# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

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SAMSON RESOURCES CORPORATION, et al.,<sup>1</sup>

Reorganized Debtors.

Case No. 15-11934 (BLS)

(Jointly Administered)

## NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON AUGUST 10, 2017 AT 10:30 A.M. (ET)<sup>2</sup>

#### I. **CONTINUED MATTER:**

1. Motion of the Long Parties for Allowance of Contingent Administrative Expense Claim [Docket No. 2219; filed March 29, 2017]

**Objection/Response Deadline:** 

May 24, 2017 at 4:00 p.m. (ET); extended to June 30, 2017; further extended to August 3, 2017; further extended to September 18, 2017

**Objections/Responses Received:** None

**Related Documents:** None

Status: The hearing regarding this matter has been continued to September 25, 2017 at 11:00 a.m. (ET).

The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, include: Geodyne Resources, Inc. (2703); Samson Contour Energy Co. (7267); Samson Contour Energy E&P, LLC (2502); Samson Holdings, Inc. (8587); Samson-International, Ltd. (4039); Samson Investment Company (1091); Samson Lone Star, LLC (9455); Samson Resources Company (8007); and Samson Resources Corporation (1227). The location of parent Reorganized Debtor Samson Resources Corporation's corporate headquarters and the Reorganized Debtors' service address is: 15 East 5th Street, Suite 1000, Tulsa, Oklahoma 74103.

<sup>2</sup> The hearing will be held before The Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the August 10, 2017 hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (ET) on Wednesday, August 9, 2017 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

# II. <u>RESOLVED MATTER</u>:

2. Reorganized Debtors and Settlement Trust's Joint Sixth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2356; filed May 5, 2017]

Objection/Response Deadline: May 26, 2017 at 4:00 p.m. (ET)

**Objections/Responses Received:** 

- A. Letter Response from Blue Bottom LLC [Docket No. 2396; filed May 26, 2017]
  - <u>Status</u>: The Reorganized Debtors, the Settlement Trust and the claimant have resolved the response. Accordingly, a hearing regarding this response is not necessary.
- B. Response to Joint Sixth Omnibus Objection to Claims (Substantive) [Docket No. 2400; filed May 30, 2017] (filed by John Stephen Southern)
  - <u>Status</u>: The Reorganized Debtors, the Settlement Trust and the claimant have resolved the response. Accordingly, a hearing regarding this response is not necessary.

- i. Notice of Submission of Claims Relating to the Reorganized Debtors and Settlement Trust's Joint Sixth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2368; filed May 10, 2017]
- Order Granting Reorganized Debtors and Settlement Trust's Joint Sixth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2447; entered June 23, 2017]
- Status: On June 23, 2017, the Court entered an order with respect to the claims in which no response was received. The responses filed by Blue Bottom LLC and John Stephen Southern have been resolved. The Reorganized Debtors and the Settlement Trust will provide an order to the Court at the hearing. Accordingly, a hearing on this matter is no longer necessary.

#### III. CONTESTED MATTERS GOING FORWARD:

3. Reorganized Debtors and Settlement Trust's Joint Third Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2353; filed May 5, 2017]

Objection/Response Deadline: May 26, 2017 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Responses from Calvin Williams
  - 1. Objection to Joint Third Omnibus Objection to Claims (Substantive) [Docket No. 2372; filed May 12, 2017] (filed by Calvin Williams)
  - 2. Attachment to Joint Third Omnibus Objection to Claims (Substantive) [Docket No. 2374; filed May 19, 2017] (filed by Calvin Williams)
  - 3. Motion to Compel Debtors to Make Immediate Payment to Seamsters filed by Calvin Williams [Docket No. 2491; filed July 11, 2017]
  - 4. Response to Debtors' Objections and Responses to Motion to Compel Production of Documents and Motion to Compel Payment [Docket No. 2503; filed July 20, 2017] (*filed by Calvin Williams*)
  - 5. Letter to Judge Shannon filed by Calvin Williams [Docket No. 2506; filed July 24, 2017] (*filed by Calvin Williams*)
  - 6. Letter to Judge Shannon Regarding Motion to Compel Production of Documents [Docket No. 2509; filed July 25, 2017] (filed by Calvin Williams)

Status: The hearing regarding these responses will go forward.

- B. Letter Response from Thomas Calvin Wells [Docket No. 2379; filed May 23, 2017]
  - <u>Status</u>: The Reorganized Debtors, the Settlement Trust and the claimant have resolved the response. Accordingly, a hearing regarding this response is not necessary.

