

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

Marvin B. Dinsmore, et al., on behalf of	)	
themselves and all others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 24-CV-369-JAR
	)	
Staghorn Petroleum II, LLC,	)	
	)	
Defendant.	)	

**STIPULATION FOR WITHDRAWAL OF OBJECTION AND REDUCTION IN  
AMOUNT OF REQUEST FOR FEES AND CASE CONTRIBUTION AWARD**

Class Representatives Marvin B. Dinsmore and Sheridan Downey III, as administrators of the Estate of David D. Dinsmore (“Class Representatives”), and Objector Daniel M. McClure (“McClure”) file this stipulation under Fed. R. Civ. P. 23(e) to resolve and withdraw McClure’s objection.

On January 28, 2025, McClure filed an objection (Doc. 27, the “Objection”) to Class Counsel’s fee request and to Class Representatives’ request for a Case Contribution Award (Doc. 25). Class Counsel conferred with McClure on January 31, 2025, concerning the Objection, and exchanged messages over the ensuing days. As a result of those discussions, Class Representatives, Class Counsel, and McClure agreed that:

- (1) McClure hereby withdraws the Objection;
- (2) Class Counsel hereby reduce the attorneys’ fee request to 25% of the Gross Settlement Fund; and
- (3) Class Representatives hereby reduce their request for a Case Contribution Award to \$5,000.00.

McClure is receiving no payment or other consideration for the withdrawal of his Objection.

/s/ Reagan E. Bradford

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~~–and–~~

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**CLASS COUNSEL**

/s/ Daniel M. McClure

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**OBJECTOR**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to parties and attorneys who are filing users.

/s/ Reagan E. Bradford

Reagan E. Bradford