

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

SAMSON RESOURCES CORPORATION,
et al.,¹

Reorganized Debtors.

Chapter 11

Case No. 15-11934 (BLS)

(Jointly Administered)

PETER KRAVITZ, as Settlement Trustee of
and on behalf of the SAMSON
SETTLEMENT TRUST;

Plaintiff,

v.

SAMSON ENERGY COMPANY, LLC;
SAMSON EXPLORATION, LLC; SAMSON
OFFSHORE, LLC; SFT (DELAWARE)
MANAGEMENT, LLC; ST 2008
(DELAWARE) MANAGEMENT, LLC;
CHARLES AND LYNN SCHUSTERMAN
FAMILY FOUNDATION; STACY FAMILY
TRUST; STACY FAMILY DELAWARE
TRUST; All Trustees of the STACY
FAMILY TRUST and STACY FAMILY
DELAWARE TRUST, including STACY
SCHUSTERMAN, LYNN SCHUSTERMAN
and WILMINGTON SAVINGS FUND
SOCIETY, FSB, as Co-Trustees of the
STACY FAMILY TRUST AND/OR STACY
FAMILY DELAWARE TRUST;
SCHUSTERMAN 2008 DELAWARE
TRUST; All Trustees of the

Adv. Proc. No. 17-_____ (BLS)

¹ 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: Two West Second Street, Tulsa, Oklahoma 74103.

SCHUSTERMAN 2008 DELAWARE TRUST, including STACY SCHUSTERMAN, C. PHILIP THOLEN and WILMINGTON SAVINGS FUND SOCIETY, FSB, as Co-Trustees of the SCHUSTERMAN 2008 DELAWARE TRUST; STACY SCHUSTERMAN; LYNN SCHUSTERMAN; HAL SCHUSTERMAN; JEROME "JAY" SCHUSTERMAN; STEVEN DOW; RUTH SCHUSTERMAN; MARY LEE SCHUSTERMAN; MEITAL SCHUSTERMAN; HALEY SCHUSTERMAN; JUDY POZNICK; DEBORAH MORRISON; DALE SCHUSTERMAN; RENEE MORRISON; CAROL WILSON; SHANE FROEBEL; TAMARA FROEBEL; and DOES 1-1000,

Defendants.

COMPLAINT

[FILED UNDER SEAL]

Dated: September 15, 2017

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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Attorneys for the Settlement Trustee

B 104

ADVERSARY PROCEEDING COVER SHEET

ADVERSARY PROCEEDING NUMBER

(Rev. 5/00)

(Instructions on Reverse)

(Court Use Only)

PLAINTIFFS

PETER KRAVITZ, as Settlement Trustee of the SAMSON SETTLEMENT TRUST

DEFENDANTS

SAMSON ENERGY COMPANY, LLC; SAMSON EXPLORATION, LLC; SAMSON OFFSHORE, LLC; SFT (DELAWARE) MANAGEMENT, LLC; ST 2008 (DELAWARE) MANAGEMENT, LLC; CHARLES AND LYNN SCHUSTERMAN FAMILY FOUNDATION; STACY FAMILY TRUST; STACY FAMILY DELAWARE TRUST; All Trustees of the STACY FAMILY TRUST and STACY FAMILY DELAWARE TRUST, including STACY SCHUSTERMAN, LYNN SCHUSTERMAN and WILMINGTON SAVINGS FUND SOCIETY, FSB, as Co-Trustees of the STACY FAMILY TRUST AND/OR STACY FAMILY DELAWARE TRUST; SCHUSTERMAN 2008 DELAWARE TRUST; All Trustees of the SCHUSTERMAN 2008 DELAWARE TRUST, including STACY SCHUSTERMAN, C. PHILIP THOLEN and WILMINGTON SAVINGS FUND SOCIETY, FSB, as Co-Trustees of the SCHUSTERMAN 2008 DELAWARE TRUST; STACY SCHUSTERMAN; LYNN SCHUSTERMAN; HAL SCHUSTERMAN; JEROME "JAY" SCHUSTERMAN; STEVEN DOW; RUTH SCHUSTERMAN; MARY LEE SCHUSTERMAN; MEITAL SCHUSTERMAN; HALEY SCHUSTERMAN; JUDY POZNICK; DEBORAH MORRISON; DALE SCHUSTERMAN; RENEE MORRISON; CAROL WILSON; SHANE FROEBEL; TAMARA FROEBEL; and DOES 1-1000

ATTORNEYS (Name, Address, Tele.)

Michael J. Farnan (Bar No. 5165)
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Telephone: (302) 777-0300

J. Christopher Shore
WHITE & CASE LLP
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200

ATTORNEYS (If Known)

PARTY 1 U.S. PLAINTIFF 2 U.S. DEFENDANT 3 U.S. NOT A PARTY

CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U. S. STATUTES INVOLVED):

Fraudulent conveyance action seeking to recover payments made to selling shareholders in the 2011 acquisition of Samson Resources Corporation pursuant to 11 U.S.C. §§ 544, and 550 and various state law fraudulent conveyance statutes.