C. Letter Response from Willie M. Aubrey, Walter R. Aubrey, Dottie Wright, Patrick Aubrey, Kazell B. Williams, Jr., Pamela Williams-Jackson, Mildra Ann Williams and Connie Ray Williams [Docket No. 2391; filed May 26, 2017]

Status: The hearing regarding this response will go forward.

D. Letter Response from Joe Louis Williams [Docket No. 2395; filed May 26, 2017]

Status: The hearing regarding this response will go forward.

E. Reply to Reorganized Debtors and Settlement Trust's Joint Third Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 from Connie Ray Williams [Docket No. 2510; filed July 26, 2017]

Status: The hearing regarding this response will go forward.

F. Response to Reorganized Debtors and Settlement Trust's Joint Third Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 from Trunella A. Williams and Brenda J. Williams [Docket No. 2520; filed August 2, 2017]

Status: The hearing regarding this response will go forward.

G. Response to Reorganized Debtors and Settlement Trust's Joint Third Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 from Connie Ray Williams [Docket No. 2525; filed August 7, 2017]

Status: The hearing regarding this response will go forward.

### Related Documents:

 Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 794; filed March 23, 2016]

- Affidavit of Yates M. French in Support of Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 796; filed March 23, 2016]
- Declaration of Lisa Johnson Regarding Royalty Interests and Purported Claims Held by Members of Heirs of William Seamster [Docket No. 799; filed March 23, 2016]
- iv. Notice of Submission of Claims Relating to the Reorganized Debtors and Settlement Trust's Joint Third Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2365; filed May 10, 2017]
- v. Order Granting Reorganized Debtors and Settlement Trust's Joint Third Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2446; entered June 23, 2017]
- vi. Reorganized Debtors' Objection and Responses to Calvin Williams' Motion to Compel Production of Documents and Motion to Compel Payment [Docket No. 2499; filed July 18, 2017]
- vii. Letter Regarding Legal Issues on This Case filed by Calvin Williams Order Granting Reorganized Debtors and Settlement Trust's Joint Third [Docket No. 2518; filed August 1, 2017]
- viii. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (SEALED) [Docket No. 2527; filed August 7, 2017]
- Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code,

Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (REDACTED) [Docket No. 2528; filed August 7, 2017]

- x. Declaration of Lisa Johnson in Support of the Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2529; filed August 7, 2017]
- xi. Joinder of the Settlement Trust to Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 in Support of Third Through Fifth Omnibus Claims Objections and Seventh Omnibus Claims Objection [Docket No. 2532; filed August 7, 2017]
- Status: On June 23, 2017, the Court entered an order with respect to the claims in which no response was received. The letter response filed by Calvin Wells has been resolved. As set forth above, the hearing with respect to the other responses will go forward.
- 4. Reorganized Debtors and Settlement Trust's Joint Fourth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2354; filed May 5, 2017]

Objection/Response Deadline: May 26, 2017 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal comments from Jones Energy
  - <u>Status</u>: The Reorganized Debtors, the Settlement Trust and the claimant have resolved the response. Accordingly, a hearing regarding this response is not necessary.
- B. Informal comments from Jean Nalley

Status: The hearing regarding this response will go forward.

C. Letter Response from Allison Lavene Smith [Docket No. 2380; filed May 23, 2017] (filed by Allison Lavene Smith on behalf of Ray E. Smith)

Status: The hearing regarding this response will go forward.

D. Response of Claimant S. Tom Morris to the Reorganized Debtors and Settlement Trust's Joint Fourth Omnibus Substantive Objection to Claims Based on Royalty Interests [Docket No. 2384; filed May 24, 2017]

Status: The hearing regarding this response will go forward.

E. Letter Response from Willie M. Aubrey, Walter R. Aubrey, Dottie Wright, Patrick Aubrey, Kazell B. Williams, Jr., Pamela Williams-Jackson, Mildra Ann Williams and Connie Ray Williams [Docket No. 2391; filed May 26, 2017] (see agenda item no. 3.C.)

Status: The hearing regarding this response will go forward.

F. Letter Response from Ruthie Lee Little [Docket No. 2393; filed May 26, 2017]

Status: The hearing regarding this response will go forward.

G. Letter Response from Michael Farris [Docket No. 2394; filed May 26, 2017]

Status: The hearing regarding this response will go forward.

H. Response to Joint Fourth Omnibus Objection to Claims (Substantive) [Docket No. 2399; filed May 26, 2017] (*filed by Debra J. Davis*)

Status: The hearing regarding this response will go forward.

