kitch emails re: settlement; evaluate settlement offers; propose alternative settlement offer and structure.
45849	TIME	Miller, Bob	5.25	1/10/2025		prof.services	GRM Jolley Fed	Emails and conference calls re: counter proposal; revise proposal; Telephone conference with Keever re: same; zoom w/co-counsel re: settlement.
45850	TIME	Miller, Bob	4.00	1/11/2025		prof.services	GRM Jolley Fed	Class counter proposal; emails re: same; Telephone conference with Keever re: settlement.
45852	TIME	Miller, Bob	4.25	1/14/2025		prof.services	GRM Jolley Fed	Telephone conference with Keever re: substance of post-class period complaint; review TEP docs.
45853	TIME	Miller, Bob	4.00	1/15/2025		prof.services	GRM Jolley Fed	Zoom w/Keever & Chrisman re: settlement and discovery next steps; review TEP docs, Telephone conference with Keever re: discovery and scheduling. Zoom w/DS & Bourque re: pipeline discovery; zoom w/co-counsel re: settlement; emails re: settlement; revisions to class proposal; MED data to Keever; redraft settlement proposal.
45854	TIME	Miller, Bob	5.25	1/16/2025		prof.services	GRM Jolley Fed	Telephone conference with DS; review Bourque email; receive TEP counterproposal; Telephone conference with co-counsel.
45855	TIME	Miller, Bob	4.00	1/20/2025		prof.services	GRM Jolley Fed	Review TEP proposal; revise same; zoom w/co-counsel, Telephone conference with Keever.
45856	TIME	Miller, Bob	4.25	1/21/2025		prof.services	GRM Jolley Fed	
45857	TIME	Miller, Bob	4.00	1/22/2025		prof.services	GRM Jolley Fed	Review MED emails re: Simpson 408 calcs; co-counsel emails re: same and settlement proposals.

G.R. Miller Time Records

Transaction ID	Transaction Type	Professional	Time Spent	Date	End Date	Activity	Client	Description
45858	TIME	Miller, Bob	2.75	1/23/2025		prof.services	GRM Jolley Fed	Review TEP emails re: TEP bank statements; Telephone conference with Keever; emails w/co-counsel.
45859	TIME	Miller, Bob	3.50	1/24/2025		prof.services	GRM Jolley Fed	zoom w/co-counsel re: settlement; Telephone conference with Keever re: settlement.
45860	TIME	Miller, Bob	4.75	1/27/2025		prof.services	GRM Jolley Fed	Emails re: Caerus settlement; JPRF preliminary settlement reached; zooms w/co-counsel; start work on settlement docs; consider next steps.
45861	TIME	Miller, Bob	3.75	1/28/2025		prof.services	GRM Jolley Fed	Telephone conference with DS; emails to expert witnesses; email w/co-counsel re: escrow agreement; review escrow agreement; legal research re: same.
45862	TIME	Miller, Bob	4.25	1/29/2025		prof.services	GRM Jolley Fed	Zoom w/co-counsel re: settlement documents; emails re: same; Telephone conference with Keever.
	Total		4880.65					

EXHIBIT B

Follow -On State Case

Professional N	Time Spent	Date	End Date	Client	Description
Miller, Bob	6.25	2/10/2025	2/13/2025	Follow-on State Case - Jolley Potter	Review & Revise complaint in 2025 state case. Drafted complaint in 2025 state case.
Miller, Bob	2.50	2/17/2025	2/20/2025	Follow-on State Case - Jolley Potter	Review & Revise Keever draft of complaint, 2025 state case.
Miller, Bob	0.50	3/3/2025	3/4/2025	Follow-on State Case - Jolley Potter	Finalize State Complaint
Miller, Bob	0.80	3/24/2025	3/26/2025	Follow-on State Case - Jolley Potter	Communications with co-counsel & Chrisman, re: state case
Miller, Bob	3.75	5/5/2025	5/9/2025	Follow-on State Case - Jolley Potter	Review TEP settlement proposal for TEP state case, analyze TEP spreadsheets
Miller, Bob	2.50	5/5/2025	5/9/2025	Follow-on State Case - Jolley Potter	Zoom call with co-counsel, review and revise draft settlement response
Miller, Bob	0.80	5/10/2025	5/22/2025	Follow-on State Case - Jolley Potter	Review and comment on escrow agreements - TEP state case
Miller, Bob	0.50	5/10/2025	5/22/2025	Follow-on State Case - Jolley Potter	Review order of preliminary approval
Miller, Bob	1.50	5/12/2025	5/15/2025	Follow-on State Case - Jolley Potter	Finalized state case settlement (1.0) and emails with co-counsel(.5)
Miller, Bob	2.50	5/19/2025	5/22/2025	Follow-on State Case - Jolley Potter	Review and correct settlement documents for State Case TEP
Miller, Bob	1.00	5/26/2025	5/29/2025	Follow-on State Case - Jolley Potter	Review and comment on settlement agreement/state case
Miller, Bob	2.50	5/26/2025	5/29/2025	Follow-on State Case - Jolley Potter	Review and comment on exhibits to state case settlement
Miller, Bob	2.20	6/2/2025	6/4/2025	Follow-on State Case - Jolley Potter	Review state case settlement exhibits.
Miller, Bob	0.50	6/16/2025	6/19/2025	Follow-on State Case - Jolley Potter	Review Reply to TEP counter claim - TEP State case.
Miller, Bob	0.50	6/16/2025	6/19/2025	Follow-on State Case - Jolley Potter	Communications with co-counsel regarding TEP state case.
Miller, Bob	0.80	7/14/2025	7/24/2025	Follow-on State Case - Jolley Potter	Review Reply to Counterclaims State Case
Miller, Bob	0.50	8/4/2025	8/7/2025	Follow-on State Case - Jolley Potter	Review preliminary distribution schedules with TEP state case 2025.
Miller, Bob	0.25	8/4/2025	8/7/2025	Follow-on State Case - Jolley Potter	Emails regarding use of fee expert in 2025 state case.
Miller, Bob	0.60	8/11/2025	8/14/2025	Follow-on State Case - Jolley Potter	Conference call with co-counsel.
Miller, Bob					
Miller, Bob					
Miller, Bob					
Miller, Bob					
Miller, Bob					

Total	30.45

DISTRICT COURT, COUNTY OF GARFIELD, COLORADO 109 8th Street, Suite 104 Glenwood Springs, CO 81601	
Plaintiff: JOLLEY POTTER RANCHES ENERGY CO., LLC, v. Defendant: TEP ROCKY MOUNTAIN LLC.	
<i>Attorneys for Plaintiff and the Class</i> Nathan A. Keever, Attorney Reg. No. 24630 DUFFORD WALDECK 744 Horizon Court, Suite 300 Grand Junction, CO 81506 Telephone: (970) 241-5500; Fax: (970) 243-7738 E-mail: keever@dwmk.com ; dwmk@dwmk.com G.R. Miller, #8406 G.R. MILLER, P.C. 1040 Main Avenue Durango, CO 81302 Telephone: (970) 247-1113 E-mail: bob@grmillerlaw.com	▲ COURT USE ONLY ▲ Case Number: 2025CV30027 Division:
DECLARATION OF NATHAN A. KEEVER	

Nathan A. Keever, being first duly sworn upon his oath, states as follows.

1. My name is Nathan A. Keever. I am over twenty-one years of age and am competent to give this Declaration.
2. I am submitting this Declaration in support of Class Counsels' Motion for Attorney Fees and Expenses. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, I could and would testify to such facts.
3. I received a J.D. degree from the University of Colorado in 1994. After a clerkship, I joined the law firm of Dufford, Waldeck, Milburn & Krohn, LLP in Grand Junction, Colorado (Dufford Waldeck) and have been a partner since 2001. I am personally familiar with the history of Dufford Waldeck's participation in the relevant class actions and oil and gas litigation.
4. I have been actively involved in more than twenty major oil and gas lawsuits on behalf of

royalty owners. For example, I was lead counsel in the reported royalty disputes in Garfield County, Colorado of *Savage v. Williams Prod. RMT Co.*, 140 P.3d 67 (Colo. App. 2005), *Clough v. Williams Prod. RMT Co.*, 179 P.3d 32 (Colo. App. 2007), and *Lindauer v. Williams Prod. RMT Co.*, 2016 COA 39, 381 P.3d 378 (2016). I was also lead counsel in group or class actions on behalf of royalty owners in Colorado against EnCana Corporation, Antero Resources Corporation, Ursa Resources Group II LLC, and Occidental Petroleum Corporation. As a result of my experience in handling natural gas royalty underpayment litigation in Colorado, I have obtained a thorough understanding of the factual and legal issues that typically arise in this type of litigation, including the litigation risks for both the royalty owners and the natural gas producers.

5. The Fleeson Firm, Mr. Miller, and I represented the Plaintiff and the Class as co-counsel in the Jolley Potter Ranch Federal Class Action Case against TEP (“JPRF”), Case No. 19-CV-495. Together, we worked for more than six years to investigate the defendant’s gas marketing, production operations, revenue accounting, and royalty calculations, as well as its use of midstream and transportation services, to identify the facts and legal authority that underly the Class Claims, and to litigate the Class Claims in this court. Through extensive written discovery, we obtained and analyzed more than 100,000 pages of documents produced by TEP in disclosures and in response to the Class’s multiple discovery requests. We reviewed more than 5,000 Excel spreadsheets and more than 335 GB of data to develop the Class Claims. We took thirteen depositions, including four prior to class certification and nine during the merits phase, which took place in Colorado, Oklahoma, and Texas. We also issued more than ten third-party subpoenas and received voluminous accounting, bank, and other data in response, and we filed numerous pleadings in this court.
6. On behalf of the JPRF Class, we retained four experts in the fields of royalty accounting, gas marketing, economics and forensic accounting. TEP retained four experts in royalty accounting, gas marketing, economics, and forensic accounting to analyze TEP’s royalty data, prepare expert reports, and assist TEP in determining the amounts at issue. Two of the Class’s experts and three of TEP’s experts prepared reports related to class certification. The Parties exchanged their expert reports, and the opposing experts then reviewed each other’s and issued rebuttal reports analyzing the accuracy of their counterpart’s report. At the time of settlement of the JPRF Case, the Class’s experts were working diligently on their merit’s reports. The Parties worked with their experts to develop a better understanding of the facts in this case, to assist each Party in determining the amounts at issue, and most recently to negotiate the proposed settlement agreement.
7. In March 2024, the Defendant TEP provided us with spreadsheets which summarized voluminous TEP monthly operational and accounting data necessary to estimate the damages resulting from most, but not all, of the Class Claims. Over the next year, the parties worked together to resolve their factual differences and factual questions regarding calculations of damage amounts. As a result of this process, the parties were eventually able to agree on the amount of actual damages (without interest) that could result from a decision in which the Class prevailed on all merits issues. This understanding then formed

the foundation upon which the parties were able to negotiate a fair, reasonable, and adequate settlement in the JPRF Case.

8. The Parties participated in a formal mediation of the JPRF Case on December 17, 2024, with the Honorable William H. Downes, who is a former federal judge and professional mediator with experience in handling royalty class action cases. Although the formal mediation did not end in a settlement, Judge Downes stayed in contact with the Parties and oversaw their further settlement discussions.
9. Counsel for both parties in the JPRF Case communicated frequently over the approximately one-year period negotiated a methodology for valuing each claim and determining damages and appropriate settlement terms. These negotiations were fair, honest, and involved no improper pressure or collusion. Following these negotiations, the Parties reached a proposed class-action settlement agreement in that action in February 2025.
10. In this case specifically, our firm—along with our co-counsel G.R. Miller P.C. and the Fleeson Firm—have: (1) engaged in fact discovery, document and data production ; (2) retained an experienced royalty accounting, marketing, economic, and forensic accounting expert to analyze the data and determine the amounts at issue in the case; and (3) participated in continuous settlement discussions in order to resolve the claims of the Plaintiffs and the Class.
11. TEP opposed this action. TEP's opposition required discovery and preparation, including the review, analysis, and categorization of individual oil and gas leases
12. Attached as Exhibit A is a print-out of Dufford Waldeck's contemporaneous time entries for work done on this case from March 2025 through November 2025. This includes all of my time entries during that period.
13. With regard to the factors set forth in *Johnson v. Railway Express* concerning the reasonableness of attorney fees, I understand that not every factor may apply in this case. *See, e.g., Gudenkauf v. Stauffer Communs.*, 158 F.3d 1074, 1083 (10th Cir. 1998) ("We have never held that a district court abuses its discretion by failing to specifically address each *Johnson* factor. To the contrary, we have stated that not all of them need be considered."). Nevertheless, I represent to the Court as follows: time required from Plaintiff's counsel in this contested and complex lawsuit. The facts were complex, as reflected by the number of class members in the case and the considerable amount of discovery from defendant TEPs.
 - a. *The preclusion of other employment by the attorneys due to the acceptance of the case* - The significant amounts of time that this case required of me and many other attorneys and staff at my firm precluded us from working on other matters that would have generated hourly fees.

- b. *The customary fee* – In my experience, the customary attorneys’ fee in a royalty class action that results in the creation of a common fund for the benefit of the class is a percentage contingency fee of not less than one-third of the net recovery, after reimbursement of counsel’s out-of-pocket litigation expenses, unless the case is settled very early after filing and prior to the expenditure of significant time, effort, and judgment, and especially in the event of an appeal, where the risks of losing are multiplied.
- c. *Whether the fee is fixed or contingent* - This case was handled entirely on a contingent fee basis, with no assurance that any fees would ever be received. Receipt of compensation for our work was wholly dependent upon achieving a favorable result for the Class. The three law firms here incurred significant risk in pursuing this case. By taking this case on a contingent fee basis, we not only shared in the risk of loss with the Class, but we also fully assumed the risk that we would be paid nothing for our services even after having invested time (and effort), as well as a cash outlay for out-of- pocket expenses to date. In my opinion, the fact that we worked diligently on this case for almost a year without any compensation from hourly fees, retainer, or any other source, after the prior years spent, weighs heavily in favor of the percentage fee of one-third (1/3) of the net recover, that we are requesting.
- d. *Any time limitations imposed by the client or the circumstances* - There were no unusual time limitations imposed in this matter.
- e. *The amount involved and the results obtained* – As was explained in the Settlement Agreement, each of the Class Claims was separately valued and negotiated based on its own merits. The settlement amount for each claim was different, and reflects the varying strengths, weaknesses, and risks of each claim. Given the inherent uncertainties of litigation and the risks presented here, especially with claims involving questions of first impression under Colorado law, the recovery here is an excellent result for the class.
- f. *The experience, reputation, and ability of the attorneys* – Dufford Waldeck enjoys a strong reputation, especially in Western Colorado. I am familiar with the experience, reputations, and abilities of each of the lawyers and staff members who have worked on this case. My education and professional experience are summarized in paragraph 1, above. I incorporate here by reference the Declarations filed by David G. Seely with the Fleeson Firm and G.R. Miller with G.R. Miller, P.C. setting forth their respective backgrounds and experience.
- g. *The nature and length of the professional relationship with the client* – I have represented the named plaintiff, Jolley Potter Ranches Energy Co., LLC, for over a decade, and have represented a number of the other Class Members for several decades.

- h. *Awards in similar cases*- The Tenth Circuit has “not adopted a benchmark percentage for attorneys’ fees from common fund settlements.” *Voulgaris v. Array Biopharma, Inc.*, 60 F.4th 1259, 1263 (10th Cir. 2023). Instead, the Tenth Circuit and District of Colorado cases regularly affirm that “a reasonable fee is based on a percentage of the fund bestowed on the class.” *In re Syngenta AG MIR 162 Corn Litig.*, 61 F.4th 1126, 1191 (10th Cir. 2023) (quoting *Blum v. Stenson*, 465 U.S. 886, 900 n.16 (1984)). A percentage fee award of at least one-third of the net recovery (after expenses) in contested cases is the standard in cases of this type.
14. I believe the amount of time expended in this matter by me and the other lawyers in connection with the successful settlement of this case is reasonable and that the requested fee of one-third of the net recovery is fair and reasonable.
15. Attached as Exhibit B is a true and correct copy of my expense records for this case. As shown on Exhibit B, I incurred and paid expenses in the total amount of \$775.55. All of these expenses were necessary, were reasonable in amount, and were incurred for the purpose of representing the Class in this case. Therefore, I believe that all of these expenses are reasonable and should be reimbursed. I also believe that the combined total expenses paid by all Class Counsel are reasonable and should be reimbursed. Any additional reimbursement for administrative expenses incurred during the distribution of the settlement to Plaintiff Class shall be the subject of a separate request for approval from the Court.

