

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 19–cv–02742–CMA–SKC

BETTY JEAN JOHNSTON,
on behalf of herself and all others similarly situated,

Plaintiff,

v.

CAMINO NATURAL RESOURCES, LLC,
a Delaware limited liability company,

Defendant.

SUPPLEMENT TO CLASS REPRESENTATIVE’S MOTION FOR FINAL APPROVAL

Class Representative Betty Jean Johnston (“Class Representative”) submits this Supplement to Class Representative’s Motion for Final Approval of Class Action Settlement (“Final Approval Motion,” Doc. 62). As is common, Class Representative’s Final Approval Motion was due prior to the request for exclusion and objection deadlines (April 28, 2021). *Id.* at 1, n. 1. As a result, Class Representative submits this supplement to address the notice campaign and any objections (none) or requests for exclusion (sixteen).

1. The Notice Campaign

As ordered in the Court's Preliminary Approval Order (Doc. 55), Class Representative worked with the Settlement Administrator, JND Class Action Administration, to effectuate the notice campaign for the Settlement.¹ A declaration from the Settlement Administrator (**Ex. 1**) details the notice campaign, including:

- a. mailing the Notice of Settlement to 8,884 identified Class Members;
- b. re-mailing nearly all of the 412 notices that were returned as undeliverable;
- c. publishing the summary Notice of Settlement on December 29, 2020, in *The Oklahoman* and *Tulsa World*;
- d. hosting a website (www.johnston-camino.com) dedicated to the Settlement, including posting copies of all key filings concerning the Settlement, which has received over 3,36 page views; and
- e. maintaining a toll-free telephone number which has received approximately 120 calls.

Id. at 2–4, ¶¶ 5–12. In other words, the Notice Campaign was highly successful and in the form and manner ordered by the Court.

2. Objections

Class Representative is pleased to report that there were no objections submitted to the Settlement from the nearly 9,000 Class Members as of the objection deadline (April 28, 2021), nor have any objections been received as of the time of this filing.

¹ Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Settlement Agreement (Doc. 53-1).

3. Requests for Exclusion

Sixteen requests for exclusions were submitted on or before the request for exclusion deadline (April 28, 2021), and no additional requests for exclusion have been received as of this filing. The Settlement Administrator has identified each Class Member requesting exclusion:

| ID | Name | Received On |
|--------|---------------------------------|-------------|
| 925117 | RONALD TIPTON ASBURY | 1/19/2021 |
| 918574 | MERIT ENERGY PARTNERS III LP | 1/25/2021 |
| 918575 | MERIT ENERGY PARTNERS D-III LP | 1/25/2021 |
| 919100 | GALLEGOS LAND & CATTLE LLC | 2/18/2021 |
| 921111 | TERRITORY RESOURCES LLC | 2/18/2021 |
| 926654 | LITTLE BEAR RESOURCES, LLC | 2/18/2021 |
| 926655 | BOUNTY TRANSFER LLC | 2/18/2021 |
| 919706 | FRANCIS OIL & GAS INC | 4/16/2021 |
| 920187 | GEORGE B KAISER | 4/16/2021 |
| 920386 | KAISER FRANCIS OIL COMPANY | 4/16/2021 |
| 920454 | GBK INVESTMENTS LLC | 4/16/2021 |
| 922060 | GBK CORP | 4/16/2021 |
| 923667 | JAMES T & DEBERA J WAKEFIELD JT | 4/16/2021 |
| 924636 | BLACKACRE RESOURCES | 4/26/2021 |
| 923179 | BESSIE HOLLMAN 1993 LIVING TR | 4/27/2021 |
| 922224 | CONOCOPHILLIPS CO | 4/28/2021 |

Ex. 1 at Ex. C. Class Representative recommends approval of each request for exclusion, which represent just 0.18% of the 8,884 identified Class Members. In other words, over 99% of the Class Members have endorsed the Settlement and the associated requests for fees, expenses, and a case contribution award.

Respectfully Submitted,

/s/ Reagan E. Bradford

Reagan E. Bradford
Ryan K. Wilson

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CLASS COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to attorneys of record at the following email addresses:

David Holman
dave@crishamholman.com

/s/ **Reagan E. Bradford**
Reagan E. Bradford