I. Letter Response from Timothy J. Farris [Docket No. 2402; filed May 30, 2017]

<u>Status</u>: The hearing regarding this response will go forward.

J. Response to Joint Fourth Omnibus Objection to Claims (Substantive) [Docket No. 2407; filed May 22, 2017] (filed by Selton G. Nelson and Richard W. Gee)

Status: The hearing regarding this response will go forward.

K. Motion of Claimant S. Tom Morris for an Order That His Claim Be Determined on the Written Record Without Oral Argument [Docket No. 2430; filed June 13, 2017]

<u>Status</u>: The hearing regarding this response will go forward.

L. Response to Objection to Claim (Amended) from Allison Lavene Smith [Docket No. 2511; filed July 26, 2017] (filed by Allison Lavene Smith on behalf of Ray E. Smith)

<u>Status</u>: The hearing regarding this response will go forward.

- i. Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 794; filed March 23, 2016] (see agenda item no. 3.i.)
- Affidavit of Yates M. French in Support of Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 796; filed March 23, 2016] (see agenda item no. 3.ii.)
- iii. Declaration of Lisa Johnson Regarding Royalty Interests and Purported Claims Held by Members of Heirs of William Seamster [Docket No. 799; filed March 23, 2016] (see agenda item no. 3.iii.)

- iv. Notice of Submission of Claims Relating to the Reorganized Debtors and Settlement Trust's Joint Fourth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2366; filed May 10, 2017]
- v. Order Granting Reorganized Debtors and Settlement Trust's Joint Fourth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2449; entered June 23, 2017]
- vi. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (SEALED) [Docket No. 2527; filed August 7, 2017] (see agenda item no. 3.viii.)
- vii. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (REDACTED) [Docket No. 2528; filed August 7, 2017] (see agenda item no. 3.ix.)
- viii. Declaration of Lisa Johnson in Support of the Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2529; filed August 7, 2017] (see agenda item no. 3.x.)

- ix. Joinder of the Settlement Trust to Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 in Support of Third Through Fifth Omnibus Claims Objections and Seventh Omnibus Claims Objection [Docket No. 2532; filed August 7, 2017] (see agenda items no. 3.xi.)
- Status: On June 23, 2017, the Court entered an order with respect to the claims in which no response was received. The informal comments from Jones Energy have been resolved and they agree to the relief requested in the objection. As set forth above, the hearing with respect to the other responses will go forward.
- 5. Reorganized Debtors and Settlement Trust's Joint Fifth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2355; filed May 5, 2017]

Objection/Response Deadline: May 26, 2017 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal comments from Dottie Wright

Status: The hearing regarding this response will go forward.

- B. Letter Response from Alice Holland Rathofer [Docket No. 2378; filed May 22, 2017]
  - <u>Status</u>: The Reorganized Debtors, the Settlement Trust and the claimant have resolved the response. Accordingly, a hearing regarding this response is not necessary.
- C. Letter Response from Don Williams [Docket No. 2385; filed May 24, 2017]
  - <u>Status</u>: The Reorganized Debtors are working to resolve this response. To the extent it is not resolved, the hearing regarding this response will go forward.

D. Norman Eugene Levick's Response to Reorganized Debtors and Settlement Trust's Joint Fifth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2389; filed May 26, 2017]

<u>Status</u>: The Reorganized Debtors believe this response has been resolved. Accordingly, a hearing regarding this response is not necessary.

E. Letter Response from Willie M. Aubrey, Walter R. Aubrey, Dottie Wright, Patrick Aubrey, Kazell B. Williams, Jr., Pamela Williams-Jackson, Mildra Ann Williams and Connie Ray Williams [Docket No. 2391; filed May 26, 2017] (see agenda item no. 3.C.)

<u>Status</u>: The hearing regarding this response will go forward.

F. Response of Cabot Oil & Gas Corporation to Reorganized Debtors and Settlement Trust's Joint Fifth Omnibus Substantive Objection to Claims Based on Royalty Interests [Docket No. 2397; filed May 26, 2017]

Status: The hearing regarding this response has been continued to September 25, 2017 at 11:00 a.m. (ET).