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

Dated November 14, 2025

/s/ Nathan A. Keever

Nathan A. Keever

EXHIBIT A

Dufford, Waldeck, Milburn and Krohn, LLP

Client Expense Report

13 November, 2025

Client Date	Client Matter ID Audit #	Resp. Lwyr.	File Type Type	File Code	Description	Units	Rate	Value	Invoice #
Terra Energy Partners Class Action 03/06/2025	18227/18227.008 550075	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 CCEF #CV30027 - Complaint	1.00	277.00	277.00	Bill
Terra Energy Partners Class Action 07/17/2025	18227/18227.008 581619	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 CCEF #CV30027 - Replay to Counterclaim	1.00	24.00	24.00	Bill
Terra Energy Partners Class Action 08/29/2025	18227/18227.008 593825	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 FedEx - Mail Services	1.00	474.55	474.55	Bill
Firm Totals								775.55	

Summary by Responsible Lawyer

	Value
NAK	775.55
Total	775.55

Summary by Type

	Value
Soft	775.55
Total	775.55

Summary by Code

	Value
	775.55
Total	775.55

Summary by File Type

	Value
Oil & Gas	775.55
Total	775.55

Summary by Billing Category

	Value
Contingency	775.55
Total	775.55

Report Selections

End Date: Nov 13, 2025

File: Terra Energy Partners - TEP State Class
2021-2024 - 18227.008

Include Task Based Files: Yes

Include Closed Files: No

Include Corrections: No

Dufford, Waldeck, Milburn and Krohn, LLP

Client Expense Report

13 November, 2025

Client Date	Client Matter ID Audit #	Resp. Lwyr.	File Type Type	File Code	Description	Units	Rate	Value	Invoice #
Terra Energy Partners Class Action 03/06/2025	18227/18227.008 550075	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 CCEF #CV30027 - Complaint	1.00	277.00	277.00	Bill
Terra Energy Partners Class Action 07/17/2025	18227/18227.008 581619	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 CCEF #CV30027 - Replay to Counterclaim	1.00	24.00	24.00	Bill
Terra Energy Partners Class Action 08/29/2025	18227/18227.008 593825	NAK	Oil & Gas Soft		Terra Energy Partners - TEP State Class 2021-2024 - 18227.008 FedEx - Mail Services	1.00	474.55	474.55	Bill
Firm Totals								775.55	
Summary by Responsible Lawyer								Value	
								NAK	775.55
								Total	775.55
Summary by Type								Value	
								Soft	775.55
								Total	775.55
Summary by Code								Value	
									775.55
								Total	775.55
Summary by File Type								Value	
								Oil & Gas	775.55
								Total	775.55
Summary by Billing Category								Value	
								Contingency	775.55
								Total	775.55

Report Selections

End Date: Nov 13, 2025

File: Terra Energy Partners - TEP State Class 2021-2024 - 18227.008

Include Task Based Files: Yes

Include Closed Files: No

Include Corrections: No

Dufford, Waldeck, Milburn and Krohn, LLP

Client Expense Report

13 November, 2025

AFFIDAVIT OF GRANT STIEFEL

I, Grant Stiefel, do hereby declare and affirm as follows:

1. My name is Grant Stiefel, and I am a full-time consultant and testifying expert specializing in attorneys' fees. I am a licensed attorney and the founder and principal of Litigation Limited, a legal fee auditing and consulting firm. I have personally drafted this affidavit, and the conclusions set forth herein reflect my independent professional analysis. Unless otherwise stated, I have personal knowledge of the facts set forth and am prepared to testify accordingly.

2. As one of the few full-time legal fee consultants in the country, I am frequently retained by litigants and law firms to provide expert testimony on attorneys' fee disputes and fee-shifting motions. Over the past two decades, I have reviewed more than \$1 billion in law firm billings and testified as a fee expert in state and federal courts, JAMS and AAA arbitrations, attorney-client fee arbitrations, and before the Ninth Circuit Court of Appeals. I have testified live as a qualified attorney fee expert in numerous trial courts, arbitrations, and State Bar proceedings.

3. I have no financial interest in the outcome of this dispute, and my compensation is not contingent upon the substance of my opinions or the final determination of this motion. My hourly rate for this matter is \$850.

4. A detailed summary of my expertise and qualifications is provided in paragraphs 5 through 29 of this affidavit, and my *curriculum vitae* is attached as **Exhibit A**.

BACKGROUND AND QUALIFICATIONS AS AN EXPERT

5. **Attorney Fee Consulting Experience.** For nearly fifteen years, my firm, Litigation Limited, has provided legal fee consulting services to clients throughout the United States and Canada. My clients include individuals, publicly traded corporations, financial institutions, universities, and government agencies at both the federal and state levels. I evaluate hourly rates, billing practices, and overall legal costs across jurisdictions, law firm sizes, and practice areas. I also assess the efficiency of outside counsel and assist in managing complex, multi-jurisdictional litigation portfolios.

6. **Attorney Fee Testifying Experience.** I am frequently retained as an expert witness in attorneys' fee disputes to provide testimony in state and federal courts and arbitrations. I have testified in over 180 matters on: (i) the reasonableness of legal fees, (ii) the propriety of attorney billing practices, (iii) reasonable hourly rates and hours billed in the context of lodestar analyses; and (iv) litigation management issues. I have also submitted expert reports and affidavits on prevailing party fee requests and testified in attorney-client fee arbitrations and State Bar courts. A list of the cases I have testified in as a fee expert is attached as **Exhibit B.**

7. I have been retained as a testifying expert in courts across the United States, including in Alabama, California, Colorado, Connecticut, Florida, Georgia, Maryland, Nevada, New Jersey, New York, Ohio, Pennsylvania, Texas, Washington, and West Virginia. I have also testified in state bar fee arbitrations and private arbitrations conducted by JAMS, the American Arbitration Association (AAA), ADR Services, and FINRA.

8. I testify for plaintiffs and defendants in roughly equal measure. I have even been retained by both sides in the same litigation (with appropriate conflict waivers) because of the impartial and consistent nature of my analysis and testimony.¹

¹ The *Brickman* class action serves as an illustrative example. I was initially retained by Defendant FitBit to provide an opinion on the reasonableness of Class Counsel's fee request. Following the approval of the class action settlement and the issuance of an order awarding attorneys' fees, I was subsequently retained

9. My clients include some of the largest companies in the world and individuals in attorney-client fee disputes. I have been retained by school districts, municipalities, and large universities in the United States and Canada. I have also testified as a fee expert for the United States Department of Justice and on behalf of the Superior Courts of California, including the Orange County, Santa Clara County, and Ventura County Superior Courts.

10. I am retained by a broad range of law firms, from solo practitioners to some of the largest and most prestigious firms in the world. My engagements have included plaintiff-side class action firms, national defense firms, boutique litigation practices, and international “Big Law” firms such as Latham & Watkins, O’Melveny & Myers, Gibson Dunn, Quinn Emanuel, Jones Day, and Seyfarth Shaw, among many others. This breadth of experience gives me a unique perspective on billing practices across the legal market, from high-stakes “bet-the-company” disputes to smaller, more routine matters.

11. An extensive list of notable clients and law firms that have retained me as a fee expert is attached as **Exhibit C**.

12. I have provided live expert testimony in numerous trials and arbitrations, including the following: *SK Law Group v. PMBS*, Los Angeles County Superior Court (trial testimony); *Hehir v. Kim*, Los Angeles County Superior Court (trial testimony); *Brown v. Gilles*, ADR Services Los Angeles (arbitration testimony); *Balle v. Ross*, Nevada State Bar Proceeding (arbitration testimony); *Pintsopoulous v. WestPark Capital*, FINRA Arbitration (arbitration testimony); *Carone v. Wooley*, Santa Barbara County Bar Association Fee Arbitration (arbitration testimony); *LegalForce v. Papiz*, JAMS Los Angeles (arbitration testimony); *Gateway Bank v. Metaxas*, JAMS San Francisco (arbitration testimony); *Joseph Aleem & Slovak v. Zaffuto*, Los Angeles County Bar Association Fee Arbitration (arbitration testimony); *In re Allyne L. Urick Trust*, Orange County Superior Court (trial testimony); *Cappello & Noel v. Rubin* (arbitration testimony); *Bertoia v. Payton*, Denver County Court (trial

by Class Counsel—with FitBit’s knowledge and consent—in their dispute with local counsel regarding the allocation of the Brickman fees. *Brickman v. FitBit*, N.D. Cal. Case No. 3:15-cv-2077-JD.

testimony); *Enenstein v. Hankey*, Los Angeles County Superior Court (trial testimony); *Thekke v. Bird Marella*, Los Angeles County Bar Association Fee Arbitration (arbitration testimony); *Lieberg v. Kanter*, Riverside County Superior Court (trial testimony), *In re Hughes Family Trust*, Los Angeles County Superior Court (trial testimony), *Linnet v. Law Offices of Beatrice Snyder*, Los Angeles County Bar Association Fee Arbitration (arbitration testimony); *Parrish v. Frank*, JAMS San Francisco (arbitration testimony); *Reif v. Clippinger*, AAA Los Angeles (arbitration testimony); and *Jolley Potter Ranches Energy v. TEP Rocky Mountain*, United States District Court for the District of Colorado (trial testimony).

13. I have also testified via affidavit or declaration in over one hundred other matters.

14. I have even been invited to testify internationally. On several occasions, I have served as an expert witness before the Seoul High Court of the Republic of Korea (the Korean Court of Appeals). In those proceedings, I was not retained as an advocate, but functioned more like a special master, providing impartial guidance to the justices.

15. Judges and arbitrators have consistently described my methodology as consistent, reliable, and conservative, and have praised my impartiality. For example:

- Hon. Eric M. Epstein (Arbitrator, AAA, July 13, 2023 Final Award of Arbitrator, *Thomas v. Security Industry Specialists, Inc.*, Case No. 01-21-0004-0957) described me as “***one of the foremost experts in the country on hourly rates for attorneys,***” noting that “***Mr. Stiefel, even though retained by Claimant as an expert, did not appear to the Arbitrator to be biased in his opinions [...] his background is impeccable, and he has testified for both Plaintiffs and Defendants, both in supporting and opposing fee applications.***”
- Hon. Michael Paul Linfield (Judge, Los Angeles Superior Court, Trial Proceedings, February 14, 2014, *Hehir v. Kim, et al.*, Case No. BC485630) stated that my qualifications as a testifying fee expert “***cannot seriously be***

in dispute.”

- Hon. Harold Hopp (Judge, Riverside County Superior Court, March 3, 2023 Order on Motion for Attorneys’ Fees, *Miller v. Desert Community College District*, Case No. PSC1904248) described my analysis and opinions as “*well-reasoned*” and my conclusions “*fair and reasonable*.”
- Hon. Jackson Lucky (Judge, Riverside County Superior Court, August 14, 2024 Ruling, *Lieberg Oberhansley v. Denise Kanter*, Case No. RIC1812773): “*Grant Stiefel [has] vast experience as an attorney, and attorneys fee expert [whose] testimony was generally uncontroverted, noncontroversial, and accepted by the court*”.

16. In addition to my consulting and testifying work, I am also a State Bar–approved Continuing Legal Education instructor and have lectured extensively on attorneys’ fees and billing practices to lawyers, judges, executives, and legal departments. I also provide training to in-house counsel and legal departments on litigation management and billing oversight

17. I regularly turn down engagements where I cannot support a party’s position, including instances where I am asked to justify unreasonable fee requests or artificially discount valid billings.

18. **Legal Experience:** Before founding Litigation Limited, I practiced law for more than a decade with two of the world’s largest law firms. I began my career at the Los Angeles office of Akin Gump Strauss Hauer & Feld LLP, working on complex, high-profile disputes including California’s structured settlement litigation, the Metabolife dietary supplement litigation, and several large consumer class actions.

19. I later joined K&L Gates LLP, where I was tasked to head the firm’s Southern California Toxic Tort Practice Group. I served as lead counsel on hundreds of personal injury and wrongful death lawsuits with aggregate settlement values in the billions of dollars. I also defended corporate clients in high-stakes “bet-the-company” government investigations and have tried around two dozen cases in California state and federal courts, securing favorable jury

verdicts.

20. As national coordinating counsel for several Fortune 500 companies, I managed litigation teams across the country, supervised dozens of lawyers and paralegals, and reviewed invoices from hundreds of firms nationwide—experience that gave me unparalleled familiarity with billing practices.

21. **Class Action Experience.** In addition to my expertise on attorneys' fees issues, I have years of relevant experience litigating class actions in state and federal courts on behalf of both corporate defendants and class plaintiffs, including the following:

- a. I represented Structured Settlement Incorporated (SSI) in the *In re Structured Settlement* litigation, which was a national class action that resulted in settlements of \$124 million. The lead case was *Richard M. Stuber, et al. v. Merrill Lynch Pierce, Fenner & Smith, et al.*, Case No. BC244111, Superior Court of California for the County of Los Angeles, and Related Case Nos. BC244271, BC245412, BC245579, BC246051, GC026372, BC243787, BC248592, BC248593, BC248594, BC248597, BC248598, BC248599, BC248600, BC249418.
- b. I represented numerous dietary supplement manufacturers in putative class actions, including *Perez, et. al. v. Metabolife International, Inc.*, Case No. GIC 733138, Superior Court of California for the County of San Diego; *Jason A. Park, et. al. v. Cytodyne Technologies, Inc.*, Case No. GIC 768364, Superior Court of California for the County of San Diego; *Pizarro, et. al. v. Starlight International, Ltd., LP, et. al.*, Case No. BC246182, Superior Court of California for the County of Los Angeles; and *Jennifer Johnson, et. al. v. Metabolife International, Inc.*, Case No. GIC780474, Superior Court of California for the County of Los Angeles.
- c. I have represented the global conglomerate Samsung and several of its subsidiaries in multiple consumer class actions, including *Luis Ho, et. al. v. Samsung Electronics America, et. al.*, Case No. 03AS03429, Superior Court of

California for the County of Sacramento, and *Tiffany Heon, et. al. v. Samsung Telecommunications LP, et. al.*, Case No. GIC 810057, Superior Court of California for the County of San Diego.

- d. I also represented class plaintiffs in *Bradley B. Larsen, et. al. v. Coldwell Banker, et. al.*, Case No. SACV 10-00401 AG (MLGx) for the United States District Court for the Central District of California.

22. Finally, I have testified as a fee expert in connection with numerous class actions, including *Drazen v. GoDaddy.com*, United States District Court for the Southern District of Alabama, Case No. 1:19-cv-00563-KD-B; *O'Garro v. Jersey City*, United States District Court for New Jersey, Case No. 2:20-cv-05282-CCC-JBC; *Brickman v. FitBit*, United States District Court for the Northern District of California, Case No. 3:15-cv-2077-JD; *Chen v. GHP Management Corp.*, Los Angeles County Superior Court, Case No. BC713402; *Gallimore v. Kaiser Foundation Health Plan, Inc.*, Alameda County Superior Court, Case No. RG12616206; *In re Fifth Third Cash Advance Litigation*, United States District Court for the Southern District of Ohio, Case No. 1:12-cv-00851-MRB; and *Kirk v. First American Title Insurance Co.*, Los Angeles County Superior Court, Case No. BC372797.

23. Most relevant to the determination of this motion, I testified on behalf of Plaintiff and the Plaintiff Class in *Jolley Potter Ranches Energy Co, LLC v. TEP Rocky Mountain LLC*, Case No. 1:19-cv-00495-DDD-NRN (“the Federal Court Action”). In that case, I conducted a lodestar cross-check analysis “that confirms the reasonableness of the attorney’s fees and expenses requested” by Class Counsel. [August 4, 2025 Order Granting Class Counsel’s Motion for Attorneys’ Fees and Expenses]. The District Court awarded Class Counsel one-third of the next settlement amount (after subtraction of expenses and addition of accrued interest on the escrowed settlement funds).

24. **Education:** I received my Juris Doctor from the University of Southern California School of Law in May 2000, where I was awarded honors or high honors in thirteen subjects. I also served as editor for the *Southern California Interdisciplinary Law Journal* and

was elected by the student body to serve on the Student Bar Association for all three years.

25. I graduated from the University of Southern California in 1994 with a Bachelor of Arts in Psychology and Linguistics, where I was a National Merit Scholar and a recipient of the USC Presidential Scholarship, a full-ride academic scholarship. I was also named to the Dean's List for the College of Letters, Arts, and Sciences for all four academic years.

26. A copy of my *curriculum vitae* is attached as **Exhibit C**.

27. **Bar Membership and Court Admissions**. I am an inactive member in good standing with the California State Bar and was admitted to practice on January 12, 2001. My state bar number is 212307, and I have no history of professional discipline. In addition to all the state courts of California, I have been admitted to the following courts: the United States Court of Appeals for the Ninth Circuit; the United States District Court for the Central District of California; the United States District Court for the Eastern District of California; the United States District Court for the Northern District of California; and the United States District Court for the Southern District of California.

28. **Legal Education**. I received my *juris doctor* from the University of Southern California School of Law in May 2000, where I was awarded honors or high honors in thirteen (13) subjects. I was also selected to serve as a staff editor on the honors journal, *Southern California Interdisciplinary Law Journal*, and was elected by the student body to serve on the Student Bar Association for all three years, first as Class Representative for the 1L class (1997-98) and then as Vice-President (1998-2000).

29. **Undergraduate Education**. I graduated from the University of Southern California in May 1994 with a Bachelor of Arts in Psychology and Linguistics, where I was a National Merit Scholar, a USC Presidential Scholarship recipient, and was named to the Dean's List for the College of Letters, Arts, and Sciences.