NATURE OF SUIT

(Check the one most appropriate)

<input checked="" type="checkbox"/> 454 To Recover Money or Property <input type="checkbox"/> 435 To Determine Validity, Priority, or Extent of a Lien or Other Interest in Property <input type="checkbox"/> 458 To obtain approval for the sale of both the interest of the estate and of a co-owner in property <input type="checkbox"/> 424 To object or to revoke a discharge 11 U.S.C. § 727	<input type="checkbox"/> 455 To revoke an order of confirmation of a Chap. 11, Chap. 12, or Chap. 13 Plan <input type="checkbox"/> 426 To determine the dischargeability of a debt 11 U.S.C. §523 <input type="checkbox"/> 434 To obtain an injunction or other equitable relief <input type="checkbox"/> 45 7 To subordinate any allowed claim or interest except where such subordination is provided in a plan	<input type="checkbox"/> 456 To obtain a declaratory judgment relating to any of foregoing causes of action <input type="checkbox"/> 459 To determine a claim or cause of action removed to a bankruptcy court <input type="checkbox"/> 49 8 Other (specify)
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ORIGIN OF PROCEEDINGS 1 Original Proceeding 2 Removed Proceeding 4 Reinstated or Reopened 5 Transferred from Another Bankruptcy Court CHECK IF TH IS A CLASS ACTION UNDER F.R.C.P. 23

(Check One Box Only)

DEMAND	NEAREST THOUSAND 9999	OTHER RELIEF SOUGHT	JURY DEMAND
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BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES

Samson Resources Corporation, et al.	15-11934 (BLS)
NAME OF DEBTOR	BANKRUPTCY CASE NO.

Delaware		The Hon. Brendan L. Shannon
District in Which Case is Pending	Divisional Office	Name of Judge

RELATED ADVERSARY PROCEEDING (IF ANY)

PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
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DISTRICT	DIVISIONAL OFFICE	NAME OF JUDGE
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FILING (Check one box only.) FEE	<input checked="" type="checkbox"/> FEE ATTACHED	<input type="checkbox"/> FEE NOT REQUIRED	<input type="checkbox"/> FEE IS DEFERRED
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DATE 9/15/2017	PRINT NAME Michael J. Farnan (Bar No. 5165)	SIGNATURE OF ATTORNEY (OR PLAINTIFF) /s/ Michael J. Farnan
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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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Defendants.

**SUMMONS AND NOTICE OF PRETRIAL CONFERENCE
IN AN ADVERSARY PROCEEDING**

YOU ARE SUMMONED and required to file a motion or answer to the complaint which is attached to this summons with the clerk of the bankruptcy court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the complaint within 35 days.

Address of Clerk: 824 Market Street, 3rd Floor
Wilmington, DE 19801

At the same time, you must also serve a copy of the motion or answer upon the Plaintiff's attorney.

Name and Address of Plaintiff's Attorneys: (next page)

Joseph J. Farnan, Jr. (Bar No. 100245)
Joseph J. Farnan, III (Bar No. 3945)
Michael J. Farnan (Bar No. 5165)
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Michele J. Meises (admitted *pro hac vice*)
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john.ramirez@whitecase.com

If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 7012.

YOU ARE NOTIFIED that a pretrial conference of the proceeding commenced by the filing of the complaint will be held at the following time and place.

Address: United States Bankruptcy Court Room: 6th Floor, Courtroom #1
824 Market Street
Wilmington, DE 19801 Date and Time: October 24, 2017 at 11:00
a.m. Eastern

IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

**United States Bankruptcy
Court for the District of Delaware**

/s/ Una O'Boyle
Clerk of the Bankruptcy Court

Date: September 15, 2017

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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Defendants.

NOTICE OF DISPUTE RESOLUTION ALTERNATIVES

As party to litigation you have a right to adjudication of your matter by a judge of this Court. Settlement of your case, however, can often produce a resolution more quickly than appearing before a judge. Additionally, settlement can also reduce the expense, inconvenience, and uncertainty of litigation.

There are dispute resolution structures, other than litigation, that can lead to resolving your case. Alternative Dispute Resolution (ADR) is offered through a program established by this Court. The use of these services are often productive and effective in settling disputes. **The purpose of this Notice is to furnish general information about ADR.**

The ADR structures used most often are mediation, early-neutral evaluation, mediation/arbitration and arbitration. In each, the process is presided over by an impartial third party, called the "neutral."

In mediation and early neutral evaluation, an experienced neutral has no power to impose a settlement on you. It fosters an environment where offers can be discussed and exchanged. In the process, together, you and your attorney will be involved in weighing settlement proposals and crafting a settlement. The Court in its Local Rules requires all ADR processes, except threat of a potential criminal action, to be confidential. You will not be prejudiced in the event a settlement is not achieved because the presiding judge will not be advised of the content of any of your settlement discussions.

Mediation/arbitration is a process where you submit to mediation and, if it is unsuccessful, agree that the mediator will act as an arbitrator. At that point, the process is the same as arbitration. You, through your counsel, will present evidence to a neutral, who issues a decision. If the matter in controversy arises in the main bankruptcy case or arises from a subsidiary issue in an adversary proceeding, the arbitration, though voluntary, may be binding. If a party requests *de novo* review of an arbitration award, the judge will rehear the case.

Your attorney can provide you with additional information about ADR and advise you as to whether and when ADR might be helpful in your case.

Dated: September 15, 2017

/s/ Una O'Boyle
Clerk of the Bankruptcy Court