- i. Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 794; filed March 23, 2016] (*see agenda item no. 3.i.*)
- Affidavit of Yates M. French in Support of Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 796; filed March 23, 2016] (see agenda item no. 3.ii.)
- iii. Declaration of Lisa Johnson Regarding Royalty Interests and Purported Claims Held by Members of Heirs of William Seamster [Docket No. 799; filed March 23, 2016] (see agenda item no. 3.iii.)
- iv. Notice of Submission of Claim Relating to the Reorganized Debtors and Settlement Trust's Joint Fifth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy

Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2367; filed May 10, 2017]

- v. Order Granting Reorganized Debtors and Settlement Trust's Joint Fifth Omnibus Substantive Objection to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2448; entered June 23, 2017]
- vi. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (SEALED) [Docket No. 2527; filed August 7, 2017] (see agenda item no. 3.viii.)
- vii. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (REDACTED) [Docket No. 2528; filed August 7, 2017] (see agenda item no. 3.ix.)
- viii. Declaration of Lisa Johnson in Support of the Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2529; filed August 7, 2017] (see agenda item no. 3.x.)
- ix. Joinder of the Settlement Trust to Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third

Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 in Support of Third Through Fifth Omnibus Claims Objections and Seventh Omnibus Claims Objection [Docket No. 2532; filed August 7, 2017] (*see agenda items no. 3.xi.*)

- Status: On June 23, 2017, the Court entered an order with respect to the claims in which no response was received. The hearing regarding the response of Cabot Oil & Gas Corporation is continued to September 25, 2017 at 11:00 a.m. (ET). The letter response filed by Alice Holland Rathofer has been resolved. The Reorganized Debtors believe the response filed by Norman Eugene Levick is resolved. As set forth above, the hearing with respect to the other responses will go forward.
- 6. Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2417; filed June 9, 2017]

Objection/Response Deadline: June 30, 2017 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal letter response from Paula Alford

Status: The hearing regarding this response will go forward.

B. Informal comments from Calvin Williams on behalf of Earnest L. Washington, Sr.

Status: The hearing regarding this response will go forward.

C. Informal comments from Calvin Williams on behalf of Danicka Thomas

Status: The hearing regarding this response will go forward.

D. Informal comments from Calvin Williams on behalf of Edwin J. Sturdivant

Status: The hearing regarding this response will go forward.

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E. Informal comments from Calvin Williams on behalf of Clayton M. Sturdivant

<u>Status</u>: The hearing regarding this response will go forward.

F. Informal comments from Calvin Williams on behalf of Patrick Sturdivant

Status: The hearing regarding this response will go forward.

- G. Response to Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 from Floyd Phillip Alford [Docket No. 2489; filed July 11, 2017]
  - Status: The Court disallowed the claim of Floyd Philip Alford pursuant to the Order (Second) Sustaining Debtors' Amended Second Omnibus (Substantive) Claims Objection [D.I. 2361]. Accordingly, a hearing regarding this response is not necessary.

- i. Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 794; filed March 23, 2016] (*see agenda item no. 3.i.*)
- Affidavit of Yates M. French in Support of Supplement to Debtors' Motion for Entry of an Order Authorizing Debtors to Sell Certain Oil and Gas Assets Free and Clear of all Liens, Claims, and Encumbrances Regarding Royalty Interests and Purported Claims Held by Heirs of William Seamster (SEALED) [Docket No. 796; filed March 23, 2016] (see agenda item no. 3.ii.)
- iii. Declaration of Lisa Johnson Regarding Royalty Interests and Purported Claims Held by Members of Heirs of William Seamster [Docket No. 799; filed March 23, 2016] (see agenda item no. 3.iii.)

- iv. Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2424; filed June 13, 2017]
- v. Letter Regarding Claims filed by Seamster Heirs [Docket No. 2435; filed June 15, 2017] (*filed by Calvin Williams*)
- vi. Order Sustaining Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2486; entered July 11, 2017]
- vii. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (SEALED) [Docket No. 2527; filed August 7, 2017] (see agenda item no. 3.viii.)
- viii. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (REDACTED) [Docket No. 2528; filed August 7, 2017] (see agenda item no. 3.ix.)
- ix. Declaration of Lisa Johnson in Support of the Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability

Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2529; filed August 7, 2017] (see agenda item no. 3.x.)

- x. Joinder of the Settlement Trust to Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 in Support of Third Through Fifth Omnibus Claims Objections and Seventh Omnibus Claims Objection [Docket No. 2532; filed August 7, 2017] (see agenda items no. 3.xi.)
- Status: On July 11, 2017, the Court entered an order with respect to the claims in which no response was received. As set forth above, the hearing with respect to the other responses will go forward.