MATERIALS REVIEWED AND METHODOLOGY

30. Before preparing this declaration, I undertook a number of investigative steps to learn more about the underlying litigation, as follows:

- a) I communicated with David G. Seely and Ryan Meyer, counsel for Plaintiff and Plaintiff's Class.
- b) I received and reviewed the entire docket from this case, *Jolley Potter Ranches Energy Co, LLC v. TEP Rocky Mountain LLC*, Case No. 2025-CV-30027. In particular, I reviewed the following:
 - i) Plaintiff's Complaint and Summons, dated March 5, 2025.
 - ii) Waiver and Acceptance of Service, filed March 20, 2025.
 - iii) TEP's Unopposed Motion for Extension of Time to Respond to Complaint, filed April 9, 2025, and this Court's Order granting same, filed April 10, 2025.
 - iv) TEP's Answer and Counterclaims, filed July 9, 2025.
 - v) Plaintiff's Reply to Counterclaims, dated July 16, 2025.
 - vi) Joint Motion for Settlement Class Certification and Preliminary Approval of Proposed Class Action Settlement Agreement, filed August 13, 2025.
 - vii) Settlement Agreement with Exhibits, filed August 13, 2025.
 - viii) Proposed Form of Mail Notice, filed August 13, 2025.
 - ix) Order Preliminarily Approving the Parties' Proposed Class Settlement Agreement, filed August 20, 2025.
 - x) Affidavit of Mailing of Class Action Notice and Exhibits Thereto (Notice of Rights and of Final Approval Hearing, and Affidavit of Mailing), dated September 18, 2025.
- c) I have also reviewed the pleadings, orders, and other materials filed in connection with *Jolley Potter Ranches Energy Co, LLC v. TEP Rocky*

Mountain LLC, Case No. 1:19-cv-00495-DDD-NRN (“the *Jolley Potter* Federal Action”). As of July 3, 2025, the docket in the *Jolley Potter* Federal Action spanned 199 entries and 2,789 pages of materials, including the following materials that I reviewed:

- i) Complaint, filed February 19, 2019.
 - ii) Amended Complaint, filed March 29, 2019.
 - iii) TEP’s Motion to Partially Dismiss Plaintiff’s Complaint, filed June 11, 2019.
 - iv) Partial Answer to Amended Complaint and Counterclaim, filed June 11, 2019.
 - v) Plaintiff’s Response to TEP’s Motion to Partially Dismiss Plaintiff’s Complaint, filed July 23, 2019.
 - vi) TEP’s Reply in Support of Motion to Partially Dismiss Plaintiff’s Complaint, filed August 20, 2019.
 - vii) Order to Show Cause, dated August 31, 2020.
 - viii) TEP Rocky Mountain LLC’s Petition for Permission to Appeal Order Granting Class Certification, filed October 5, 2023.
 - ix) Respondent’s Answer in Opposition to Petition for Permission to Appeal, filed October 19, 2023.
 - x) Motion for Leave to File Reply in Support of Petition for Permission to Appeal, dated November 2, 2023.
 - xi) Order on Motion for Petition for Permission to Appeal, dated January 24, 2024.
 - xii) Class Counsel’s Motion for Attorneys’ Fees and Expenses and Supporting Memorandum and Declarations, filed July 11, 2025.
- d) I received and reviewed discovery requests, objections, and responses, as well as deposition and hearing transcripts from the *Jolley Potter*

Federal Action, including the following:

- i) TEP Rocky Mountain LLC's Rule 26(a)(1) Initial Disclosures.
- ii) TEP Rocky Mountain LLC's Rule 26(a)(1) Amended Initial Disclosures.
- iii) TEP's Second Supplemental Rule 26(a)(1) Disclosures.
- iv) TEP Rocky Mountain LLC's Amended Rule 26(a)(1) Initial Disclosures for Merits Phase.
- v) TEP's Third Supplemental Rule 26(a)(1) Disclosures for Merits Phase.
- vi) TEP's Fourth Supplemental Rule 26(a)(1) Disclosures for Merits Phase.
- vii) TEP's Objections and Responses to Plaintiff's First Set of Discovery (Requests for Documents, Interrogatories, Requests for Admissions).
- viii) TEP's Objections and Responses to Plaintiff's Second Set of Discovery (Requests for Documents, Interrogatories, Requests for Admissions).
- ix) TEP's Objections and Responses to Plaintiff's Third Set of Discovery (Interrogatories, Requests for Admissions).
- x) TEP's Amended and Supplemental Objections and Responses to Plaintiff's Interrogatories, Requests for Admission, and Requests for Production of Documents Regarding Moratory Interest and Interest as Damages.
- xi) Plaintiff's Answers to TEP Rocky Mountain LLC's First Set of Interrogatories and Requests for Production.
- xii) Plaintiff and the Plaintiff Class Members' Responses to TEP Rocky Mountain LLC's First Set of Written Discovery Requests

Regarding the Merits.

- xiii) Reporter's Transcript, Class Certification Proceedings, Vols I-III, dated January 23-25, 2023.
 - xiv) 30(b)(6) Deposition Transcript of Alan Killion, Vols. I-II, dated November 4, 2024 and November 6, 2024.
 - xv) 30(b)(6) Deposition Transcript of Paul Benacquista, Vols I-II, dated December 9-10, 2020.
 - xvi) 30(b)(6) Deposition Transcript of Elizabeth Edgeller, dated November 4, 2024.
 - xvii) 30(b)(6) Deposition Transcript of Janice Wiseman, dated December 10, 2020.
 - xviii) Deposition Transcript of Michael Rowe, dated November 20, 2024.
 - xix) 30(b)(6) Deposition Transcript of Morris Miller, dated November 5, 2004.
 - xx) Deposition Transcript of Paul Benacquista, dated November 19, 2004.
 - xxi) 30(b)(6) Deposition Transcript of Samuel B. Potter, dated March 24, 2021.
 - xxii) 30(b)(6) Deposition Transcript of Rebecca Paris, dated November 5, 2024.
 - xxiii) 30(b)(6) Deposition Transcript of Tiffany Pollock, dated December 11, 2020.
- e) I reviewed the billing records and cost records from Class Counsel Fleeson Gooing Coulson & Kitch, LLC ("Fleeson"), Dufford Waldeck Milburn & Krohn, LLP ("Dufford"), and George Robert Miller, PC ("Miller") for work by those firms on this litigation and the *Jolley Potter*

Federal Action.

31. Finally, I reviewed the surveys, databases, and legal fee matrices detailed in the following paragraphs. These sources are widely recognized and commonly relied upon by courts and fee experts.

32. I apply a consistent, court-approved methodology in evaluating attorney fee issues. Throughout this declaration, I have cited a range of judicial decisions not to argue legal conclusions—those are reserved for the Court—but to demonstrate that my analysis is grounded in well-established standards that courts have routinely accepted, including in matters where I have testified as an expert.

33. While my opinions are informed by relevant case law and ethical guidance, they are ultimately grounded in practical, real-world experience. Since 2006, I have reviewed and audited tens of thousands of legal invoices across a broad spectrum of practice areas and litigation contexts—including routine matters, complex commercial disputes, and federal class actions like this one.

34. In developing my conclusions, I have also drawn upon recognized secondary sources, including legal treatises, state bar advisories, empirical data on market rates, and professional standards governing law firm billing practices and fee applications. Where I cite legal authorities, it is to provide context and to show that the methodology I follow aligns with prevailing judicial standards.

LODESTAR CROSS-CHECK

35. I have been retained by Class Counsel to conduct a lodestar cross-check for the purposes of their application for an award of attorneys' fees. It is my hope that the Court finds this analysis helpful in evaluating the reasonableness of Class Counsel's requested fee and the methodology used in support of it.

36. Under Colorado law, class counsel who obtain a common fund settlement are entitled to recover reasonable attorneys' fees paid from the fund. *Kuhn v. State*, 924 P.2d 1053, 1060 (Colo. 1996); *Shaw v. Interthinx, Inc.*, No. 13-CV-01229-REB-NYW, 2015 WL 1867861, at *5 (D. Colo. Apr. 22, 2015). Fees are "based on a percentage of the common fund obtained for the benefit of the class," thereby "proportionately spreading payment of attorney fees among the class members." *Lucken Family Ltd. Partnership, LLP v. Ultra Resources, Inc.*, 2010 WL 5387559 at *2–3 (D. Colo. Dec. 22, 2010).

37. The Tenth Circuit also "favors the common fund approach, as opposed to the lodestar method, because a percentage of the common fund is less subjective than the lodestar plus multiplier approach, matches the marketplace most closely, and is the better suited approach when class counsel were retained on a contingent fee basis." *Id.*

38. The customary fee awarded to class counsel in a common fund settlement is "approximately one third of the total economic benefit bestowed on the class." *Shaw v. Interthinx, Inc.*, No. 13-CV-01229-REB-NYW, 2015 WL 1867861, at *6 (D. Colo. Apr. 22, 2015).²

39. Using the "common fund approach", Class Counsel's fee award would be approximately **\$2,044,230.87**, or one-third of the net Settlement Fund (after expenses) plus accrued interest on that one-third while the settlement funds are in interest-bearing escrow account.

² Numerous cases hold that a one-third fee award is customary in class action settlements. *See id.* ("attorneys' fees of 33 1/3% of the common fund created by the efforts of counsel for the Class are in line with comparable other cases, [and]consistent with prevailing case law of this circuit").

40. Courts using the percentage method “will often cross check the requested award with the lodestar amount.” *In re Crocs, Inc. Sec. Litig.*, No. 07-CV-02351-PAB-KLM, 2014 WL 4670886, at *4 (D. Colo. Sept. 18, 2014). This lodestar cross-check is not mandatory but is frequently used by courts applying the percentage-of-the-fund method to determine whether a requested fee award is reasonable. The lodestar cross-check functions as a secondary, confirmatory mechanism to ensure that a percentage-based fee is not excessive in relation to the time expended.

41. To conduct a lodestar cross-check, the first step is to calculate the baseline lodestar by multiplying the number of hours reasonably expended by a reasonable hourly rate for each timekeeper. This figure represents the value of the legal services provided based on standard billing principles and serves as a benchmark for evaluating the reasonableness of the requested fee.

42. Next, the court compares the lodestar to the requested fee—typically calculated as a percentage of the common fund—by dividing the requested amount by the lodestar to determine the implied multiplier. This multiplier reflects how much the requested fee exceeds the lodestar and serves as a proxy for assessing whether the percentage-based fee is excessive.

43. Colorado courts have held that “a multiplier of 2.3 times the lodestar is well within the range of fees customarily awarded in complex litigation.” *Brody v. Hellman*, 167 P.3d 192, 203 (Colo. App. 2007) (referencing multipliers of up to 5.0 and noting that “fee awards in class actions average around one-third of the recovery”).

44. Courts in this District generally consider multipliers in the range of 2.5 to 4.6 to be reasonable, especially in complex, high-risk litigation where contingency representation justifies an enhancement.

ANALYSIS OF LODESTAR HOURS

45. As noted in the May 30, 2025 Settlement Agreement, the settlement in this action—which avoided the cost, time, and uncertainty of continued litigation—would not have been possible without “the Parties’ knowledge and experience from over six years litigating the *Jolley Potter* Federal Action and the *Jolley Potter* 2019 State Action.” [Settlement Agreement, at p. 2].

46. As set forth in more detail in Plaintiff’s motion, this case was a continuation of the *Jolley Potter* Federal Action, but involved a separate, four-year period (January 1, 2021 to December 31, 2024). The evidence, legal research, and expert opinions developed in the Federal Action were directly applicable to this case. The settlement in this case was achieved only a few months after suit was commenced and was resolved on the same terms as those in the Federal Action. This efficient resolution was possible only because of the counsel’s involvement in the *Jolley Potter* Federal Action that provided extensive knowledge through which the facts of the present case could be efficiently marshaled and analyzed.

47. Class Counsel’s involvement in the Federal Action resulted in extensive discovery and rulings on class certification that were able to be used in this case, and the swift resolution brought about by counsel’s experience, efficiency and expertise should be rewarded, not penalized. Indeed, if protracted litigation were a prerequisite for an award of attorney fees, there would be an incentive for delay and inefficiency, rendering early settlements on favorable terms unlikely. Further, this case was resolved on the same terms as those in the *Jolley Potter* Federal Action.

48. Thus, in evaluating Class Counsel’s lodestar hours for purposes of this cross-check, I evaluated counsel’s billing records from both this litigation and the *Jolley Potter* Federal Action to determine whether they comply with best practices for law firm timekeeping and appear to be a reliable record of work performed. Class Counsel recorded 10,553.75 hours in the Federal Action and 145.15 hours in this State Court action.

49. The billing records that were generated by Class Counsel, as described in

Paragraph 30(e), are in a “proper” format and contain the requisite information that I would expect to find in a commercially reasonable legal invoice, presented clearly, cleanly, and concisely in the customary and appropriate manner.

50. For each line-item entry, Class Counsel’s billing records show: (1) the date of the work performed, (2) the identity of the timekeeper performing the work, (3) a description of the work performed, and (4) the number of hours required to perform the enumerated tasks (to the nearest tenth hour). This is precisely the sort of information that I expect to see in commercially reasonable billing records.

51. My review of counsel’s time entries gave no indication that any specific time entries—or, for that matter, the total hours expended on the underlying litigation—are inflated or otherwise unreasonable. Cases hold that typically a court “should defer to the winning lawyer’s professional judgment as to how much time he was required to spend on the case.” *Charlebois v. Angels Baseball LP*, 993 F. Supp. 2d 1109 (C.D. Cal. 2012). “To reduce the number of hours worked, it must appear that the time claimed is obviously and convincingly excessive under the circumstances.” *Id.*, at 1123; *see also Blackwell v. Foley*, 724 F. Supp. 2d 1068, 1081 (N.D. Cal. 2010) (“An attorney’s sworn testimony that, in fact, [he] took the time claimed . . . is evidence of considerable weight on the issue of the time required”).

52. I have compared counsel’s billing records to the Court dockets in this litigation and the Federal Court Action to the voluminous pleadings and case materials referenced hereinabove to satisfy myself that the time and concomitant fees recorded by counsel were reasonable under the circumstances. As a bill reviewer and fee auditor, nothing in counsel’s time records or the corresponding pleadings and materials I reviewed appears to reflect unnecessary work, or an unreasonable amount of time spent on necessary work, much less time entries that are “obviously and convincingly excessive.”

53. There is no indication that Class Counsel was doing unnecessary work on these matters when no billable work was reasonably required. There were months where Class Counsel did little or no work, because the case did not require it. Other months, of course, would

be busy if the case demanded. I always evaluate whether there is any indication of ‘churning the file’ to inflate billable hours, and I see no evidence of that here. (Considering that Class Counsel was always going to seek a percentage of the settlement fund as compensation, there was little incentive for counsel to “churn” the file by engaging in unnecessary work).

54. I also evaluated counsel’s billing entries to determine whether they comport with best practices for law firm billing. One of the most useful and widely referenced authorities on reasonable billing practices is the State Bar of California Committee on Mandatory Fee Arbitration’s advisory on Bill Padding, which was first promulgated in 2003. A true and correct copy of the most recent iteration, Arbitration Advisory 16-02, Analysis of Potential Bill Padding and Other Billing Issues (March 25, 2016) (“Bill Padding Advisory”) is attached as **Exhibit D**. Over the past two decades, the Bill Padding Advisory has been cited favorably by both federal and state courts, including the Colorado Court of Appeals.³ *Payan v. Nash Finch Co.*, Case No. 11CA0570 (Co. App. 2012); *Welch v. Metropolitan Life Ins. Co.* (9th Cir. 2007) 480 F.3d 942, 948; *Darling Int’l, Inc. v. Baywood Partners, Inc.*, 2007 WL 4532233 at * 9 (N.D. Cal. 2007).

55. The Bill Padding Advisory describes numerous indicia of overbilling that “suggest padding” or are signifiers of unreliable, inflated invoices. Although not necessarily an exhaustive list, these are “red flags” that I typically look for, whether I have been hired as a consultant by a consumer of legal services to review outside counsel billings or retained as an expert witness in connection with a fee shifting motion or attorney/client fee dispute. By comparing counsel’s billing records to the Bill Padding Advisory, I conclude that the typical indicia of overbilling are not present in counsel’s billing records. On the contrary, Class Counsel’s billing records comply with best practices for hourly billing and timekeeping and appear to be a reliable record of time worked on this litigation.

56. **Class Counsel’s time entries are highly detailed, and do not suffer from vagueness.** Billing entries must be “specific enough to let the client know what was done”

³ The Bill Padding Advisory was originally promulgated on January 29, 2003, and was superseded and replaced by the current (substantively similar) version in 2016.

(Arbitration Advisory, at p. 10) and failure to provide sufficient detail is often used as a basis for reducing the time requested for a particular task. For instance, “[i]f one sees the exact same phrases used again and again in the bills, it is likely that some routine has set in. This may allow some ‘down time’ to find it[s] way into the bills. An entry such as ‘review documents produced by opposition, 7.5 hours’ is typical.” [*Id.*] Here, the time entries by Class Counsel do not appear to be routine or duplicative, keeping in mind that there are only so many ways to describe similar, routine tasks, and that a single project may legitimately take several days with the same or similar description each day.

57. On the contrary, I note that even the briefest time entries are typically detailed, describing not only the task performed (‘what’) and its purpose (‘why’), but also the participants involved (‘who’), such as in meetings or correspondence; in short, the ‘*what*’ ‘*why*’ and ‘*who*’ that I look for when auditing time entries. (For instance: 3/7/2021 – Nathan A. Keever: *Prepare for and conference call [i.e., the ‘what’] with co-counsel and opposing counsel [the ‘who’] re: Sam Potter’s 30(b)(6) deposition topics [the ‘why’]*). Likewise, entries for research and analysis provide significant detail about the nature and purpose of the billable work being performed. (10/6/2023 – Lyndon W. Vix: *“Legal research re: “death knell” argument in opposition to class certification”*).

58. **Class Counsel has generally recorded time in tenth-hour increments.** The standard minimum is one-tenth of an hour (0.1 hour) or 6 minutes. *See, e.g., Morris v. Saul*, No. CV 18-0164 KBM, 2019 WL 5864732, at *4 (D.N.M. Nov. 8, 2019) (the “acceptable general practice” in the Tenth Circuit is “to accrue expended time in a given controversy in one-tenths of an hour [6 minute] increments”).

59. “If a higher minimum is used, such as .25 or .5, this probably increases the time by 15% to 25%. Some courts have criticized the use of a .25 or 1/4 hour minimum as being too high.” [2003 Arbitration Advisory, at p. 7]. “Courts and fee arbitrators view high incremental charges with suspicion as they may constitute an unreasonable or unconscionable fee, particularly where application of high incremental charges results in overstating the fees owed

by a client.” [Arbitration Advisory, at p. 8]. Here, the Fleeson and Dufford firms have recorded time in tenth hour (i.e., six minute) increments, which is indicia of reasonableness. *See, e.g., In re Tom Carter Enters., Inc.* (C.D. Cal. 1985) 55 B.R. 548, 549 (“honesty and reasonableness” requires attorney to charge clients in “one tenth of an hour” increments).

60. **Class Counsel has not estimated or “rounded up” time.** Class Counsel’s detailed billing entries appear to reflect the actual time spent on each discrete project, as opposed to being rounded-up estimates of time, which are usually a signifier of padded bills: “If the bills show time entries in whole numbers, especially large time entries such as 8.0, 9.0 or 10.0, these are probably estimates rather than actual time spent and should be scrutinized.” [Arbitration Advisory, at 8]. That is manifestly not the case here, as even the most cursory review of the subject invoices reflects very specific and detailed time values for each billing entry, and no suspicious pattern of large, estimated or rounded-up billing entries.⁴

61. **Counsel has not included charges for overhead or administration.** “[O]verhead expenses are a cost of doing business [that] should be reflected in the hourly rates [and] should not be passed on to the client...” [Arbitration Advisory, at p. 11]. Thus, it is “inappropriate to allow a lawyer to also charge a client his/her hourly rate for doing secretarial work.” *Id.* Class Counsel’s billing records do not reflect impermissible charges for office overhead or administrative work.

62. **Class Counsel recorded their time contemporaneously.** One of the reasons that Class Counsel’s time entries are so detailed—and therefore appear to be a credible record of time worked—is that they were recorded contemporaneously: “Was the invoice [or time entry] prepared at or near the time when the services were provided? [I]f too much time has elapsed between the event and generating the invoice, the times shown might be estimates or best

⁴ There are a handful of entries from the Miller firm in the *Jolley Potter* Federal Action where a single, multi-day project was combined into a single billing entry that shows the total time attributed to the work described, which should not impair the Court’s ability to evaluate the reasonableness of the work performed.

guesses of the time involved.” [Arbitration Advisory, at 8]. I am informed by Class Counsel that it is the policy of each of the firms that worked on this matter that billing entries must be recorded daily, and that this daily timekeeping policy was consistently followed during the litigation.

ANALYSIS OF LODESTAR RATES

63. The next step in the lodestar cross-check was to determine reasonable hourly rates for Class Counsel’s work on this litigation. Based on my analysis of market rates⁵ and the qualifications of the professionals involved, I used the following rates for this lodestar calculation:

- (a) **\$750 per hour** for partners with 40+ years’ experience (G.R. “Bob” Miller, Lyndon Vix, David Seeley, Gregory Stucky, and Thomas Kitch).
- (b) **\$650 per hour** for a partner with thirty to forty years’ experience (Nathan Keever).
- (c) **\$550 per hour** for partners with ten to thirty years’ experience (Daniel Lawrence and Ryan Meyer).
- (d) **\$350 per hour** for associates Emily Arida, Audrey Koehler, and John Ralston.
- (e) **\$250 per hour** for paralegals.
- (f) **\$175 per hour** for law clerks.

⁵ I understand that this case is venued in Garfield County and that market rates here are generally lower than for other markets like Denver. However, I believe that out-of-market rates are warranted considering the complexity of this matter and counsel’s expertise in this field, so I have used Denver rate data for this analysis. Colorado courts recognize that out-of-town rates are permissible when competent local counsel with the requisite expertise is unavailable or unwilling to take the case, and the Tenth Circuit has expressly approved use of non-local rates where “the subject matter of the litigation is so unusual or requires such special skills that only an out-of-town attorney possesses,” *Ramos v. Lamm*, 713 F.2d 546, 555 (10th Cir. 1983); see also *Jane L. v. Bangerter*, 61 F.3d 1505, 1510 (10th Cir. 1995) (approving out-of-district rates where the relevant expertise was unavailable locally).

64. Class Counsel’s qualifications and experience are described in detail in the concurrently filed declarations of counsel, but there is no question that these were the right lawyers for the job.

65. The result obtained on behalf of the class against formidable defense lawyers speaks for itself, but these are specialists who collectively have 286 years of experience. Some of these lawyers have practiced for more than forty years. Mr. Miller has ***forty-eight years*** of experience. This depth of knowledge and track record of success is uncommon even among firms regularly involved in class action work.

66. Given the experience of Class Counsel, the complexity and duration of the case, and the quality of the result obtained, the hourly rates I applied are—if anything—conservative. They fall well below prevailing market rates for similarly experienced counsel litigating comparable matters in courts across the country.

67. According to recent orders from the District of Colorado, rates for experienced class counsel in comparable litigation can exceed ***\$1,000 per hour***. See, e.g., *Peace Officers’ Annuity & Benefit Fund of Georgia v. DaVita Inc.*, Case No. 17-CV-0304-WJM-NRN, 2021 WL 2981970, at *3 (D. Colo. July 15, 2021); *Ramos v. Banner Health*, Case No. 15-cv-2556-WJM-NRN, 2020 WL 6585849 (D. Colo. Nov. 10, 2020) and ECF No. 504 (approving rates ranging from ***\$490 to \$1,060 per hour***); *In re Molycorp Inc. Sec. Litig.*, Case No. 1:12-cv-00292-RM-KMT, 2017 WL 11598681, at *1–2 (D. Colo. June 16, 2017) (approving 30% fee request in securities class action where attorney hourly rates ranged from ***\$435 to \$955 per hour***).

68. Recently, Judge Martinez approved a 30 percent settlement where the lodestar cross-check was premised on hourly rates “***ranging from \$450 to \$1,250 for attorneys, \$150 to \$625 for support staff, and \$75–175 for interns***” in the District of Colorado. *Oregon Laborers Emps. Pension Tr. Fund v. Maxar Techs. Inc.*, No. 19-CV-0124-WJM-SKC, 2024 WL 98387, at *7 (D. Colo. 2024).

69. Perhaps most importantly, the rates I have used here are the same rates that I used—and that were approved by the District Court—in connection with Class Counsel’s lodestar cross-check in the *Jolley Potter* Federal Action.

70. I have also referred to the 2024 Real Rate Report by CEB/Gartner and Wolters Kluwer in determining reasonable hourly rates for Class Counsel. The Real Rate Report, which is published annually, provides objective hourly rate data for legal markets and practice areas, and reflects rates actually paid by clients, as opposed to the often-aspirational “rack rates” cited in fee applications or self-reported in surveys, which may not reflect actual market behavior. *See, e.g., Hicks v. Toys ‘R’ Us-Delaware, Inc.*, No. CV13-1302-DSF JCGX, 2014 WL 4670896, at *1 (C.D. Cal. Sept. 2, 2014) (Real Rate Report is “a much better reflection of true market rates than self-reported rates in all practice areas”).

71. The data used in the Real Rate Report includes more than \$155 billion in fees billed for legal services in the United States through June 2024 from the world’s largest permission-based contributory data warehouse of highly detailed, anonymized invoice data showing the actual hours and fees law firm personnel billed, and was not based on surveys, sampling, or reviews of other published surveys. The relevant portions of the 2024 Real Rate Report are attached as **Exhibit E**.

72. I believe that the Real Rate Report hourly rate data which I have used in my analysis here is objective, credible, and reliable. *See Sabinsa Corp. v. HerbaKraft, Inc.*, Civil Action 14-cv-04738 RBK-SAK, at *6 n.3 (D.N.J. Dec. 5, 2022) (“The Real Rate Report is generally regarded as the legal industry’s leading benchmark for law firm rates and staffing trends based on actual invoice data”). For more than a decade, this data has been used by top firms and experts in the field and the Real Rate Report has been repeatedly cited by both state and federal courts to support the reasonableness of hourly rates. I use and rely upon the Real Rate Report in working with my consulting and expert witness clients and have found it to be a reliable indicator of real-world billing rates.

73. The Real Rate Report has been cited and relied upon by trial courts as “indicia of a reasonable market rate” for work within the District of Colorado. *Pro Polish, LLC v. Abkarian*, No. 23-CV-02470-NYW-SBP, 2024 WL 4661385, at *7 (D. Colo. Oct. 16, 2024) (citing Real Rate Report for evidence of market rates charged in District of Colorado); *Interstate Restoration, LLC v. Marriott Int'l, Inc.*, No. 21-CV-01380-NYW-JPO, 2024 WL 4661345, at *7 (D. Colo. Oct. 31, 2024), *appeal dismissed*, No. 24-1127, 2025 WL 1727520 (10th Cir. June 20, 2025) (also relying upon Real Rate Report for evidence of Colorado rates).

74. My recommended lodestar rates are substantially lower than third quartile Real Rate Report rates for the Denver, Colorado legal market, which is further indication that my analysis is conservative and reasonable. In my experience, which is supported by reference to numerous court opinions, successful counsel in complex cases like this are typically awarded the equivalent of third quartile Real Rate Report rates, or higher. *See, e.g., Sabinsa Corp. v. HerbaKraft, Inc.*, No. 14-CV-04738 RBK-SAK, 2022 WL 17446485, at *6 (D.N.J. Dec. 6, 2022) (third quartile Real Rate Report fees are justified in cases with a “complex procedural background”); *see also United States v. J-M Mfg. Co., Inc.*, No. EDCV 06-55-GW-PJWX, 2025 WL 1148344, at *11 (C.D. Cal. Mar. 13, 2025) (approving Real Rate Report rates between the median and third quartile); *Kries v. City of San Diego*, No. 17-CV-1464-GPC-BGS, 2021 WL 120830, at *8 (S.D. Cal. Jan. 13, 2021) (“rates above the third quartile [in the Real Rate Report] are reasonable”).

75. According to the Real Rate Report, the expected third quartile rate for a partner-level attorney with more than two decades of experience in the Denver, Colorado legal market is **\$792/hour**. [Real Rate Report, at *56]. My recommended lodestar rates for Class Counsel’s senior partners (\$750/hour and \$650/hour) are therefore well **below** the third quartile Real Rate Report rates for this market.

76. The same is true with respect to my recommended rate for junior partners which, at \$550/hour, is below the third quartile Denver rate for partner-level attorneys with less than twenty years’ experience, per the Real Rate Report (**\$594/hour**). *See id.*

77. My recommended lodestar rate for the associates on this matter (\$350/hour) is also below both the third quartile (**\$439/hour**) and the median (**\$400/hour**) rates for Denver, Colorado associates, per the Real Rate Report. [Real Rate Report, at *14]. Finally, my suggested lodestar rate for paralegals (**\$250/hour**) is dramatically lower than the third quartile Real Rate Report rate of \$340/hour. [Real Rate Report, at *9].

78. No matter how the rate data is sliced, my recommended lodestar rates are at the lower end of the market for class action attorneys, and particularly for lawyers of this quality.

CLASS COUNSEL’S REQUESTED MULTIPLIER IS REASONABLE

79. My lodestar cross-check confirms that Class Counsel’s requested fee award is reasonable.

80. The lodestar is calculated based upon “the total number of hours reasonably expended multiplied by a reasonable hourly rate—and then adjust[ing] the lodestar upward or downward to account for the particularities of the suit and its outcome.” *Zinna v. Congrove*, 680 F.3d 1236, 1239, 1242 (10th Cir. 2012) (quotation marks omitted).

81. Accordingly, I multiplied the hours reasonably worked by each timekeeper by a reasonable hourly rate for that timekeeper, as described in the foregoing sections of this affidavit.⁶ This resulted in a base lodestar of **\$7,358,773**.

82. I then calculated an implied multiplier of **2.14** by dividing the requested fee (\$15,810,230.87, exclusive of interest⁷) by the base lodestar of \$7,358,773.

83. This multiplier is lower than the range typically approved in Colorado for class action and other contingent-fee litigation. *See Mishkin v. Zynex, Inc.*, No. 09-CV-00780-REB-KLM, 2012 WL 4069295, at *1 (D. Colo. Sept. 14, 2012). In *Mishkin*, the court noted that

⁶ Attached as **Exhibit F** is a report that shows each timekeeper’s total billable hours from the *Jolley Ranches* Federal and 2025 State Court Actions multiplied by a reasonable market rate.

⁷ The requested fee for the *Jolley Ranches* Federal Action was \$13,766,000 and the requested fee for this State Court Action is \$2,044,230.87, so the total claimed lodestar for both actions is \$15,810,230.87.

multipliers in collective actions in this District typically range from 2.5 to 4.6:

- *In re Petro–Lewis Sec. Litig.*, No. 84–326, slip op. (D. Colo. Jan. 23, 1985) (a 2.5 multiplier in a settlement reached within four months).
- *In re Oppenheimer Champion Income Fund Sec. Fraud Class Action*, No. 09–cv–386–JLK–KMT, slip op. (D. Colo. Sept. 30, 2011) (*Appendix* [# 102], Ex. 6) (4.6 multiplier).
- *In re Core Bond Fund*, No. 09–cv–1186–JLK–KMT, slip op. (D. Colo. Sept. 30, 2011) (*Appendix* [# 102], Ex. 7) (4.2 multiplier).

84. Other decisions from this District similarly hold that “a multiplier of 3 [...] is in line with the multipliers awarded in similar cases.” *In re Davita Healthcare Partners, Inc.*, No. 12-CV-2074-WJM-CBS, 2015 WL 3582265, at *5 (D. Colo. June 5, 2015). Even “a multiplier of 2.75 [...] is at the low end of the typical range of multipliers routinely approved by courts in this District and the Tenth Circuit.” *Peace Officers’ Annuity & Benefit Fund of Georgia v. DaVita Inc.*, No. 17-CV-0304-WJM-NRN, 2021 WL 2981970, at *3 (D. Colo. July 15, 2021).

85. The fact that the proposed multiplier falls below this customary range is a strong indicator that Class Counsel’s requested fee is fair, reasonable, and fully supported by the time and effort expended on behalf of the class.

86. In my opinion, the requested fee of approximately \$2,044,230.87 is fair and reasonable under the common fund method. The requested fee is also fair and reasonable under the lodestar method as well.

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct. Executed on November 13, 2025, at Santa Monica, California.



Grant D. Stiefel, Declarant

GRANT STIEFEL, ESQ.

ATTORNEY FEE CONSULTANT

424.223.8252



grant@litigationlimited.com



grantstiefel.com



Los Angeles CA | Denver CO



EDUCATION

UNIVERSITY OF
SOUTHERN CALIFORNIA
SCHOOL OF LAW

J.D. 2000

Highest Honors: Law, Language &
Ethics; Copyright Law; Constitutional
Law II

Honors: Constitutional Law,
Professional Responsibility, Real
Estate Transactions, Business
Organizations, Criminal Law, Pre-Trial
Advocacy; Taxation; Corporate Crime
Seminar; Directed Research;
Dissertation

Honors Journal: Staff Editor, *Southern
California Interdisciplinary Law Journal*

Elected by Student Body: Vice-
President, Student Bar Association
(1998-2000), Class Representative
(1997-98)

UNIVERSITY OF
SOUTHERN CALIFORNIAPsychology & Linguistics
B.A. 1994

Honors: Presidential Scholar (1990-94),
National Merit Scholar (1990-94),
Dean's List (1990-1994)

PROFESSIONAL EXPERIENCE

LITIGATION LIMITED

Denver, Colorado and Los Angeles, California
(2012-Present)

Grant Stiefel, Esq. is an attorney fee consultant, testifying expert, and the principal of Litigation Limited, a boutique legal auditing firm. Mr. Stiefel has assisted clients and courts nationwide by providing expert trial testimony on fee issues, including the reasonableness of attorneys' fees:

- Mr. Stiefel has qualified and testified as a legal fee expert in **over 160 lawsuits**, including federal and state courts, private arbitrations, State Bar courts, and attorney-client fee arbitrations
- His methodology for reviewing, auditing, and evaluating legal invoices has been **cited, approved and adopted by state and federal courts**
- Mr. Stiefel is a member of the California State Bar and is unique among fee experts in that he was a trial attorney for more than a decade at two of the world's largest law firms
- Because he uses **consistent, court-approved methodologies**, Mr. Stiefel can effectively testify on behalf of fee-seeking or fee-opposing parties

As an independent fee auditor and consultant, Grant Stiefel also assists corporate clients with the review and management of law firms and fees:

- Mr. Stiefel advises clients on the selection and management of counsel for complex, multi-jurisdictional litigation and has audited hundreds of millions of dollars in legal fees
- He helps clients develop and implement outside counsel guidelines and internal auditing procedures
- Mr. Stiefel is a California State Bar-approved continuing legal education instructor on attorneys' fees issues who has trained hundreds of executives and in-house lawyers on legal fee issues

GRANT STIEFEL, ESQ.

ATTORNEY FEE CONSULTANT

BAR ADMISSIONS

State of California (*inactive*)
Ninth Circuit Court of Appeals
Northern District of California
Southern District of California
Eastern District of California
Central District of California

PROFESSIONAL AFFILIATIONS & CERTIFICATIONS

National Association of
Legal Fee Analysts

Claims and Litigation
Management Alliance

Professional Liability Committee
Audit Committee

California State Bar
Attorney-Client Fee Arbitrator

Los Angeles County Bar Assn.
San Fernando Valley Bar Assn.

A.M. Best Certified Attorney
Fee Practice Group

California State Bar Certified
CLE Provider
Provider No. 16342

PROFESSIONAL EXPERIENCE [CONTINUED]

K&L GATES LLP

Los Angeles, California
(2004-2012)

Head of Southern California Toxic Tort Defense Practice

Senior Associate / Associate

- Headed the Southern California toxic tort defense practice for the world's fifth-largest law firm
- Counsel of record and lead trial counsel on hundreds of eight-figure personal injury and wrongful death claims
- Supervised and managed a multi-jurisdictional litigation portfolio with an aggregate settlement value of over \$3 billion
- Obtained favorable jury verdicts and dismissals as first and second chair trial counsel
- Supervised teams of lawyers and law firms across the nation as coordinating counsel for multi-jurisdictional litigation
- Reviewed millions of dollars in fees and costs monthly from dozens of law firms and offices
- Trained lawyers, paralegals and staff in ethical billing practices
- Developed custom case management, billing and calendaring systems for Fortune 500 clients
- Successfully argued dozens of motions to dismiss and motions for summary judgment in high-value cases
- Defended multi-state Attorneys General investigation
- Litigated motions for attorneys' fees
- Representative clients (as lead trial counsel/attorney of record) included Schneider Electric, Crane Co., World Wrestling Entertainment, Macquarie Bank, Samsung Electronics America, Calgon Carbon Corporation, Black Entertainment Television and TransUnion

GRANT STIEFEL, ESQ.