# IV. <u>MATTERS GOING FORWARD</u>:

7. Reorganized Debtors' Motion for Entry of an Order (A) Authorizing the Reorganized Debtors to File Redacted Exhibits in Connection with the Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Section 502(b) of the Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Rule 3007-1 and (B) Waiving Requirement of Local Rule 9018-1(d) to File Sealed, Unredacted Version of Reply [Docket No. 2530; filed August 7, 2017]

Obj	ection/Response Deadline:	At the hearing.	
	-	-	

Objections/Responses Received: None at this time.

Related Documents:

i. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (SEALED) [Docket No. 2527; filed August 7, 2017] (*see agenda item no. 3.viii.*)

ii. Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rule 3007-1, and (IV) the Reorganized Debtors' Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 (REDACTED) [Docket No. 2528; filed August 7, 2017] (see agenda item no. 3.ix.)

<u>Status</u>: The hearing on this matter will go forward.

8. Motion of Reorganized Debtors' for Leave to File and Serve Reorganized Debtors' Reply in Support of the Reorganized Debtors and Settlement Trust's (I) Joint Third Omnibus, (II) Joint Fourth Omnibus, and (III) Joint Fifth Omnibus Substantive Objections to Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, 3007, and Local Bankruptcy Rules 3007-1, and (IV) the Reorganized Debtors Seventh Omnibus (Substantive) Objection to Certain No Liability Claims Based on Royalty Interests Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 [Docket No. 2531; filed August 7, 2017]

Objection/Response Deadline: At the hearing.

Objections/Responses Received: None at this time.

Status: The hearing on this matter will go forward.

# V. <u>FINAL FEE APPLICATIONS</u>:

9. Final Fee Applications (*See* Exhibit A)

- i. Certification of Counsel Regarding Proposed Omnibus Orders Granting Final Applications of the Fee Examiner and His Counsel for Allowance of Compensation for Services Rendered and Reimbursement of Expenses [Docket No. 2507; filed July 25, 2017]
- ii. Omnibus Order for Final Allowance of Compensation for Services Rendered and Reimbursement of Expenses for Fee Examiner and His Counsel [Docket No. 2524; entered August 4, 2017]
- Status: On August 4, 2017, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

Dated: August 8, 2017 Wilmington, Delaware

/s/ Joseph C. Barsalona II John H. Knight (No. 3848) Amanda R. Steele (No. 5530) Joseph C. Barsalona II (No. 6102) **RICHARDS, LAYTON & FINGER, P.A.** One Rodney Square 920 North King Street Wilmington, Delaware 19801 Telephone: (302) 651-7700 Facsimile: (302) 651-7701 E-mail: knight@rlf.com steele@rlf.com barsalona@rlf.com

-and-

Ana Alfonso (admitted *pro hac vice*) **WILLKIE FARR & GALLAGHER LLP** 787 Seventh Avenue New York, New York 10019-6099 Telephone: (212) 728-8000 Facsimile: (212) 728-8111 E-mail: aalfonso@willkie.com

Counsel for Samson Resources II, LLC, for itself and the Reorganized Debtors

# EXHIBIT A

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

SAMSON RESOURCES CORPORATION, et al.,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 15-11934 (BLS)

(Jointly Administered)

# INDEX OF FINAL FEE APPLICATIONS TO BE CONSIDERED AT THE AUGUST 10, 2017 HEARING

- 1. Benesch, Friedlander, Coplan & Aronoff LLP's (I) Second Interim Application for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Delaware Counsel to the Fee Examiner for the Period from December 1, 2016 Through May 31, 2017 and (II) Final Fee Application for the Period from August 31, 2016 Through May 31, 2017 [Docket No. 2462; filed June 30, 2017]
- 2. First and Final Application of Richard Gitlin, Individually and as Chairman of Gitlin & Company LLC, as the Fee Examiner, for Allowance of Compensation for Services Rendered for the Period from June 24, 2016 Through May 31, 2017 [Docket No. 2463; filed June 30, 2017]
- 3. First and Final Application of Godfrey & Kahn, S.C., Counsel to the Fee Examiner, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from June 24, 2016 Through May 31, 2017 [Docket No. 2464; filed June 30, 2017]

The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, include: Geodyne Resources, Inc. (2703); Samson Contour Energy Co. (7267); Samson Contour Energy E&P, LLC (2502); Samson Holdings, Inc. (8587); Samson-International, Ltd. (4039); Samson Investment Company (1091); Samson Lone Star, LLC (9455); Samson Resources Company (8007); and Samson Resources Corporation (1227). The location of parent Reorganized Debtor Samson Resources Corporate headquarters and the Reorganized Debtors' service address is: 15 East 5th Street, Suite 1000, Tulsa, Oklahoma 74103.