ATTORNEY FEE CONSULTANT

REPRESENTATIVE LAW FIRM CLIENTS

O'Melveny & Myers
Latham & Watkins
Reed Smith
McDermott Will and Emery
Jones Day
Sidley Austin
Dykema Gossett
Orrick Herrington & Sutcliffe
Littler Mendelson
O'Melveny & Myers
Morrison & Foerster
Buchalter
Stroock Stroock & Lavan
Vedder Price
Duane Morris
Loeb & Loeb

REPRESENTATIVE CLIENTS

Apple
Citibank
Toyota
United States Department of Justice
Superior Courts of California
AstraZeneca Pharmaceuticals
Verizon Wireless
American Airlines
Wells Fargo
County of Los Angeles
University of Southern California
Los Angeles Unified School District
FitBit
Sinclair Broadcasting
University of California
Kaiser Health
Beats by Dre
Los Angeles Times

PROFESSIONAL EXPERIENCE [CONTINUED]

AKIN GUMP STRAUSS HAUER & FELD, LLP

Los Angeles, California, 1999-2004

Associate Attorney

- Defended consumer class actions, unfair competition and antitrust claims, including California's *In re Structured Settlement Litigation*
- Drafted and argued numerous successful summary judgment motions, motions for attorneys' fees, anti-SLAPP motions, discovery motions and motions to dismiss
- Representative clients included Kia Motors, Samsung Telecommunications America, Thane International, Univar USA and Ready Pac Produce

PUBLICATIONS AND PRESENTATIONS

- "Recent Developments in Block Billing"
J.D. Supra (article)
- "Ten Things You Need to Know About Law Firm Billing"
(article, live seminars and online presentations)
- "The Client's Guide to Law Firm Billing"
HG Experts (article)
- California State Bar MCLE Presentations on Law Firm Billing
(live seminars and online presentations)
- "Analysis: John Doe No. 1 v. Patrick Cahill and Julia Cahill"
e-Commerce Law Reports, Volume 5, Issue 6
(article)

PERSONAL

Grant Stiefel lives in Colorado with his wife. Before law school, in the days of analog, he was a professional songwriter, producer and musician.

LIST OF PRIOR TESTIMONY

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>United National Insurance Company v. Bass Underwriters</i>	State of Pennsylvania Common Law Arbitration	Expert testimony on behalf of fee-opposing party
<i>Chang & Cote v. WHPM Inc.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Nouveau v. Disguise</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>American Express Bank v. Sobelsohn</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Wong v. HRJ Capital BD</i>	Superior Court of the State of California for the County of Santa Clara	Expert testimony on behalf of fee-opposing party
<i>SK Law Group v. PMBS</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Tallman v. CPS</i>	United States District Court for the District of Nevada	Expert testimony on behalf of fee-opposing party
<i>Kwang Kang v. Ha-Yeong Kim</i>	Honorable Seoul Central District Court (Korea)	Expert testimony regarding California law (in Korean dispute applying CA law)
<i>Garnet Analytics v. Diversified Solutions</i>	United States District Court for the District of Connecticut	Expert testimony on behalf of fee-opposing party
<i>Rodriguez v. Arter</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Sheikh v. East West Bank</i>	United States District Court for the District of Central District of California	Expert testimony on behalf of fee-opposing party
<i>Hunter v. Fisher</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Urban Pacific Construction v. Samax Development</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Kern Water Bank Authority v. Grayson Service</i>	Superior Court of the State of California for the County of Kern	Expert testimony on behalf of fee-opposing party
<i>Kirk v. First American Title Company</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Cuevas v. Mortgage Capital Partners</i>	ADR Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party
<i>F&F LLC v. East West Bank</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Chavarra v Benihana National Corp.</i>	United States District Court for the District of California	Expert testimony on behalf of fee-seeking party
<i>Kuba v. Fairclough</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Oliver v. Astrazenca Pharmaceuticals</i>	United States Court of Appeals for the Ninth Circuit	Expert affidavit on behalf of fee-seeking party
<i>Schweitzer v. Post Advisory Group</i>	AAA Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Kwang Kang v. Sunsa Kim</i>	Seoul Central District Court (Korea)	Expert testimony regarding California law (in Korean dispute applying CA state law)
<i>Hehir v. Kim</i>	Superior Court of the State of California for the County of Los Angeles	Expert trial testimony on behalf of fee-opposing party
<i>Balle v. Ross</i>	State Bar of Nevada Attorney-Client Fee Arbitration	Expert testimony on behalf of fee-opposing party
<i>Gallimore v. Kaiser Foundation Health Plan</i>	Superior Court of the State of California for the County of Alameda	Expert testimony on behalf of fee-opposing party
<i>Ancheta v. Verizon Wireless</i>	JAMS Arbitration (San Jose)	Expert testimony on behalf of fee-opposing party
<i>Anhing v. Thuang Phong Company</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-seeking party
<i>Jones v. Wells Fargo</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-seeking party
<i>Vides v. ABM Janitorial Services</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Flores v. AHMC Monterey Park Hospital</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Investors Warranty of America v. Chicago Title Insurance Company</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-seeking party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Gateway Bank v. Metaxas</i>	Superior Court of the State of California for the County of San Mateo	Expert testimony on behalf of fee-seeking party
<i>Paskenta Band of Nomlaki Indians v. Crosby</i>	United States District Court for the Eastern District of California	Expert testimony on behalf of fee-seeking party
<i>McLaughlin v. Wells Fargo Bank</i>	United States District Court for the Northern District of California	Expert testimony on behalf of fee-opposing party
<i>John Russo Industrial Sheetmetal Inc. v. City of Los Angeles Department of Airports et al.</i>	Superior Court of the State of California for the County of San Mateo	Expert testimony on behalf of fee-opposing and fee-seeking party
<i>Flores v. Brown</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-seeking party
<i>Blanda v. Martin & Seibert</i>	United States District Court for the Southern District of West Virginia	Expert testimony on behalf of law firm in whistleblower suit/federal investigation
<i>Natural-Immunogenics v Newport Trial Group</i>	United States District Court for the Southern District of California	Expert testimony on behalf of fee-opposing party
<i>Buckley v. Penny Mac</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Morton v. First American Title Insurance Company</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Maus v. Tamraz</i>	Los Angeles County Bar Association Attorney-Client Fee Arbitration	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Dignity Health v. LA Care Health Plan</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Civic Financial Services v. Torres</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-opposing party
<i>Precision Industrial v. New Hampshire Insurance Company</i>	United States District Court for the Western District of Washington	Expert testimony on behalf of fee-opposing party
<i>Jibe Audio v. Iovine</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Brown v. Gilles</i>	ADR Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party
<i>JFK Memorial Hospital v. Access Nurses</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-seeking party
<i>MMM Holdings v. Reich</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-opposing party
<i>Carone v. Wooley</i>	Santa Barbara County Bar Association Mandatory Fee Arbitration	Expert testimony on behalf of fee-opposing party
<i>Morales v. Bridgestone</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-opposing party
<i>Brickman v. FitBit</i>	United States District Court for the Northern District of California	Expert testimony on behalf of fee-opposing party
<i>LegalForce v. Papiz</i>	JAMS Arbitration (Los Angeles)	Expert trial testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Lombardi v. Lombardi</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Navarro v. Hudson</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-opposing party
<i>Melendez v. Los Angeles Unified School District</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Department of Fair Employment & Housing v. M&N Financing Corp.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Mills v. Melone</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>In re Estate of Thomas</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-opposing party
<i>LegalForce v. LegalZoom</i>	AAA Arbitration (San Francisco)	Expert testimony on behalf of fee-opposing party
<i>Riskin v. Larchmont Property Association</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Correia v. Peak Campus California</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Pintsopoulos vs. WestPark Capital Inc.</i>	FINRA Arbitration (Florida)	Expert trial testimony on behalf of fee-opposing party
<i>Coffee+Food LLC v. Leonian</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Aetna v. KCC Class Action Services</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Canizales v. The Pep Boys - Manny Moe & Jack of California</i>	AAA Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Casillas v. Workforce Solutions</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Association of Independent Judicial Interpreters of California v. Superior Court of California for Orange County</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Chavez v. Lifetech Resources</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Skylight Advisors v. Zephyr Investment</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Woodall v. Woodall</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-opposing party
<i>Taggares v. Burrows</i>	JAMS Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party
<i>Joseph Aleem & Slovak v. Zaffuto</i>	Los Angeles County Bar Association Mandatory Fee Arbitration	Expert trial testimony on behalf of fee-seeking party
<i>Blum Collins v. Sasson</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Edwards v. RMO</i>	Los Angeles County Bar Association Mandatory Fee Arbitration	Expert testimony on behalf of fee-seeking party
<i>In re Williams Family Trust</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-seeking party
<i>Air Combat USA v. O'Reilly</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-seeking party
<i>North American Title Insurance Company v. Napean Capital Group</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Fernandez v. Arm & J</i>	ADR Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>In re Allyne L. Urick Trust</i>	Superior Court of the State of California for the County of Orange	Expert trial testimony on behalf of fee-seeking party
<i>Kithas v. Dworken & Bernstein</i>	AAA Arbitration (Ohio)	Expert trial testimony on behalf of fee-seeking party
<i>Lieberg v. Kanter</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-seeking party
<i>Rueda v. Pacquiao</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Colliers v. Mattress Firm</i>	United States District Court for the Northern District of Georgia	Expert testimony on behalf of fee-opposing party
<i>Simerly v. Children's Hospital of Los Angeles</i>	Signature Resolution Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>In re Mark Hughes Family Trust</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Anabi Oil Corp. v. IFuel</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Gerardi v. Redlands Ford</i>	AAA Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party
<i>HK v. United Teachers Los Angeles</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Formosa v. King's Seafood</i>	AAA Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party
<i>In re Cahill</i>	Texas District Court 451st Judicial District (Kendall County, Texas)	Expert testimony on behalf of fee-opposing party
<i>Lloyds Underwriters v. Zillow</i>	Superior Court of the State of California for the County of San Francisco	Expert testimony on behalf of fee-seeking party
<i>Scofield v. Superior Court of California for the County of Santa Clara</i>	Superior Court of the State of California for the County of Santa Clara	Expert testimony on behalf of fee-opposing party
<i>Winter v. El Camino Community College</i>	State of California Public Employment Relations Board	Expert testimony on behalf of fee-opposing party
<i>Bond v. QVC</i>	Signature Resolution Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Elmy v. Related Management</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Griffith v. Related Management</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Mendes v. Stonermor</i>	JAMS Arbitration (San Francisco)	Expert testimony on behalf of fee-opposing party
<i>Nava v. Related Management</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Simers v. Los Angeles Times</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Gardner v Abode Communities</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Carter v Abode Communities</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Government Accountability & Oversight v Regents of the University of California</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Drakeford v. Capital Benefit</i>	United States District Court for the Northern District of California	Expert testimony on behalf of fee-opposing party
<i>Glaser Weil v. Bulochnikov</i>	JAMS Arbitration (Los Angeles)	Expert deposition testimony on behalf of fee-opposing party
<i>Sammis v. Bridgestone</i>	AAA Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Cappello & Noel v. Rubin</i>	JAMS Arbitration (Los Angeles)	Expert deposition testimony on behalf of fee-seeking party
<i>Martin v. Toyota Motor Credit Corp.</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Smith v. Abode</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Reyes v. Dunbar Armored</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Save Mount Diablo v. City of Pittsburg</i>	Superior Court of the State of California for the County of Contra Costa	Expert testimony on behalf of fee-opposing party
<i>Doe v. Commission on Professional Competence</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Woods v. Related Management Company</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Pappas v. State Coastal Conservatory</i>	Superior Court of the State of California for the County of Santa Barbara	Expert testimony on behalf of fee-opposing party
<i>Doe v. Torrance Unified School District</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Nevis Two LLC v. Farmers Insurance</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-seeking party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Menlo v. Big Lots Stores, et. al.</i>	Superior Court of the State of California for the County of San Diego	Expert testimony on behalf of fee-opposing party
<i>Hoang v. Hoang</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-seeking party
<i>Aerotek Affiliated Services, Inc. v. Mettler-Toledo Rainin LLC</i>	American Arbitration Association (Maryland)	Expert testimony on behalf of fee-seeking party
<i>Martin v. Inland Urology Medical Group</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>In re Kanter</i>	United States Bankruptcy Court for the Central District of California	Expert testimony on behalf of fee-seeking party
<i>Shahbazian v. CVS RX Services</i>	American Arbitration Association (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Cruz v. Orange County Sanitation District</i>	Superior Court of the State of California for the County of Orange	Expert testimony on behalf of fee-seeking party
<i>Thomas v. Security Industry Specialists, Inc.</i>	American Arbitration Association (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Newborn v. City of Santa Clarita</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Nayback v. FM Restaurants HQ, et. al.</i>	JAMS Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Wilson Elser v. SRCC Associates LLC, et. al.</i>	AAA Arbitration (San Francisco)	Expert testimony on behalf of fee-seeking party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>United States of America (Thrower) v. Academy Mortgage Corp.</i>	United States District Court for the Northern District of California	Expert testimony on behalf of fee-opposing party
<i>Fowler v. Jensen Meat Co.</i>	Superior Court of the State of California for the County of San Diego	Expert testimony on behalf of fee-seeking party
<i>Heidari v. Sweeney, et. al.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>ViacomCBS v. Great Divide Insurance Co.</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Barragan v. Ace Industrial Supply, Inc.</i>	Judicate West Arbitration Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Thekke v. Bird Marella</i>	Los Angeles County Bar Association Mandatory Fee Arbitration	Expert testimony on behalf of fee-seeking party
<i>Enenstein v. Hankey</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Bertoia v. Payton</i>	Denver District Court for the State of Colorado	Expert testimony on behalf of fee-opposing party
<i>Seneman LLC, et. al. v. Corona Industrial JV, et. al.</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-opposing party
<i>HSS Inc. v. Evolution Consulting LLC</i>	United States District Court for the District of Colorado	Expert testimony on behalf of fee-seeking party
<i>Pierce v. County of Los Angeles</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Rueda v. Pacquiao II</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Salstrom v. Solnsoft</i>	JAMS Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>In re: Fifth Third Early Access Cash Advance Litigation</i>	United States District Court for the Southern District of Ohio	Expert testimony on behalf of fee-opposing party
<i>Timmins v. Henderson</i>	United States District Court for the District of Colorado	Expert testimony on behalf of fee-opposing party
<i>WheelImage Corp. v. Axial Manufacturing</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-seeking party
<i>Beltran v. Hard Rock Hotel Licensing</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-opposing party
<i>Devine v. Morgan Stanley & Co.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Slauson v. Broadway National Bank</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Passport 420 v. Starr Indemnity & Liability Co.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>L.A. International Corp. v. Prestige Brands Holdings</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Davis v. Redlands Unified School District</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>American Honda Finance Corp. v. R&H Automotive Group, Inc.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Gomez v. Food 4 Less of California, Inc.</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>US Airways v. Sabre Holdings Corp.</i>	United States District Court for the Southern District of New York	Expert testimony on behalf of fee-seeking party
<i>Perrigo v. Nat'l Fire & Marine Ins. Co.</i>	JAMS Arbitration (San Francisco)	Expert testimony on behalf of fee-seeking party
<i>Samperio v. Transcontinental Ontario, Inc.</i>	Superior Court of the State of California for the County of San Bernardino	Expert testimony on behalf of fee-opposing party
<i>Jang v. County of Los Angeles</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Pinter-Brown v The Regents of the University of California</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Drazen v. GoDaddy</i>	United States District Court for the Southern District of Alabama	Expert testimony on behalf of fee-opposing party
<i>O'Garro v City of Jersey City</i>	United States District Court for the District of New Jersey	Expert testimony on behalf of fee-seeking party
<i>Armstrong v. Life Care Centers of America, Inc.</i>	Superior Court of the State of California for the County of Riverside	Expert testimony on behalf of fee-opposing party
<i>Raju v. County of Los Angeles</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>C.B. v. Moreno Valley Unified School Dist.</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Parrish v. Frank</i>	JAMS Arbitration (San Francisco)	Expert testimony on behalf of fee-seeking party
<i>Engineer.ai v. Talkdesk</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Lucas R. v. Kennedy</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Reif Law Group v. Clippinger</i>	AAA Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Lawson v. PPG Architectural Finishes, Inc.</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-seeking party
<i>Lucas R v. US Dep't of Health and Human Services</i>	United States District Court for the Central District of California	Expert testimony on behalf of fee-opposing party
<i>Jolley Potter Ranches Energy Co. v. TEP Rocky Mountain LLC</i>	United States District Court for the District of Colorado	Expert testimony on behalf of fee-seeking party
<i>Kaufman v. Dorfman</i>	ADR Arbitration (Los Angeles)	Expert testimony on behalf of fee-seeking party
<i>Cummins v. City of National City</i>	Superior Court of the State of California for the County of San Diego	Expert testimony on behalf of fee-opposing party
<i>United Farm Workers of America v. Foster Poultry Farms</i>	Superior Court for the State of California for the County of Merced	Expert testimony on behalf of fee-opposing party

CASE NAME	COURT/PANEL	NATURE OF TESTIMONY
<i>Intelligent SCM v. Roten</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Breliant v. Arent Fox LLP</i>	American Arbitration Association (Los Angeles)	Expert testimony on behalf of fee-opposing party
<i>Adamian v. Kaiser</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-opposing party
<i>Xie v. Faraday</i>	Superior Court of the State of California for the County of Los Angeles	Expert testimony on behalf of fee-seeking party
<i>Carroll v. O'Hara</i>	JAMS Arbitration (Orange County)	Expert testimony on behalf of fee-opposing party
<i>Gharraee v. Trader Joe's Co.</i>	Superior Court of the State of California for the County of Stanislaus	Expert testimony on behalf of fee-seeking party
<i>Tillamook Country Smoker v. Beyond Meat</i>	JAMS Arbitration (Los Angeles)	Expert testimony on behalf of fee-opposing party



LITIGATION LIMITED

NOTABLE CORPORATE & INSTITUTIONAL CLIENTS

American Airlines

Anthem Blue Cross

Apple

AstraZenca Pharmaceuticals

Beats by Dre

Bridgestone

Citibank

City of National City

County of Los Angeles

Dignity Health

FitBit

Hard Rock Hotels

JFK Memorial Hospital

Kaiser Health

Los Angeles Times

Los Angeles Unified School District



LITIGATION LIMITED

NOTABLE CORPORATE & INSTITUTIONAL CLIENTS (continued)

Los Angeles World Airports

Maxum Indemnity Company

Medicaid Defense Fund

Moreno Valley School District

Superior Court of California for Orange County

Superior Court of California for Santa Clara County

Superior Court of California for Ventura County

Torrance Unified School District

Toyota

University of California Los Angeles

University of Southern California

United States Department of Justice

Verizon

Wells Fargo



LITIGATION LIMITED

NOTABLE LAW FIRM CLIENTS

Buchalter Nemer

Cappello & Noël

Duane Morris

Dykema Gossett

Fisher Phillips

Gibson Dunn

Gordon Rees

Holland & Knight

Jones Day

Latham & Watkins

Littler Mendelson

Loeb & Loeb

McDermott Will & Emery



LITIGATION LIMITED

NOTABLE LAW FIRM CLIENTS (continued)

Morrison & Foerster

O'Melveny & Myers

Orrick Herrington & Sutcliffe

Perkins Coie

Quinn Emmanuel

Reed Smith

Sheppard Mullin

Snell & Wilmer

Steptoe & Johnson

Stroock Stroock & Lavan

Vedder Price

Wilson Elser

ARBITRATION ADVISORY

2016-02

ANALYSIS OF POTENTIAL BILL PADDING AND OTHER BILLING ISSUES

Replaces and Supersedes Arbitration Advisory 2003-01

March 25, 2016

Points of view or opinions expressed in this document are those of the Committee on Mandatory Fee Arbitration. They have not been adopted or endorsed by the State Bar's Board of Trustees and do not constitute the official position or policy of the State Bar of California.

QUESTION PRESENTED

When a lawyer's fee bill overstates the amount of time spent for work performed, it is called "bill padding." If a client alleges that a lawyer's bills are not accurate or truthful, how can an arbitrator assess the evidence, including the fee bills, for possible bill padding? This advisory explores the question of how an arbitrator may assess the evidence to identify bill padding.¹

INTRODUCTION

Most hourly fee bills are a collection of time entries itemizing work performed in the privacy of a lawyer's office. Therefore, it is difficult to verify the accuracy of the time entries. Accordingly, arbitrators should do at least four things:

- A. Evaluate the process by which the fee bill was prepared and the specificity of the time entries;
- B. Evaluate the staffing used on the matter;
- C. Evaluate the work performed against the time billed, and
- D. Look for certain patterns in the descriptions of the work performed, including the time entries.

DISCUSSION

¹ Rules and observations about determining reasonable attorney's fees in general are addressed in other Arbitration Advisories. This advisory focuses on a subset of that topic: when too much time is alleged to have been recorded for the individual units of work performed. In the event that an arbitrator encounters bill padding, he/she may refer to our other arbitration advisories for assistance in determining an appropriate charge under the circumstances.

A. Evaluate the process by which the fee bill was prepared and the specificity of the time entries

In order to understand the likely areas to look for bill padding, it is useful to consider the historical background of professional fees charged by a lawyer [See American Bar Association Commission on Billable Hours Report (August, 2002), referred to hereinafter as “ABA Report” (See <http://www.abanet.org>)]. Prior to the 1960s, the majority of lawyers billed clients in flat sums or fixed amounts - often at the conclusion of the matter. This required some estimating and discretion on the part of the lawyer. A lawyer’s fee bill often read something like this:

“Fee for services rendered, \$ 750.00.”

Clients sometimes paid their bills six months or a year after receipt of the fee bill, which reflected services performed long before the fee bill was even sent.

In Gisbrecht v. Barnhart, 535 U.S. 789 (2002), the Supreme Court wrote:

“ . . . An American Bar Association (ABA) report, published in 1958, observed that attorneys’ earnings had failed to keep pace with the rate of inflation; the report urged attorneys to record the hours spent on each case in order to ensure that fees ultimately charged afforded reasonable compensation for counsels’ efforts. (*citation omitted*).

Hourly records initially provided only an internal accounting check. See *Honest Hour* 19. The fees actually charged might be determined under any number of methods: the annual retainer, the fee-for-service method, the “eyeball” method under which the attorney estimated an annual fee for regular clients, or the contingent-fee method, recognized by this Court in Stanton v. Embrey, 93 U. S. 548, 556 (1877), and formally approved by the ABA in 1908. See *Honest Hour* [W. Ross, *The Honest Hour: The Ethics of Time-Based Billing by Attorneys* (1996), 13-19]. As it became standard accounting practice to record hours spent on a client’s matter, attorneys increasingly realized that billing by hours devoted to a case was administratively convenient; moreover, as an objective measure of a lawyer’s labor, hourly billing was readily impartable to the client. *Id.*, at 18. By the early 1970’s, the practice of hourly billing had become widespread. *See id.*, at 19, 21.”

1. Evaluate the process by which the fee bill was prepared

In the now-standard chronological fee bill used by lawyers, almost all time is (or should be) itemized by day and by timekeeper. If a lawyer or other timekeeper does several things in one day on a particular matter then he or she must decide how to best describe this work and how much time to record for that work. An arbitrator’s review of fee bills should include an assessment of the method and timing used to prepare the bills in order to form an understanding regarding the accuracy of the data shown by the fee bills.

Some lawyers still use word processing programs to generate fee bills. Others use specialized billing software programs. Many billing software programs in use today have a timer feature that allows the user to input “start” and “stop” commands for one or more matters. The billing software program then automatically calculates the elapsed time for each task in the same manner as a stopwatch. If the evidence at the arbitration reveals that lawyers properly utilized the timer feature that is a factor tending toward accuracy.

While it is almost universally acknowledged that contemporaneous records are the best practice, many times the press of business is such that a day or two (or more) passes without the lawyer recording his/her time. Sometimes a month may pass without any entries. In rare cases, a year or more may pass before a lawyer goes through his/her case file and attempts to re-create what transpired in the case since its inception. It is generally at the point when a fee bill needs to be generated that the lawyer is faced with the need to reconstruct what happened a day or two or a month ago (or a year ago) with great precision. If the lawyer is able to prepare the fee bills using information from notes he/she made contemporaneous with the tasks actually performed, that is a factor tending towards accuracy. But if the reconstruction is done by the lawyer going through his or her file and then ascribing a time entry to each e-mail, letter, document and calendar entry in the file, then it is much less likely that the time entries are truly accurate. While the corresponding fee bills may appear to be very precise, with exact times noted for each specific and itemized activity, the appearance of accuracy may be deceptive and the time recorded should be assessed by the arbitrator. Under such circumstances, it may be appropriate to put the burden of providing evidence/facts to support the accuracy of the time entries onto the lawyer.

The arbitrator should also examine who recorded the entries and created the fee bills. The original time entries are generally recorded by the lawyer or other person who performed the task. However, in some firms, a support person, such as a secretary, paralegal, or billing clerk, records the time entries ultimately charged to the client. Variations for this practice abound. In some firms, lawyers hand-write their entries on paper and some other person inputs them in the billing software. In other firms, a billing clerk may go through the case file on a periodic basis and record a time entry for every scrap of paper in that file. For instance, if the file contains a letter from opposing counsel, the billing clerk may charge the client an agreed-upon minimum charge irrespective of whether the lawyer actually reviewed that letter and how long it took. Suffice it to say, the arbitrator may consider evidence of who actually recorded the time entries [and when they were recorded] to assess the accuracy of the corresponding fee bills.

It is customary for larger law firms to have a draft of the fee bill, commonly referred to as a “pre-bill,” reviewed by the partner or lawyer in charge of billing on the matter. The billing partner may not have actually worked on the file, but is otherwise in control of the relationship with the client. If pre-bills are utilized, the billing partner should scrutinize and edit the time entries in the “pre-bills” to ensure that they are accurate. The recorded time entries may be increased or decreased in an exercise called “billing judgment” by the billing partner. However, any evidence that the pre-bills were adjusted upwards should be examined carefully, as it may indicate that the client is being charged more time than actually expended by his/her lawyer. Absent clearly defined and explained terms in the written fee agreement allowing such upward adjustments, the increased time may be evidence of bill padding. For example,

increasing a time entry to a contractually agreed-upon minimum charge may be appropriate, as would an increase to reflect time inadvertently omitted by the lawyer. On the other hand, increasing a time charge for the sake of inflating the fee bill is not. If an arbitrator encounters such circumstances, the lawyer should bear the burden to clarify and substantiate such increased time entries.

The pre-bills may not be carefully reviewed by the billing partner for a number of reasons, including the fact that most billing partners are very busy and do not have or want to allocate the time to check each pre-bill carefully, the entries may be for a lawyer who is not readily available, or the billing partner may have a huge stack of pre-bills to go through and only a short time to do so since the firm wants to “get the bills out”. Consequently, arbitrators should consider facts and evidence concerning the pre-bill process, including whether the lawyer(s) that actually worked on the matter also verified the accuracy of the fee bills, and whether the pre-bill process increased or decreased the accuracy and transparency of the fee bills ultimately delivered to the client for payment.

2. Evaluate the specificity of the time entries

Many lawyers no longer physically handwrite what they do on paper time-sheets but contemporaneously input a description of their tasks directly into their computers. These types of entries can usually be identified because they are often longer and more detailed. For example, if a fee bill reads: “meeting with client to discuss the elements of the separate statement of facts and the source of evidence for each element (1.8); research new opinion on the presumptions and burden of proof under *Festo* and progeny (2.5)” [Example 1], this is likely (but not necessarily) something directly inputted into the billing software program by the lawyer. On the other hand, the briefer description for the same work of: “meeting with client re MSJ and research burden of proof (4.3)” [Example 2] is probably something initially written in longhand and then later inputted into the billing software program.

Arbitrators should be aware that regardless of the method of time keeping or billing used, it is not the format of the fee bill but the information provided which is important. Accordingly, the arbitrator’s primary focus should be on analyzing those facts that tend to demonstrate the accuracy, or inaccuracy, of the information contained in the fee bills. When examining the fee bills it is very important to remember that in the vast majority of cases each time entry in a fee bill is merely an estimate of how much time was required for the task performed that is being described in a summary fashion. Therefore, the longer the time period between when the task was performed and the corresponding time entry is recorded, the greater the probability that the time entry may lack accuracy.

If, in Example 1 above, the client is certain that the meeting required only 30 minutes (with no travel time), then perhaps one could question the entry of 1.8 hours. But how can one prove that the time for, say, a specific letter was really 12 minutes rather than 30?² If the time is

² It is just about impossible to be certain that any one single time entry is wrong or faked or padded. “The ‘perfect crime’ [is the] padding of bills...” [William G. Ross, *The Honest Hour: The Ethics of Time Based Billing by Attorneys* (1996)].

block-billed and one does not even know how much time is being claimed for the letter, then what? In such cases, look at the totality of the evidence.

B. Evaluate the staffing used on the matter

The staffing of a legal matter by a lawyer presents the potential for bill padding that an arbitrator may consider. The main staffing issues that should be assessed include:

(1) Did multiple lawyers work on the same task simultaneously? and (2) Was the task performed by the proper lawyer?

1. Did multiple lawyers work on the same task simultaneously?

A recurring complaint by clients concerns charges for tasks involving more than one lawyer, paralegal, or support staff from the same firm at the same time. This typically occurs when a client is charged for multiple lawyers attending a court hearing or deposition, or where two or more lawyers participate in a meeting or telephone call. Generally, the determination of whether the matter was overstaffed is a question of fact the arbitrator must resolve. In a mandatory fee arbitration it is appropriate to place the burden of proof on the lawyer to demonstrate that the disputed matters/tasks were properly staffed and not attempts to inflate time charged to a client.

Issues that may affect this factual determination may include the complexity or significance of the case, the litigious nature of the parties, the amount in controversy, client consultation in advance, the client's awareness and lack of objection, or any other fact tending to demonstrate whether it was appropriate for more than one lawyer or support staff to participate in a disputed task.

In some firms, newly admitted lawyers sometimes accompany their supervising lawyer to depositions or court hearings for training purposes. In most instances, the client should not be charged solely for training time.

It is also generally accepted that the more timekeepers on a case, the higher the bill will be. Pay particular attention to time recorded by newer associates who record time on the matter only briefly, such as one or two months, particularly if accompanied by entries reflecting the associate recorded "get up to speed" activities, such as "review file." Such entries by a transient biller may not be an appropriate charge/expense to impose on a client.

2. Was the task performed by the proper lawyer/person?

In some cases, a client may complain that some necessary task was performed by a senior lawyer charging a much higher hourly rate, when it could have been completed by a cheaper associate or support staff. For instance, in a commercial real estate lease dispute, the firm's main real estate partner, charging \$700.00-plus per hour, personally drives to the commercial site to deliver the keys to the complaining landlord. Even assuming that it was necessary for a licensed lawyer to deliver the keys, the issue becomes why it was done by the most expensive lawyer in the firm. Was it because some circumstance actually required that specific high-priced lawyer to undertake that task, or was it an inadvertent or intentional attempt to pad the client's bill. The

client may also challenge delegation of tasks to inexperienced lawyers/staff with resulting inefficiencies. In examining such complaints, arbitrators should consider all of the circumstances relevant to the issue, as well as the custom in the community and the terms of the written fee agreement.

C. Evaluate some or all of the work produced against the hours claimed

Arbitrators may consider evidence and facts concerning the actual tasks/work performed by the lawyer, including an analysis of the major items of work performed. How many hours were recorded for this work? How many timekeepers were involved? What did they do? Did they duplicate each other's work? Was some of this "training" time for new lawyers? ³

Major tasks. It may be appropriate for an arbitrator to review and assess the fee bills to determine how much cumulative time was recorded by the lawyer [or lawyers] to complete a major task. Major tasks may include specific motions, appellate briefs, and transactional documents. An arbitrator may need to quantify the cumulative time first. This task will require the arbitrator to go through the fee bills and essentially group separate billing entries. For example, an arbitrator may have to group all of the entries that refer to the preparation of a specific document, like a demurrer. The arbitrator would then cumulate all of the billing entries referring to or concerning the demurrer, including the review of the complaint and file, conducting legal research, telephone conferences and other communications regarding the demurrer or the sufficiency of the complaint, and then the time entries for the drafting, revising and finalizing and filing the demurrer.

Once the cumulative time to complete a major task is obtained, then the arbitrator may look at the actual work product [or demurrer in foregoing example] to see if the time falls into a range that appears reasonable. This can be hard to do without some experience in the particular legal area involved. But, in the above example, if the fee bills reveal that a lawyer recorded 25-plus hours to research, draft, and file the demurrer, the arbitrator should review the actual demurrer to determine if the time recorded is reasonable. If the evidence reveals that the demurrer is a four page boilerplate document attacking the sufficiency of a fraud claim lacking specificity, then the arbitrator may put the burden on the lawyer to explain why it took so long to prepare such a simple document. On the other hand, if the evidence reveals a 20-page masterpiece artfully advocating novel concepts of law, then that may be evidence tending towards accuracy and reasonableness.

While a times-by-task assessment can be hard to assemble, sometimes the fee bills themselves will have guides to that information within them if the lawyer or law firm utilizes

³ Arbitrators may also consider whether the client was given an estimate or a budget. An "estimate" is not binding. On the other hand, a budget typically involves a more detailed forecast and is supposed to be reasonably accurate (subject to disclosed caveats and assumptions). Moreover, a budget should be revised if circumstances change and the client should be promptly notified of the revision(s). Accordingly, if an estimate or budget was given, it may be reviewed to determine whether the disputed tasks were contemplated and explained to the client.

task-based billing codes like the “Uniform Task-Based Management System” published by the American Bar Association (ABA Task Codes).⁴ Task-based billing codes are in fairly wide use but are not standard and there is some debate over their usefulness. For example, one may know that certain hours were recorded for “L240 - Motions For Judgment” but not how many hours were shown for a specific Motion for Summary Adjudication. Where such codes are not used, the arbitrator may wish to ask the lawyer to provide evidence of the cumulative time expended on major tasks. For instance, in Example 1 on page 4, Section A(2) *supra*, assuming that the lawyer utilized the ABA Task Codes, the time billed for meeting with the client to prepare the statement of facts would show the codes “L240” / “A106” in or right after the descriptions of the activities and the totals for these things would (or could) appear on the bill. Once the ABA Task Codes key is in hand, this will help to break down the time and fees into broad tasks, which may be useful information. Once it is known that a motion for summary judgment required many hours of several timekeepers’ time, an arbitrator can then come to a conclusion or ask for an explanation of whether or not the time spent on this particular task is reasonable.

Documents. There often is a good deal of time shown for “reviewing documents” (“L320 - Document Production”) in many litigation matters. First, ascertain how many document pages were produced or reviewed. This is sometimes stated in terms of “boxes” which is a standard file storage box normally holding anywhere from 2,000 to 3,500 pages of documents, depending on how tightly the documents are packed. Some courts and commentators mention 2,500 as the average number of pages per box. Assess how many timekeepers reviewed the documents and how long it took. Were summaries of the document reviews created? Were relevant documents culled? Were relevant documents scanned and tagged? If the foregoing tasks were not done, did it then result in multiple lawyers having to review the same documents? Arbitrators must assess all evidence and facts regarding whether the lawyer’s document review was efficient and judicious rather than inadvertent or intentional bill padding.

Also, the propriety of tasks must be considered within the context performed. For instance, it may be entirely reasonable for a lawyer to charge a client eight-plus hours to carefully review a 100-page prospectus in a federal securities case involving claims of securities fraud and misrepresentation. On the other hand, it may not be appropriate for a lawyer to charge a client eight-plus hours to review the same 100-page prospectus if the claims in the subject lawsuit are unrelated to the contents of the prospectus [like the wrongful termination of a broker or analyst involved in the securities offering].

Lastly, the arbitrator may consider evidence or facts concerning the timeliness of the client’s objection or complaint concerning any fee bill, including when and if the client objected or made inquiries upon receiving the now contested fee bill, and whether the fee agreement

⁴ The ABA Task Codes assign litigation time within five groups: case assessment, pre-trial, discovery, trial and appeal. There are also 11 optional Activities Codes (such as “A106 - Communication (with client)”) which may be used within each of the five groups in the Litigation Code Set. The various ABA Task Codes may be accessed at www.americanbar.org/groups/litigation/resources/uniform_task_based_management_system.htm

contained an agreement that the client would reasonably or promptly notify the lawyer if there were questions or objections to the fee bills or time entries.

D. Consider the format and content of the fee bills

1. High minimum increments

Many fee agreements state that the lawyer shall bill in minimum increments of .10 hour [or six minutes]. When properly disclosed to a client, such a term may provide support or justify charging that client at least .10 hour for any single task irrespective of how long the task took. Consequently, if the lawyer participates in a phone call regarding the case with opposing counsel that lasts less than two or three minutes, pursuant to the terms of the written fee agreement, the lawyer may be justified in billing .10 hour.

On the other hand, some lawyers still bill in minimum increments of .25 hours or greater. Consequently, they may charge .25 hours for any compensable task, irrespective of how long the task actually takes. Assume that such a lawyer charges \$300/hour. Assume further that on any given day, that lawyer completes at least four separate compensable tasks, each task taking less than 3 minutes each to complete. Billing in increments of .25 hours means that the client would be billed \$300 for the four tasks [4 x .25 hours x \$300/hour = \$300]. However, in this example, the client is being charged \$300 for less than 12 minutes of actual work, essentially requiring the client to pay an effective hourly rate greater than \$1,500.

Courts and fee arbitrators view high incremental charges with suspicion as they may constitute an unreasonable or unconscionable fee, particularly where application of high incremental charges results in overstating the fees owed by a client. *Your Bill: A Behind the Scene look at a Legal Audit*, Mekler Bulger Tilson Marick & Pearson Legal Audit Group, 1, 2 (March 2007) (high incremental charges artificially inflate fees). Relevant factors an arbitrator may consider in this regard include the terms of the written fee agreement, the frequency with which apparent minimum billing entries appeared on the bills, and whether there is evidence that the lawyer was judicious in not employing the high minimum billing entries for brief activities either by (1) not recording such activities, (2) aggregating them with other related activities, or (3) “no charged” the entry.

2. Billing all tasks separately

Like high minimum increments, billing every task separately may artificially inflate time entries. For example, it does not take more than a few seconds to read most routine documents or correspondence. If a lawyer reads a group of documents or correspondence in a minute or two and then records a minimum time entry for each such document/correspondence, this may artificially increase the time billed to the client.

3. Large whole number time entries

If the bills show time entries in whole numbers, especially large time entries such as 8.0, 9.0, or 10.0, these are probably estimates rather than actual time spent and should be scrutinized,

[except where the event involved trial, mediation, day-long deposition, or other inherently extended activity].

4. Block billing

Block billing is the practice of assigning one time charge to multiple separate tasks. An extreme example would be a fee bill mailed to a client at the end of the case with a single entry for 200 hours for “work on case” without identifying, among other things, the various individual tasks performed, who performed them, and when. A more subtle example would be a 3.6 hour charge for “review client’s e-mail, retrieve file, call with DR re same, and prepare/send reply.” In the foregoing example, a client would be unable to determine how much time any one of the listed tasks actually took. More importantly, this type of block billing is prone to hide accountability and prevents a client from discerning which of the listed tasks are compensable and which are not. For instance, in the foregoing example, what if the lawyer [charging \$300/hour] decided to personally make a 3-hour drive to and from an off-site storage facility to retrieve the file rather than sending his secretary [whom he pays \$15/hour]? In such an instance, the itemized tasks actually took the lawyer 3.6 hours to complete, but in most instances, the 3 hours the lawyer spent retrieving the file may not be compensable. By utilizing block-billing, the client’s [and arbitrator’s] ability to assess the accuracy [and propriety] of the 3.6 hour charge is impeded.

Block billing may also inadvertently or intentionally inflate the actual time a lawyer takes to complete the listed tasks. For example, if a lawyer bills a client 8.0 hours on a given day to “prepare for trial,” that block of time would most likely include, among other things, time for coffee and restroom breaks, personal calls and non-compensable administrative/managerial tasks. Since block billing has the potential of, among other things, camouflaging non-compensable tasks, many judges, fee arbitrators, and commentators regard its persistent and egregious use with suspicion, and some consider the practice a violation of Business and Profession Code §6148(b).

The basic rule is that courts [and arbitrators] have wide discretion to require additional evidence to support the accuracy of block-billed entries. In a mandatory fee arbitration, it is the lawyer’s burden to provide such additional support, which may include testimony and documentary evidence. After consideration of such additional support, or lack thereof, arbitrators may assign a reasonable percentage to the block billed entries, disregard them altogether, or determine that other evidence is sufficient to substantiate the hours aside from the block billed entries. The court in *Heritage Pacific Financial v. Monroy*, (2013) 215 Cal.App.4th 972, 1010 held “trial courts retain discretion to penalize block billing when the practice prevents them from discerning which tasks are compensable and which are not.” Previously, the court in *Bell v. Vista Unified School Dist.*, (2001) 82 Cal.App.4th 672, 689, held that “the trial court should exercise its discretion in assigning a reasonable percentage to the entries, or simply cast them aside” if counsel “cannot further define his billing entries” In a much harsher tone, the court in *Christian Research Institute v. Alnor*, (2008) 165 Cal.App.4th 1315, 1329 held:

Similarly, counsel may not submit a plethora of noncompensable, vague, block-billed attorney time entries and expect particularized, individual deletions as the

only consequence. The trial court could reasonably conclude counsel made no effort to prune the fee request to comply with the law. Counsel erred grievously by attempting to transfer that responsibility onto the trial court. The trial court could reasonably conclude counsel's disregard for the law undercut the credibility of their fee request and, as officers of the court, warranted a severe reaction.

If a lawyer uses block-billing, it may be appropriate for the arbitrator to place on the lawyer the burden of proving that all of the time entries that were block billed are actually compensable and appropriate.

In our prior version of this arbitration advisory titled "Detecting Attorney Bill Padding" (Arbitration Advisory 2003-01)(January 29, 2003), at section C 4 on page 7, the State Bar's Committee on Mandatory Fee Arbitration ["Committee"] opined that block billing "hides accountability and may increase time by 10% to 30%." However, the arbitrator's discretion is not limited to the 10% to 30% range. Rather, as noted above, an arbitrator may consider all evidence to determine the propriety of any block billed entry and may conclude, upon due consideration of all such evidence, that the entire time billed is appropriate or some portion is not.

5. Standardized work descriptions and lack of detail

If an arbitrator encounters the exact same phrases used again and again in the fee bills, it is likely that some routine has set in. This may allow some "down time" to find its way into the fee bills. An entry such as "review documents produced by opposition, 7.5 hours" is typical.

Furthermore, generalized time entries such as "research issues", "review file", "attention to file", "discovery", "prepare for trial", "trial prep", and other similar general statements are not specific enough to let the client know what was done. If a lawyer uses such non-specific task descriptions, it may be appropriate for the arbitrator to place on the lawyer the burden of clarifying what was actually done to assess whether the generalized time entries are actually compensable and appropriate.

6. Wrong times

Sometimes a client knows that a specific task took less time than was billed. For example, a lawyer charges four hours to attend a deposition in his office, but the corresponding deposition transcript confirms that the deposition started at 10 am and finished at 11 am. A fee bill may charge a client for the lawyer attending an in-person meeting with the client in his Los Angeles office, but the client was out of the country on that day. The lawyer may charge an hour to prepare a letter to the client, but cannot produce the letter at the arbitration. In each instance, the arbitrator should examine all of the evidence presented by the parties to determine whether the disputed task was actually performed and if so, that it took the time recorded in the fee bills. Demonstrably false or inaccurate entries, unless explained, may justify the arbitrator viewing with distrust other disputed billings or time entries.

7. Timeliness of invoices

As noted above, if too much time has elapsed between the disputed task and generating the fee bill, the times shown might be estimates or best guesses of the time involved. On the other hand, it is possible that the timekeeper recorded his or her time contemporaneously but did not generate the fee bill for some reason. The lawyer should clarify why the fee bills were not timely delivered. The arbitrator may also examine the fee agreement to determine if the lawyer committed to delivering periodic billing, and other factors such as (1) whether delayed billing came during a period of substantial activity, (2) whether the fee bill was a surprise to the client, (3) whether the claimed fee exceeds estimates or budgets, and (4) whether there were legitimate reasons that prevented the lawyer from timely delivering a fee bill to the client.

8. Experts and outside investigators

Lawyers sometimes retain expert witnesses, consultants, investigators and other third-party professionals to assist a client. These third-party professionals typically forward their bills to the lawyer for payment. Sometimes the lawyer pays such third party bills directly and then subsequently sends the client an invoice for the advanced costs. Other times, the lawyer forwards the third party bill directly to the client for payment. Whatever the process used, it is imperative that such third party bills state what was done with adequate detail to allow a client to decipher what was done and how much is being charged. If the lawyer advanced payment for such third party bills, representations and proof that these charges were actually paid should also be produced.

9. Overhead items

A lawyer's hourly fee should include consideration for overhead items like rent, support staff wages, telephone service, internet fees, office supplies, library charges, seminars, continuing legal education charges, malpractice insurance and a whole host of expenses a lawyer will incur every day to keep his/her practice operating. Consideration for such expenses explains why lawyers in located in urban cities, like downtown Los Angeles and San Francisco, may generally charge higher hourly rates than their colleagues who rent much less expensive office space in the suburbs and outlying farming communities. Since overhead expenses are a cost of doing business, and should be reflected in the professionals' hourly rates, they should not be passed on to the client unless the client has clearly agreed otherwise in the fee agreement. (See American Bar Association Standing Committee on Ethics and Professional Responsibility, Formal Opinion 93-379, *Billing for Professional Fees, Disbursements, and Other Expenses*, (December 6, 1993).

10. Ministerial, administrative and secretarial tasks

As noted above, a lawyer's hourly fee should include consideration for support staff wages. Accordingly, it may be inappropriate to allow a lawyer to also charge a client his/her hourly rate for doing secretarial work. For instance, the vast majority of lawyers are able to prepare judicial form interrogatories in less than 5-10 minutes. Their assistants or secretaries then prepare the actual hard document, prepare and attach the proof of service, generate the

stamped envelope and then serves it on the opposing party. Typically, the only service the client should be charged for is the lawyer's 5-10 minutes to determine what boxes to check off on the form interrogatories. But arbitrators will inevitably encounter situations where the lawyer also charges the client the time spent preparing the proof of service and mailing. It is not uncommon to encounter fee bills that charge clients up to an hour for a simple task like preparing and serving form interrogatories. Arbitrators will also encounter situations where lawyers personally type their own correspondence, motions and other documents. This is typically not a problem, unless of course, the lawyer can only type 10-20 words a minute. In such circumstances, the arbitrator should consider the lawyer's typing proficiency, whether support staff is available for such tasks, and whether the hourly fee agreed-upon by the client includes consideration of support staff wages.

Also, operating a law practice requires substantial efforts on the part of the lawyers wholly unrelated to representing clients. This includes dozens of administrative, managerial, and ministerial tasks lawyers must perform every day. In the vast majority of cases, it is inappropriate to seek to charge a client for such non-legal tasks.

11. Paralegals

The use of paralegals and unlicensed legal assistants is wide-spread and completely appropriate if disclosed to the client. Guideline 8 of the 2004 update of the ABA Model Guidelines for the Utilization of Paralegal Services states that: "A lawyer may include a charge for the work performed by a paralegal in setting a charge and/or billing for legal services." Courts have addressed and accepted the theory that paralegal fees are appropriately billed and recovered by lawyers under various prevailing party attorney fee recovery statutes. *Missouri v. Jenkins* (1989) 491 U.S. 274; *Richlin Security Service Co. v. Chertoff* (2008) 553 U.S. 571; and *Guinn v. Dotson* (1994) 23 Cal. App. 4th 262. In California, paralegal fees are only compensable if in total compliance with Business and Profession Code §6450. This requires that the paralegal actually qualifies as a paralegal and the type of work/tasks he/she purports to perform is compensable.

Surprisingly, many lawyers do not realize that some tasks performed by a paralegal are not compensable. The test to determine whether a task performed by a paralegal is compensable is not predicated on the person that performs it, but rather on the nature of the task itself. Business and Profession Code §6450 (a) states:

(a) "Paralegal" means a person who holds himself or herself out to be a paralegal, who is qualified by education, training, or work experience, who either contracts with or is employed by an attorney, law firm, corporation, governmental agency, or other entity, and **who performs substantial legal work under the direction and supervision of an active member of the State Bar of California**, as defined in Section 6060, or an attorney practicing law in the federal courts of this state, that has been specifically delegated by the attorney to him or her. **Tasks performed by a paralegal include, but are not limited to, case planning, development, and management; legal research; interviewing clients; fact gathering and retrieving information; drafting and analyzing legal**

documents; collecting, compiling, and utilizing technical information to make an independent decision and recommendation to the supervising attorney; and representing clients before a state or federal administrative agency if that representation is permitted by statute, court rule, or administrative rule or regulation.

(Emphasis added).

Furthermore, Business and Profession Code §6454 states that the "terms "paralegal," "legal assistant," "attorney assistant," "freelance paralegal," "independent paralegal," and "contract paralegal" are synonymous for purposes of this chapter. Consequently, billing a client for a paralegal or legal assistant's ministerial, administrative, or secretarial duties may be improper, particularly if not disclosed in the fee agreement and explained to the client. However, even if the lawyer disclosed the use of a paralegal or unlicensed legal assistant for ministerial, administrative or secretarial tasks in the fee agreement, the arbitrator may assess whether the consequent fees agreed upon were unconscionable at the time the fee agreement was entered into pursuant to Rule 4-200 of the Rules of Professional Conduct.

Lastly, it is imperative to remember that it is improper for a paralegal to establish the fees charged to the client for the paralegal's services. Business and Professions Code §6450 (b)(8). This prohibition may prove to be a minefield for lawyers utilizing their paralegals to act as calendar clerks, office managers, supervisors or administrators who control and prepare the lawyer's/firm's fee bills.

12. Canned Briefs-Recycled Work

Even newly admitted lawyers have access to a library or cache of canned briefs and template documents they may utilize in their practice. These include, but are not limited to, canned or standardized pleadings, motions, discovery requests, and transactional documents like trusts and leases. These canned or standardized documents may have been created by the lawyer or some third source. The issue becomes whether it is appropriate for the lawyer to bill a client any premium for the creation of the original document, or may the lawyer only bill for the revisions made to the canned or standardized document.

As a threshold matter, the ABA long ago opined that:

In addressing the hypothetical regarding...recycled work product, it is helpful to consider these questions, not from the perspective of what a client could be forced to pay, but rather from the perspective of what the lawyer actually earned.... A lawyer who is able to reuse old work product has not re-earned the hours previously billed and compensated when the work product was first generated. Rather than looking to profit from ... the luck of being asked the identical question twice, the lawyer who has agreed to bill solely on the basis of time spent is obliged to pass the benefits of these economies on to the client. The practice of billing several clients for the same time or work product, since it results in the

earning of an unreasonable fee, therefore is contrary to the mandate of the Model Rules. Model Rule 1.5.

(American Bar Association Standing Committee on Ethics and Professional Responsibility, Formal Opinion 93-379, *Billing for Professional Fees, Disbursements, and Other Expenses*, (December 6, 1993); *See also Ethics and Time-Based Billing*, Michael Downey, Law Practice Today, ABA Law Practice Management Section, (January 2006) (Over-billing occurs when “billing the client who received the recycled work product time already billed to another client when that work product was originally created.”); *See also, The Moral Compass of the American Lawyer*, Richard Zitrin and Carol Langford, (1999 Ballantine Books)(examples of cases in which lawyers were prosecuted and convicted of bill padding practices including billing multiple clients simultaneously and for recycled work product).

Similarly, the authors of the well-regarded Rutter Guide, caution:

Attorneys who prepare standardized documents for clients (e.g., wills, partnership agreements) often keep forms of those documents on their computers to use as “templates” that can be revised and customized to suit each client. Absent clear disclosure to the client, attorneys billing on an hourly basis cannot properly add additional hours to a client's bill when revising such an “in-house” form to reflect the time spent preparing the original (template) form. [Orange County Bar Ass'n Form.Opn. 99-001]

California Practice Guide: Professional Responsibility, Paul W. Vapnek, Mark L. Tuft, Ellen R. Peck and Justice Howard B. Wiener (Ret.), Chapter 5. Attorney Fees And Fee Agreements, Paragraph 5-945 (2012).

Given the foregoing, in the event a lawyer seeks to charge a client a “premium” for the use of recycled work, the arbitrator should determine if that “premium” was properly stated and disclosed in the written fee agreement. (State Bar of California Committee on Mandatory Fee Arbitration, Arbitration Advisory 1998-03, *Determination of a “Reasonable” Fee*, pages 15-16 (Updated March 20, 2015). If it is not, it may be evidence of bill padding.

13. Billing multiple clients for the same time

An arbitrator may encounter situations where the lawyer simultaneously worked on matters of several clients. For example, a lawyer charges two clients the full five hours it took him to attend two court hearings for the two separate clients on the same morning in the same court. The issue is whether each client can be properly billed for the full five hours. Generally, billing multiple clients for the same time raises questions of potential impropriety. The answer typically depends on whether the terms of the fee agreements actually disclosed and explained the manner of billing to the all of the affected clients and the fee agreements of every affected client is fair and reasonable. (*See American Bar Association Standing Committee on Ethics and Professional Responsibility, Formal Opinion 93-379, Billing for Professional Fees, Disbursements, and Other Expenses*, (December 6, 1993); State Bar of California Standing Committee on Professional Responsibility and Conduct, Formal Opinion No. 1996-147).

Therefore, if a lawyer seeks to bill the same time to more than one client simultaneously, that arrangement must be fair, reasonable, fully disclosed in the written fee agreements of all affected clients, and fully explained to each client. If it is not, then it may be evidence of bill padding. Additionally, the arbitrator must ensure that, irrespective of how much time the lawyer ultimately bills to any one client for such a collective task, the resulting fees are not unconscionable pursuant to Rule 4-200 of the Rules of Professional Conduct.

14. Ghost Billing

“Ghost billing” occurs when a lawyer bills for work or task(s) performed by another person. Variations abound. For example, a paralegal or associate prepares a motion, but the partner in charge bills the time as his/her own. Or a non-employee contract attorney attends a status conference, but the lawyer of record bills the time as his/her own. Ghost billing should be scrutinized as it may constitute (1) a deceptive practice, (2) a violation of Business and Professions Code Section 6148(b), (3) bill padding, and (4) an attempt to collect an unconscionable fee or cost in violation of Rule 4-200 of the Rules of Professional Conduct.

15. Contract Attorneys

Another recurring complaint in fee disputes concerns charges for the use of contract attorneys. Lawyers use contract attorneys for a myriad of purposes, including court appearances, conducting legal research, drafting motions or appeals briefs, etc. The resulting complaints typically concern how much the client is ultimately charged for these tasks. The ABA has opined that, if properly disclosed, it is appropriate for the lawyer to mark-up the cost [or add a profit] for work performed by contract attorneys. (*See American Bar Association Standing Committee on Ethics and Professional Responsibility Formal Opinion 00-420, Surcharge to client for use of a contract attorney (November 29, 2000)*). However, disputes result when a lawyer chooses to use a “contract attorney” and then bills for the work performed as a fee at the lawyer’s hourly rate, when, in fact, the lawyer is paying the contract attorney a lesser rate.⁵

Anticipated use of contract attorneys should be addressed in the written fee agreement. The written fee agreement should state whether the contract lawyer is billed out as a cost or their time is charged as a fee at indicated rates along with the time of the lawyer’s or law firm’s other timekeepers (partners and associates). (*See State Bar of California Standing Committee on Professional Responsibility and Conduct, Formal Opinion No. 2004-165; and The Professionalism and Ethics Committee of the Orange County Bar Association, Formal Opinion 2014-1*). Absent such disclosure, the client should only be charged the out-of-pocket cost of the contract attorney.

⁵ There are numerous other non-billing, ethical considerations that are triggered by the use of contract lawyers. As COPRAC concluded in its Opinion 2004-165: Contract attorney services, and individual lawyers providing contract legal services to lawyers, may provide cost-effective alternatives to consumers of legal services. In using these services, those lawyers hiring the contract attorneys must comply with the ethical rules concerning the disclosure to the client of significant developments in the representation. Both those lawyers doing the hiring and those lawyers who are hired must comply with the ethical rules concerning competence, confidentiality, advertising, and conflicts of interest that apply to their respective roles in any such arrangement.

For example, assume that a lawyer [a solo practitioner], charging her client \$300/hour, is unable to attend a status conference. She engages a contract attorney to attend a status conference. The contract attorney then delivers an invoice to the lawyer indicating that it took him 1½ hours to attend the status conference and the cost to the lawyer is \$100, which the lawyer pays. Generally, given the foregoing facts, the client should only be charged the \$100 paid to the contract attorney. If the lawyer seeks to charge the client some other amount, more than \$100 or \$450 (1½ hours it took to attend the status conference multiplied by her \$300/hour rate), it must be clearly disclosed in the written fee agreement. If it is not, then it may be evidence of bill padding.

However, there are circumstances where the facts are not so clear-cut. For example, some law firms [including large multi-national law firms], occasionally find it necessary to hire groups of contract attorneys to conduct special assignments, like document reviews in large cases involving hundreds of thousands, if not millions, of hard and digital documents. In addition to the hourly rate for the contract attorneys, such law firms also incur office and transportation [and other] costs associated with using the contract attorneys. For example, the law firm may have to allocate a portion of their office space, or rent some additional office space, for the contract attorneys to do their work. In such cases, assuming that the use and charge of the contract attorneys are properly disclosed in the written fee agreement, it may be appropriate for the law firm to charge a premium for the use of the contract attorneys. If there is no such disclosure, in addition to the contract attorney's actual hourly rate, the law firm may also be able to properly charge the client for the associated costs described above. Of course, in such circumstances, it is the law firm's obligation to bear the burden of proof to quantify the associated costs chargeable to the client.

The arbitrator should consider the terms of the written fee agreement and whether the client agreed to pay for contract attorneys at some rate other than the actual cost to the lawyer. In the vast majority of written fee agreements, the term "attorney" or "lawyer" is typically defined to mean only the lawyer and/or law firm hired by the client. While a reasonable extension of this definition may include the defined lawyer's employee associates and partners, it does not necessarily include non-employee contract attorneys to which the client has no relationship. Accordingly, the arbitrator should assess those facts regarding whether the client agreed or acknowledged the use and expense of contract attorneys.

CONCLUSION

The vast majority of lawyers are honest and their bills are reliable statements of the work and time billed to the client. However, if a client claims to have been over-billed, the arbitrator should, at the very least, (1) evaluate the specificity of the time entries and the process by which the fee bill was prepared, (2) evaluate the staffing used on the matter, (3) evaluate the work performed against the time billed, and (4) look for certain patterns in the descriptions of the work performed, including the time entries, to assess the accuracy and propriety of the time charged to the client.



ELM Solutions

2024 Real Rate Report[®]

The industry's leading
analysis of law firm
rates, trends, and
practices

Report Editor**Jennifer McIver**

Director, Legal Operations and Industry Insights
Wolters Kluwer ELM Solutions

Lead Data Analysts**Carol Au**

Business Systems Quantitative Analyst
Wolters Kluwer ELM Solutions

Aaryak Shandilya

Data Scientist
Wolters Kluwer ELM Solutions

ELM Solutions Creative**David Andrews**

Senior Graphic Designer
Wolters Kluwer ELM Solutions

Contributing Analysts and Authors**Jason Bender**

Legal Analytics Product Manager
Wolters Kluwer ELM Solutions

Haemi Jung

Strategic Business Intelligence Manager
Wolters Kluwer ELM Solutions

Margie Sleboda

Lead Technology Product Manager
Wolters Kluwer ELM Solutions

Executive Sponsor**Brian Jorgenson**

Vice President, Product Management
Wolters Kluwer ELM Solutions

© 2004 - 2024 Wolters Kluwer ELM Solutions. All rights reserved. This material may not be reproduced, displayed, modified, or distributed in any form without the express prior written permission of the copyright holders. To request permission, please contact:

ELM Solutions, a Wolters Kluwer business
2929 Allen Pkwy Ste 3300
Houston, TX 77019 United States
ATTN: Marketing
ELMSolutionsSales@wolterskluwer.com

LEGAL CAVEAT

Wolters Kluwer ELM Solutions has worked to ensure the accuracy of the information in this report; however, Wolters Kluwer ELM Solutions cannot guarantee the accuracy of the information or analyses in all cases. Wolters Kluwer ELM Solutions is not engaged in rendering legal, accounting, or other professional services. This report should not be construed as professional advice on any particular set of facts or circumstances. Wolters Kluwer ELM Solutions is not responsible for any claims or losses that may arise from any errors or omissions in this report or from reliance upon any recommendation made in this report.

Section I: High-Level Data Cuts

Partner, Associate, and
Paralegal
By Role

2024 - Real Rates

Trend Analysis - Mean

Role	n	First Quartile	Median	Third Quartile	2024	2023	2022
Partner	12,476	\$436	\$680	\$1,056	\$803	\$792	\$754
Associate	11,172	\$340	\$523	\$795	\$597	\$579	\$554
Paralegal	5,253	\$149	\$229	\$340	\$258	\$263	\$250

Section I: High-Level Data Cuts

Cities
By Matter Type

2024 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2024	2023	2022
	Non-Litigation	Partner	146	\$525	\$693	\$1,088	\$794	\$786	\$721
		Associate	172	\$370	\$575	\$809	\$589	\$542	\$522
Dayton OH	Non-Litigation	Partner	11	\$335	\$380	\$407	\$381	\$411	\$375
Denver CO	Litigation	Partner	53	\$415	\$572	\$699	\$584	\$528	\$534
		Associate	41	\$275	\$400	\$439	\$366	\$368	\$349
	Non-Litigation	Partner	129	\$475	\$562	\$679	\$595	\$593	\$555
		Associate	104	\$375	\$412	\$471	\$444	\$404	\$375
Detroit MI	Litigation	Partner	58	\$275	\$300	\$399	\$339	\$338	\$333
		Associate	47	\$244	\$265	\$295	\$283	\$271	\$263
	Non-Litigation	Partner	63	\$345	\$445	\$535	\$444	\$423	\$408
		Associate	34	\$265	\$303	\$393	\$339	\$305	\$265
Greenville SC	Non-Litigation	Partner	32	\$400	\$438	\$515	\$450	\$451	\$431
Hartford CT	Litigation	Partner	40	\$353	\$431	\$658	\$483	\$486	\$464
		Associate	18	\$255	\$275	\$325	\$310	\$303	\$329

Section I: High-Level Data Cuts

Cities
By YOY

2024 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2024	2023	2022
Charlotte NC	Fewer Than 21 Years	27	\$700	\$805	\$998	\$856	\$735	\$636
	21 or More Years	40	\$689	\$850	\$1,062	\$862	\$802	\$770
Chicago IL	Fewer Than 21 Years	144	\$725	\$1,105	\$1,443	\$1,115	\$989	\$871
	21 or More Years	273	\$669	\$961	\$1,340	\$1,012	\$966	\$902
Cincinnati OH	Fewer Than 21 Years	11	\$400	\$473	\$589	\$484	\$480	\$446
	21 or More Years	24	\$499	\$555	\$655	\$574	\$600	\$507
Cleveland OH	Fewer Than 21 Years	47	\$433	\$509	\$750	\$615	\$565	\$518
	21 or More Years	90	\$482	\$600	\$726	\$647	\$630	\$598
Columbus OH	21 or More Years	20	\$442	\$559	\$694	\$583	\$538	\$487
Dallas TX	Fewer Than 21 Years	41	\$611	\$755	\$899	\$777	\$661	\$573
	21 or More Years	35	\$470	\$625	\$1,050	\$753	\$815	\$758
Denver CO	Fewer Than 21 Years	27	\$425	\$526	\$594	\$536	\$522	\$492
	21 or More Years	57	\$436	\$557	\$792	\$618	\$623	\$611
Detroit MI	21 or More Years	26	\$280	\$338	\$422	\$377	\$380	\$382
Greenville SC	21 or More Years	16	\$400	\$448	\$550	\$481	\$480	\$463

EXHIBIT F - Jolley Potter Ranches v. TEP Rocky Mountain

Initials	Name	Position	Firm	Experience	Hours (Federal Court)	Hours (State Court)	Total Hours	Market Rate	Subtotal
ADK	Audrey D. Koehler	Associate	Fleeson, Gooing	1 year	135.50	0.00	135.50	\$350.00	\$47,425.00
JWR	John W. Ralston	Associate	Fleeson, Gooing	1 year	26.70	0.00	26.70	\$350.00	\$9,345.00
EKA	Emily K. Arida	Associate	Fleeson, Gooing	4 years	190.60	0.00	190.60	\$350.00	\$66,710.00
DEL	Daniel E. Lawrence	Member	Fleeson, Gooing	12 years	1.50	0.00	1.50	\$550.00	\$825.00
RKM	Ryan K. Meyer	Member	Fleeson, Gooing	13 years	985.50	1.40	986.90	\$550.00	\$542,795.00
NAK	Nathan A. Keever	Partner	Dufford Waldeck	30 years	1,506.90	75.70	1,582.60	\$650.00	\$1,028,690.00
LWV	Lyndon W. Vix	Member	Fleeson, Gooing	40 years	10.90	0.00	10.90	\$750.00	\$8,175.00
DGS	David G. Seely	Member	Fleeson, Gooing	41 years	1,725.00	18.90	1,743.90	\$750.00	\$1,307,925.00
GRM	George R. ("Bob") Miller	Member	G.R. Miller, P.C.	48 years	4,880.65	30.45	4,911.10	\$750.00	\$3,683,325.00
GJS	Gregory J. Stucky	Member	Fleeson, Gooing	48 years	747.00	0.00	747.00	\$750.00	\$560,250.00
TDK	Thomas D. Kitch	Member	Fleeson, Gooing	56 years	29.40	0.00	29.40	\$750.00	\$22,050.00
ACH	Anna C. Hedstrom	Law Clerk	Fleeson, Gooing	3 months	9.60	0.00	9.60	\$175.00	\$1,680.00
CLC	Cheryl L. Clark	Paralegal	Fleeson, Gooing	28 years	72.30	0.00	72.30	\$250.00	\$18,075.00
EMR	Elizabeth M. Raehpour	Law Clerk	Fleeson, Gooing	3 months	12.90	0.00	12.90	\$175.00	\$2,257.50
JDH	Jack D. Hamilton	Law Clerk	Fleeson, Gooing	3 months	14.60	0.00	14.60	\$175.00	\$2,555.00
KRD	Kathy R. Davis (k/n/ a Katherine R. Brown)	Paralegal	Fleeson, Gooing	3 years	59.30	0.00	59.30	\$250.00	\$14,825.00
TSW	Tammy S. West	Paralegal	Fleeson, Gooing	19 years	145.40	0.20	145.60	\$250.00	\$36,400.00
BW	BW	Paralegal	Dufford Waldeck		0.00	12.90	12.90	\$250.00	\$3,225.00
JE	JE	Paralegal	Dufford Waldeck		0.00	0.60	0.60	\$250.00	\$150.00
TJK	TJK	Paralegal	Dufford Waldeck		0.00	0.60	0.60	\$250.00	\$150.00
EAA	EAA	Paralegal	Dufford Waldeck		0.00	1.50	1.50	\$250.00	\$375.00
					10,553.75	142.25	10,696.00		\$7,357,208

EXHIBIT G - Jolley Potter Ranches v. TEP Rocky Mountain (Reduced Rate and Reduced Federal Court H

Initials	Name	Position	Firm	Experience	Reduced Hours (Federal Court)	Hours (State Court)	Total Hours	Reduced Rate	Subtotal
ADK	Audrey D. Koehler	Associate	Fleeson, Gooing	1 year	67.75	0.00	67.75	\$175.00	\$11,856.25
JWR	John W. Ralston	Associate	Fleeson, Gooing	1 year	13.35	0.00	13.35	\$175.00	\$2,336.25
EKA	Emily K. Arida	Associate	Fleeson, Gooing	4 years	95.30	0.00	95.30	\$175.00	\$16,677.50
DEL	Daniel E. Lawrence	Member	Fleeson, Gooing	12 years	0.75	0.00	0.75	\$275.00	\$206.25
RKM	Ryan K. Meyer	Member	Fleeson, Gooing	13 years	492.75	1.40	494.15	\$275.00	\$135,891.25
NAK	Nathan A. Keever	Partner	Dufford Waldeck	30 years	753.45	75.70	829.15	\$325.00	\$269,473.75
LWV	Lyndon W. Vix	Member	Fleeson, Gooing	40 years	5.45	0.00	5.45	\$375.00	\$2,043.75
DGS	David G. Seely	Member	Fleeson, Gooing	41 years	862.50	18.90	881.40	\$375.00	\$330,525.00
GRM	George R. ("Bob") Miller	Member	G.R. Miller, P.C.	48 years	2,440.33	30.45	2,470.78	\$375.00	\$926,540.63
GJS	Gregory J. Stucky	Member	Fleeson, Gooing	48 years	373.50	0.00	373.50	\$375.00	\$140,062.50
TDK	Thomas D. Kitch	Member	Fleeson, Gooing	56 years	14.70	0.00	14.70	\$375.00	\$5,512.50
ACH	Anna C. Hedstrom	Law Clerk	Fleeson, Gooing	3 months	4.80	0.00	4.80	\$87.50	\$420.00
CLC	Cheryl L. Clark	Paralegal	Fleeson, Gooing	28 years	36.15	0.00	36.15	\$125.00	\$4,518.75
EMR	Elizabeth M. Raehpour	Law Clerk	Fleeson, Gooing	3 months	6.45	0.00	6.45	\$87.50	\$564.38
JDH	Jack D. Hamilton	Law Clerk	Fleeson, Gooing	3 months	7.30	0.00	7.30	\$87.50	\$638.75
KRD	Kathy R. Davis (k/n/ a Katherine R. Brown)	Paralegal	Fleeson, Gooing	3 years	29.65	0.00	29.65	\$125.00	\$3,706.25
TSW	Tammy S. West	Paralegal	Fleeson, Gooing	19 years	72.70	0.20	72.90	\$125.00	\$9,112.50
BW	BW	Paralegal	Dufford Waldeck		0.00	12.90	12.90	\$125.00	\$1,612.50
JE	JE	Paralegal	Dufford Waldeck		0.00	0.60	0.60	\$125.00	\$75.00
TJK	TJK	Paralegal	Dufford Waldeck		0.00	0.60	0.60	\$125.00	\$75.00
EAA	EAA	Paralegal	Dufford Waldeck		0.00	1.50	1.50	\$125.00	\$187.50
					5,276.88	142.25	5,419.13		\$1,862,036